

Low Sensitivity 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 low sensitivity information.

A. Excepted Guidelines and Processes

Information Intake

Certain Low sensitivity information (as outlined in section D) may be brought into the Bureau at the discretion of individual Bureau employees or contractors and without the need for approval from the CIO or other delegated authority.

Guidelines and Processes NOT Excepted

Management, Disclosure and Disposition

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

B. 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*.

C. Low Sensitivity Information Excepted from Intake Requirements

In general, information that is small or unstructured, and does not have significant restrictions, is eligible for this exception. Examples include:

- Public information that has been sampled, aggregated, consolidated, or otherwise altered by the Bureau
- Non-public or proprietary information from widely available sources which does not have significant contractual or legal restrictions on access, distribution or use (*e.g.* periodicals, subscription-based web site content)
- Small procured datasets or information intended for a specific purpose, such as research reports on particular companies, industries, products, or consumer segments

D. Low Sensitivity Information NOT Excepted from Intake Requirements

Certain information, even though low sensitivity, requires review and approval due to legal, privacy, operational or other reasons.

- Any low sensitivity information which we do not have a clear authority to intake or is of a nature that other federal laws may restrict us from collecting (*e.g.*, 1st Amendment protected activities such as religious affiliation)
- Proprietary datasets which have significant contractual or legal restrictions on access, distribution or use
- Data from social media sources (*e.g.*, Twitter feeds, Facebook posts), other than social media information specifically directed at the Bureau (*e.g.*, responses to Tweets from @CFPB)
- Any microdata (consumer-level or loan-level) data in structured datasets
- Any information obtained as part of an information collection effort which requires review by Cybersecurity (*e.g.*, a collection performed by a 3rd-party which requires review of the 3rd-party's systems)
- Any information that implicates compliance actions under applicable information law (*e.g.*, creating a new Privacy Impact Assessment, System of Records Notice, Paperwork Reduction Act Information Collection Request)
- Any information where the data rights or other limitations associated with the data restrict the Bureau from collecting or intaking said information
- Large information assets which are intended for Bureau-wide use (*e.g.*, certain procured datasets)
- Information which, if misused or inappropriately disclosed, would likely cause significant harm to individuals, entities or the Bureau

E. Applicability of Exception

It is the responsibility of the individual/office wishing to intake Low sensitivity 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 regulators that would restrict the use of the exception.

F. 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 edit or 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