



# governmentattic.org

*"Rummaging in the government's attic"*

Description of document: Securities and Exchange Commission (SEC) publication:  
Safety and Security For U.S. SEC Employees Traveling  
Abroad, SEC Security office, 2013

Requested date: 21-February-2017

Appealed date: 23-February-2017

Released date: 27-June-2017

Posted date: 07-August-2017

Source of document: FOIA Request  
Securities and Exchange Commission  
100 F Street NE  
Mail Stop 2465  
Washington D.C. 20549  
Fax: 202-772-9337  
[Online Request for Copies of Documents](#)

The governmentattic.org web site ("the site") is noncommercial and free to the public. The site and materials made available on the site, such as this file, are for reference only. The governmentattic.org web site and its principals have made every effort to make this information as complete and as accurate as possible, however, there may be mistakes and omissions, both typographical and in content. The governmentattic.org web site and its principals shall have neither liability nor responsibility to any person or entity with respect to any loss or damage caused, or alleged to have been caused, directly or indirectly, by the information provided on the governmentattic.org web site or in this file. The public records published on the site were obtained from government agencies using proper legal channels. Each document is identified as to the source. Any concerns about the contents of the site should be directed to the agency originating the document in question. GovernmentAttic.org is not responsible for the contents of documents published on the website.



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

OFFICE OF THE  
GENERAL COUNSEL

Stop 9612

June 27, 2017

*Via electronic mail*

Re: Appeal, Freedom of Information Act Request No. 17-01785-FOIA, designated on appeal as No. 17-00343-APPS

This responds to your Freedom of Information Act (FOIA) appeal of the FOIA Officer's decision regarding your February 21, 2017 FOIA request for a "digital/electronic copy of guidance to SEC employees concerning foreign travel contained in the International Travel section of the SEC Inside Intranet website." By letter dated April 20, 2017, the FOIA Officer denied your request, withholding a four-page document pursuant to 5 U.S.C. §§ 552(b)(2), (b)(5). On February 23, 2017, you filed an appeal challenging the FOIA Office's decision to withhold this record.

I have considered your appeal and it is granted. Enclosed is a copy of the requested record – "Safety and Security for U.S. SEC Employees Traveling Abroad." If you have any questions regarding this determination, please contact Mark Tallarico, Senior Counsel, at 202-551-5132.

For the Commission  
by delegated authority,

A handwritten signature in black ink, appearing to read "R. Humes".

Richard M. Humes  
Associate General Counsel

Enclosure

# U.S. Securities and Exchange Commission



*"The willingness of US scientists and scholars to engage in academic exchange make US travelers particularly vulnerable not only to standard electronic monitoring devices—installed in hotel rooms or conference centers— but also to simple approaches by foreigners trained to ask the right questions."*

Annual Report to Congress on Foreign Economic Collection and Industrial Espionage, 2003.

## SAFETY AND SECURITY

### *For U.S. SEC Employees Traveling Abroad*

*You or the SEC may be a target of a foreign country's efforts to obtain information in order to increase their market share, build their economies, or some other competitive advantage. Targeting methods include luggage searches, extensive questioning, and unnecessary inspection and downloading of information from laptop computers, cell phones, and hand held devices.*



*Travelers should take measures to ensure not only the safety and security of themselves, but also SEC information while traveling outside the United States.*



The SEC Personnel Security Office encourages all travelers to register with the U.S. Department of State's Smart Traveler Enrollment Program (STEP) (<https://step.state.gov/step>) prior to foreign travel to receive the latest security updates.

Corporate espionage is an increasingly serious threat for a traveler. The perpetrator may be a competitor, opportunist, or foreign intelligence officer. In many countries, domestic corporations collect competitive intelligence with the help and support of their government. To mitigate this risk, Commission critical information and technologies should not reside on any hard copy or electronic device you take unless it is absolutely necessary, and if so, then you must safeguard the physical access to the information by using encryption and keeping the material on your person at all times. Hotel safes are not adequate protection.

#### Critical business information may include:

- ◆ Customer data
- ◆ Employee data
- ◆ Vendor information
- ◆ Pricing strategies
- ◆ Proprietary formulas and processes
- ◆ Technical components and plans
- ◆ Corporate strategies
- ◆ Corporate financial data
- ◆ Phone directories
- ◆ Computer access protocols
- ◆ Computer network design
- ◆ Acquisition strategies
- ◆ Marketing strategies
- ◆ Investment data
- ◆ Negotiation strategies
- ◆ Passwords (computer, phone, accounts)

## Before You Go

**Familiarize yourself with local laws and customs** in the areas you plan to travel. You are expected to obey their laws, which may include dress standards, photography restrictions, telecommunication restrictions, curfews, etc.



**Plan your wardrobe** so that it does not offend the locals, nor draw unwanted attention to yourself. Americans are perceived as wealthy and are targeted for pick pocketing and other crimes. Do not wear expensive-looking jewelry and avoid wearing American team

sports shirts or baseball caps that might indicate you are an American.

**Make copies of your passport, airplane ticket, driver's license, and credit cards** that you take with you. Keep one copy at home; carry a second copy with you but separate from the originals. This will help speed the replacement process if they are lost or stolen.

**Do not take unnecessary identification or credit cards** in case they are stolen. Take only what is necessary. Obtain traveler's checks if needed.

**Establish points of contact** for your family to contact and for your foreign hosts to contact in the event of an emergency. Register your trip with the State Department. Obtain the phone number and address for the US Embassy or Consulate in the countries you plan to visit.

**Take any necessary medications** with you in their original containers and keep them in your carry-on luggage (not checked baggage) during the flight. Verify you have adequate medical insurance.

**Obtain specific pre-travel country risk assessments** for the countries you plan to visit from the SEC Office of Security Services, the State Department, and/or the FBI. There may be specific issues you should be aware of and prepare for to ensure your safety and peace of mind.

**Visit [www.osac.gov](http://www.osac.gov)** for security news and reports for the countries you plan to visit.

**Sanitize your laptop, telephone, & PDA** prior to travel and ensure no sensitive contact, research, or personal data is on them. Back-up all information you take and at home. If feasible, use a "clean" laptop, phone and a new email account while traveling. Or **if you can do without the device, do not take it.**



**Cell phones can be hacked to steal contact lists, usernames, passwords, and browser history.**

**Use up to date protections** for antivirus, spyware, security patches, and firewalls.

**Clean out your voice mail.** When you access your messages, the passcode may become compromised and others may then retrieve your messages.



## During Your Stay

**Protect your passport!** Theft of American passports is on the rise. It is recommended that you carry your passport in a front pants pocket or in a pouch hidden in your clothes, and that it remains with you at all times. Some hotels require you to leave it at the desk during your stay and they may use it to register you with the local police—a routine policy. Ask for a receipt and be sure to retrieve your passport before continuing your trip. If your passport is lost or stolen, report the situation immediately to the nearest US Embassy or Consulate.

**Be courteous and cooperative** when processing through customs. Do not leave your bags unattended. Stay alert.

**Use authorized taxis.** You could be overcharged, robbed or kidnapped when using “gypsy” taxis.

**Do not invite strangers into your room.**

**Avoid traveling alone**, especially after dark. Be conscious of your surroundings and avoid areas you believe may put your personal safety at risk. Be wary of street vendors and innocent-looking youngsters. While one person has your attention, another might be picking your pocket.



**Do not carry large amounts of cash.** Always deal with reputable currency exchange officials or you run the risk of receiving counterfeit currency. Keep a record of your financial transactions.

**Be aware that theft** from hotel rooms or other areas such as sleeping compartments on trains is common.

**Do not leave drinks unattended** – someone could slip a drug into it that causes amnesia and sleep.

**Avoid long waits in lobbies and terminals**, if possible. These areas may harbor pickpockets, thieves, and violent offenders. Laptop theft is especially common in airports.

***At the airport, a thief preceded a traveler through a security checkpoint. After the traveler placed his laptop computer on the x-ray machine conveyor belt, a second thief set off the metal detector causing a delay. The first thief then stole the traveler's laptop after it passed through the x-ray machine.***

**If you are arrested** for any reason, ask to notify the nearest US Embassy or Consulate.

**Beware of new acquaintances who probe for information** about you or who attempt to get you into what could become a compromising situation.

**Avoid civil disturbances and obey local laws.** If you come upon a demonstration or rally, be careful; in the confusion you could be arrested or detained even though you are a bystander. Be mindful that in many countries, it is prohibited to speak derogatorily of the government and its leaders. It may be illegal to take photographs of train stations, government buildings, religious symbols, and military installations.

**Avoid any actions that are illegal, improper or indiscreet.** Avoid offers of sexual companionship; it may lead to a room raid, photography, and blackmail. Do not attempt to keep up with your hosts in social drinking. Do not engage in black market activities. Do not sell your possessions. Do not bring in or purchase illegal drugs or pornography. Do not seek out political or religious dissidents. Do not accept packages or letters for delivery to another location.

***An American was given a letter by a man he had never met. He tried to return the letter but the man ran away. That evening national security officers visited the American and admonished him for taking the letter.***

**Keep a low profile and shun publicity.** Do not discuss personal or business information with local news media and be careful what type of information you share with foreigners. They may have been directed to obtain information in order to exploit you or your family. Politely redirect the topic.

**Evade criminals and terrorists by being aware of your surroundings** and alert to the possibility of surveillance. Take mental notes of anyone following you and promptly report it to the appropriate security officials and/or the US Embassy or Consulate. In general, criminals will strike when their target seems most lax about his/her security. If anyone grabs you, make a scene—yell, kick and try to get away! If you are kidnapped, remain alert and establish a program of mental and physical activity for yourself; try to remain calm and non-threatening.

**Do not gossip about character flaws**, financial problems, emotional relationships, or other difficulties of your fellow Americans or yourself. This information is eagerly sought by those who want to exploit you or your fellow travelers.

## During Your Stay



**Be aware that your conversations may not be private or secure.** Unlike The United States, most other countries do not have legal restrictions against technical surveillance. Most foreign security services have various means of screening incoming visitors to identify persons of potential intelligence interest.

They also have well

established contacts with hotels and common hosts that can assist in various forms of monitoring you. Electronic eavesdropping has been reported on airlines, in hotel rooms, taxis, and meeting rooms.

**Business and government travelers have reported their hotel rooms and belongings were searched while they were away. Sometimes there was no effort to conceal the search.**

**Do not leave electronic devices unattended.** Do not transport them (or anything valuable) in your checked baggage. Shield passwords from view. Avoid Wi-Fi networks if you can. In some countries they are controlled by security services; in all cases they are insecure.

**Clear your Internet browser** after each use: delete history files, caches, cookies, and temporary internet files.

**If your phone or laptop is stolen,** report it immediately to the local US Embassy or Consulate.

**Do not use non-issued computers to log into the SEC network.** Always consider any information conveyed through a non-issued computer to be compromised, even if encrypted.

**Cyber criminals from numerous countries buy and sell stolen financial information including credit card data and login credentials (user names and passwords).**

**Do not allow foreign electronic storage devices to be connected to your computer or phone.** They may contain malware or automatically copy your stored electronic data. Do not use thumb drives given to you – they may be compromised.

**In most countries, you have no expectation of privacy** in Internet cafes, hotels, airplanes, offices, or public spaces. All information you send electronically can be intercepted, especially wireless communications. If information might be valuable to another government, company or group, you should assume that it will be intercepted and retained. Security services and criminals can track your movements using your mobile phone and can turn on the microphone in your device even when you think it is turned off.

**During the Beijing Olympics, hotels were required to install software so law enforcement could monitor the Internet activity of hotel guests.**

**Beware of “phishing.”** Foreign security services and criminals are adept at pretending to be someone you trust in order to obtain personal or sensitive information.

## Upon Your Return

**Review your system access with your OIT staff or the OIT Information Security Officer.** Access that is not accounted for should be investigated.

**It is not uncommon for foreigners to contact you** after your return. The SEC Security office will be able to help you determine if these contacts pose any risk to you or the SEC.

**Change all your passwords** including your voicemail and check electronic devices for malware.

**Report any unusual circumstances** or noteworthy incidents to the SEC security office and to the FBI. Notifying the FBI will help ensure that future travel advisories take into consideration the circumstances and incidents you encountered.



SEC Security office #: (202) 551-2222  
SecurityMailbox@sec.gov

August 13, 2013