

Bulk U.S. Sensitive Personal Data Screening Form
(Required for Cloud, SaaS, AI, VM, and Data-Sharing Agreements)

As part of this purchase, contract, data-use agreement, or recurring engagement with a vendor, **will any of the following categories of data be shared (directly or indirectly) or otherwise made available to “Covered Person(s),” or “Country of Concern”?** Reference [Preventing Access to U.S. Sensitive Personal Data and Government-Related Data by Countries of Concern or Covered Persons](#).

Type of Data	Bulk Threshold	Yes / No
Covered personal identifiers ¹	> 100,000 U.S. persons	<input type="checkbox"/> Yes <input type="checkbox"/> No
Personal financial data	> 10,000 U.S. persons	<input type="checkbox"/> Yes <input type="checkbox"/> No
Personal health data	> 10,000 U.S. persons	<input type="checkbox"/> Yes <input type="checkbox"/> No
Precise geolocation data	> 1,000 U.S. persons or devices	<input type="checkbox"/> Yes <input type="checkbox"/> No
Biometric identifiers	> 1,000 U.S. persons or devices	<input type="checkbox"/> Yes <input type="checkbox"/> No
Human 'omic data (non-genomic)	> 1,000 U.S. persons	<input type="checkbox"/> Yes <input type="checkbox"/> No
Human genomic data	> 100 U.S. persons	<input type="checkbox"/> Yes <input type="checkbox"/> No
Any combination of the above categories (or personal identifiers linked to the above categories)	lowest threshold of data type applies	<input type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Government-related data ²	Any amount of data	<input type="checkbox"/> Yes <input type="checkbox"/> No

If you answered “Yes” to any question above, please contact Caltech’s Research Compliance Office. This purchase cannot proceed through Procurement Services until reviews are completed.

¹ In simple terms, *covered personal identifiers* are pieces of information—when linked or linkable to other data—can reveal a U.S. person’s personal or sensitive data or information. *Covered personal identifiers* include government ID numbers, financial account numbers, device-based identifiers, demographic or contact data, advertising identifiers, account-authentication data, network-based identifier or call-detail data. Please refer to [28 CFR Parts 202.212, 202.234, and 202.249](#) for full definition, examples, and exclusions.

² In simple terms, *U.S. Government-related data* includes (1) precise geolocation data of sensitive government-linked locations (e.g., military bases, national security worksites, or intelligence-related facilities) and/or (2) other sensitive personal data that is linked (or linkable) to current or recent U.S. government employees or contractors, including military members, intelligence staff, or senior officials. Please refer to [28 CFR Part 202.222](#) for full definition and examples.