

OCTOBER 22, 2012

Privacy Impact Assessment Update

SCHEDULING AND EXAMINATION SYSTEM



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DOCUMENT PURPOSE

The Privacy Impact Assessment or “PIA” provides the public with information about the Consumer Financial Protection Bureau’s (“CFPB” or “Bureau”) collection and use of personally identifiable information (“PII”). While PIAs are reviewed every three years to ensure accuracy, periodic changes to information systems may warrant more frequent notification. This document alerts the public to any changes to an existing CFPB IT system that creates new privacy risks. In general, such changes are minor. In cases where significant changes to a system occur, a new PIA may be drafted and published.

PROJECT / SYSTEM NAME: **Scheduling and Examination System**

PIA PUBLISH DATE: May 22, 2012

UPDATED / REVISED PIA SECTIONS:

- Section 1.0 – Purpose of Collection
 - Section 2.0 – Openness and Transparency
 - Section 3.0 – Data Minimization
 - Section 4.0 – Limits on Uses and Sharing of Information
 - Section 5.0 – Data Quality and Integrity
 - Section 6.0 – Security
 - Section 7.0 – Individual Participation
 - Section 8.0 – Awareness and Transparency
 - Section 9.0 – Accountability and Auditing
 - Appendices (if applicable)
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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.

3.8 What kinds of reports can be produced on individuals? Will the data included in the reports produced be made anonymous?

Updated Response: In general, reports generated by the system will contain limited PII such as names of CFPB employees or directors, officers and employees of supervised institutions, and from time to time, information relating to individual or business customers.

Specific examination reports generated at the conclusion of examinations may include the names and contact information (e.g. title, phone number) of company and CFPB employees. In addition, such reports may include the names and account numbers of company customers. If examiners find

apparent legal violations that the company is directed to correct, reports will generally include specific transaction examples.

The Bureau distributes its exam reports internally only to employees with a bona fide need for such reports to carry out their assigned job responsibilities, and externally to a limited group of company employees who review the results of supervisory examinations. As required or necessary, such reports are distributed to other state and federal government agency employees whose job functions allow them to review reports generated from a CFPB examination. The sharing of reports from the SES is further discussed in Section 4.2.

SECTION 4.0 LIMITS ON USES AND SHARING 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.

- 4.2 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?

Updated Response: The CFPB may share PII from the SES with other federal or state government agencies to fulfill its supervisory or enforcement responsibilities. In some cases, the Dodd Frank Act requires us to share supervision and examination information with certain agencies. In other cases, we have chosen to work with other agencies, which may involve sharing information derived from the examination process. You can learn more about how we share information derived from the examination process in the CFPB Bulletin found at www.consumerfinance.gov/wp-content/uploads/2012/01/GC_bulletin_12-01.pdf. Additionally, the CFPB has outlined the ways in which information from the SES may be shared under the “Routine Uses” section of the related SORNs for the system.

The CFPB will only share information with authorized users through secure channels, such as online portals or through encrypted email, and only with appropriate data sharing agreements in place.

Internally, the CFPB may share information from the SES, in the form of reports or through access to the system, with members of the enforcement and fair lending teams, and through reports only with the research, markets, and regulations team. Information on the content of reports is available in Section 3.8. Information on system access is available under Section 6 of this PIA.

4.4 Will the project interact with other systems, whether within the CFPB or outside of the CFPB? If so, how?

Updated Response: At this time, the SES is not capable of connecting to or interacting with systems outside of the CFPB.

While the SES does not connect to any systems external to the CFPB, information maintained in the system may be manually uploaded into secure online portals or shared through other secure methods in order to provide access to other agencies to facilitate joint examinations, enforcement, or other related activities.

Internally, the SES connects to the Bureau's [Directory Database](#). This connection allows the SES to pull a list of the names and addresses of companies the Bureau is conducting examinations on. Connections can occur on a nightly basis or ad-hoc (as necessary). No PII is transferred through this connection.