

# Voluntarily Supplied Contact Information Intake Policy Exception

## A. Overview

CFPB's *Information Governance Policy* sets in place rigorous guidelines and processes around the intake of information. The CIO has developed this exception to the *Information Governance Policy* as related to certain types of voluntarily supplied contact information.

### A. Excepted Guidelines and Processes

#### Information Intake

Voluntarily supplied contact information (as outlined in section D) that qualifies under this Exception may be brought into the Bureau at the discretion of individual Bureau employees or contractors, and without CIO (or other delegated) approval.

### B. Guidelines and Processes NOT Excepted

#### Management, Disclosure, and Disposition

Information which qualifies for this exception is only exempted from the Intake portion of the *Information Governance Policy*, and is *not* exempted from CFPB's *Information Governance Policy* Management, Disclosure and Disposition policy requirements.

### C. Other Bureau Policies

Nothing in this memo shall be construed as an exception to adhere to the requirements of any applicable law or regulation, including but not limited to the Dodd-Frank Act, the Right to Financial Privacy Act, e-Government Act, and the Privacy Act, or any Bureau policy other than the *Information Governance Policy*.

### D. Voluntarily Supplied Contact Information Excepted from Intake Requirements

An individual's or financial institution's contact information is not subject to the review and approval process as long as the individual or institution who is supplying the information has done so voluntarily, and understands the reasonably foreseeable purposes for which the Bureau may use the information. This information may include items such as:

- Full Name
- Title
- Company
- Phone number
- Email address
- Address

In order to be eligible for this exception, the above information must not be associated with any additional data about that individual or institution (e.g., personal financial information, demographics, survey

responses etc.). The contact information must be used for administrative purposes only, and not for market research or other analyses.

#### **E. Voluntarily Supplied Contact Information NOT Excepted from Intake Requirements**

As noted above, if contact information is associated with any additional information about that individual or institution, it no longer qualifies under this exception and must be reviewed and approved. This includes but is not limited to:

- An individual's social security number or financial account numbers
- Any other information which, if misused or inappropriately disclosed, would likely cause significant harm to individuals, business entities or the Bureau.

#### **F. Applicability of Exception**

It is the responsibility of the individual/office wishing to intake contact information under this exception to: a) ensure that the desired information clearly falls within the scope of the exception; and, b) be able to articulate/demonstrate applicability. The Data Governance Lead or Data Intake Group Coordinator must be consulted if there is any uncertainty about the applicability of this exception. The Data Governance Lead or Data Intake Group Coordinator will consult with subject matter experts regarding whether there are any applicable laws or regulations that would restrict the use of the exception.

#### **G. Term of Exception**

This exception will become effective on September 30, 2014, and is granted for a period of one year, at which time it may be renewed by the CIO. If not renewed, this exception will expire. The CIO may, at his/her discretion, rescind this exception at any time.

The CIO will retain the right to exercise any authority that is excepted under this document, and to review any activities excepted under this document.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
Ashwin Vasan, Chief Information Officer, Consumer Financial Protection Bureau