

Qualtrics PIA v.2

Does the CFPB use the information to benefit or make a determination about an individual? No

What is the purpose? PII collected by Qualtrics is used by authorized Bureau offices to track, manage, and report on survey results.

Are there controls to enforce accountability? Yes, all standard CFPB privacy protections and security controls apply.

What opportunities do I have for participation? Appropriate opportunities for notice, consent,

Overview

The Dodd-Frank Wall Street Reform and Consumer Protection Act (“Act”), Public Law No. 111-203, Title X, established the Consumer Financial Protection Bureau (“CFPB” or “Bureau”). The CFPB administers, enforces, and implements federal consumer financial protection laws.

The Bureau utilizes Qualtrics as its enterprise survey software. The software is hosted externally by Qualtrics and is Federal Risk and Authorization Management Program (FedRAMP) authorized. Qualtrics provides the Bureau with the capability to generate and manage web-based surveys. Additionally, Qualtrics offers a variety of reporting and analytics tools that allow authorized Bureau users to track survey results and configure customized reports.

Surveys developed through Qualtrics are sent to survey participants via hyperlink either by email or by posting the hyperlink to pages on consumerfinance.gov or applicable Salesforce (SF) community portals. Personally Identifiable Information (PII) collected through Qualtrics is used by authorized Bureau offices as a means to contact survey respondents, and may also be used to track, manage, and report on survey results. Requests to administer surveys must be approved through internal processes that align with the Bureau's internal policy for collecting and protecting sensitive information and PII.

The establishment of the use of Qualtrics is authorized by Sections 1011, 1012, and 1021 of the Dodd-Frank Act. There are no System of Records Notices (SORNs) or Paperwork Reduction Act (PRA) approvals that apply to Qualtrics, which is a tool; specific collections that require SORNs or PRA approvals are addressed in compliance documentation specific to those collections. For example, surveys related to consumer education would be covered by the *Consumer Education Privacy Impact Assessment (PIA)*. For additional information and analysis regarding specific collections that will use the Qualtrics tool, PIAs are available at www.consumerfinance.gov/privacy.

This PIA has been updated to reflect the addition of the website feedback metric functionality of Qualtrics. The collection of website feedback metrics tracks the number of impressions (each time the web intercept is shown to a web visitor) and number of clicks (each time a visitor

interacts with the web intercept). Website feedback metrics allow for the use of embedded data¹ to capture additional pieces of information about web visitors who take a survey.²

Privacy Risk Analysis

Qualtrics is an enterprise survey software tool, and any risks that may arise likely involve the underlying collection of data, rather than the software tool that is used to collect the data. Those risks will *not* be addressed in this PIA; instead, where appropriate, they are addressed by separate PIAs related to the underlying data collection. In addition, where a PIA is not required for an underlying data collection (such as collections of PII from Bureau employees), privacy risks are addressed via internal processes at the Bureau. PII collected through Qualtrics is used by authorized Bureau offices to contact survey respondents, and may also be used to track, manage, and report on survey results. In accordance with Bureau privacy principle of data minimization,³ all PII collected through surveys must be relevant and necessary to accomplish an authorized Bureau business need. Additionally, data collections undergo review through internal processes at the Bureau.

With any acquisition and use of a new tool to process data, there may be privacy risks. The primary risk associated with Qualtrics is the risk related to:

- Limits on Uses and Sharing of Information

This risk and the mitigations are described below:

Limits on Uses and Sharing of Information

Qualtrics utilizes and adheres to internal Bureau processes and policies to prevent unauthorized use and sharing of information. Only individuals with a “need to know” will be granted access to data associated with the Qualtrics survey responses, and they will only be able to access specified information based on their role and allocated system permission set. This data includes both the survey responses themselves, as well as any additional data that

¹ “Embedded data” is any extra information you would like recorded in your survey data in addition to the question responses.

² A “web intercept” for surveys is a mechanism that invites certain visitors on the web page to participate in a given survey. The intercept is a prompt to the visitor, which they may accept or decline. If they accept, a survey will pop up once they've finished visiting the specified web page(s).

³ “The CFPB will limit the collection of PII to what is needed to accomplish the stated purpose for its collection. The CFPB will keep PII only as long as needed to fulfill its stated purpose.” CFPB Privacy Policy, available at <https://www.consumerfinance.gov/privacy/privacy-policy/>.

may be collected from or about the survey participant. This process is documented in the Qualtrics Business Process Document and Account Management Plan. The System Administrator for Qualtrics is the only authorized user able to create and remove Qualtrics users. The business owner is responsible for identifying who has access to their business unit's surveys and responses. Authorized users will access Qualtrics through the Bureau's single sign-on (SSO) service that will automatically verify authentication before granting access to the user. Access to the website feedback metrics are limited to a specified subset of users.

The technical, physical, and administrative controls implemented to promote limits on use and sharing of information are appropriate.

Privacy Risk Management

1. Describe what information the Bureau collects, how the information is collected, and the sources from which the information is collected.

Surveys are typically used by the Bureau to collect data from survey respondents, which may include a limited amount of PII (*i.e.*, names and basic contact information), non-sensitive business information, work-related contact information (*e.g.*, work email address, work, telephone number), demographic range (*e.g.*, date of age or age range such as 18 – 25, 65 or older, *etc.*) and affiliation to certain population groups (*e.g.*, military status, university student, older adults, *etc.*). It is also possible that survey answers may contain PII; for example, there is an open-ended text box where survey participants may submit PII.

The update to this PIA also considers the collection of website feedback metrics, including the number of impressions and number of clicks. These features are disabled by default, which means they will only be engaged and turned on after a review through internal processes at the Bureau. These website feedback metrics also allow the Bureau to use “embedded data” to capture additional information about web visitors who take a survey, including information about how a user is interacting with, or navigating, a webpage:

- **Recorded Site History:** This captures all the sites a visitor has visited that have the project code on the page. This information is stored on “persistent cookies”, also known as “Tier 2 web measurement and customization technologies” that website feedback places on the

browser.⁴ These cookies do not collect personal information on users, but can stay on browsers for longer periods of time unless a user deletes them. This Qualtrics function is set to “off” at default, so no data will be captured unless the Bureau enables it following the internal process discussed above.

- **Event Tracking:** This data point tracks selected individual events on the target page(s) such as what items the web visitor clicks upon. This Qualtrics function is set to “off” at default, so no data will be captured unless the Bureau enables it following the internal process discussed above.
- **Current Page URL:** This logs the page the visitor is on when the web intercept appears. This Qualtrics function is set to “off” at default, so no data will be captured unless the Bureau enables it following the internal process discussed above.
- **Page Referrer:** This logs the page the visitor was on before arriving at the page with your Intercept. This Qualtrics function is set to “off” at default, so no data will be captured unless the Bureau enables it following the internal process discussed above.
- **Search Term:** This captures the term the visitor searched to arrive at the website. This Qualtrics function is set to “off” at default, so no data will be captured unless the Bureau enables it following the internal process discussed above.
- **HTML on Site:** This specifies the HTML on the page to be captured in addition to survey-related visitor interactions. For example, the Bureau may want to capture values or information entered onto a form displayed on the page outside of the actual survey, in addition to the survey submission itself. This Qualtrics function is set to “off” at default, so no data will be captured unless the Bureau enables it following the internal process discussed above.
- **Value from Cookie:** This feature captures the value (potential values can be text, numbers, or whatever other values the Bureau may be using for a custom cookie) from a specific cookie on your site. For example, the Bureau may have a cookie named “return visitor” which captures whether someone has previously visited the Bureau website. This feature applies only to cookies for which Bureau users have deployed on Bureau assets. Accordingly, the value captured is limited to the data values from the deployed cookies. This function in Qualtrics is set to “off” at default unless the Bureau decides to enable it following the internal process discussed above.

The website feedback metrics and embedded data fields listed above are all optional, and the default setting is that they are not enabled. Whether a specific embedded data field is enabled will be assessed on a case-by-case basis via internal processes at the Bureau.

As this PIA applies solely to the Qualtrics tool, issues relating to the underlying information

⁴ OMB Memorandum M-10-22, *Guidance for Online Use of Web Measurement and Customization Technologies* (June 25, 2010), available at https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/memoranda_2010/m10-22.pdf.

collections, including the consequences of collection and flow of information will be addressed in other PIAs addressing those specific collections. Efforts to minimize a specific collection of information will also be addressed in the PIA applicable to that collection. Where a PIA is not required for an underlying data collection (such as collections of PII from Bureau employees), privacy risks are addressed via internal processes at the Bureau.

2. Describe the Bureau's objective for the information.

Because Qualtrics is an enterprise survey tool, the purpose or objective for any PII collected through Qualtrics varies by intended use. All surveys must go through proper Bureau internal processes to ensure that the objectives fulfill a legitimate business function, and that uses of the information are compatible with the purpose(s) for which the information was collected.

Some examples of different purposes for the use of Qualtrics include:

- Obtain feedback from Bureau employees and contractors on their experience and sentiment of classes, trainings, or programs offered/implemented by the Bureau;
- Identify classes, programs, or detail assignments in which employees may be interested in participating;
- Conduct quarterly operations survey for data collection from Bureau employees *e.g.*, parking needs at remodeled HQ, workforce of the future efforts, seat assignments, *etc.*;
- Obtain feedback from consumers about their experience with the Bureau's complaint services, tools, and/or intake process;
- Obtain feedback from Salesforce application users (consumers, entities, Bureau staff) on their experience using the application and/or recommendations to improve the applications; and
- Obtain feedback from the public, including consumers, entities, and government agencies representatives, about tools and information provided by the Bureau on consumerfinance.gov (*e.g.*, AskCFPB, Buying a Home, Your Money, Your Goals, *etc.*)

The purpose of the collection of website feedback metrics and embedded data is to supporting data-driven decisions about public-facing web content. This requirement is adapted from Office of Management and Budget (OMB) guidance on the Federal Government's Customer Experience Framework.⁵

⁵ OMB Circular A-11 Section 280, *Preparation, Submission, and Execution of the Budget* (July 2016) available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/s280.pdf>.

3. Describe how the Bureau shares any of the information with third parties with whom the Bureau shares the information for compatible purposes, e.g. federal or state agencies, the general public, etc.

Qualtrics is an enterprise software available to all program offices at the Bureau. Anonymized survey responses may be shared with third parties, however raw data (individual survey responses) will not be shared.

4. Describe what opportunities, if any, individuals to whom the information pertains have to (a) receive notice regarding the Bureau's use of the information; (b) consent to such use; (c) access the information that pertains to them; or (d) obtain redress.

Individuals can decline to provide their personal data or to consent to particular uses of their information. Individuals participating in Bureau surveys may choose to remain anonymous by opting out of providing personal information. In instances where collection of personal data is necessary to accomplish a business purpose, a Privacy Act Statement or privacy notice is made available to survey participants, instructing them about the intended purpose and use of their PII and whether or how they may opt-out of providing their PII. Notice of the collection of visitor metrics is provided via “pop-up” notification statement upon accessing the site. The notification statement explains that the Bureau uses persistent cookies that allow the collection of information about user activity on the Bureau’s website. These cookies do not collect personal information on users, however they remain on a user’s browser for up to 90 days unless deleted. Users are informed of their right to refuse cookies and how to ensure that refusal is effective. Finally, users are directed to the Bureau’s Privacy Policy for further details relating to how the Bureau safeguards the privacy of their records.

The notification statement is not applicable to users accessing the site with session tracking features disabled or blocked. Regarding the collection of website metrics and “embedded data,” individuals have the option to decline to complete a survey.

5. Explain the standards and relevant controls that govern the Bureau’s—or any third-party contractor(s) acting on behalf of the Bureau—collection, use, disclosure, retention, or disposal of information.

Qualtrics meets FedRAMP standards.

PII collected through Qualtrics is protected under normal Bureau policies and procedures governing the protection and internal use of PII. The Privacy team consults regularly with the system owner on any potential privacy concerns, such as the types of PII that can be processed through the Qualtrics tool.

The underlying information collected through each survey will be protected based on the sensitivity of the information collected and governed by the laws specific to the collection. For example, surveys used to obtain feedback from members of the public about awareness of Bureau activities will undergo review through internal processes at the Bureau. The Bureau uses appropriate technical and administrative controls to secure the data and create accountability for the Bureau's appropriate collection, use, disclosure, and retention of the information collected through Qualtrics. Where information collections require a PIA or a SORN, those documents will have additional information about the corresponding controls and protections. Because Qualtrics is a tool, the Bureau may, on a collection-by-collection basis, take different approaches to the use of direct identifiers, masking of data, or use of third-party contractors acting on behalf of the Bureau. These issues are discussed in separate PIAs that address the underlying data collections. Where a PIA is not required for an underlying data collection (such as collections of PII from Bureau employees), the data collection will undergo review through internal processes at the Bureau.

The Bureau uses the following technical and administrative controls to secure the data and create accountability for the Bureau's appropriate collection, use, disclosure, and retention of the information processed through the Qualtrics tool:

- Recurring Audit Log(s) Reviews;
- CFPB Personnel Privacy Training;
- CFPB Privacy Incident Response and Recovery Plan;
- Compliance with CFPB/Federal cybersecurity policy and procedures;
- Technical, Administrative, and Physical controls to support the Confidentiality, Integrity, and Availability of Bureau operations;
- Extract logging and 90-day reviews;
- Policy and Standard Operating Procedures;
- Role-based Access Controls;
- Records Schedule Submitted to/Approved by National Archives and Records

- Administration: dependent on specific collections processed through Qualtrics; and
 - Personnel Security including background checks.
6. Discuss the role of third parties that collaborate or partner with the Bureau, if any. Identify any controls used to protect against inappropriate collection, use, disclosure, or retention of information.

The Bureau does not share any data collected through Qualtrics with third parties. Anonymized survey responses may be shared with third parties, however raw data (*e.g.*, individual survey responses) will not be shared. Where a PIA is not required for an underlying data collection (such as collections of PII from Bureau employees), these data collections undergo review through internal processes at the Bureau.

Document control

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Change control

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