

Q & A Regarding Hotel Imprinting of Credit Cards

Heartland Payments Systems®, the endorsed provider for payments processing to the American Hotel & Lodging Association and 40+ state lodging associations, would like to take a moment to answer a question recently asked regarding credit card imprinting.

Question: *May a hotel take complete imprints of a credit card for the following purposes, and does the hotel have any responsibility to shred these documents? If so, when and how?*

1. A hotel takes two complete imprints of a credit card and all of the numbers on the card (one for the registration card and one on the charge authorization printout in the room folio).
2. The hotel feels the imprints are necessary to satisfy Bank of America's requirements for proving a guest has actually provided his/her credit card.
3. When the guest checks out, the receipt that given to the guest has only the last four numbers on the credit card as does the copy retained by the hotel.
4. The hotel keeps the copies of the imprints for the standard record-keeping retention period.

Here is what Larry Godfrey, Heartland Sales Engineer for End-to-End Encryption, had to say:

Answer: *Two points regarding imprinting any type of credit/debit card:*

1. Imprinting is only required if the hotel can't swipe the card. The imprint MUST have the full primary account number (PAN), as well as a clear image of all other embossed characters.
2. Some cards are not embossed and composed of thinner plastic— which can sometimes lead to fewer successful swipes. If a hotel receives a non-embossed card that doesn't swipe, the hotel should refuse the card altogether. **Photocopying any credit card is NOT allowed** (Visa® Operating Regulations, 5.2.M.4).

Hotels can retain these copies as long as they are kept in a secured location (i.e. a locked cabinet). From a chargeback perspective, keeping the imprints for twelve months should be adequate. The cardholder has 180 days to dispute under most conditions. For compliance violation claims (such as those that are filed against hotels that attempt to charge for room damage), the issuer has up to 18 months, but these disputes cannot be won by the hotel (Visa Operating Regulations, 5.2.M.4). Keeping an imprint of a card for this purpose is ineffective and any imprints should be shredded in a cross-cut shredder.

The imprinted card media must follow PCI-DSS 2.0 Requirement 9: "Restrict physical access to cardholder data." To boil requirement 9 down to the most important items regarding saving imprinted or photocopied cards please review the following:

Keep the information locked and only accessible by those who need access by ensuring that:

- 9.6 All media is physically secure (including but not limited to computers, removable electronic media, paper receipts, paper reports, and faxes). For purposes of Requirement 9, "media" refers to **all paper and electronic media containing cardholder data**
- 9.7 Strict control maintained over the internal or external distribution of any kind of media

If you ever need to send an imprint to the main office or another location:

- 9.7.2 Media is sent by secured courier or other delivery method that can be accurately tracked
- 9.8 Logs are maintained to track all media that is moved from a secured area, and is management approval obtained prior to moving the media (especially when media is distributed to individuals)
- 9.9 Strict control is maintained over the storage and accessibility of media

Once you no longer need the media:

- 9.10 Media is destroyed when it is no longer needed for business or legal reasons

Destruction performed as follows:

- 9.10.1 Hardcopy materials are cross-cut shredded, incinerated, or pulped so that cardholder data cannot be reconstructed. Containers that store information are destroyed secured to prevent access to the contents. (For example, a "to-be-shredded" container has a lock preventing access to its contents.)

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