

JANUARY 30, 2011

# CFPB Privacy Impact Assessment Questions



Consumer Financial  
Protection Bureau

## SECTION 1.0

# Purpose of collection

The CFPB will state the purpose and legal authority for collecting personally identifiable information (“PII”).

- 1.1 Why is the information being collected?
- 1.2 What legal authority and/or agreements allow the information to be collected?
- 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?
- 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.
- 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”)?
- 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?

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

## 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?
- 3.2 What PII will the system include?
- 3.3 Why is the collection and use of the PII necessary to the project or system?
- 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?
- 3.5 What controls exist to protect the consolidated data and prevent unauthorized access?
- 3.6 Will the system monitor the public?
- 3.7 Will the system monitor employees or contractors?
- 3.8 What kinds of reports can be produced on individuals? Will the data included in the reports produced be anonymized?
- 3.9 Are there any privacy risks for this system that relate to data minimization? If so, how will the CFPB mitigate these risks?

## SECTION 4.0

# Limits on uses 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?
- 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?
- 4.3 Is the information collected directly from the individual or is it taken from another source?
- 4.4 Will the project interact with other systems, whether within the CFPB or outside of the CFPB? If so, how?
- 4.5 Are there any privacy risks for this project that relate to use limitation? If so, how will the CFPB mitigate these risks?

## 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?

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?

## 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?

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

6.3 How will the system be secured?

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

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

## 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.

7.2 What procedures will allow individuals to access their information?

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

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

## 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.

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?

## 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?

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?