

## 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:

NAF Lodging Point of Sale (NAF LPOS)

### 2. DOD COMPONENT NAME:

Department of the Navy/United States Marine Corps

### 3. PIA APPROVAL DATE:

01/03/24

Marine Corps Manpower and Reserve Affairs (M&RA), Business and Support Services Division (MR)

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

**a. The PII is:** (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

☐ From members of the general public

☐ From Federal employees

☒ from both members of the general public and Federal employees

☐ Not Collected (if checked proceed to Section 4)

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

☐ New DoD Information System

☐ New Electronic Collection

☒ Existing DoD Information System

☐ Existing Electronic Collection

☐ 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 NAF Lodging Point of Sale (NAF LPOS) System is a Software as a Service (SaaS) Cloud Service Offering for managing and administering MCCS lodging and Marine Corps Hospitality Services (MCHS) (hereinafter called Marine Corps Lodging) reservations, accommodations, sales transactions, and services; recording payment of accounts; cash control; gathering occupancy data; determining occupancy breakdown; accounting for rentals and furnishings; and tracking data for statistical analysis and reporting for business optimization and to support regulatory requirements.

Types of personal information include: Name, contact information (business and personal), lodging reservation and transaction data, military status, financial information for payment processing, and vehicle information.

**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)

PII is collected for verification, identification, administrative, and mission-related uses.

**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.

Patrons traveling for leisure have the opportunity to object to the collection of their personal information during the reservation and check-in processes; however, failure to provide the requested information may result in ineligibility to access Marine Corps Lodging services.

Active duty service members and/or DoD civilians who are on official travel orders and are required to stay at official Marine Corps Lodging facilities, pending availability, do not have an opportunity to object to the collection of their PII.

Individuals are provided the ability to opt-out of future promotional communications.

**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.

Providing information is considered consent. All information collected on the individual may be used for mission-related and administrative use without further consent of the individual.

Individuals are provided the ability to opt-out of future promotional communications.

**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.)

☒ Privacy Act Statement ☐ Privacy Advisory ☐ Not Applicable

**PRIVACY ACT STATEMENT**

**AUTHORITY:** 10 U.S.C. 5013; 10 U.S.C. 5041; DoDI 1015.11; DoDI 1015.10; MCO 1700.30; and SORN N04066-4.

**PURPOSE:** Information will be accessed by Marine Corps Lodging personnel with a need-to-know to manage and administer lodging reservations, accommodations, sales transactions, and service activities.

**ROUTINE USES:** Information may be disclosed to current authorized contractors and vendors to accomplish a function related to this system of records and to credit card processors, banks, and other financial institutions to process payments. A complete list and explanation of applicable Routine Uses are accessible at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/NavyUSMC-Article-List/>.

**DISCLOSURE:** Voluntary; however, failure to provide the requested information may result in an ineligibility to access Marine Corps Lodging services.

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

☒ Within the DoD Component

Specify.

Marine Corps Lodging, MCCS finance, and Navy Exchange Service Command (NEXCOM) personnel with a lawful, government purpose.

☒ Other DoD Components (i.e. Army, Navy, Air Force)

Specify.

Army and Air Force Exchange Service (AAFES)

☐ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

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.

RMS North America LLC  
Language in the contract that safeguards PII includes requiring RMS to comply with the Privacy Act, applicable agency regulations, OMB Memorandum M-06-15, and National Institute of Standards and Technology, Special Publication 800-53.

Contracts for Raven Solutions (upon contract modification) and the vendor providing Global Distribution System (GDS) services (upon award) will include MCCS NAF privacy clauses with privacy safeguard language similar to FAR privacy clauses 52.224-1, 52.224-2, and 39.105.

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

Specify.

Agencies that conduct suitability/background checks; banking and financial institutions to include Bank of America; and credit card processors to include First Data Merchant Services (FDMS), Elavon Inc., and MilitaryStar Card (via AAFES).

**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

Existing DoD Information Systems are NEXCOM's Lodging Reservation Call Center and Defense Travel System (DTS) and DoD MyTravel systems via Global Distribution System (GDS).

Commercial System is RMS 9+, the hospitality cloud.

**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)

☒ In-Person Contact

☐ Paper

☒ Fax

☒ Telephone Interview

☒ Information Sharing - System to System

☒ Website/E-Form

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

<https://lodgingreservations.usmc-mccs.org/obookings3/Search/Index/9436/90/>

**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.

DON Records Schedule 4000-32, General Operations of Navy Exchanges and Non-Appropriated Funds Activities: Cutoff at end of CY. Destroy no earlier than 1 year and no later than 3 years after cutoff. Longer retention is authorized if required for business use.

**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.

SORN N04066-4, Navy Lodge Records, 73 FR 23448 (April 30, 2008) authorities: 10 U.S.C. 5013, Secretary of the Navy and E.O. 9397 (SSN), as amended.

In addition: 10 U.S.C. 5041, Headquarters, Marine Corps; DoDI 1015.11, Lodging Policy; DoDI 1015.10, Military Morale, Welfare, and Recreation Programs; and MCO 1700.30, Marine Corps Community Services Business Operations Manual.

**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.

OMB Control Number 0703-0072, Marine Corps Lodging Guest Registration and Feedback, with expiration date 06/30/2025