Overseas Private Investment Corporation
Privacy Impact Assessment (PIA)

Overview

Date of this Submission: March 20, 2006

System Owner: Alison Germak, Public Affairs Specialist

Department: Office of External Affairs

Title of system or information collection: Contact Management System (CMS)

Is this system or information collection new or is an existing one being modified? No

Does this system collect, maintain, and/or disseminate information in identifiable form (IIF) about members of the public? Yes

Identifying Numbers (Use N/A, where appropriate)

Unique Project Identifier Number: 184-20-02-00-01-4200-00-404-139

System of Records Number: OPIC-21, Contacts and Mailing Lists

OMB Information Collection Approval Number and Expiration Date: N/A

Other Identifying Number(s): N/A

Description

1. **Describe what information is to be collected (*e.g.*, nature and source).**

    The Contact Management System (CMS) houses OPIC's mailing and contact list for public relations purposes. It contains contact information on individuals who have a) requested either in writing, in person, by phone, fax, email, or via an electronic form on OPIC's web site, that they be placed on OPIC's mailing list, or b) been placed on OPIC's contact/mailing list by OPIC staff members who enter IIF about individuals directly into the database based on contacts they have made in the course of conducting OPIC business.

    IIF contained in the system includes name, organization name, job title, mailing address, business phone and fax numbers, email address, industrial sector, type of organization, regions of interest, industrial sectors of interest, OPIC programs of interest, and OPIC publications of interest.

2. **Explain why the information is being collected.**

    OPIC collects and maintains contact information on members of the public, business representatives, and stakeholder contacts who have either expressed an interest in OPIC materials or whom OPIC staff determine would benefit by receiving OPIC materials. The CMS aggregates the contact information required to effectively and efficiently execute the mission of OPIC's Office of External Affairs and for OPIC's program offices to conduct outreach regarding their products and services. This includes information enabling OPIC to contact individuals by mail, email, phone, or fax to provide information that OPIC determines would be of interest to potential clients or business partners.

3. **Describe the intended use of the information, and explain how the data collected are the minimum necessary to accomplish the purpose for this effort.**

    OPIC uses the information to mail hard and electronic copies of key annual publications, to email its electronic newsletter, and to distribute announcements regarding OPIC-sponsored events. The IIF contained in the CMS is used by OPIC solely for the purpose of distributing information about OPIC and OPIC-sponsored or co-sponsored events. The IIF contained within the CMS contains the minimum necessary data to contact members of the public who have stated that they are interested in receiving information on OPIC's programs and events, or whom OPIC staff have identified as being potentially interested in this information.

4. **Identify with whom the agency will share the collected information.**

   The information is maintained for OPIC internal use. It may be shared with other organizations that have a mission or interest similar to OPIC's, *e.g.*, other Federal agencies and/or corporate or non-profit co-sponsors, to distribute announcements regarding events in which OPIC is a co-sponsor. It may also be shared with members of Congress in response to their requests.

5. **Describe any opportunities individuals have to decline to provide information (i.e., where providing information is voluntary), or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.**

   Individuals who submit their information via OPIC's web site are informed of the purposes and uses of the information via written notice on the CMS web form. The form contains a link to OPIC's web privacy policy, which discusses the voluntary nature of the submission. There is opportunity to consent to particular uses of information in the context of regions, sectors, program, and publications of interest. Furthermore, individuals may edit their areas of interest or delete their own records through the OPIC web site once they have submitted their contact information to OPIC. Likewise, individuals may edit their areas of interest or delete their own records by contacting OPIC directly (e.g., by phone or email).

6. **Describe how the information will be secured (*e.g.*, administrative and technological controls).**

   Access is restricted by physical and computer-based access controls. The system that houses CMS data is secured within OPIC's local area network, which is in compliance with administrative, technical, and physical security controls commensurate with its level of sensitivity. Persons accessing the system externally are only able to access their own information as described above. Access to the system from within OPIC is strictly limited to employees on a need-to-know basis based on security privileges (username and password). All data are safeguarded in accordance with applicable government-wide guidelines and OPIC's Information Systems Security Program.

7. **Identify whether a system of records is being created under section 552a of Title 5, United States Code (the *Privacy Act),* or identify the existing Privacy Act system of records notice under which the records will be maintained.**

   The system is covered by OPIC-21, Contacts and Mailing Lists.

8. **Describe the choices the agency made regarding this IT system or collection of information as a result of performing the PIA.**

   Because the system and information collection were in operation at the time the PIA was conducted, OPIC made no choices regarding the IT system or the information collection as a result of performing the PIA. Additionally, OPIC implemented no post-implementation changes to its systems or information collection procedures as a result of performing the PIA.