



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

CNREURAFSWA NAPLES BUSINESS APPLICATIONS ONE-NET COMMUNITY  
OF INTEREST (COI) (NABACOI)

Department of the Navy - CNIC

### **SECTION 1: IS A PIA REQUIRED?**

**a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).**

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel\* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

\* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

**b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.**

**c. If "Yes," then a PIA is required. Proceed to Section 2.**

**SECTION 2: PIA SUMMARY INFORMATION**

a. Why is this PIA being created or updated? Choose one:

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

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR      Enter DITPR System Identification Number
- Yes, SIPRNET      Enter SIPRNET Identification Number
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes
- No

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes
- No

If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.  
Consult the Component Privacy Office for additional information or  
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office

Consult the Component Privacy Office for this date.

**e. Does this DoD information system or electronic collection have an 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

Enter OMB Control Number

Enter Expiration Date

No

**f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.**

(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 DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.)

(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) 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 should be identified.

**SORN Authorities:**

**SORN NM05512-1**

10 U.S.C. 5013, Secretary of the Navy;  
10 U.S.C. 5041, Headquarters, Marine Corps;  
E.O. 9397 (SSN), as amended.

**SORN DMDC 10 DoD**

10 U.S.C. 113, Secretary of Defense;  
10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness;  
DoD Directive 1000.25, DoD Personnel Identity Protection (PIP) Program;  
DoD Instruction 5200.08, Security of DoD Installations and Resources and the DoD Physical Security Review Board (PSRB);  
DoD 5200.08-R, Physical Security Program;  
E.O. 9397 (SSN), as amended.

NABACOI system authority to collect is Host Nation Agreements, and Tri-Component Directive (COMUSNAVEURISNT 5840.2 series).

Spanish Fiscal Laws.

PII for the embedded ROTAAPS (CIVPAY and AMIS) applications are only accessible by ROBACOI, Regional Payroll Service Office and SysAdm/Developer personnel or application maintenance. Paper documentation is stored in file cabinets that are secured within the Payroll Office or stored on the Department of Defense's server located and maintained in CNREURAFSWA facilities in Capodichino, Italy.

**g. Summary of DoD 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 DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

NABACOI system provides Motor Vehicle registration of all U.S. and NATO vehicles imported into Italy for governmental or personal use. This information is required to issue an Armed Forces in Italy Driver's License and Vehicle Title/Registration.

Personal information collected includes: Personnel Names, DoD I.D. numbers, Nationality and Gender, citizenship, Insurance Policy Numbers, Stateside Driver's Licensing information to include: date of birth, place of birth, weight and Physical description (height, color of hair and eyes) is provided by the person registering the vehicle and/or obtaining an Armed Forces in Italy Drive 5 License.

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

NABACOI system electronic information is restricted to NABACOI, Regional Legal Service Office and Security personnel for security and/or disposition of host nation traffic ticket tickets. All captured data in the application deals with Spanish local nationals personal information. Access is limited to authorized users by the comptroller, N8 Department.

Personal information is collected by a local national employees. Personal information is currently protected through login process in Windows and Database application.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.**

**Within the DoD Component.**

Specify.

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

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

Specify.

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

Specify.

NATO, Italian Ministry of Transport, SP Navy Pagaduria; SP Hacienda (Treasury) and Soc. Sec. Agencies

**i. Do individuals have the opportunity to object to the collection of their PII?**

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

For NABACOI system users, any member can object to providing their information at the risk of not being allowed to drive and/or register their vehicle or purchase tax-free petroleum products within Italy.

(2) If "No," state the reason why individuals cannot object.

**j. 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.

For NABACOI system users, members can consent or withhold consent to providing their information at the risk of not being allowed to drive and/or register their vehicle or purchase tax-free petroleum products within Italy.

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

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- |  |  |
|--|--|
| <input type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other                 | <input type="checkbox"/> None                        |

Describe each applicable format.

Privacy Advisory is provided in hard copy format for NABACOI system.

**NOTE:**

**Sections 1 and 2 above are to be posted to the Component'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.**

**A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.**