

SYNTHETIC TEST DOCUMENT — FICTIONAL COMPANY — NO CUSTOMER DATA

Bluebird Mortgage Brokerage LLC

Consumer Information Disposal Procedure - GAP SCENARIO

Document ID	BMB-REC-002
Version	0.1 (draft)
Drafted	2026-09-15
Owner	Office Manager
Approval status	Draft only
Cross-reference to WISP	Not added (intentional test gap)
Classification	Internal - synthetic test fixture

This document is a synthetic test fixture created for AuditReady page-count, pricing, and pre-scan testing. The company, people, vendors, and events are fictional. It contains no real customer data and no protected health information.

Test intent

A weak and partly contradictory disposal SOP. It mentions covered information and a vendor, but documents unsafe recycling, indefinite retention, missing device sanitization, and absent oversight. A keyword-only screen may miss the negative meaning of these statements. Expanded inventory records and proposals in the appendices do NOT fix these gaps; proposals are explicitly not adopted.

Draft history

Version	Date	Author (role)	Summary of change
0.1	2026-09-15	Office Manager	First draft describing current practice. Not reviewed or approved.

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1. Scope

Bluebird is a fictional mortgage broker that receives borrower applications and consumer report information for a business purpose. This procedure concerns paper credit reports, derived notes, exported spreadsheets, scanned copies, retired laptops, backup media, and files held by a records vendor. It is intended to be referenced by the company's written information security program, but that cross-reference has not been added.

2. Current paper-file practice

Staff place old borrower folders in a locked cabinet. Every quarter, the Office Manager sends folders to a destruction vendor. The company has not documented how the vendor is selected or monitored, and it does not require a certificate of destruction. Some photocopies of consumer report information are placed in ordinary office recycling when a file cabinet is full. That practice is an intentional test gap; ordinary recycling does not render the information unreadable.

3. Current electronic-file practice

Employees delete local spreadsheet copies after a loan closes, but the procedure gives no deadline and does not distinguish deletion from secure erasure. Retired laptops are kept in an unlocked storage room until pickup. No one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory.

4. Retention and exceptions

The Office Manager currently says to keep every electronic copy indefinitely in case it is needed later. There is no record-type retention schedule, legal-hold process, exception owner, or review date. This is an intentional test gap; the draft offers no controlled decision for when information is no longer needed.

5. Missing evidence and next actions

Bluebird has no disposal log, vendor contract review, destruction receipts, or periodic check of the procedure. The proposed next action is to assign a Records Manager, inventory consumer information in all formats, establish a retention schedule, use secure paper and electronic destruction methods, review any vendor, and retain evidence that each disposal event occurred.

6. Roles (current state)

Role	Current responsibility	Gap
Office Manager	Sends folders to vendor quarterly; instructs staff to keep electronic copies indefinitely	No written authority or oversight
Loan officers	Delete local spreadsheets after closing (no deadline)	Deletion is not secure erasure

Role	Current responsibility	Gap
Front desk staff	Place photocopies in office recycling when cabinets are full	Unsafe disposal method
Records Manager	Proposed only	Role not assigned
IT support (fictional contractor)	Picks up retired laptops when called	No sanitization verification

7. Location walkthrough notes

Location	Observation (2026-09-10 walkthrough)	Status
File room	Locked cabinet with old borrower folders awaiting quarterly pickup	No disposal log
Copy room	Recycling bin contains photocopies of consumer report pages	Unsafe - intentional test gap
Storage room	Three retired laptops on an open shelf; door unlocked	Unsafe - intentional test gap
Shared drive	Exported pipeline spreadsheets dating back several years	Indefinite retention
Backup appliance	Nightly backups with no deletion schedule	Not in retention inventory
Records vendor (fictional)	Off-site boxes; contract not reviewed	No oversight

8. Glossary

Term	Meaning in this draft
Consumer information	Records about an individual that are a consumer report or derived from a consumer report, in any format.
Disposal	Discarding or abandoning consumer information, or selling, donating, or transferring media containing it.
Reasonable measures	Steps such as burning, pulverizing, or shredding paper and destroying or erasing electronic media so information cannot practicably be read or reconstructed.
Certificate of destruction	Vendor evidence that specific media was destroyed. Not currently collected.

Appendix A - Current-state disposal matrix

Record / media	Current disposal practice	Safe?	Evidence
Paper credit reports	Quarterly vendor pickup	Unverified	None
Photocopies of consumer reports	Ordinary office recycling when cabinet full	No	None
Loan officer notes	Kept in folders indefinitely	No decision	None
Exported spreadsheets	Deleted locally, no deadline; shared drive copies kept	No	None
Scanned copies	Kept indefinitely on shared drive	No decision	None
Retired laptops	Unlocked storage room until pickup	No	None
Backup media	Not inventoried; no deletion schedule	No	None
Records vendor boxes	Held off-site; no contract review	Unverified	None

Appendix B - Proposed remediation (NOT adopted)

The following items are proposals only. They have not been approved, funded, assigned, or implemented, and they do not change the current practices described above.

- Assign a Records Manager (proposed).
- Inventory consumer information in all formats (proposed).
- Establish a record-type retention schedule with legal holds (proposed).
- Use cross-cut shredding and secure erasure or physical destruction (proposed).
- Review the destruction vendor and require certificates (proposed).
- Keep a disposal log for each disposal event (proposed).

- Add a cross-reference from the WISP to this procedure (proposed).

Appendix F.001 - Disposal inventory record: Paper credit report

Record or media type	Paper credit report
Format	Paper
Location	File room locked cabinet
Observation period	Q4 2025
Current disposal practice	Sent to destruction vendor quarterly; no certificate requested
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the paper credit report stored at the file room locked cabinet was handled as follows: sent to destruction vendor quarterly; no certificate requested. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded.

Oversight status

No one reviewed how the paper credit report at the file room locked cabinet was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0001. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.002 - Disposal inventory record: Photocopy of consumer report

Record or media type	Photocopy of consumer report
Format	Paper
Location	Copy room
Observation period	Q3 2026
Current disposal practice	Placed in ordinary office recycling when the cabinet is full
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the photocopy of consumer report stored at the copy room was handled as follows: placed in ordinary office recycling when the cabinet is full. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps.

Oversight status

No one reviewed how the photocopy of consumer report at the copy room was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0002. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.003 - Disposal inventory record: Loan officer handwritten notes derived from consumer report

Record or media type	Loan officer handwritten notes derived from consumer report
Format	Paper
Location	Loan officer desks
Observation period	Q2 2026
Current disposal practice	Kept in folders with no disposal decision
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the loan officer handwritten notes derived from consumer report stored at the loan officer desks was handled as follows: kept in folders with no disposal decision. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored.

Oversight status

No one reviewed how the loan officer handwritten notes derived from consumer report at the loan officer desks was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0003. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.004 - Disposal inventory record: Exported pipeline spreadsheet

Record or media type	Exported pipeline spreadsheet
Format	Electronic
Location	Loan officer laptop
Observation period	Q1 2026
Current disposal practice	Deleted after closing with no deadline; not securely erased
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the exported pipeline spreadsheet stored at the loan officer laptop was handled as follows: deleted after closing with no deadline; not securely erased. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner.

Oversight status

No one reviewed how the exported pipeline spreadsheet at the loan officer laptop was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0004. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.005 - Disposal inventory record: Exported pipeline spreadsheet (shared copy)

Record or media type	Exported pipeline spreadsheet (shared copy)
Format	Electronic
Location	Shared drive
Observation period	Q4 2025
Current disposal practice	Kept indefinitely per Office Manager instruction
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the exported pipeline spreadsheet (shared copy) stored at the shared drive was handled as follows: kept indefinitely per office manager instruction. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever.

Oversight status

No one reviewed how the exported pipeline spreadsheet (shared copy) at the shared drive was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0005. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.006 - Disposal inventory record: Scanned borrower application

Record or media type	Scanned borrower application
Format	Electronic
Location	Shared drive scans folder
Observation period	Q3 2026
Current disposal practice	Kept indefinitely; no review date
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the scanned borrower application stored at the shared drive scans folder was handled as follows: kept indefinitely; no review date. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred.

Oversight status

No one reviewed how the scanned borrower application at the shared drive scans folder was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0006. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.007 - Disposal inventory record: Retired laptop hard drive

Record or media type	Retired laptop hard drive
Format	Device
Location	Unlocked storage room
Observation period	Q2 2026
Current disposal practice	Awaiting pickup; sanitization not verified
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the retired laptop hard drive stored at the unlocked storage room was handled as follows: awaiting pickup; sanitization not verified. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program.

Oversight status

No one reviewed how the retired laptop hard drive at the unlocked storage room was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0007. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.008 - Disposal inventory record: Nightly backup set

Record or media type	Nightly backup set
Format	Electronic
Location	Backup appliance
Observation period	Q1 2026
Current disposal practice	Not listed in retention inventory; no deletion schedule
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the nightly backup set stored at the backup appliance was handled as follows: not listed in retention inventory; no deletion schedule. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage.

Oversight status

No one reviewed how the nightly backup set at the backup appliance was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0008. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.009 - Disposal inventory record: Archived borrower boxes

Record or media type	Archived borrower boxes
Format	Paper
Location	Records vendor (fictional, off-site)
Observation period	Q4 2025
Current disposal practice	Held by vendor; contract not reviewed for disposal duties
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the archived borrower boxes stored at the records vendor (fictional, off-site) was handled as follows: held by vendor; contract not reviewed for disposal duties. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two.

Oversight status

No one reviewed how the archived borrower boxes at the records vendor (fictional, off-site) was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0009. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.010 - Disposal inventory record: Email attachments with credit report PDFs

Record or media type	Email attachments with credit report PDFs
Format	Electronic
Location	Mailbox archives
Observation period	Q3 2026
Current disposal practice	Kept indefinitely; no purge rule
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the email attachments with credit report pdfs stored at the mailbox archives was handled as follows: kept indefinitely; no purge rule. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed.

Oversight status

No one reviewed how the email attachments with credit report pdfs at the mailbox archives was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0010. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.011 - Disposal inventory record: Scanner internal storage

Record or media type	Scanner internal storage
Format	Device
Location	Multifunction copier
Observation period	Q2 2026
Current disposal practice	Not considered in this draft
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the scanner internal storage stored at the multifunction copier was handled as follows: not considered in this draft. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages.

Oversight status

No one reviewed how the scanner internal storage at the multifunction copier was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0011. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.012 - Disposal inventory record: USB drive used for closing packages

Record or media type	USB drive used for closing packages
Format	Device
Location	Office Manager drawer
Observation period	Q1 2026
Current disposal practice	Reused without erasure
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the usb drive used for closing packages stored at the office manager drawer was handled as follows: reused without erasure. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed.

Oversight status

No one reviewed how the usb drive used for closing packages at the office manager drawer was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0012. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.013 - Disposal inventory record: Paper credit report

Record or media type	Paper credit report
Format	Paper
Location	File room locked cabinet
Observation period	Q4 2025
Current disposal practice	Sent to destruction vendor quarterly; no certificate requested
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the paper credit report stored at the file room locked cabinet was handled as follows: sent to destruction vendor quarterly; no certificate requested. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal.

Oversight status

No one reviewed how the paper credit report at the file room locked cabinet was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0013. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.014 - Disposal inventory record: Photocopy of consumer report

Record or media type	Photocopy of consumer report
Format	Paper
Location	Copy room
Observation period	Q3 2026
Current disposal practice	Placed in ordinary office recycling when the cabinet is full
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the photocopy of consumer report stored at the copy room was handled as follows: placed in ordinary office recycling when the cabinet is full. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files.

Oversight status

No one reviewed how the photocopy of consumer report at the copy room was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0014. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.015 - Disposal inventory record: Loan officer handwritten notes derived from consumer report

Record or media type	Loan officer handwritten notes derived from consumer report
Format	Paper
Location	Loan officer desks
Observation period	Q2 2026
Current disposal practice	Kept in folders with no disposal decision
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the loan officer handwritten notes derived from consumer report stored at the loan officer desks was handled as follows: kept in folders with no disposal decision. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason.

Oversight status

No one reviewed how the loan officer handwritten notes derived from consumer report at the loan officer desks was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0015. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.016 - Disposal inventory record: Exported pipeline spreadsheet

Record or media type	Exported pipeline spreadsheet
Format	Electronic
Location	Loan officer laptop
Observation period	Q1 2026
Current disposal practice	Deleted after closing with no deadline; not securely erased
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the exported pipeline spreadsheet stored at the loan officer laptop was handled as follows: deleted after closing with no deadline; not securely erased. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed.

Oversight status

No one reviewed how the exported pipeline spreadsheet at the loan officer laptop was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0016. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.017 - Disposal inventory record: Exported pipeline spreadsheet (shared copy)

Record or media type	Exported pipeline spreadsheet (shared copy)
Format	Electronic
Location	Shared drive
Observation period	Q4 2025
Current disposal practice	Kept indefinitely per Office Manager instruction
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the exported pipeline spreadsheet (shared copy) stored at the shared drive was handled as follows: kept indefinitely per office manager instruction. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when.

Oversight status

No one reviewed how the exported pipeline spreadsheet (shared copy) at the shared drive was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0017. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.018 - Disposal inventory record: Scanned borrower application

Record or media type	Scanned borrower application
Format	Electronic
Location	Shared drive scans folder
Observation period	Q3 2026
Current disposal practice	Kept indefinitely; no review date
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the scanned borrower application stored at the shared drive scans folder was handled as follows: kept indefinitely; no review date. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information.

Oversight status

No one reviewed how the scanned borrower application at the shared drive scans folder was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0018. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.019 - Disposal inventory record: Retired laptop hard drive

Record or media type	Retired laptop hard drive
Format	Device
Location	Unlocked storage room
Observation period	Q2 2026
Current disposal practice	Awaiting pickup; sanitization not verified
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the retired laptop hard drive stored at the unlocked storage room was handled as follows: awaiting pickup; sanitization not verified. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained.

Oversight status

No one reviewed how the retired laptop hard drive at the unlocked storage room was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0019. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.020 - Disposal inventory record: Nightly backup set

Record or media type	Nightly backup set
Format	Electronic
Location	Backup appliance
Observation period	Q1 2026
Current disposal practice	Not listed in retention inventory; no deletion schedule
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the nightly backup set stored at the backup appliance was handled as follows: not listed in retention inventory; no deletion schedule. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file.

Oversight status

No one reviewed how the nightly backup set at the backup appliance was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0020. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.021 - Disposal inventory record: Archived borrower boxes

Record or media type	Archived borrower boxes
Format	Paper
Location	Records vendor (fictional, off-site)
Observation period	Q4 2025
Current disposal practice	Held by vendor; contract not reviewed for disposal duties
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the archived borrower boxes stored at the records vendor (fictional, off-site) was handled as follows: held by vendor; contract not reviewed for disposal duties. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure.

Oversight status

No one reviewed how the archived borrower boxes at the records vendor (fictional, off-site) was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0021. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.022 - Disposal inventory record: Email attachments with credit report PDFs

Record or media type	Email attachments with credit report PDFs
Format	Electronic
Location	Mailbox archives
Observation period	Q3 2026
Current disposal practice	Kept indefinitely; no purge rule
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the email attachments with credit report pdfs stored at the mailbox archives was handled as follows: kept indefinitely; no purge rule. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision.

Oversight status

No one reviewed how the email attachments with credit report pdfs at the mailbox archives was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0022. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.023 - Disposal inventory record: Scanner internal storage

Record or media type	Scanner internal storage
Format	Device
Location	Multifunction copier
Observation period	Q2 2026
Current disposal practice	Not considered in this draft
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the scanner internal storage stored at the multifunction copier was handled as follows: not considered in this draft. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded.

Oversight status

No one reviewed how the scanner internal storage at the multifunction copier was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0023. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.024 - Disposal inventory record: USB drive used for closing packages

Record or media type	USB drive used for closing packages
Format	Device
Location	Office Manager drawer
Observation period	Q1 2026
Current disposal practice	Reused without erasure
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the usb drive used for closing packages stored at the office manager drawer was handled as follows: reused without erasure. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever.

Oversight status

No one reviewed how the usb drive used for closing packages at the office manager drawer was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0024. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.025 - Disposal inventory record: Paper credit report

Record or media type	Paper credit report
Format	Paper
Location	File room locked cabinet
Observation period	Q4 2025
Current disposal practice	Sent to destruction vendor quarterly; no certificate requested
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the paper credit report stored at the file room locked cabinet was handled as follows: sent to destruction vendor quarterly; no certificate requested. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred.

Oversight status

No one reviewed how the paper credit report at the file room locked cabinet was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0025. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.026 - Disposal inventory record: Photocopy of consumer report

Record or media type	Photocopy of consumer report
Format	Paper
Location	Copy room
Observation period	Q3 2026
Current disposal practice	Placed in ordinary office recycling when the cabinet is full
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the photocopy of consumer report stored at the copy room was handled as follows: placed in ordinary office recycling when the cabinet is full. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program.

Oversight status

No one reviewed how the photocopy of consumer report at the copy room was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0026. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.027 - Disposal inventory record: Loan officer handwritten notes derived from consumer report

Record or media type	Loan officer handwritten notes derived from consumer report
Format	Paper
Location	Loan officer desks
Observation period	Q2 2026
Current disposal practice	Kept in folders with no disposal decision
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the loan officer handwritten notes derived from consumer report stored at the loan officer desks was handled as follows: kept in folders with no disposal decision. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage.

Oversight status

No one reviewed how the loan officer handwritten notes derived from consumer report at the loan officer desks was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0027. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.028 - Disposal inventory record: Exported pipeline spreadsheet

Record or media type	Exported pipeline spreadsheet
Format	Electronic
Location	Loan officer laptop
Observation period	Q1 2026
Current disposal practice	Deleted after closing with no deadline; not securely erased
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the exported pipeline spreadsheet stored at the loan officer laptop was handled as follows: deleted after closing with no deadline; not securely erased. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two.

Oversight status

No one reviewed how the exported pipeline spreadsheet at the loan officer laptop was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0028. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.029 - Disposal inventory record: Exported pipeline spreadsheet (shared copy)

Record or media type	Exported pipeline spreadsheet (shared copy)
Format	Electronic
Location	Shared drive
Observation period	Q4 2025
Current disposal practice	Kept indefinitely per Office Manager instruction
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the exported pipeline spreadsheet (shared copy) stored at the shared drive was handled as follows: kept indefinitely per office manager instruction. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed.

Oversight status

No one reviewed how the exported pipeline spreadsheet (shared copy) at the shared drive was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0029. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.030 - Disposal inventory record: Scanned borrower application

Record or media type	Scanned borrower application
Format	Electronic
Location	Shared drive scans folder
Observation period	Q3 2026
Current disposal practice	Kept indefinitely; no review date
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the scanned borrower application stored at the shared drive scans folder was handled as follows: kept indefinitely; no review date. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages.

Oversight status

No one reviewed how the scanned borrower application at the shared drive scans folder was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0030. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.031 - Disposal inventory record: Retired laptop hard drive

Record or media type	Retired laptop hard drive
Format	Device
Location	Unlocked storage room
Observation period	Q2 2026
Current disposal practice	Awaiting pickup; sanitization not verified
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the retired laptop hard drive stored at the unlocked storage room was handled as follows: awaiting pickup; sanitization not verified. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed.

Oversight status

No one reviewed how the retired laptop hard drive at the unlocked storage room was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0031. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.032 - Disposal inventory record: Nightly backup set

Record or media type	Nightly backup set
Format	Electronic
Location	Backup appliance
Observation period	Q1 2026
Current disposal practice	Not listed in retention inventory; no deletion schedule
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the nightly backup set stored at the backup appliance was handled as follows: not listed in retention inventory; no deletion schedule. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal.

Oversight status

No one reviewed how the nightly backup set at the backup appliance was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0032. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.033 - Disposal inventory record: Archived borrower boxes

Record or media type	Archived borrower boxes
Format	Paper
Location	Records vendor (fictional, off-site)
Observation period	Q4 2025
Current disposal practice	Held by vendor; contract not reviewed for disposal duties
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q4 2025, the archived borrower boxes stored at the records vendor (fictional, off-site) was handled as follows: held by vendor; contract not reviewed for disposal duties. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files.

Oversight status

No one reviewed how the archived borrower boxes at the records vendor (fictional, off-site) was handled during Q4 2025. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0033. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.034 - Disposal inventory record: Email attachments with credit report PDFs

Record or media type	Email attachments with credit report PDFs
Format	Electronic
Location	Mailbox archives
Observation period	Q3 2026
Current disposal practice	Kept indefinitely; no purge rule
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q3 2026, the email attachments with credit report pdfs stored at the mailbox archives was handled as follows: kept indefinitely; no purge rule. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when. Records held by the vendor have never been inventoried or reconciled against Bluebird's own files. No one has checked whether copier or scanner storage retains images of consumer report pages. Former employees' laptops were not reviewed for local copies of borrower spreadsheets before storage. The draft contradicts itself by asking staff to delete local copies while keeping shared copies forever. No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason.

Oversight status

No one reviewed how the email attachments with credit report pdfs at the mailbox archives was handled during Q3 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0034. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.035 - Disposal inventory record: Scanner internal storage

Record or media type	Scanner internal storage
Format	Device
Location	Multifunction copier
Observation period	Q2 2026
Current disposal practice	Not considered in this draft
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q2 2026, the scanner internal storage stored at the multifunction copier was handled as follows: not considered in this draft. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

No budget or schedule exists for any of the proposed remediation steps. Management has not reviewed or signed this procedure. There is no training on disposal for staff who handle consumer report information. No exception process exists for records that must be kept longer for a legal reason. Ordinary recycling does not render consumer information unreadable or unable to be reconstructed. Deleting a file is not the same as secure erasure; the draft does not distinguish the two. No certificate of destruction is required from the vendor, so there is no evidence that destruction occurred. The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed.

Oversight status

No one reviewed how the scanner internal storage at the multifunction copier was handled during Q2 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0035. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.

Appendix F.036 - Disposal inventory record: USB drive used for closing packages

Record or media type	USB drive used for closing packages
Format	Device
Location	Office Manager drawer
Observation period	Q1 2026
Current disposal practice	Reused without erasure
Retention rule	None - keep indefinitely (Office Manager instruction) - intentional test gap
Disposal method verified	No - intentional test gap
Evidence on file	None - no disposal log, no certificate of destruction
Owner	Unassigned (Records Manager proposed, not appointed)

Current practice described

During Q1 2026, the usb drive used for closing packages stored at the office manager drawer was handled as follows: reused without erasure. This record contains consumer information or information derived from a consumer report. The draft procedure does not state when the information is no longer needed, who decides, or which disposal method must be used. No one checks whether the practice was followed, and no evidence of any disposal event is retained. Staff interviewed for this record said they follow the practice because it has always been done that way, and no written instruction or training tells them otherwise.

Gap checklist (current state)

- Retention schedule entry for this record type: absent.
- Legal-hold check before disposal: absent.
- Secure destruction or erasure method specified: absent.
- Vendor due diligence and monitoring: absent or undocumented.
- Certificate of destruction or disposal log entry: absent.
- Periodic review of this procedure: absent.
- Cross-reference from the written information security program: absent.

Reviewer notes

The vendor was not selected through documented due diligence and is not monitored. The Office Manager instruction to keep every electronic copy indefinitely means no record ever reaches a disposal decision. No legal-hold process exists, so the company cannot show why any record is retained. Retired devices sit in an unlocked room and no one verifies that drives are sanitized or destroyed. Backup copies are not listed in the retention inventory, so they are never considered for disposal. There is no disposal log and no periodic check of whether this procedure is followed. The procedure has not been cross-referenced from the written information security program. The Records Manager role is proposed but not assigned, so this record has no accountable owner. Any remediation listed below is a proposal only and has not been adopted or funded. Staff were not told which records are consumer information, so the same practice is applied to every file. The quarterly vendor pickup is not logged, so the company cannot say which folders left the office or when.

Oversight status

No one reviewed how the usb drive used for closing packages at the office manager drawer was handled during Q1 2026. The Office Manager has not documented how the destruction vendor is selected or monitored, does not require a certificate of destruction, and has not added this procedure to the written information security program. These statements describe current practice and are intentionally left unresolved in this fixture.

Proposed remediation (NOT adopted): assign an owner, add this record type to a retention schedule, and use secure destruction with retained evidence. Record ID BMB-DR-0036. Synthetic test fixture for a fictional company; the unsafe practices above are intentional and should be reported as gaps.