



# EXCHANGE

## PRIVACY IMPACT ASSESSMENT (PIA)

Exchange Official Personnel Folder
Human Resource

Questions relative to this document should be directed to the Exchange HQ Information Technology Governance Risk Management or to the Exchange Office of General Counsel, Compliance Division by mail to 3911 S. Walton Walker Blvd., Dallas, TX 75236.

**OBJECTIVE:** The objective of a PIA is to determine the scope, justification, and Privacy Act applicability for systems collecting, storing, or processing sensitive, personal data that may be concerned to be private. A PIA should be completed prior to development/procuring any new IT system which collects/maintains such information or updated when a significant change is made to the system. The completed PIA should be directed to the system owner, to the IT-Government (IT-G) representative, and to the Office of General Counsel, Compliance Division (OGC-C).

### SECTION 1: IS A PIA REQUIRED?

**A. Will this Exchange information system or electronic collection of information collect, maintain, use, and/or disseminate Personal Identifiable Information (PII) about members of the public, federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? (Mark all that apply).**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Members of the General Public.          | <input type="checkbox"/> Foreign Nationals                  |
| <input checked="" type="checkbox"/> Federal Personnel / Exchange Associates | <input type="checkbox"/> Federal Contractors and/or Vendors |

**B. If no items are marked in question A, you may stop here. Have this PIA signed and return it to the system owner. A copy should also be directed to IT-G and to OGC-C.**

**C. If any item in A is marked, proceed to Section 2.**

## SECTION 2: PIA SUMMARY INFORMATION

### A. Why is this PIA being created or updated? Choose one:

- New Information System                       New Electronic Collection
- Existing Information System                       Existing Electronic Collection
- Significantly Modified Information System

If unsure, consult IT-G or OGC-C.

### B. Does this information system or electronic collection require a Privacy Act System of Records Notice (SORN)? [if unknown, please contact OGC-C]

A Privacy Act SORN is required if the information system or electronic collection contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

- Yes                       No, a SORN is not required for this system.

If "Yes," enter Privacy Act SORN Identifier

AAFES 0401.04

Date of submission for approval to Defense Privacy Office  
Consult the OGC-C for this date.

April 2016

### C. Does this information system or electronic collection have an Office of Management & Budget (OMB) Control Number? [If unknown, contact OGC-C].

- Yes

Enter OMB Control Number

0702-0129

Enter Expiration Date

31 DEC 18

- No

### D. Authority to collect information. Please list the Federal law, Executive Order of the President (EO), or regulation which authorizes the collection and maintenance of a system of records. [If unknown, contact OGC-C]

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) Cite the authority for this information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.) i.e. Title 10 U.S.C. § 3013, "Secretary of the Army".

(a) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect authority may be cited if the authority requires the operation or administration of a program, the execution of which will require the collection and maintenance of a system of records.

(c) The Exchange may use Exchange Operating Procedures, Exchange Standards of Operations, or CEO Guidance as the primary authority. The requirement, directive, or instruction implementing the statute within the Exchange should be identified.

10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 8013, Secretary of the Air Force; Army Regulation 215-8/AFI 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN), as amended.

**E. Summary of information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.**

(1) Describe the purpose of this information system or electronic collection.

The Official Personnel Folder and other general personnel records is the official repository of employment records, reports of personnel actions, and documents and papers required in connection with actions effective during an employee's service with the Exchange. Records include the basic source of factual data about a person's employment and has various uses by Exchange personnel office. These include screening qualifications of employees, determining employment status, eligibility, and employee's rights and benefits, computing length of service, and other information needed to provide personnel services. It is also the repository of the employee's dependents and records associated with benefits and shopping privileges.

(2) Briefly describe the types of personal information about individuals collected in this system.

Individual's name, social security number (SSN), Exchange location, home address, date of birth, date of hire, race, hair color, color of eyes, height and weight, sex, marital status, citizenship, disability statement, home owner statement, acknowledgment of foreign languages, DoD ID number, Exchange LAN ID, leave accrual data, retirement participation data, service award data, security clearance, military status, job qualifications, notification from the Exchange concerning selection/non-selection, sponsor affiliation and relationship where employee is a dependent of a U.S. Government/military member, job code and title, employment category, pay plan, wage schedule, base hourly rate, scheduled work week, Federal and state tax exemptions, personal bank account information, type of insurance and annuity coverage, authorized deductions, allotments, life insurance coverage, physical examination documents, education and experience, licenses, copies of certificates of appointment, career plans, mobility statement and assignment preferences, personnel evaluation reports, awards, award justification, accomplishments, training course data, organization in which employed, personnel actions such as reprimands, transfers, appointments, reassignments and separations, travel orders, and clearance documents, legal documents in the nature of garnishments, withholdings, and proceedings for the enforcement of child support and alimony obligations.

(3) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Risk: data leakage. Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) with an official "need to know" who are responsible for servicing the record in the performance of their official duties. Persons are properly screened and cleared for access.

**F. With whom will the PII maintained in this system be shared? (i.e., other DoD Components, Federal Agencies)?** Indicate all that apply. Questions should be coordinated with OGC-C.

**Within the Exchange.**

Specify.

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

**Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

**Other** (e.g., commercial providers, colleges).

Specify.

Private Attorneys and Legal Staff and delegated third parties based on individual's written request.

**G. Do individuals have the opportunity to object to the collection of their PII (opt-out)?**

Yes  No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Individuals are provided the privacy act statement which includes the use and routine disclosures of the information they voluntarily provide to the Exchange. Individuals when appearing face-to-face with an Exchange associate have the option of withdrawing their desire to provide personal information. When information is requested through on-line environments or through forms, the individual has the authority to stop processing or completion of the form, choosing not to divulge their personal information.

(2) If "No," state the reason why individuals cannot object.

n/a

**H. Do individuals have the opportunity to consent to the specific uses of their PII?**

Yes  No

(1) If "Yes," describe the method by which individuals can give or withhold their consent.

n/a

(2) If "No," state the reason why individuals cannot give or withhold their consent.

Information is used for the proper processing of HR, Pay, Benefits, Workers' Compensation Claims, Appeal of grievances, accident follow-up, employee legal issues and security clearance. Information provided is not used in a means for which it was not collected.

**I. What information is provided to an individual when asked to provide PII data? Indicate all that apply.**

Privacy Act Statement  Privacy Advisory

Exchange Privacy Policy

None

Other

Describe each applicable format listed above.

This electronic system is a repository of Information collected regarding the employee's tenure at the Exchange.

**IDENTITY CARD:**

**AGENCY DISCLOSURE NOTICE:**

The public reporting burden for this collection of information, OMB 0702-0129, is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services, at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

**PLEASE DO NOT RETURN YOUR RESPONSE TO THE ABOVE ADDRESS.**

Responses should be sent to your local Human Resources Office that provided you the form.

**PRIVACY ACT STATEMENT**

**AUTHORITY:** Title 10 U.S.C. §3013, "Secretary of the Army"; Title 10 U.S.C. §8013, "Secretary of the Air Force"; Army Regulation 215-8/AFI 34-211 (1), "Army and Air Force Exchange Service Operations"; and E.O. 9397 (SSN) as amended.

**PRINCIPAL PURPOSES(S):** To collect information necessary to process a request to obtain privileges as an authorized patron of the Exchange.

**ROUTINE USE(S):** Your records may be disclosed outside of DoD pursuant to Title 5 U.S.C. §552a(b)(3) regarding DoD "Blanket Routine Uses" published at <http://dpclid.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>. This includes disclosure to Federal agencies, and state, local and territorial government including to the U.S. Department of Justice/U.S. Attorneys, to the Department of Labor, Department of Veterans Affairs, Social Security Administration, Office of Personnel Management, Federal agencies that have special civilian employee retirement programs; or a national, state, county, municipal, or other publicly recognized charitable or income security administration agency.

**DISCLOSURE:** Voluntary, however, failure to provide all the requested information may result in the denial of your application for inadequate data.

**NOTE:**

**Sections 1 and 2 above will be posted to the Exchange's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.**

**The Exchange may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.**