

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:

HAKU APP CORPORATION

2. DOD COMPONENT NAME:

Department of the Navy/United States Marine Corps

3. PIA APPROVAL DATE:

05/15/2025

Marine Corps Marathon Organization

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.

This is a commercial third-party vendor external IT service capability hosted in a cloud environment to support MCMO race management activities such as event registration for participants, payment activities, and communication and marketing efforts. In addition, it provides a means for MCMO to track and manage volunteer qualifications, activities, and reporting data associated with these actions.

Personal information requested includes name; date of birth; sex; citizenship; work and personal contact information (address, phone number, and email address); emergency contact information; medical and disability information; military status/affiliation, position, title, rank, and grade; employment information; professional certification/license number; possession of US government issued driver's license; associated group/team; t-shirt size; race information (such as expected finish time, team category, live map tracking and race results, and any physical or special accommodations requested); and payment processing 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 mission-related and administrative use.

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.

A Privacy Act Statement is provided to individuals at the point of registration so individuals may decide if they would like to provide their personal information. If they do not provide the requested information, participants and volunteers cannot complete the registration process.

In addition, individuals may opt out of receiving promotional communications by unsubscribing.

Lastly, MCMO provides race participants instructions during registration on how to claim their profile on the day of the race to opt-out of sharing and publishing their live map tracking data and race results. These instructions will also be displayed at the race event.

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.

Individuals may opt out of receiving promotional communications by unsubscribing. In addition, participants are provided instructions during registration on how to claim their profile on the day of the race to opt-out of sharing and publishing their live map tracking data and

race results. For all other data, providing information at the original source is considered consent and may be used for mission-related and administrative use in accordance with the purpose of the system without further consent of the individual.

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

PARTICIPANTS - PRIVACY ACT STATEMENT

AUTHORITY: 10 U.S.C. 5013; 10 U.S.C. 5041; DoD 7000.14-R Vol 13; SECNAVINST 1700.12B; MCMO Charter dtd 27 Mar 2017; and SORN M01710-2.

PURPOSE: Information requested is used for the purpose of managing and administering the Marine Corps Marathon Organization's (MCMO) running events and for marketing, statistical analysis, tracking, and reporting and documentation required in connection with these actions.

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 non-cash payments. Complete lists and explanations of the applicable routine uses are published in the authorizing SORNS available at <https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNS/>.

DISCLOSURE: Voluntary. However, failure to provide the requested information may result in ineligibility to participate in MCMO events.

VOLUNTEERS - PRIVACY ACT STATEMENT

AUTHORITY: 10 U.S.C. 5013; 10 U.S.C. 5041; DoDI 1015.15; DoDI 1100.21; DoD 7000.14-R Vol 13; SECNAVINST 1700.12B; MCO 5380.2; MCM Charter dtd 27 Mar 2017; and SORNS M01710-2 and NM05000-2.

PURPOSE: Information requested is used to acknowledge and document the volunteer agreement for Marine Corps Marathon Organization (MCMO) before the statutory individual is allowed to provide volunteer services.

ROUTINE USES: Information may be disclosed to current authorized contractors and vendors to accomplish a function related to this system of records. Complete lists and explanations of the applicable routine uses are published in the authorizing SORNS available at <https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNS/>.

DISCLOSURE: Voluntary. However, lack of a signed volunteer agreement will limit MCMO support and eliminate certain benefits to individuals donating voluntary services to MCMO.

PRIVACY ADVISORY

Your registration and participation in the Marine Corps Marathon Organization race Event is contingent on your accepting the following terms:

I have read and agree to the No Refund Agreement

I have read and agree to the Assumption of Risk and Hold Harmless Agreement and Publicity Release

I have read and agree to the method for opting-out of the sharing and publishing of my live map tracking data and race results.

I have read and agree to the Consent to Disclose my personal information to authorized MCMO volunteers and sponsors.

I have read and agree to the Privacy Act Statement.

Each of the above is clickable to open and must be read and acknowledged to complete your registration.

Assumption of Risk and Hold Harmless Agreement and Publicity Release

For considering my voluntary entry's acceptance in the Marine Corps Marathon Organization (MCMO) Event, I the undersigned, intending to be legally bound, forever release and hold harmless for myself, my heirs, executor and administrators, any and all rights and claims for damages, demands and any other actions, which I may have against the MCMO; U.S. Marine Corps; U.S. Government; U.S. National Park Service; volunteer medical support' all participating supporting agencies, sponsors; and those entities' representatives, successors and assignees, from my participation in the event, including for any and all injuries suffered by me because of my participation in this event. I verify I have full knowledge of the rigors of MCMO race Events and the risks, inherent or otherwise, involved with my participation that reasonable care, caution, instruction, and preparation cannot eliminate. These risks may involve substantial risks of minor and severe injury, including but not limited to: trip and falls caused by hazards in and around the course; loss of orientation, exhaustion, dehydration, and hyponatremia; unexpected contact with race participants, bystanders, or support personnel; fatigue, over-exertion, sun or heat stroke, cold injuries, hypothermia; sprains, muscle or ligament injury, and broken bones; and other injuries related to walking or running races and endurance events, up to and including permanent trauma, disability, or death. I assert that I am physically fit and have sufficiently trained to complete this event. I hereby freely and voluntarily ASSUME and accept ANY and ALL RISKS of my participation. I realize medical support for this event will consist primarily of volunteer medical personnel prepared to administer first-aid type assistance along the race course and the finish line.

The MCMO Events are open to all people who are physically fit. However, running is not recommended for people below the age of 10. It is also recommended anyone over the age of 35 and/or with a family history of heart disease consult with their physician before undertaking the event.

I hereby grant permission to the MCMO and its sponsors to use all information submitted in my application, and any photograph, videotape, motion pictures, recording and any other record of this event including race results, my likeness, name and completion time for any lawful purpose related to the race and post-race publicity. The United States Government has requested that I grant, release, and discharge certain rights arising from my appearance, or the appearance of an infant or minor child for whom I execute custody, in any picture, video, advertisement, or other recording or presentation as a result of my participation in the MCMO, Marine Corps Historic Half, MCM Event Series and other related events. I hereby grant and release to the United States Government the right to use my name, likeness, and personal information, or that of said infant or minor child, in any manner, and to photograph, videotape, make motion pictures, recordings or any other record o; to reproduce, duplicate, publish, exhibit, use or transmit the same or any parts thereof, by any means, in any manner and for any purpose whatsoever; and to do the same perpetually. This voluntary grant and release will not be made the basis of a future claim of any kind against the United States Government. I release and discharge the United States Government from any cause of action arising from my participation or the participation of the infant or minor child in the production. This grant, release, and discharge shall inure to the benefit of the United States Government, and its officers, agents, servants, and employees when acting in their official capacities; and to persons, firms or corporations contracting with the United States Government and state and local government entities supporting these events, and their heirs, executors, administrators, successors, or assigns; and to any other persons lawfully reproducing, distributing, exhibiting, or otherwise using the said production or any portion thereof. Runner data may be used to offer a limited number of race enhancements.

The Race Director reserves the right to reject any entry. No unauthorized bicycles, roller skates or other wheeled devices are permitted during the race; headphones and other similar devices are not advised.

I acknowledge that the entry fee paid with this registration application is non-refundable. I acknowledge and agree that MCMO in its sole discretion may delay or cancel the event if it believes the conditions on race day are unsafe. In the event the Event is delayed or canceled for any reason, including but not limited to: fire, threatened or actual strike, labor difficulty, work stoppage, insurrection, war, public disaster, flood, unavoidable casualty, acts of God or the elements, or any other cause beyond the control of MCMO there shall be no refund of the entry fee or any other costs.

Opting-out of the sharing and publishing of live map tracking data and race results. I hereby acknowledge that MCMO uses RTRT.me to track runners during race Events. I further acknowledge that per the RTRT.me privacy notice, I may make my profile invisible to others by Opting-out and still have ability to use the RTRT.me tracking results related to my participation in the race Event. I understand that Opting-out of the RTRT.me tracking for general public viewing must be done prior to each race Event that I participate by going to the RTRT App and claiming my account for that event.

Consent to Disclose: As a condition of my participation in the MCMO race Event, I am providing my written consent for the MCMO to disclose my personal information to MCMO authorized volunteers and sponsors so they may complete an official MCMO function relating to my registration and participation in the race Event..

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.

MCMO personnel (includes MCMO paid staff and approved volunteers (to include medical positions)) with a need to know; Information Overload (for real time race tracking); RTRT.me (timing); and a medical tracking app (pending selection).

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

Specify.

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

Specify.

☒ State and Local Agencies

Specify.

Local first responders and medical facilities

☒ 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.

Haku App Corporation
Upon award, language in the contract for safeguarding PII will include compliance with the Privacy Act and Agency implementing policies, privacy training, and breach reporting requirements.
VolunteerLocal. This volunteer tracking service is subcontracted from Haku App Corporation, all Marine Corps NAF privacy clauses from the original Haku contract will be added to this subcontract.

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

Sponsors include: current merchandise vendors to include

Specify. MarathonFoto, iTab, and Recover Brand; and current virtual race training vendors to include Runna.

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 | |

Commercial system includes Information Overload.

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) | |

Website/E-Forms URLs are specific for the individual races, which may be accessed from the official MCMO website at <https://www.marinemarathon.com/events/>. Information sharing system to system is the current contracted timing and race technology solution (Information Overload).

Sign up pages for <https://volunteerlocal.com> are unique to the various volunteer opportunities. Individuals are redirected to the respective sign up page when clicking on a volunteer opportunity posted on the official MCMO website at <https://www.marinemarathon.com/volunteer/>.

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 M01710-2 and NM05000-2

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. DAA-NU-2015-0001-0023 and DAA-NU-2015-0004-0029

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

(3) Retention Instructions.

For participant registration records: DON Records Schedule 1000-23, Morale and Welfare Program Management: TEMPORARY: Cutoff at CY. Destroy when 10 years old.

For volunteer records: DON Records Schedule 4000-32: General Operations of Navy Exchanges and Nonappropriated Funds Activities. TEMPORARY: Cutoff at end of Calendar Year (CY). Destroy no earlier than 1 year and no later than 3 years after cutoff. Longer retention is authorized if required for business use. *MCMO has determined the business use needs for volunteer record retention to be, "TEMPORARY: Cutoff at CY or when individual leaves the program. Destroy 3 years after cutoff."

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 M01710-2, Marine Corps Marathon Organization Event Records authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps: Function, Composition; DoD 7000.14-R Volume 13, Financial Management Regulations (FMR); SECNAVINST 1700.12B, Operation of Morale, Welfare, and Recreation Activities; and Marine Corps Marathon Charter, 27 March 2017.

SORN NM05000-2, Program Management and Locator System (January 24, 2008, 73 FR 4193) authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; and E.O. 9397 (SSN).

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.

OBM Control Number 0712-0005, "Marine Corps Marathon Race Applications," with expiration date 11/30/2026. As approved by ARDB, volunteer information will be included with the OMB renewal submission in 2026.