

Is Payment Account Reference (PAR) as defined by EMVCo considered PCI Account Data?

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Payment Account Reference (PAR) is a new data element introduced by EMVCo in Specification Bulletin No. 167 January, 2016. PAR is a new data element that is associated with the EMVÆ Payment Tokenisation Specification — Technical Framework. As detailed in the EMVCo Bulletins, PAR is a value that is intended to allow acquirers and merchants to link tokenized transactions to transactions that are based on the underlying PAN. PAR is generated and linked to a PAN (and successor PANs associated with the underlying issuer customer account) and will also be associated with all affiliated Payment Tokens when a PAN is tokenized.

PAR cannot be used to initiate transactions and no authorization, capture, clearing or settlement message can be initiated with PAR alone. The guidelines for PAR also indicate that a PAR value must be generated in such a way as to ensure that it cannot be reverse engineered to obtain a PAN or other PCI Account Data. The data structure of PAR is also intentionally designed to ensure that PAR cannot be confused for PAN, Payment Token or other PCI Account Data.

Based on the underlying EMVCo description of PAR and its intended functions including the underlying guidelines for PAR generation, PAR data is not considered to be PCI Account Data and on its own is not subject to the underlying requirements for protecting PCI Account Data as specified in PCI DSS. PCI DSS still applies anywhere PCI Account Data is stored, processed, or transmitted. If any system storing, processing, or transmitting PAR also stores, processes, or transmits Account Data (such as a PAN), or is connected to systems that store, process or transmit Account Data, those systems remain in scope for PCI DSS requirements.

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