

## PRIVACY IMPACT ASSESSMENT (PIA)

**PRESCRIBING AUTHORITY:** DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

**1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:**

Trusted Capital Digital Marketplace (TCDM)

**2. DOD COMPONENT NAME:**

If Other, enter the Component name in the box below.

**3. PIA APPROVAL DATE:**

Under Secretary of Defense for Acquisition and Sustainment (USD(A&S))

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4)   |

**b. The PII is in a:** (Check one)

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input type="checkbox"/> Existing DoD Information System               | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> Significantly Modified DoD Information System |   |

**c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.**

The Trusted Capital Digital Marketplace (TCDM) application is a website infrastructure designed to collect information from prospective DoD program business applicants and connect businesses and capital. TCDM is a DoD-led whole-of-government program supporting trusted partnerships between critical capability companies and capital providers. TCDM facilitates business relationships between eligible investors ("Capital Providers") and eligible small and medium-sized businesses that have been "downselected" by Department of Defense (DoD) Components based on relevancy, technical merit, business viability, or innovativeness ("Capability Providers"). The program is meant to help "small, innovative companies that do not have the resources to reach sources of capital. Information collected consist of names of business owners, email address, and phone number.

**d. Why is the PII collected and/or what is the intended use of the PII?** (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

CUI (e.g. Sensitive Personally Identifiable Information (PII), Tax, Financial, and Proprietary Business Information) is collected to execute the mission of the DoD Trusted Capital program.

**e. Do individuals have the opportunity to object to the collection of their PII?**  Yes  No

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

(2) If "No," state the reason why individuals cannot object to the collection of PII.

Failure to provide the requested information will prevent processing of a respondent's eligibility.

**f. 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.

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

Upon submission, a respondent authorizes the use of data by authorized DoD and contractor personnel with a need to know for purposes of Trusted Capital participation.

**g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided.** (Check as appropriate and provide the actual wording.)

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory | <input type="checkbox"/> Not Applicable |
|--|--|---|

This system contains Privacy Act Information, which is covered by the Privacy Act of 1974, as amended, 5 U.S.C. Section 552a, and it must

be protected from unauthorized access or use.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)**

Within the DoD Component

Specify.

Under Secretary of Defense for Acquisition and Sustainment (USD(A&S))

Other DoD Components

Specify.

The Office of the Secretary of Defense (OSD), the Military Departments (including the Reserve Components), the Office of the Chairman of the Joint Chiefs of Staff, the Combatant Commands, the Inspector General of the Department of Defense, the Defense Agencies, the DoD Field Activities and all other organizational entities of the Department of Defense (hereafter referred to collectively as the "DoD Components").

Other Federal Agencies

Specify.

State and Local Agencies

Specify.

Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Specify.

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

Specify.

**i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)**

Individuals

Databases

Existing DoD Information Systems

Commercial Systems

Other Federal Information Systems

**j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)**

E-mail

Official Form (Enter Form Number(s) in the box below)

Face-to-Face Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

Other (If Other, enter the information in the box below)

**k. Does this DoD Information system or electronic collection require a Privacy Act System of Records Notice (SORN)?**

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 must be consistent.

Yes  No

If "Yes," enter SORN System Identifier

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.d.defense.gov/Privacy/SORNs/>

or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

**l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority**

**for the system or for the records maintained in the system?**

(1) NARA Job Number or General Records Schedule Authority.

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

**m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.**

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.
- (2) If a SORN does not apply, cite the authority for this DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply).
  - (a) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.
  - (b) If direct statutory authority or an Executive Order does not exist, indirect statutory 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) If direct or indirect authority does not exist, DoD Components can use their general statutory grants of authority ("internal housekeeping") as the primary authority. The requirement, directive, or instruction implementing the statute within the DoD Component must be identified.

Section 1711 of Public Law 115-91, the National Defense Authorization Act for Fiscal Year 2018.

**n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (OMB) Control Number?**

Contact the Component Information Management Control Officer or DoD Clearance Officer for this information. This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

Yes     No     Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.
- (2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections."
- (3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

0704-0596, "Trusted Capital Digital Marketplace Application" Exp. 6/30/2021  
Extension Pending

**SECTION 2: PII RISK REVIEW**

**a. What PII will be collected** (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Biometrics                        | <input type="checkbox"/> Birth Date  | <input type="checkbox"/> Child Information                                  |
| <input checked="" type="checkbox"/> Citizenship            | <input type="checkbox"/> Disability Information                                      | <input type="checkbox"/> DoD ID Number                                      |
| <input type="checkbox"/> Driver's License                  | <input type="checkbox"/> Education Information                                       | <input type="checkbox"/> Emergency Contact                                  |
| <input checked="" type="checkbox"/> Employment Information | <input checked="" type="checkbox"/> Financial Information                            | <input type="checkbox"/> Gender/Gender Identification                       |
| <input type="checkbox"/> Home/Cell Phone                   | <input type="checkbox"/> Law Enforcement Information                                 | <input type="checkbox"/> Legal Status                                       |
| <input type="checkbox"/> Mailing/Home Address              | <input type="checkbox"/> Marital Status  | <input type="checkbox"/> Medical Information                                |
| <input type="checkbox"/> Military Records                  | <input type="checkbox"/> Mother's Middle/Maiden Name                                 | <input checked="" type="checkbox"/> Name(s)                                 |
| <input checked="" type="checkbox"/> Official Duty Address  | <input type="checkbox"/> Official Duty Telephone Phone                               | <input type="checkbox"/> Other ID Number                                    |
| <input type="checkbox"/> Passport Information              | <input type="checkbox"/> Personal E-mail Address                                     | <input type="checkbox"/> Photo  |
| <input type="checkbox"/> Place of Birth                    | <input checked="" type="checkbox"/> Position/Title                                   | <input type="checkbox"/> Protected Health Information (PHI) <sup>1</sup>    |
| <input type="checkbox"/> Race/Ethnicity                    | <input type="checkbox"/> Rank/Grade  | <input type="checkbox"/> Religious Preference                               |
| <input checked="" type="checkbox"/> Records                | <input type="checkbox"/> Security Information  | <input type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input type="checkbox"/> Work E-mail Address               | <input checked="" type="checkbox"/> If Other, enter the information in the box below |   |

Tax, Financial, and Proprietary Business Information.

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

- Yes     No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?

If "No," explain.

- Yes     No

**b. What is the PII confidentiality impact level<sup>2</sup>?**       Low     Moderate     High

<sup>1</sup>The definition of PHI involves evaluating conditions listed in the HIPAA. Consult with General Counsel to make this determination.

<sup>2</sup>Guidance on determining the PII confidentiality impact level, see Section 2.5 "Categorization of PII Using NIST SP 800-122." Use the identified PII confidentiality impact level to apply the appropriate Privacy Overlay low, moderate, or high. This activity may be conducted as part of the categorization exercise that occurs under the Risk Management Framework (RMF). Note that categorization under the RMF is typically conducted using the information types described in NIST Special Publication (SP) 800-60, which are not as granular as the PII data elements listed in the PIA table. Determining the PII confidentiality impact level is most effective when done in collaboration with the Information Owner, Information System Owner, Information System Security Manager, and representatives from the security and privacy organizations, such as the Information System Security Officer (ISSO) and Senior Component Official for Privacy (SCOP) or designees.

**c. How will the PII be secured?**

(1) Physical Controls. (Check all that apply)

- |  |  |
|--|--|
| <input type="checkbox"/> Cipher Locks      | <input type="checkbox"/> Closed Circuit TV (CCTV)                                    |
| <input type="checkbox"/> Combination Locks | <input type="checkbox"/> Identification Badges                                       |
| <input type="checkbox"/> Key Cards         | <input type="checkbox"/> Safes   |
| <input type="checkbox"/> Security Guards   | <input checked="" type="checkbox"/> If Other, enter the information in the box below |

Department of Defense Impact Level 4 (DoD IL4) required physical controls.

(2) Administrative Controls. (Check all that apply)

- Backups Secured Off-site
- Encryption of Backups
- Methods to Ensure Only Authorized Personnel Access to PII
- Periodic Security Audits
- Regular Monitoring of Users' Security Practices
- If Other, enter the information in the box below

Department of Defense Impact Level 4 (DoD IL4) required administrative controls.

(3) Technical Controls. (Check all that apply)

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Biometrics                    | <input type="checkbox"/> Common Access Card (CAC)                         | <input type="checkbox"/> DoD Public Key Infrastructure Certificates  |
| <input type="checkbox"/> Encryption of Data at Rest    | <input type="checkbox"/> Encryption of Data in Transit                    | <input type="checkbox"/> External Certificate Authority Certificates |
| <input type="checkbox"/> Firewall                      | <input type="checkbox"/> Intrusion Detection System (IDS)                 | <input type="checkbox"/> Least Privilege Access                      |
| <input type="checkbox"/> Role-Based Access Controls    | <input type="checkbox"/> Used Only for Privileged (Elevated Roles)        | <input type="checkbox"/> User Identification and Password            |
| <input type="checkbox"/> Virtual Private Network (VPN) | <input type="checkbox"/> If Other, enter the information in the box below |  |

Department of Defense Impact Level 4 (DoD IL4) required technical controls.

**d. What additional measures/safeguards have been put in place to address privacy risks for this information system or electronic collection?**