



EXCHANGE

PRIVACY IMPACT ASSESSMENT (PIA)

Exchange Credit Program
Army and Air Force Exchange Service

Questions relative to this document should be directed to the Exchange Office of General Counsel, Compliance Division, ATTN: Privacy Manager by mail to 3911 S. Walton Walker Blvd., Dallas, TX 75236 or through e-mail to PrivacyManager@aafes.com.

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 OGC-C Privacy Manager for the Exchange will track, monitor, and approval all finalized PIA and compliance with the E-Government Act of 2002. Completed and approved PIAs will be forwarded to the system owner and to the IT-Government (IT-G) representative.

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 checked="" 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 Privacy Manager.

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 New Electronic Collection
- Existing Information System Existing Electronic Collection
- Significantly Modified Information System

If unsure, consult OGC-C Privacy Manager.

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

0702.34 AAFES

Date of submission for approval to Defense Privacy Office
Consult the OGC-C Privacy Manager for this date.

June 2019

C. Does this information system or electronic collection have an Office of Management & Budget (OMB) Control Number? [If unknown, contact OGC-C Privacy Manager].

- Yes

Enter OMB Control Number

0702-0137

Enter Expiration Date

August 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 Privacy Manager]

(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. § 7013, "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; Federal Claims Collection Act of 1966 (Pub.L. 89-508, as amended) and Debt Collection Act of 1982 (Pub.L. 97-365, as amended), as amended by the Debt Collection Improvement Act of 1996 (Pub.L. 104-134, section 31001) as codified in 31 U.S.C. §3711, Collection and Compromise; 31 CFR 285.11, Administrative Wage Garnishment; DoD Instruction 1330.21, Armed Services Exchange Regulations; DoD 7000.14-R, Department of Defense Financial Management Regulation Volume 13:, "Nonappropriated Funds Policy" and Volume 16: "Department of Defense Debt Management"; Army Regulation 215-8/Air Force Instruction 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.

Purpose: To process, monitor, and post audit accounts receivable, to administer the Federal Claims Collection Act, and to answer inquiries pertaining thereto. To collect indebtedness and determine customer's patron's eligibility to cash checks at Exchange facilities.

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

Types of Personal Information Collected in System: Individual's name, address, SSN, telephone number, cell number, work number, date of birth, gender, number of dependents, military branch of service, pay grade, and ETS/EOS date, bank and saving account numbers, bank names, Magnetic Ink Character Recognition Number (MICR), e-mail address, Exchange credit account number, monthly salary, other monthly income; name of spouse, spouse's monthly income and spouse's SSN; representative name, address and telephone number; authorized user's names, address, SSN, date of birth, gender, and relationship to account holder; returned checks, transaction data including items purchased, ATM/Debit/Credit card numbers and receipts; credit scores from credit reporting bureaus; salary/travel advances; military commander's name and business address; pecuniary liability claims; pay adjustment authorizations; and account statements.

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

Risk involved includes data leakage. Safeguards in place to protect PII include the following. Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) with an official "need to know" who are responsible for servicing the record in performance of their official duties. Persons are properly screened and cleared for access. Access to computerized data is role-based and further restricted by passwords, which are changed periodically. Credit card information is also subject to the Data Security Standards (DSS) promulgated by the Payment Card Industry (PCI) Security Council.

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 Privacy Manager.

Within the Exchange.

Specify. Exchange Directorates/Associates: Fraud, Attorneys, Paralegals, FA Associates/Mgr., HRM, HRSC, Loss Prevention, Inspector General

Other DoD Components.

Specify. DOA IG, DOAF IG; Office of Special Investigators

Other Federal Agencies.

Specify. Dept of Justice, US Attorney, Internal Revenue Service, Dept of Treasury, FBI, U.S. Postal Service Inspectors

State and Local Agencies.

Specify. Employers, State and Local Government, State Employment Offices, Child Support Services

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify. Transworld Systems, Inc. (TSI); Special Provisions provided in contract to safeguard personally identifiable information.

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

Specify. Private collection agencies; employers; consumer reporting agencies, former spouses for use in payments under Title 10 U.S.C. 1408; Legal Authorities, Civilian attorneys, U.S. Bankruptcy Courts

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 are provided a Privacy Act Statement along with the routine disclosures. Individuals have an option of halting application process. This is available through the on-line, paper application, or through an authorized/designated Exchange point of sale register. Failure to provide all the requested information or halting the application process may result in the denial of credit.

(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.

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

Pursuant to the Privacy Act of 1974, information collected may be disclosed and used for government debt purposes, legal issues, regulated reporting to the credit bureaus, to the Department of Treasury for tax purposes and treasury offsets relative to debt.

Individuals must consent in writing to the disclosure of their information to non-exempt third parties. Information may be disclosed to exempt third parties for appropriate reasons pursuant to the Privacy Act of 1974.

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.

PRIVACY ACT STATEMENT: AUTHORITY: Title 10 U.S.C. §7013, Secretary of the Army; Title 10 U.S.C. §9013, Secretary of the Air Force; Federal Claims Collection Act of 1966 (Pub.L. 89-508, as amended) and Debt Collection Act of 1982 (Pub.L. 97-365, as amended), as amended by the Debt Collection Improvement Act of 1996 (Pub.L. 104-134, section 31001) as codified in 31 U.S.C. §3711, Collection and Compromise; 31 CFR 285.11, Administrative Wage Garnishment; DoD Instruction 1330.21, Armed Services Exchange Regulations; DoD 7000.14-R, Department of Defense Financial Management Regulation Volume 13: "Nonappropriated Funds Policy" and Volume 16: "Department of Defense Debt Management"; Army Regulation 215-8/Air Force Instruction 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN), as amended.

PRINCIPAL PURPOSES(S): These forms collect personal information mandatory to process and provide the basis of approving participation in the Exchange Credit Program.

ROUTINE USE(S): Your records may be disclosed outside of DoD pursuant to Title 5 U.S.C. §552a(b)(3) regarding DoD "Blanket Routine Uses" published at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>. This includes disclosure to the Department of the Treasury, and a debt collection agency with which the United States has contracted for collection services to recover debts owed to the United States. To any employer (person or entity) that employs the services of others and that pays their wages or salaries, where the employee owes a delinquent nontax debt to the United States. The term employer includes, but is not limited to, State and local governments, but does not include any agency of the Federal Government. To consumer reporting agencies pursuant to 5 U.S.C. 552a(b)(12) as defined in the Fair Credit Reporting Act (14 U.S.C. 1681a(f)) or the Federal Claims Collection Act of 1966 (31 U.S.C. 3701(a)(3)). The purpose of this disclosure is to aid in the collection of outstanding debts owed to the Federal government; typically to provide an incentive for debtors to repay delinquent Federal government debts by making these debts part of their credit report. The disclosure is limited to information necessary to establish the identity of the individual, including name, address, and taxpayer identification number (Social Security Number); the amount, status, and history of the claim; and the agency or program under which the claim arose for the sole purpose of allowing the consumer reporting agency to prepare a commercial credit report. This disclosure will be made only after the procedural requirement of 31 U.S.C. 3711(f) has been followed.

DISCLOSURE: Voluntary, however, failure to provide all the requested information may result in the denial of your application for inadequate data.

AGENCY DISCLOSURE NOTICE: The public reporting burden for this collection of information, 0702-0137, is estimated to average 2 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.

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.