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# Privacy Impact Assessment

CFPB BUSINESS INTELLIGENCE TOOL

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Consumer Financial  
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## DOCUMENT PURPOSE

The Privacy Impact Assessment or “PIA” provides the public with information about the Consumer Financial Protection Bureau’s (“CFPB” or “Bureau”) collection and use of personally identifiable information (“PII”). PII is any information “that can be used to distinguish or trace an individual’s identity”<sup>1</sup> like a name, address, Social Security number, or place and date of birth. The CFPB uses PIAs to document how the PII it collects is used, secured, and destroyed in a way that protects each individual’s privacy. Each PIA is broken out into sections that reflect the CFPB’s Privacy Principles. The CFPB’s Privacy Principles are a set of nine rules the CFPB follows when it collects or uses PII.

## OVERVIEW

PROJECT / SYSTEM NAME: CFPB Business Intelligence Tool

PROJECT/SYSTEM INCLUDES INFORMATION ABOUT:

- Federal Employees
- Contractors
- Consultants
- The Public

PROJECT/SYSTEM INCLUDES:

- Name and other biographic information (e.g. date of birth)
- Contact Information (address, zip code, telephone number, email address)
- Social Security number (“SSN”) or other identifier
- Financial Information
- User and Online Information
- Third Party Information
- Other Information (including biometric information and health or medical information)

The CFPB Business Intelligence Tool (“BI Tool” or “tool”) provides the Bureau with an integrated reporting and analysis environment for organizational knowledge and performance management. The tool offers a web and desktop-based collaboration, analysis, and publishing capability.

The tool is composed of commercial-off-the-shelf technologies hosted in the CFPB’s private cloud environment. It is available on specific CFPB desktops and through a secure web portal. The tool turns existing information from Bureau data repositories and systems (“source systems”) into easy-to-understand visualizations. Users can “publish” visualizations, meaning they can post the visualizations for review and interaction by other users of the tool within the Bureau. The tool is read-only; it receives all information through secure connections with existing Bureau source systems. The tool cannot change connected source systems. Some source systems connected to the tool contain PII; the following Bureau System of Records Notices (“SORN”) account for source systems containing PII used by the tool:

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<sup>1</sup> Office of Management and Budget (“OMB”) Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, May 22, 2007, (OMB M-07-16) defines PII as “information which can be used to distinguish or trace an individual’s identity, such as his or her name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.”

CFPB.002 – Depository Institution Supervision Database  
CFPB.003 – Non-Depository Institution Supervision Database  
CFPB.004 – Enforcement Database  
CFPB.005 – Consumer Response Database  
CFPB.006 – Social Networks and Citizen Engagement  
CFPB.007 – Directory Database  
CFPB.011 – Correspondence Tracking Database  
CFPB.013 – External Contact Database  
CFPB.016 – Consumer Advisory Board  
CFPB.017 – Small Business Review Panels and Cost of Credit Consultations  
CFPB.019 – Nationwide Mortgage Licensing System and Registry  
CFPB.021 – Consumer Education and Engagement Records  
CFPB.022 – Market and Consumer Research Records

This PIA documents the Bureau’s use of this tool and its impact on privacy.

## **SECTION 1.0                      PURPOSE OF COLLECTION**

*The CFPB will state the purpose and legal authority for collecting PII.*

### 1.1            Why is the information being collected?

The BI Tool is a read-only tool that does not collect any information directly. The tool uses previously collected information from existing Bureau source systems to provide visualizations to users.

### 1.2            What legal authority and/or agreements allow the information to be collected?

The tool uses previously collected information from Bureau source systems accounted for under existing CFPB SORNs. Authority for each source system is available in that system’s SORN.

### 1.3            Is the information searchable by a personal identifier – like a name or Social Security number? If so, what Privacy Act System of Records Notice(s) apply/applies to the information being collected?

The BI Tool does not allow users to query the system by personal identifier.

### 1.4            Is there a records retention schedule that has been approved by the National Archives and Records Administration (NARA) for the information system(s)? Explain how long and for what reason the information is retained.

The BI Tool is not the originating information source. The tool uses previously collected information from existing Bureau source systems. Records from source systems are subject to schedules referenced in their corresponding SORNs.

### 1.5            Are there any forms or surveys that are associated with the collection of the information that would be covered by the Paperwork Reduction Act (PRA)?

No.

- 1.6 Are there any privacy risks for this system that relate to the purpose of the collection? If so, how will the CFPB mitigate these risks?

No.

## **SECTION 2.0 OPENNESS AND TRANSPARENCY**

*The CFPB will be open and transparent. We should tell individuals about the PII we collect and how we will protect it, use it, and share it. We will provide an easy way for individuals to learn about what is happening to their PII.*

- 2.1 Will individuals be given notice prior to the collection of personal information about them? If not, please explain.

The BI Tool is a read-only tool that does not collect information directly. It uses previously collected information from existing Bureau source systems. The Bureau provides notice through this PIA and through the SORN(s) and PIA(s) for each source system used by the tool.

- 2.2 Will individuals be given notice prior to their information being shared? If not, please explain.

The BI Tool only uses information from existing Bureau source systems. No information is shared with external parties through the tool. To the extent that source system information is shared from source systems, the Bureau provides notice through the SORNs and PIAs for each source system.

- 2.3 Are there any privacy risks for this system that relate to openness and transparency? If so, how will the CFPB mitigate these risks?

No.

## **SECTION 3.0 DATA MINIMIZATION**

*The CFPB will limit the collection of PII to what is needed to accomplish the stated purpose for its collection. The CFPB should keep PII only as long as needed to fulfill that purpose.*

- 3.1 Whose information is included in the system?

The BI Tool is a read-only tool that uses previously collected information from existing Bureau source systems. Information used by the CFPB BI Tool includes information about any individuals included in the SORNs outlined under in the introduction portion of this PIA. In general, this includes:

- CFPB employees
- Individuals who submit complaints, inquiries, or correspondence to CFPB
- Individuals who participate in CFPB-sponsored activities, programs, boards or committees
- Individuals who currently or previously owned or worked for an entity offering or

- providing consumer financial products or services
- Current, former, and prospective customers of entities offering or providing consumer financial products or services
- Other individuals with information relevant to the enforcement of federal consumer financial laws

***This list is not exhaustive. Please consult the SORNs outlined in the introduction section of this PIA for a complete list of information used by the tool.***

### 3.2 What PII will the system include?

The BI Tool is a read-only tool that uses previously collected information from existing Bureau source systems. Information, including PII, used by the tool includes any information accounted for in the SORNs outlined in Section 3.1. In general, this includes:

- Names and contact information
- Unique numbers used to establish identity of owners or controlling persons of entities
- Information relating to business activities and transactions of individuals and entities
- Correspondence received or produced by the Bureau
- Information received from individuals about their complaints or queries to the Bureau

***This list is not exhaustive. Please consult the SORNs outlined in the introduction section of this PIA for a complete list of information used by the tool.***

### 3.3 Why is the collection and use of the PII necessary to the project or system?

The BI Tool does not collect information, including PII, directly. The BI Tool turns previously collected information from existing Bureau source systems of various sizes and complexities into easy-to-understand visualizations – essentially providing another method of data analysis for the Bureau. For most of these visualizations, PII is unnecessary. In some cases, however, PII may be necessary in creating visualizations. For instance, one type of visualization offered by the tool is a point map; this visualization would let the user see, for example, consumer complaints received by the Bureau by zip code plotted on a map. In this case, the use of PII (zip code) of the complainant would be necessary to create the visualization.

### 3.4 Will the system aggregate previously unavailable data about the individual or create new data about the individual? If so, how will this data be maintained and used?

The system does not create new information about individuals. However, it does aggregate information from existing Bureau source systems in order to provide visualizations to users.

### 3.5 What controls exist to protect the consolidated data and prevent unauthorized access?

When users publish visualizations for sharing with other users, the underlying information is included. Users who create visualizations have the ability to specify which other users (or groups of users) have the ability to see or interact with the visualization. Controls on visualizations supplement controls derived from the Bureau's Active Directory ("AD"). AD controls limit individual users' ability to access source systems used by the tool. Section 6.0 discusses user roles and other security controls.

3.6 Will the system monitor the public?

No.

3.7 Will the system monitor employees or contractors?

No.

3.8 What kinds of reports can be produced on individuals? Will the data included in the reports produced be made anonymous?

The BI Tool does not create reports on specific individuals. The tool does use previously collected information from source systems, in aggregate, to provide visualizations to users.

3.9 Are there any privacy risks for this system that relate to data minimization? If so, how will the CFPB mitigate these risks?

No.

## **SECTION 4.0 LIMITS ON USES AND SHARING OF INFORMATION**

*The CFPB will publish a notice about how we plan to use and share the PII that we collect from you. We will only share your PII in ways that are compatible with the notice or as stated in the Privacy Act.*

4.1 Is the information in the project limited to only the information that is needed to carry out the purpose of the collection?

The BI Tool turns previously collected information from existing Bureau source systems into easy-to-understand visualizations – essentially providing the Bureau with an additional way to conduct high-level data analysis on existing information. For most of these visualizations, PII is unnecessary; however, some visualizations such as a point map, may rely on PII. Controls limit users' access to source system information based on their existing permissions in AD, and additional controls may further limit access to see underlying data on a published visualization. That said, the information in source systems users may access in their daily duties, and that is available through this tool, may be broader than what is directly needed in the creation of a specific visualization.

4.2 Will the CFPB share any of the information with other individuals, federal and/or state agencies, or private sector organizations? If so, how will the CFPB share the information?

The Bureau may share reports and visualizations generated by the tool with external individuals, federal or state agencies, or other organizations. However, the Bureau does not grant external individuals, agencies, or organizations access to the tool. The Bureau will not share information from underlying source systems through the tool.

The Bureau may share information contained within underlying source systems in accordance with each system's SORN. Consult the introduction section of this PIA for more information.

#### 4.3 Is the information collected directly from the individual or is it taken from another source?

The BI Tool is a read-only tool that does not collect information directly. The tool uses previously collected information from existing Bureau source systems.

#### 4.4 Will the project interact with other systems, whether within the CFPB or outside of the CFPB? If so, how?

The tool will not interact with systems outside of the CFPB. Internally, the tool will access information from source systems housed in the Bureau's cloud environments. The tool will also interact with Bureau systems external to those environments through the Bureau's Data Warehouse, a secure staging area where data is standardized for use in the tool. The CFPB BI Tool then retrieves this standardized information directly from the Data Warehouse.

#### 4.5 Are there any privacy risks for this project that relate to use limitation? If so, how will the CFPB mitigate these risks?

There is a risk that use of information in the tool is not limited to only what is needed to carry out the purpose for which it was originally collected. While the universe of information available in the tool may be broader than what is necessary for a particular visualization, the risk to personal privacy posed by misuse is minimal.

As discussed in Section 4.1, the BI Tool provides the Bureau with an additional method of data analysis for existing source system information. The tool only uses source system information for this purpose. The Bureau has implemented technical and administrative controls to limit what source system information users may use and access through the tool and visualizations produced by the tool. Users are also instructed through policy and training to only use PII when necessary to create visualizations. Sections 6.0 and 8.0 discuss access and security, including training and other governance documents, for the tool.

## **SECTION 5.0 DATA QUALITY AND INTEGRITY**

*The CFPB will make reasonable efforts to ensure that all PII it maintains is accurate, relevant, timely, and complete.*

#### 5.1 How will the information collected be verified for accuracy and completeness?

Information contained within underlying Bureau source systems is verified for accuracy and completeness in accordance with each system's SORN or the underlying technology originally used to collect it. The introductory section includes a list of impacted SORNs.

The tool pulls in source system information used for visualizations by one of two methods. The first method is a continuous "live" feed. A live feed just means a continuous connection of information in real-time. The second is through localized extracts. Extracts are copies of information pulled out of source systems and stored outside of that system, for example, on a hard drive or a local network. In general, the CFPB discourages users of the tool from creating visualizations using local extracts of source information. However, in some cases, live feeds of

information may be burdensome to the performance of the tool or may be unnecessary – for example, source systems that remain static or change very infrequently. The CFPB is drafting policy, procedures, user guides, and related governance documents which will address when users should use a live feed or an extract.

5.2 Are there any privacy risks for individuals whose information is collected or used by the project that relate to data quality and integrity? If so, how will the CFPB mitigate these risks?

There is a risk that some information used by the tool in visualizations or reports is outdated, particularly that which is derived from localized extracts. The CFPB is mitigating this risk by developing and providing users with guidance and training on when to use a live feed for their visualizations.

**SECTION 6.0 SECURITY**

*The CFPB must protect PII from loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.*

6.1 Who will have access to the data in the project? What is the authorization process for access to the project?

The tool manages access through a multi-layered security model. In general, access and use of the tool is limited to individuals who demonstrate a *bona fide* need for access. Both the desktop application and the secure web portal are license based. Availability is limited to a set number of users throughout the Bureau. Access is managed through non-transferrable usernames and passwords derived from the Bureau’s AD. The tool imports usernames and passwords to provide for a single sign-on experience for the user.

Users can be one of four role types, listed in the table below:

User Role	Basic Capabilities and Permissions
<i>Project Leads</i>	Ability to develop and publish reports and visualizations, see source information within the tool, and perform light administration of the tool (select which users can view a visualization or set of visualizations, which can see source information, etc.).
<i>Developers</i>	Same basic abilities as Project Leads with the exception of administrative capabilities.
<i>Users</i>	Ability to create visualizations, but are restricted from publishing them. Like Developers, they have no administrative rights within the tool.
<i>Viewers</i>	Restricted to viewing published visualizations only and have no ability to interact with those visualizations, nor can they create or publish visualizations. They do not have any administrative rights.

While an overall “Content/System Administrator” role also exists, this role is limited to a handful of Bureau employees tasked with managing the tool. The Content/System Administrator for the tool is responsible for assigning approved users of the tool to user roles and Projects.

Once logged into the tool, a user’s access to visualizations and information is based on a user’s role within the organization and their need to access certain information or visualizations. The CFPB BI Tool achieves this through groupings of users into “Projects” and “Workbooks.”

Permissions are set at the project level by assigning authenticated users to existing Projects and then allowing the Project Lead or the Content/System Administrator to assign additional access to Workbooks within each project. Each Workbook is also divided into two sub-project areas: “Development” and “Production.”

Projects are segmented by functional areas within the Bureau, as follows:

- Research, Markets, and Regulations (“RMR”) Development (“DEV”) and Production (“PROD”)
- Supervision, Enforcement, and Fair Lending (“SEFL”) Development (“DEV”) and Production (“PROD”)
- Common Development (“DEV”) and Production (“PROD”)

Basic rights associated with a user type are further refined within the assigned Project and sub-project areas. Projects and their contained components are not visible to users who do not have permissions to access them. The three projects and their sub-levels and associated base permissions are presented in the following table:

Project	Project Description	Permissions
RMR-DEV	Development project for the RMR group	RMR Developers can publish visualizations. Other users cannot access.
RMR-PROD	Production project for the RMR group	RMR Users can access as interactors. Viewers can view only. Only Project Leads can publish. Other users cannot access.
SEFL-DEV	Development project for the SEFL group	SEFL Developers can publish. Other users cannot access.
SEFL-PROD	Production project for the SEFL group	SEFL Users can access as interactors. Viewers can view only. Only Project Leads can publish. Other users cannot access.
Common-DEV	Development project for the Common CFPB group users	Common Developers can publish, other project developers can publish also. Other users cannot access.
Common-PROD	Production project for the Common CFPB group users	All Users can access as interactors. Viewers can view only. Only Project Lead(s) can publish. Other users cannot access.

As previously noted, Project Leads can further restrict permissions for certain published visualizations beyond what is outlined above.

## 6.2 Has the CFPB completed a system security plan for the information system(s) supporting the project?

The BI Tool does not require a separate System Security Plan and Authority to Operate (“ATO”) as it is an application within the Bureau’s private cloud environment. The CFPB is

conducting a Risk Assessment and Recommendation on the tool. Once approved, it will become an amendment to the existing ATO for the Bureau's cloud environment.

### 6.3 How will the system be secured?

In addition to the access controls outlined in Section 6.1, Project Leads and Developers are also restricted by existing permissions in AD. Project Leads and Developers cannot use the tool to access information they could not otherwise.

The tool also includes multiple technical and physical controls:

- Information is transferred from the BI Tool server to the end-user's desktop by Hypertext Transfer Protocol Secure ("HTTPS")
- Invalid login attempts and generic error messages are audited
- The tool prevents user access after 15 minutes of inactivity through a session lock
- Users are limited to five consecutive invalid access attempts during a 120 minute time period - the tool automatically locks a user out after they exceed the maximum number of unsuccessful attempts

The Bureau continues to develop policies around use of the tool. Policy, in addition to user permissions, will govern which users can create and publish visualizations, which visualizations users can see, and what permissions specific to those visualizations users have. For example, Project Leads may not provide Viewers access to see source PII of a visualization if that Viewer's permissions through AD do not allow for access to the source system from which the PII was derived. Section 6.5 highlights the lack of finalized policy and procedures surrounding use of this tool as a risk and outlines the Bureau's mitigation strategy.

### 6.4 Are there mechanisms in place to identify security breaches? If so, what are they?

In general, the CFPB follows the Treasury Department's directives related to security and privacy incidents. The CFPB is developing supplemental interim incident-reporting materials, and, upon moving onto its own network infrastructure, will issue new directives related to security and privacy incidents.

Since the BI Tool resides in the Bureau's private cloud environment, it inherits the process and policy that governs the monitoring and tracking of that environment for security breaches.

### 6.5 Are there any privacy risks for this system that relate to security? If so, how will the CFPB mitigate these risks?

There is a risk that the tool cannot meet NIST Special Publication 800-18 requirements for auditing. The tool is unable to create event logs that the CFPB can use for auditing. This risk has been included in the CFPB Plan of Action and Milestones for the tool. The CFPB will periodically re-assess this risk according to internal continuous monitoring policies and procedures.

There is a risk that users could have unauthorized access to PII due to a lack of policies and procedures for the tool. The CFPB has mitigated this risk in part, by technical controls inherent in the tool and CFPB's network, as discussed in this section. However, the CFPB currently lacks procedures for the granting of user roles and permissions within the tool and a policy for granting permissions through the Bureau's AD or for informing users of acceptable use of the

system. The Bureau is currently drafting these governance documents and intends to finalize them prior to full deployment of the tool in June 2013.

## **SECTION 7.0 INDIVIDUAL PARTICIPATION**

*The CFPB will give individuals, in most cases, the ability to access their PII, and allow them to correct or amend their PII if it is inaccurate.*

- 7.1 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project? If no opportunities are available to consent, decline or opt out, please explain.

The BI Tool is a read-only tool that uses previously collected information from existing Bureau source systems. The tool does not modify source systems, and the CFPB refers individuals making a request about the use of their information in the tool to the source system's SORN. Section 2.1 of this PIA provides more information about notice.

- 7.2 What procedures will allow individuals to access their information?

The CFPB offers a means through the Privacy Act for individuals to access, amend, or correct their records held in each source system used by the tool. Information about Privacy Act requests is available through the SORNs for each source system used by the tool and at [www.consumerfinance.gov/foia](http://www.consumerfinance.gov/foia).

- 7.3 Can individuals amend information about themselves in the system? If so, how?

The BI Tool is not the authoritative source of information and merely utilizes previously collected information from existing Bureau source systems. The CFPB BI Tool makes no amendments or corrections to information in source systems. However, individuals may be able to amend information about themselves in the source systems used by the tool. Section 7.2 outlines this process.

- 7.4 Are there any privacy risks for this system that relate to individual participation? If so, how will the CFPB mitigate these risks?

No.

## **SECTION 8.0 AWARENESS AND TRAINING**

*The CFPB will train all personnel about the proper treatment of PII.*

- 8.1 Describe what privacy training is provided to users, either generally or specifically relevant to the project.

The CFPB offers general privacy and security training to all employees of the CFPB, including contractors who handle PII on behalf of the Bureau.

There is currently limited informal training available to a small group of BI Tool users as part of the initial rollout. The Bureau continues to develop a plan for training new users of the tool prior, which it intends to have in place prior to full deployment of the tool in June 2013.

8.2 Are there any privacy risks for this system that relate to awareness and training? If so, how will the CFPB mitigate these risks?

There is a risk that users do not receive appropriate training because there are no formal training materials specific to the tool. The CFPB is developing training materials and acceptable use agreements in anticipation of a full release in June 2013. Currently, a limited set of users with desktop licenses for the tool receive hands-on instruction in proper use of the tool.

## **SECTION 9.0 ACCOUNTABILITY AND AUDITING**

*The CFPB is accountable for complying with these principles. We will regularly check that we are meeting the requirements and take appropriate action if we are not doing so.*

9.1 How does the system ensure that the information is used in accordance with the stated practices in this PIA?

The CFPB has implemented controls as outlined in this PIA to ensure the confidentiality, accuracy, and integrity of information in the tool.

9.2 Are there any privacy risks for this system that relate to accountability and auditing? If so, how will the CFPB mitigate these risks?

There is a risk that the BI Tool is incapable of auditing at a level acceptable under NIST guidance. Section 6.5 discusses this risk and the corresponding mitigation.

There is a risk that the Bureau's lack of finalized governance documentation related to the use of this tool could pose a risk to personal privacy. Sections 6.0 and 8.0 discuss these risks and the associated mitigations.