Data Protection

— 21st CENTURY —

A Pathway to Improve Agency Policies & Procedures

SCOPE

START

Conduct inventory of data required to fulfill agency's mission

Consider the necessity of sensitive data when determining intake needs Implement ongoing data usage tracking

ACCESSIBILITY

Review receipt methods (routine filings, ad hoc requests, removal during examinations) Consider alternative modes of access for sensitive data such as IP and PII

SECURITY

Audit security safeguards and internal controls for data in agency's systems:

- storage procedures
- encryption formatting
- permissioned access

RESPONSE

Examine internal response procedures to apply in event of security breach at agency:

- impact and risk assessment
- notification policy

RETENTION

Evaluate circumstances that require retaining sensitive data at agency Update retention & disposal policies

UPDATE POLICIES & PROCEDURES

Dawn D. Stump Commissioner Commodity Futures Trading Commission

 $Disclaimer: The suggestions above \ reflect \ my \ own \ views \ and \ not \ those \ of \ the \ CFTC, nor \ my \ fellow \ Commissioners$