

## 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:**

ESMC - Enterprise Suite of Marketing Capabilities for Family and Morale Welfare and Recreation

**2. DOD COMPONENT NAME:**

United States Army

**3. PIA APPROVAL DATE:**

09/09/20

Headquarters Installation Management Command (HQ IMCOM), G9 Family and Morale, Welfare and Recreation

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

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

- |  |  |
|--|--|
| <input type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" 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 checked="" 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 purpose of the Enterprise Suite of Marketing Capabilities system for Family and Morale, Welfare and Recreation is to support patron awareness of Family and Morale, Welfare and Recreation programs, activities and products Army-wide and specific to each Garrison. The system helps the organization/command by providing a headquarters level corporate website, social media presence, email, and text communication for Family and Morale, Welfare and Recreation programs and a standardized mechanism and format for subordinate Family and Morale, Welfare and Recreation program websites, mobile applications, social media presence, email, and text communication at each Installation Management Command Garrison. The system provides each Installation Management Command Garrison the capability to list Family and Morale, Welfare and Recreation services, provide information on available programs, detail activity operating hours, provide activity contact information, market special events and provides a platform for paid commercial advertisements or recognition of commercial sponsorship providers. The type of information collected by the system is name, personal e-mail address, and personal 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)

Name, phone number, and email personally identifiable information is collected for administrative purposes to allow Family and Morale, Welfare and Recreation staff members to contact patrons who have self-completed a request for information regarding Family and Morale, Welfare and Recreation services, products and activities.

**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 may object to the collection of their personally identifiable information by not self completing a customer service request and using an alternative means to initiate contact with Family and Morale, Welfare and Recreation program or activity staff.

**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.

Patrons consent to use of their personally identifiable information by self-completing customer service request fields on a Family and Morale, Welfare and Recreation website within the Enterprise Suite of Marketing Capabilities system and hitting "send" to forward the request to the published Family and Morale, Welfare and Recreation information email associated with their area of program or activity interest.

Continued... (See attached)

**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

The Installation Management Command Family and Morale, Welfare and Recreation website and each of the subordinate Installation Management Command Garrison Family and Morale, Welfare and Recreation websites provide the following privacy notice and information.

**PRIVACY ACT STATEMENT**

Authority: Army Regulation 215-1, Morale, Welfare and Recreation

PRINCIPAL PURPOSE(s): To allow Family and Morale, Welfare and Recreation staff members to contact patrons regarding Family and Morale, Welfare and Recreation services, products and activities.

ROUTINE USE: The information collected will be used by Family and Morale, Welfare and Recreation staff to respond to patron messages requesting information.

DISCLOSURE: Voluntary. Your personal information security is highly important to us and is treated as such, with confidentiality following Army regulations and procedures. You may refuse to provide the data, or you may withdraw your consent to provide any data, for any reason, without consequences. Please note that providing this information is completely voluntary.

Continued.... (See attached)

**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  
 Other DoD Components  
 Other Federal Agencies  
 State and Local Agencies

Specify.  
Specify.  
Specify.  
Specify.

Installation Management Command Headquarters and Garrisons

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.

Contractor: PortlandLabs  
 Contract Number NAFBA-A-18-D-0007  
 C-11 PRIVACY POLICY.  
 A. Contractor shall respect Army NAF employee policies.  
 B. Contractor shall protect and adhere to fair electronic information practices.  
 C. Contractor shall not electronically process any personal information in any way that does not comply with applicable privacy policies, including but not limited to, adhering to the Department of Army regulation requirements in handling, processing, and protecting Personally Identifiable Information (PII).  
 1. Contractor shall follow the same regulatory policies, procedures, and guidance as a Government agency to include, Privacy Act of 1974 (5 USC 552a), DoD 5400.11, DoD 5400.11-R, and 32 CFR Part 505.  
 2. The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data. The Contractor shall also ensure the confidentiality, integrity, and availability of Government data in compliance with all applicable laws and regulations, including data breach reporting and response requirements, in accordance with NAF clause I-20 (BI-049) and I-21 (BI-050) for Privacy Act information. The Contractor shall also comply with federal laws relating to freedom of information and records management.  
 Continued... (See attached)

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)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Individuals            | <input type="checkbox"/> Databases          |
| <input type="checkbox"/> Existing DoD Information Systems  | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems |   |

Installation Management Command Headquarters Family Morale, Welfare and Recreation website and subordinate Garrison Morale, Welfare and Recreation websites and mobile applications within the Enterprise Suite of Marketing Capabilities for Family and Morale, Welfare and Recreation.

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

- |   |  |
|---|--|
| <input type="checkbox"/> E-mail   | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> Face-to-Face Contact                                     | <input type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax  | <input type="checkbox"/> Telephone Interview                                   |
| <input type="checkbox"/> Information Sharing - System to System                   | <input checked="" type="checkbox"/> Website/E-Form                             |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) |  |

Personally identifiable information will be collected through patron self completion of customer service request fields available on each of the Enterprise Suite of Marketing Capabilities for Family and Morale, Welfare and Recreation websites and mobile applications.

**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://dpclid.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.

Contract Retention:  
Contract will be destroyed 6 years and 3 months after the final period of performance.  
All Delivery Orders placed against the IDIQ will be deleted 6 years and 3 months from the date of final payment.  
Contract Clause:  
I.6 EXAMINATION OF RECORDS (NOV 2005) BI.011  
(a) The Contractor agrees that the Contracting Officer or the Contracting Officer's duly authorized representative shall have the right to examine and audit the books and records of the Contractor directly pertaining to the contract during the period of the contract and until the expiration of three years after the final payment under the contract.  
(b) The Contractor agrees to include the clause in (a) above, in all subcontracts.  
(End of clause)  
840 NARA Retention Instructions:  
Continued... (See attached)

**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.

Department of Defense Instruction 1015.10, Military Morale, Welfare and Recreation Programs requires the heads of the Department of Defense components to establish, manage and control Morale, Welfare and Recreation programs. The Installation Management Command Enterprise Suite of Marketing Capabilities for Family and Morale, Welfare and Recreation supports execution of this requirement.

**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.

Personally identifiable information entered at Installation Management Command Enterprise Suite of Marketing Capabilities for Family and Morale, Welfare and Recreation websites and mobile applications are self entered by authorized Family and Morale, Welfare and Recreation patrons supporting patron customer service requests for facts and are not considered public information collections in accordance with Department of Defense Manual 9810.01 Enclosure 8 Paragraph b (12).