CIP COMPLIANCE MAP

The Section 326 CIP compliance map

Zyphe

The same statutory duty, met two ways. Compliance is an architecture decision, not a checklist.

CIP DUTY (31 CFR 1020.220)	WHAT THE LAW LITERALLY REQUIRES	CENTRALISE EVERYTHING AND ITS LIABILITY	PRIVACY-FIRST WAY TO MEET THE SAME DUTY
Collect	Name, date of birth, address, and identification number for each individual customer.	✗ Pile raw documents and identifiers into one database, a single high-value target.	✓ Capture and shard data so no single store holds a complete record.
Verify	Confirm identity within a reasonable time, documentary or non-documentary.	✗ Upload and retain image scans on central servers indefinitely.	✓ Read identity from an NFC chip to ICAO 9303 and eIDAS with two-step liveness, no image upload.
Record	Maintain records of the information used to verify identity.	✗ Keep the full plaintext record in one place, conflating retention with centralisation.	✓ Retain an exportable, audit-ready trail without a central plaintext honeypot.
Screen	Check the customer against government terrorist lists, with adequate notice.	✗ Couple screening to the same central PII store, widening the blast radius.	✓ Screen against lists while identity stays sharded and access-controlled.

Section 326 says record the information used to verify identity. It never says build a central PII honeypot.

Zyphe shards verified data across thousands of nodes under a 29-of-100 threshold scheme, so no single node holds a complete record. The customer holds the key.

zyphe.com · General information, not legal advice