Bulk Data Rule High-Level Decision Tree

The DOJ Bulk Data Rule prohibits or restricts U.S. entities from transferring or allowing bulk transfers of U.S.-related sensitive or government data to certain individuals and/or countries of concern.

Fully enforceable as of mid-2025, it mandates robust data governance and technical controls—failure of which risks severe civil and criminal penalties. Examples, applicable at various thresholds, include: personal identifiers (e.g., name, address), personal financial or health data, precise geolocation, biometrics, 'omic data, and genomic data.

The Bulk Data Rule applies even if the data to be shared has been de-identified, anonymized, pseudonymized, or encrypted.

Please answer the following questions to determine whether further analysis is needed.

1. As part of your contract/agreement (or a continuing series of agreements with the same entity), will you share any of the following:

Type of Data	Thresholds	Yes/No
Covered personal identifiers of U.S. persons	> 90,000	☐ Yes or ☐ No
Personal financial data of U.S. persons	> 9,000	☐ Yes or ☐ No
Personal health data of U.S. persons	> 9,000	☐ Yes or ☐ No
Precise geolocation data, biometric identifiers, human 'omic data (other than human genomic data) of U.S. persons and/or devices	> 900	☐ Yes or ☐ No
Human genomic data of U.S. persons	> 90	☐ Yes or ☐ No
Combination of the data detailed above	Any	☐ Yes or ☐ No

2. If you answered 'yes' to any of the categories in Question 1, will the data be provided to a person or entity domiciled in or affiliated with a person or entity domiciled in a country of concern (China (including Hong Kong and Macau), Russia, Iran, North Korea, Cuba, and Venezuela)? ☐ **Yes** or ☐ **No**

3. If you answered 'yes' to any of the categories in Question 1, will the data be provided to any foreign person or entity (> 50% owned)? ☐ **Yes** or ☐ **No**

If you answered 'yes' to any of the questions above, please contact exportcontrols@cornell.edu.