

Is Pause and Resume dead?

This has been added to PCI DSS V4.0.1, effective from December 2024



When Cardholder Data and/or Sensitive Authentication Data is Accidentally Received via an Unintended Channel

There could be occurrences where an entity receives cardholder data and/or sensitive authentication data unsolicited via an insecure communication channel that was not intended for the purpose of receiving sensitive data. In this situation, the entity can choose to either:

- Include the channel in the scope of their CDE and secure it according to PCI DSS

Or

- Securely delete the data and implement measures to prevent the channel from being used in the future for sending such data.

Is Pause and Resume dead?

We can interpret
this as follows



If a company uses Pause and Resume and for any reason it fails, Cardholder data will be written to an unintended channel, and therefore the client would need to bring it in scope, and both delete the data and implement new measures to prevent it from occurring again.

Manual Pause and Resume cannot be acceptable under this guidance, and it shows the trajectory of shutting down the hit and miss nature of pause and resume.