CAJA MORELIA VALLADOLID PROTECTS CLIENT DATA

Upon transformation from a cooperative to a regulated financial institution, Caja Morelia (Mexico) was required to meet Mexican federal data management and reporting requirements. This period of transformation provided the FSP with the motivation to strengthen its Information Communications Technology (ICT) system.

Caja Morelia's upgraded its system to include the following features:
- A single, "master" electronic database has remote access for branch offices. Each branch can modify client data for its own portfolio but cannot download the master database. Staff at headquarters can access the entire database but cannot change client profiles. This both prevents version control problems and ensures that employees only have access to the minimum client data needed to perform their duties.
- Each person who accesses the database uses an individual username and password. Users must change their passwords every four months and cannot repeat previous passwords. When an employee logs into the database, their name, the information they query, and the time when the request is made are all recorded in a query log.
- Headquarters employees enter and leave the main office using a thumbprint scanner and sign-in process to prevent unauthorized access to the client information stored there.
- Changes to client information must be authorized by two or more people, often from different departments. This prevents misuse of data by any one person.
- Each of the FSP's computers is configured to access the system for only one department (e.g., a computer configured for HR cannot be used by Accounting). This helps prevent access to data by unauthorized employees.
- During the collections process, only the collections agent, branch manager, and headquarters Collections Department have access to the personal information for clients with overdue loans. When the bank uses a specialized external collections firm, it shares only the few pieces of information that are most necessary for the firm to recover the loan.

To enforce the above changes, Caja Morelia requires employees to sign client data confidentiality agreements. In-house software developers also sign contracts to protect the proprietary nature of the software. The FSP has the right to bring criminal charges for violations of these agreements. Read more in "Customized IT at Caja Morelia Safeguards Client Data (Full Case)" which can be found in the Resource Center.