

ConsumerFinance.gov

Does the CFPB use the information to benefit or make a determination about an individual? No

What is the purpose?

Enable the CFPB to interact with the public through the public facing website, www.consumerfinance.gov, to educate the public about the CFPB and key consumer financial issues, and to improve the overall user experience of Consumerfinance.gov

Are there controls to enforce accountability? Yes

What opportunities do I have for participation?

Generally applicable: Appropriate opportunities for notice, consent, access, and redress

Overview

The Dodd-Frank Wall Street Reform and Consumer Protection Act (“Act”), Public Law No. 111-203, Title X, established the Consumer Financial Protection Bureau (“CFPB” or “Bureau”). The CFPB administers, enforces, and implements federal consumer financial protection laws, and, among other powers, has the authority to protect consumers from unfair, deceptive, and abusive acts and practices when obtaining consumer financial products or services.

The CFPB uses a variety of tools, including our website, www.consumerfinance.gov (ConsumerFinance.gov) to interact with the public. In doing so, the CFPB supports an empowered online community of consumers who can share the latest information about the agency and consumer finance issues to help them make clearer choices. ConsumerFinance.gov is authorized by 12 U.S.C. §§ 5491, 5492 and 5511.

Although the CFPB does use some third-party social media providers to communicate with the public, as well as other tools, this Privacy Impact Assessment only relates to ConsumerFinance.gov. More information about the CFPB’s use of specific third-party social media platforms is available at www.consumerfinance.gov/privacy. In addition, this Privacy Impact Assessment does not address publication of Consumer Response Complaint Narratives by the CFPB. More information on that initiative can be found at http://files.consumerfinance.gov/f/201506_cfpb_publication-of-consumer-response-complaint-narratives.pdf.

When you visit and use ConsumerFinance.gov, we may collect information such as your contact information, information about your use of the website, demographic information, information about consumer financial products you and others have used, as well as input and feedback in the form of comments, videos, links, or images. Depending on how you use ConsumerFinance.gov, you can limit how much information you give to us and how much of that information is made public through the website. We will only collect your directly identifiable PII through ConsumerFinance.gov when you knowingly provide it to us.

ConsumerFinance.gov will interact with other systems within and external to the CFPB. For instance, ConsumerFinance.gov serves as the method by which most consumers reach our online complaint intake system. Google Analytics aids CFPB in evaluating aggregate web traffic to ConsumerFinance.gov to be able to inform future changes and upgrades to the site based on former trends and behaviors, and possibly add new resources or products when there is a demand. A snippet of code has been added to each page on ConsumerFinance.gov that lets

Google Analytics collect important information about how and why users are interacting with the site. This code operates automatically by default unless the user makes the appropriate changes in their search browser to disable cookies. According to Google Analytics' terms of use, CFPB has, abides by, and posts a Privacy Policy that provides notice of CFPB's use of cookies that are used to collect data. The Privacy Policy discloses the use of Google Analytics and explains how data is collected and processed; and provides the choice for the user to opt-out of having their data collected. Additionally, CFPB has a link in its Privacy Policy entitled "How Google uses data when you use our partners' sites or apps." Consumerfinance.gov allows individuals to opt-out of web measurement while still accessing and using the website without any limitation.

Under the authorized use of web measurement for customization technologies approved by the United States Government, the CFPB operates under Tier 2, multi-session without PII. This means that we track if users are returning at an aggregate level through the use of first party persistent cookies, but we do not collect PII. Tracking allows us to approximate how many users are new or returning. Google Analytics code also tracks (in aggregate) unique visits, page views, location (down to the metro area), referral URLs, interactions with tools, clicks on links, time spent on pages, and more. By learning how users navigate the site overall, CFPB can learn how we should create new products and tools, the best way to advertise our products, possible referral opportunities, locations with higher interest, etc. Additionally, GovDelivery supports elements of ConsumerFinance.gov. However, there are currently no direct connections between ConsumerFinance.gov and other CFPB systems that allow PII to be shared.

CFPB can take immediate action if a certain page in our Google Analytics account has been found to collect PII. Website owners using the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) can disable tracking on a page without having to remove the Google Analytics JavaScript snippet. The ga.js tracking snippet now includes a window property that, when set to true, disables the tracking snippet from sending data to Google Analytics. When Google Analytics attempts to set a cookie or send data back to the Google Analytics servers, it will check for whether this property is set to true. If it is, it will have the same effect as if the visitor had the Google Analytics Opt-out Browser Plugin installed. This provides CFPB with a quick and effective option to remedying a security breach, and can be implemented without removing any code.

The CFPB has also documented ConsumerFinance.gov through the Social Networks and Citizen Engagement System under the System of Records Notice ("SORN") CFPB.006 – Social Networks and Citizen Engagement System located at [76 FR 45759] and a previously published

PIA for ConsumerFinance.gov, which can be found at http://files.consumerfinance.gov/f/2012/01/CFPB_PIA_Social-Networks-Citizen-Engagement.pdf. This PIA update is being performed to align with updates to the website privacy policy for ConsumerFinance.gov. No PRA clearance is required for this PIA.

The establishment of ConsumerFinance.gov is authorized by Sections 1011 and 1021 of the Dodd-Frank Act. Information collection by ConsumerFinance.gov complies with applicable federal laws and best practices, including OMB Open Government Directive, M-10-06, December 8, 2009; Presidential Memorandum to the Heads of Executive Departments and Agencies on Transparency and Open Government, January 21, 2009; OMB Guidance for Online Use of Web Measurement and Customization Technologies, M-10-22, June 25, 2010; and OMB Guidance for Agency Use of Third-Party Websites and Applications, M-10-23, June 25, 2010.¹

Information in ConsumerFinance.gov is at times searchable by PII, including:

- Name
- Username
- Email Address
- Business Affiliation
- Demographic Information
- Videos or Photos
- Geographic Information

Privacy Risk Analysis

CFPB has chosen Google Analytics for a variety of reasons, including: it is the most used analytics tool for webpages, and it is compatible with multiple other tools, such as Google Tag Manager, Tableau, and AdWords, used on the Digital Analytics and Consumer Engagement Teams on a regular basis. Also, using Google Analytics allows CFPB to join the General Services Administration's (GSA) Digital Analytics Program along with other federal agencies. Apart from

¹ Although pursuant to Section 1017(a)(4)(E) of the Consumer Financial Protection Act, Pub. L. No. 111-203, the CFPB is not required to comply with Office of Management and Budget (OMB)-issued privacy guidance; it voluntarily follows OMB privacy-related guidance as a best practice and to facilitate cooperation and collaboration with other agencies.

being easy to use, Google Analytics is always evolving and updating or adding new features that widen the base of knowledge CFPB has about our web-based materials, making it one of the leading innovators in online analytics tools.

The primary privacy risks associated with data covered by the ConsumerFinance.gov PIA are risks related to:

- Limits on uses and sharing of information;
- Data Quality and Integrity;
- Security; and
- Individual Participation.

Use Limitation: The CFPB's website privacy policy describes the information collected from and about visitors to the website and serves as notice about how we plan to use and share the personal information we collect. The Bureau limits collection of personal information to that which is needed to meet the visitors' requested use of the website. How visitors choose to use (or not use) the site's features will determine how much and what information is collected. The Bureau's updated website privacy policy also details the use of persistent cookies by Google Analytics. Google Analytics uses persistent cookies for the collection of web metrics and to track visitor interactions; however, the Bureau does not use persistent cookies to collect any PII about visitors to the consumerfinance.gov webpage. Traffic statistics for the website are only reported to the Bureau anonymously and in the aggregate, and no information provided by Google Analytics is traceable to any specific individual. CFPB may share web analytics data with other federal agencies as part of the GSA Digital Analytics Program or the public in aggregate form. For example, the CFPB may want and need to share the number of users that have visited consumerfinance.gov in the past six months or how many users utilize a particular tool. CFPB may share website analytical data with external organizations or the public, but this will only include aggregated data and the CFPB will never share PII.

Data Quality and Integrity: The Bureau does not verify information that visitors provide to ConsumerFinance.gov, so there is a risk that the information submitted may be erroneous, fraudulent, incomplete, or inaccurate. Information submitted to the Bureau may be corrected or updated for email lists, blogs, and other contact mediums. Given the low sensitivity of information collected through the site, and that information collected is for the very specific purpose of meeting the visitor's requested use of the site, this risk is acceptable. The Bureau is not responsible for the quality of data collected by Google Analytics and used to provide the Bureau with aggregate information.

Security: Visitors to the website choose which information to share with the Bureau or the public through ConsumerFinance.gov. Some of the information is provided for public consumption (e.g. comments), or is of a very-low level of sensitivity (e.g. email addresses). The CFPB does not believe that ConsumerFinance.gov is a particularly high risk target. However there is a risk that the site could inadvertently disclose some personal information included in comments made by visitors to the site. The CFPB has mitigated this risk by providing a clear and concise moderation policy, which can be found at <http://www.consumerfinance.gov/comment-policy>, on ConsumerFinance.gov that outlines what is and is not acceptable information to include in comments and a disclaimer that we reserve the right to remove posts if they are deemed inappropriate or a risk to personal privacy.

Individual Participation: Since visitors choose how to interact with ConsumerFinance.gov, there are no identifiable risks to individual participation associated with ConsumerFinance.gov. There is, however, a risk that after providing information to ConsumerFinance.gov, the visitor may be limited in ability to add to, delete, or otherwise modify certain information. For instance, comments, once posted, may not be able to be removed or edited. The Bureau has taken steps to mitigate this risk by providing its moderation policy on ConsumerFinance.gov.

The technical, physical, and administrative controls implemented to promote individual participation, minimization, and accountability are appropriate.

Privacy Risk Management

1. Describe what information the CFPB collects, how the information is collected, and the sources from which the information is collected.

The CFPB limits the intake of PII to only data that is necessary for the purpose of its collection. Information in ConsumerFinance.gov is searchable by PII, including:

- Name
- Username
- Email Address
- Business Affiliation
- Demographic Information
- Videos or Photos
- Geographic Information

The information is collected directly from individuals who visit our website.

Google Analytics uses Internet Protocol (IP) addresses to provide and protect the security of the service, and to give website owners a sense of where in the world their users come from (also known as "IP geolocation"). Google Analytics does not share actual IP address information with Google Analytics customers. Additionally, a method known as IP masking gives website owners using Google Analytics the option to tell Google Analytics to use only a portion of an IP address, rather than the entire address, for geolocation. When IP masking is enabled, Google Analytics removes the last octet of the user's IP address. The IP anonymization/masking takes place as soon as data is received by the Google Analytics Collection Network, before any storage or processing takes place.

CFPB does not (and does not allow any third party to) use Google Analytics to track, collect or upload any data that personally identifies an individual, or data that permanently identifies a particular device (such as a mobile phone's unique device identifier if such an identifier cannot be reset), even in hashed form. PII includes any data that can be used by Google to identify an individual, including, but not limited to names, social security numbers, email addresses, or billing information.

Google Analytics:

Google Analytics will never collect PII. When Google Analytics is utilized with third party software it will not share nor collect PII. Examples of the types of information that Google Analytics collects is listed below:

- Time and Date of Session
- Page Title and full URL
- Traffic Medium
- Traffic Source
- Referral, Complete URL
- Screen Color Depth
- Screen Resolution
- Page Request
- Repeat vs. New Session
- Browser Type
- Browser Version
- Language Encoding for Browser
- Geographic Data (Country, State, City, Metro Region)
- Device Type (Mobile, Desktop, Laptop)

2. Describe CFPB's objective for the information.

ConsumerFinance.gov collects information from visitors to the website to better interact with and engage visitors, to educate the public about the CFPB and key consumer financial issues, and to improve the overall user experience of ConsumerFinance.gov.

Third Party Tools and Google Analytics

At times, CFPB will want to utilize Google Analytics data with other third party software to improve the user experience. Examples of third party software include Search Engine Optimization (SEO) tools, Heat Mapping Tools, and A/B testing tools.

3. Describe how CFPB shares, for compatible purposes, any of the information with third parties, e.g. federal or state agencies, the general public.

Information posted directly to ConsumerFinance.gov by visitors will be available to the general public through the website. In addition, CFPB may share web analytics data with third parties. All web analytics data collected by CFPB is collected in aggregate form and is closely monitored to ensure that no PII is collected. Currently, CFPB is sharing web analytics data with the Digital Analytics Program (DAP). The DAP is a federal collaboration project run by the Government Services Administration (GSA) that encourages the collaboration of digital data sharing among federal agencies. The purpose of the DAP is to improve the user experience of all federal agency websites and to encourage the use of best practices for web design and development.

CFPB also shares web analytics data with third party tools. The purpose of these tools is to improve the user experience and to ensure consumerfinance.gov content is showing in appropriate organic search results.

The ConsumerFinance.gov Privacy Policy, which can be found at <http://www.consumerfinance.gov/privacy-policy>, outlines how we may share the information collected through ConsumerFinance.gov.

Where applicable, the CFPB may share information as outlined in the Routine Uses of the relevant SORN, CFPB.006, Social Networks and Citizen Engagement, [which can be found at](#)

<https://www.federalregister.gov/articles/2013/08/16/2013-19971/privacy-act-of-1974-as-amended>.

4. Describe what opportunities, if any, individuals to whom the information pertains have to (a) receive notice regarding the CFPB's use of the information; (b) consent to such use; (c) access the information that pertains to them; or (d) obtain redress.

To minimize the risks associated with notice and informed consent, the CFPB promotes transparency by generally announcing third party collaborations, issuing notices on its website, and documenting the program in this PIA. The CFPB gives individuals the ability to request access and amendment to their personal information in accordance with the Privacy Act and the CFPB's Privacy Act regulations, at 12 C.F.R. 1070.50 *et sea*.

5. Explain the standards and relevant controls that govern the CFPB's—or any third party contractor(s) acting on behalf of the CFPB—collection, use, disclosure, retention, or disposal of information.

The CFPB complies with the Privacy Act of 1974, Right to Financial Privacy Act, and E-Government Act of 2002; adopts Office of Management and Budget privacy-related guidance as best practice; and applies National Institute of Standards and Technology risk management processes for privacy.

The CFPB uses the following technical and administrative controls to secure the information and create accountability for the Bureau's appropriate collection, use, disclosure, and retention of the information:

- CFPB Personnel Privacy Training, including annual and role-based training,
- CFPB Privacy Incident Response and Recovery Plan and contractual obligations for third parties to support CFPB Privacy Incident Response and Recovery Plan,
- Compliance with CFPB cybersecurity policy and procedures,
- Policy and Standard Operating Procedures, and
- Records Schedule Submitted to/Approved by National Archives and Records Administration (NARA): Records will be disposed of according to the applicable records schedule. Some records schedules are awaiting NARA approval

Google and their partners use various technologies to collect and store information when you visit a Google service. This may include using cookies or similar technologies to identify browsers or devices. Google also uses these technologies to collect and store information when you interact with services offered to their partners, such as advertising services or Google features that may appear on other sites. Access to personal information is restricted to Google employees, contractors and agents who need to know that information in order to process it for Google, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Google processes personal information on their servers in many countries around the world; and may process personal information on a server located outside the country. Google Analytics guarantees to retain data for at least 25 months². CFPB plans to maintain access to information collected on Google Analytics for the lifetime of our account, or for as long as the data is available on Google Analytics.

The CFPB does not use Google Analytics to collect any PII about visitors to the consumerfinance.gov webpage. Traffic statistics for the website are only reported to the Bureau anonymously and in the aggregate, and no information provided by Google Analytics is traceable to any specific individual.

6. Discuss the role of third party(ies) that collaborate or partner with the CFPB, if any. Identify any controls used to protect against inappropriate collection, use, disclosure, or retention of information. (This does not include third parties acting on behalf of the CFPB, e.g., government contractors discussed in Question 5.)

Collaboration with third-party contractors that act on the CFPB's behalf is discussed above. The CFPB does not collaborate or partner with other third parties with respect to ConsumerFinance.gov.

² See Google Analytics Privacy Policy, https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008; Google Privacy Policy, <http://www.google.com/intl/en/policies/privacy/>.

Document control

Approval

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Change control

Version	Summary of material changes	Pages affected	Date of change
2	Revised to update generally in new template plus Google Analytics.	All	9/17/15