



EXCHANGE

PRIVACY IMPACT ASSESSMENT (PIA)

Exchange Travel Files
Army & Air Force Exchange Service (Exchange) - 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 checked="" 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
- Existing Information System
- Significantly Modified Information System
- New Electronic Collection
- Existing Electronic Collection

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

0410.01

Date of submission for approval to Defense Privacy Office

Consult the OGC-C for this date.

January 2019

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

0702-0131

Enter Expiration Date

31 Jan 2019

- 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.

Title 10 U.S.C. 7013, Secretary of the Army; Title 10 U.S.C. 9013, Secretary of the Air Force; Army Regulation 215-1, The Administration of Morale, Welfare, and Recreation Activities and Non-appropriated Fund Instrumentalities; 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.

To process official travel requests for civilian employees of the Army and Air Force Exchange Service; to determine eligibility of individual's dependents to travel; to obtain necessary clearance where foreign travel is involved, including assisting individual in applying for passports and visas and counseling where proposed travel involves visiting/transiting communist countries and danger zones

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

This system maintains .eEmployee/potential employees and family member(s) full names, dates of birth, relationships, last five digits of employee's Social Security Number (SSN), Department of Defense Identification Number (DoD ID Number), home addresses, phone numbers (home, cell, and work), personal e-mail addresses, emergency contact name and phone number, employee and dependent's biographical information, passport numbers, employee's current pay grade and duty station, new duty station, and security clearances. System maintains documents pertaining to the travel of persons on official Government business, including travel assignment orders, authorized leave en route, availability of quarters and/or shipment of household goods and personal effects, travel expense vouchers and similar related documents.

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

The main privacy risk is data leakage. Administrative safeguards include periodic security audits, regular monitoring of individual security practices, and limiting access to personal information to those individuals who have a need to know to perform their official duties. Technical safeguards include individual user logins and passwords, intrusion detection system, encryption, and firewall protection. Physical safeguards include security guards, identification badges, key cards, safes, and cipher locks.

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.

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 may object to personal information being collected. However, without the collection of PII, the individual may not be approved to travel.

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

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.

After reading the Privacy Act Statement, individuals sign the official Travel Request for official orders. They are notified that their information is shared with certain organizations/agencies. Without the information collection, the Exchange cannot assist the individual with their travel needs.

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

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.

AGENCY DISCLOSURE NOTICE
The public reporting burden for this collection of information, 0702-0131, is estimated to average 45 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.

PRIVACY ACT STATEMENT
AUTHORITY: Title 10 U.S.C. 8013, Secretary of the Army; Title 10 U.S.C. 9013, Secretary of the Air Force; Army Regulation 215-1, The Administration of Morale, Welfare, and Recreation Activities and Non-appropriated Fund Instrumentalities; Army Regulation 215-8/AFI 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN), as amended.

PRINCIPAL PURPOSE(S)
To process official travel requests for civilian employees of the Army and Air Force Exchange Service; to determine eligibility of individual's dependents to travel; to obtain necessary clearance where foreign travel is involved, including assisting individual in applying for passports and visas and counseling where proposed travel involves visiting/transiting communist countries and danger zones.

ROUTINE USE(S)
In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, the records contained herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) in accordance with items listed in SORN AAFES 0410.01 including disclosures to the attaché or law enforcement authorities of foreign countries, the U.S. Department of Justice or Department of Defense legal/intelligence/investigative agencies for security, investigative, intelligence, and/or counterintelligence operations.

DISCLOSURE: Voluntary. However, failure to provide all information may result in denial of PCS orders.

A copy of SORN 0410.01 may be viewed at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/Army-Article-List/>. A copy of this Privacy Impact Assessment is viewable at <https://www.aafes.com/about-exchange/public-affairs/FOIA/assessments.htm>.

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.