

Department of the Treasury  
BUREAU OF ENGRAVING AND PRINTING

# Customer Tracking and Fulfillment



22 December 2011

# Privacy Impact Assessment (PIA)

---

## A. Contact Information

<b>System/Project Name</b>	Customer Tracking and Fulfillment (CTF)
<b>OMB Unique Identifier</b>	

<b>1. Who is the person completing this document?</b>	
<b>Name / Title</b>	Adam Besecker; Security Analyst
<b>Office/Division</b>	OCIITS/ITAC
<b>Phone Number</b>	(202) 874-3073
<b>Email Address</b>	adam.besecker@bep.gov

<b>2. Who is the system owner?</b>	
<b>Name / Title</b>	Dawn Haley; Chief
<b>Office/Division</b>	External Relations
<b>Phone Number</b>	(202) 874-3545
<b>Email Address</b>	dawn.haley@bep.gov

<b>3. Who is the system manager for this system or application?</b>	
<b>Name / Title</b>	Kevin Brown; Manager
<b>Office/Division</b>	External Relations
<b>Phone Number</b>	(202) 874-4393
<b>Email Address</b>	kevin.brown@bep.gov

<b>4. Who is the Information System Security Manager who reviewed this document?</b>	
<b>Name / Title</b>	Michael Pease; Manager
<b>Office/Division</b>	OCIITS
<b>Phone Number</b>	(202) 874-2651
<b>Email Address</b>	michael.pease@bep.gov

<b>5. Who is the Office/Bureau Privacy Officer who reviewed this document?</b>	
<b>Name / Title</b>	Keir Bancroft; Attorney/Advisor
<b>Office/Division</b>	Chief Counsel
<b>Phone Number</b>	(202) 874-5915
<b>Email Address</b>	keir.bancroft@bep.gov

<b>6. Who is the IT Reviewing Official?</b>	
<b>Name / Title</b>	David Redding; Manager
<b>Office/Division</b>	OCIITS
<b>Phone Number</b>	(202) 874-2953
<b>Email Address</b>	david.redding@bep.gov

---

## Privacy Impact Assessment (PIA)

---

### B. System Application/General Information

1. Does this system contain any PII?       No                       Yes

2. What is the purpose of the system/application?

*This is a system of systems to collect orders and fulfill sales over an ecommerce solution. Customers voluntarily provide PII as part of the process of registering for the BEP public facing storefront at [www.moneyfactorystore.gov](http://www.moneyfactorystore.gov). Customers enter order data into the website. This data is processed by Network Solutions, the hosting provider of the moneyfactorystore web site, the payment information is verified with Pay.gov, and the order is completed. The results of the order are forwarded to BEP and loaded into the SAP financial management system. The primary use of the data is to execute orders placed at the moneyfactorystore.gov web site.*

*BEP also uses this data to maintain a mailing list of customers and interested parties to provide continuous communication and/or promotional materials about existing and upcoming product offerings, record and maintain records of customer, interested party and order information and requests for promotional materials, and to capture orders through each stage of the order life cycle; research and resolve orders that were not successfully delivered to customers and interested parties; and maintain a list of its products and to monitor and maintain product and promotional material inventory levels to meet customer and interested party demand. BEP will also use this data for analysis to assist in determining the most effective way to distribute promotional materials.*

*For example, the historical purchase data will be used to identify individuals that might be interested in current promotional material.*

3. What legal authority authorizes the purchase or development of this system/application?

*The authority at 5 U.S.C. sec. 301 authorizes the purchase or development of the system. The provision provides for the head of an Executive department to prescribe regulations for, among other things, "the distribution and performance of its business."*

4. Under which SORN does the system operate? (Provide name and number)

*BEP .045 – Mail Order Sales Customer Files is the SORN under which this system operates. However, at this time, the SORN will need to be updated to reflect changes specific to the CTF system.*

---

### C. Data in the System

1. What categories of individuals are covered in the system? (e.g., employees, contractors, taxpayers, other)

---

## Privacy Impact Assessment (PIA)

---

*System processes information about all individuals, i.e. employees, contractors and the public, who places an order in the system.*

### 2. What are the sources of information in the system?

- a. **Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other sources?**

*All the information is provided by the individual ordering from the Money Factory site or by direct interaction with BEP.*

- b. **What Federal agencies are providing data for use in the system?**

*Financial Management Service owns Pay.gov which does the verification of credit card data and provides this data to CTF.*

- c. **What state and/or local agencies, tribal governments, foreign governments, or international organizations are providing data for us in the system?**

*None.*

- d. **From what other third party sources will data be collected?**

*None.*

- e. **What information will be collected from employees, government contractors and consultants, and the public?**

*Name, Address, Email, Credit Card, and telephone numbers will be collected.*

### 3. Accuracy, Timeliness, and Reliability

- a. **How is data collected from sources other than from Treasury records going to be verified for accuracy?**

*The individual entering the data is responsible for its accuracy. However, Pay.gov verifies the credit card data.*

- b. **Is completeness required?**     No                     Yes

- c. **What steps or procedures are taken to ensure the data is current and not out-of-date?**

*Pay.gov verifies addresses and updates the data if a more recent address is associated with the credit card.*

- d. **Are the data elements described in detail and documented?**  No                     Yes

## Privacy Impact Assessment (PIA)

---

*There are two manuals addressing this within the overall External Relations, Public Sales Standard Operating Procedures:*

*External Relations, Public Sales Standard Operating Procedures: SAP Procedures; and Network Solutions – User Manual.*

---

### D. Attributes of the Data

1. **Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

*All data collected is needed to complete the customer's order. This data also provides a source of information used for analysis to assist in determining the most effective way to distribute promotional materials.*

2. **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**  No  Yes

*The data acquired during the ordering and provisioning process is forwarded and stored at BEP. This data provides a source of information used for analysis to assist in determining the most effective way to distribute promotional materials. Given that there is historical data on purchases, it is possible to derive new data on purchasing trends that would be otherwise unavailable.*

**Will the new data be placed in the individual's record?**  No  Yes

3. **Can the system make determinations about employees/members of the public that would not be possible without the new data?**

*This data provides a source of information used for analysis to assist in determining the most effective way to distribute promotional materials. Given that there is historical data on purchases, it is possible to derive new data on purchasing trends that would be otherwise unavailable.*

4. **How will the new data be verified for relevance and accuracy?**

*Customers are responsible for correctly entering and verifying their own information through the Money Factory website. For phone, fax, and mail orders, site operators correctly enter the information provided by the customer. Information is verified for completeness by a second person who compares the provided data with the inputted data.*

5. **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

---

## Privacy Impact Assessment (PIA)

---

*Not Applicable.*

- 6. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

*Not Applicable.*

- 7. How will the data be retrieved? Is the data retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

*Data is stored in a relational database and can be retrieved based on virtually any combination of data elements in the database including, name, address, e-mail address, phone number and customer number.*

- 8. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

*The data is stored in a relational database and reports can be created using any field as a reference. Therefore, reports can be produced on a specific individual showing their purchasing history. The primary use of the reports is centered on various products and geographic areas, with the purpose of preparing mailing lists for promotional materials and not on an individual. Only Supervisors and Managers may see these. A second use of the data does center on the individual, where the data is used to track and resolve issues associated with the completion of a purchase.*

---

### **E. Maintenance and Administrative Controls**

- 1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

*While there are several sites involved, they are involved with a different part of the process. The data transferred between the sites is verified for accuracy when received. This helps ensure consistency of data. An SAP system is also used to validate the file format, which helps ensure consistency of data. .*

- 2. What are the retention periods of data in the system?**

*There are three systems that are involved in the processing of the data.*

*Network Solutions is the initial point of entry for the data through the moneyfactorystore.gov web site. Network Solutions holds this data for 90 days.*

*The Treasury Bureau Financial Management Systems (FMS) processes the credit card data through the Pay.gov System. This data is held for 7 years.*

---

## Privacy Impact Assessment (PIA)

---

*BEP receives the data from Network Solutions, with the exception of the credit card data. This data is stored in the SAP System and held indefinitely. In accordance with NARA General Records Schedule 20, these data may be deleted when the BEP determines that they are no longer needed for administrative, legal, audit, or other operational purposes.*

- 3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

*Hardcopies are destroyed after two years via BEP Standard (70 FR 43508, 43517, July 27, 2005).*

- 4. Is the system using technology in ways the office or bureau has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)? If yes, explain.**

*No.*

- 5. How does the use of this technology affect public/employee privacy?**

*The system holds an individual's name, address and purchasing history which allows BEP to identify an individual's purchasing trends. The use of this technology, does not affect public or employee privacy in any way not set forth under BEP SORN .045 – Mail Order Sales Customer Files.*

- 6. Will the system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

*While the individuals name, address and phone number are stored, this information does not provide the capability to identify, locate and monitor individuals.*

- 7. What kind of information is collected as a function of the monitoring of individuals?**

*Not applicable.*

- 8. What controls will be used to prevent unauthorized monitoring?**

*Not applicable.*

- 9. Under which SORN does the system operate? (Provide name and number)**

*BEP .045 – Mail Order Sales Customer Files is the SORN under which this system operates. However, at this time, the SORN will need to be updated to reflect changes specific to the CTF system. The SORN will be updated to reflect some additional categories of records in the system, routine uses for the records maintained in the system, the means by which records in the system are retrieved, and the retention and disposal of the records in the system.*

- 10. If the system is being modified, will the SORN require amendment or revision? Explain.**

---

## Privacy Impact Assessment (PIA)

---

*The SORN requires an update to reflect the roles of FMS and the Pay.gov system, Network Solutions, collection of phone numbers, the routine use to provide a source of information used for analysis to assist in determining the most effective way to distribute promotional materials, and the period for retention and disposal of records.*

---

### **F. Access to Data**

- 1. Who will have access to the data in the system? (e.g., contractors, users, managers, system administrators, developers, others).**

*Network Solutions personnel have access to the data as the web portal service provider. FMS personnel have access to the credit card data for verifying the credit card through the Pay.gov system, and Contractors, employees, administrators, and users of the system within the BEP's Office of External Relations will have access to the data forwarded and stored at BEP.*

- 2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

*There are three systems that are involved in the processing of the data.*

*Network Solutions is the initial point of entry for the data through the moneyfactorystore.gov web site. Network Solutions controls access to the data through internal procedures and limits access only to the set of personnel that are required to support the application and only provides access to the data and services required to perform their role. User access requires a user name and password to log in and access is controlled through the Network Solutions Active Directory system.*

*The Treasury Bureau Financial Management Systems (FMS) processes the credit card data through the Pay.gov System. FMS controls access to the data by restricting who may make changes to the system. FMS utilizes a spreadsheet which depicts who has access and what level of access. There are only two people, who are both employed by BEP, who have the ability to add and delete access.*

*BEP stores the data in their SAP financial database. BEP has implemented specific user roles to control access to the SAP data. These User Roles are enforced by the BEP Active Directory system and require a user name and password to access the system.*

- 3. Will users have access to all data on the system or will the user's access be restricted? Explain.**

*There are three systems that are involved in the processing of the data.*

*Network Solutions is the initial point of entry for the data through the moneyfactorystore.gov web site. Network Solutions controls access to the data through internal procedures and limits access only to the set of personnel that are required to support the application and only provides*



## Privacy Impact Assessment (PIA)

---

*access to the data and services required to perform their role. User access requires a user name and password to log in and access is controlled through the Network Solutions Active Directory system.*

*The Treasury Bureau Financial Management Systems (FMS) processes the credit card data through the Pay.gov System. FMS restricts user access by ensuring that only two employees at BEP can regulate access levels.*

*BEP stores the data in their SAP financial database. BEP has implemented specific user roles to control access to the SAP data. These User Roles are enforced by the BEP Active Directory system and require a user name and password to access the system.*

**4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? List procedures and training materials.**

*The CTF inherits a majority of its security controls from the BEP LAN/WAN. Additionally, CTF has specific controls and user access lists to ensure the protection of data from unauthorized use.*

*Network Solutions is the initial point of entry for the data through the moneyfactorystore.gov web site. Network Solutions controls access to the data through internal procedures and limits access only to the set of personnel that are required to support the application and only provides access to the data and services required to perform their role. User access requires a user name and password to log in and access is controlled through the Network Solutions Active Directory system.*

*The Treasury Bureau Financial Management Systems (FMS) processes the credit card data through the Pay.gov System. FMS restricts user access by ensuring that only two employees at BEP can regulate access levels.*

*BEP stores the data in their SAP financial database. BEP has implemented specific user roles to control access to the SAP data. All employees of BEP are required to take Privacy awareness training on an annual basis.*

**5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?**

*Contractors are involved with the design, development, and maintenance of all three component systems. Network Solutions is a private sector company and is responsible for the web interface of the system. Pay.gov is responsible for verifying the data. They are responsible for updates to the systems and were instrumental in the design and implementation of the existing systems.*

**6. Do other systems share data or have access to the data in the system? If yes, explain.**

*Other systems share data or have access to the data in the system, but the sharing and access is closely controlled. Network Solutions personnel have access to the data as the web portal*

---

## Privacy Impact Assessment (PIA)

---

*service provider. FMS personnel have access to the credit card data for verifying the credit card through the Pay.gov system, and contractors, employees, administrators, and users of the system within External Relations will have access to the data forwarded and stored at BEP. That access, however, is subject to the conditions described in paragraphs 1, 2, 3, 4, and 5 above.*

**7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

*Dawn Haley, Office of External Relations.*

**8. Will other agencies share data or have access to the data in this system?**

Federal     State     Local     Other

*FMS has access to the credit card data for the purpose of verifying the credit card purchase.*

**9. How will the data be used by the other agency?**

*Data sent to Pay.gov is used to verify accuracy of the credit card information.*

**10. Who is responsible for assuring proper use of the data?**

*Kevin Brown, Office of External Relations.*

# Privacy Impact Assessment (PIA)

## The Following Officials Have Approved This Document

1. Program Manager

Name:

(Signature)

*Dawn Haley*

Date

*1-12-12*

2. System Manager

Name:

(Signature)

*K-B*

Date

*1/2/12*

3. Information System Security Manager

Name:

(Signature)

*HARRY SIMON*

*[Signature]*

Date

*1-17-12*

4. Privacy Officer

Name:

(Signature)

*KE:2 BOWEN*

*[Signature]*

Date

*1/17/12*

5. IT Review Official

Name:

(Signature)

*David Redding*

*[Signature]*

Date

*1/17/12*

6. Deputy Assistant Secretary for Privacy and Treasury Records

(when necessary) Name:

(Signature)

Date

# Privacy Impact Assessment (PIA)

---