

Local Information Storage Policy Exceptions

A. Overview

CFPB's *Information Governance Policy* states that Medium and High Sensitivity information should not be stored locally on user laptops or desktop computers, and must be stored in centralized, CFPB-approved locations. The *Information Governance Policy* also recognizes that in certain circumstances temporary local storage of high sensitivity information may be necessary. Accordingly, this document provides exceptions to the centralized storage requirements in certain situations.

A. Local Storage Exception Conditions

Connectivity to CFPB Network Unavailable

When Medium or High Sensitivity information is received by a CFPB employee or contractor who temporarily does not have access to the CFPB network, the information may be stored locally on the user's computer. When the task is complete and the user has access to the CFPB network, the user must move the information back to the appropriate centralized storage area and remove it from local storage as soon as reasonably practical.

Information required locally for work or business reasons

Certain tasks require information to be available locally on a user's laptop (*e.g.*, when information will be needed offline, when performance issues make using centralized storage impossible or impractical). When performing such tasks, users are permitted to temporarily store Medium and High Sensitivity information locally. When the task is complete or the issue resolved, the user must move the information back to the appropriate centralized storage area and remove it from local storage as soon as reasonably practical.

Physical Information

Physical information (*e.g.*, paper, CD/DVDs) is excepted from the centralized storage requirement in section III.A.1 of the Bureau's *Information Governance Policy*. It must, however, be stored in accordance with Bureau policy and any applicable law or regulation.¹

B. Division or Office-Specific Procedures

Divisions and offices within CFPB may establish additional local information storage procedures. Any such procedures must be at least as restrictive as this Local Information Storage Exception.

C. Other Bureau Policies

¹ For additional information on Bureau policies, visit and http://team.cfpb.local/wiki/index.php/CFPB_Internal_Policies <http://team.cfpb.local/wiki/index.php/Category:Policy>.

Nothing in this memo shall be construed as an exception to adhere to the requirements of any applicable law or regulation, or any Bureau policy other than the *Information Governance Policy*.

D. 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 and relevant Associate Directors. 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

Signature: _____ Date: _____
Steve Antonakes, Associate Director for Supervision, Enforcement & Fair Lending, Consumer Financial Protection Bureau