

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:

Commissary Click2Go® Online Ordering and Contracted Delivery Service

2. DOD COMPONENT NAME:

Defense Commissary Agency

3. PIA APPROVAL DATE:

05/04/22

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.

DeCA is expanding its Commissary Click2Go system to include options for both pick-up and delivery. Additionally, DeCA is moving its locally stored data to a commercial cloud hosted by the contractor that is DeCA's Enterprise Business Solution (EBS) provider.

In accordance with the new option for delivery, a patron will have to provide an address for delivery. This may be either a home address or a delivery address. This information will be shared first with DeCA's EBS contractor, which will then share the information with a contracted delivery service provider.

- 1) Personal information is collected to validate a user's privilege to shop with Commissary Click2Go.
- 2) The validation requires users to provide a minimal amount of personally identifiable information, including the Electronic Data Interchange Personal Identifier (EDIPI) found on the back of the Common Access Card (CAC).
- 3) The information collected for online shopping changed from operating on DeCA's operating systems to a cloud-based system (known as Software as a Service) that is administered by the EBS Contractor.
- 4) The Defense Manpower Data Center (DMDC) validates the EDIPI number.
- 5) Credit card payments are processed through pay.gov.
- 6) Pay.gov then notifies DeCA that a payment has been received (known as tokenization).
- 7) The EBS Contractor retains no visibility of any transactional data.
- 8) Shoppers are given the options of picking up their products at the commissary or requesting delivery by a contracted service.

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)

PII is being collected to validate an online customer's privilege to shop using Commissary Click2Go and to facilitate the delivery of products by a contracted service. A shopper's billing address, delivery address, phone number, and email address may be needed by the contracted delivery service for coordination purposes.

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.

The EDIPI is required to validated shopping privileges.
Name and billing address must be provided to complete the financial transactions.
A delivery address and phone number are needed to coordinate delivery.
The only mechanism a patron has to object to the collection of their PII is to not use the service.

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.

The EDIPI is required to validated shopping privileges.

Name and billing address must be provided to complete the financial transactions.

A delivery address and phone number are needed to coordinate delivery.

The patron consents to the use of its PII by opting to use the service.

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

PRIVACY ACT STATEMENT

AUTHORITY: 5 U.S.C. § 552a, The Privacy Act of 1974; 10 U.S.C. §2481, Defense Commissary and Exchange Systems; Existence and Purpose; 10 U.S.C. §2484, Commissary Stores: Merchandise That May Be Sold; Uniform Surcharges and Pricing; 10 U.S.C. §2485, Commissary Stores: Operation; 10 U.S.C Chapter 54, Commissary and Exchange Benefits; Department of Defense Directive 5105.55, Defense Commissary Agency (DeCA); Department of Defense Instruction 1330.17, Armed Services Commissary Operations; Department of Defense 7000.14- R, Department of Defense Financial Management Regulations (FMR). DEERS System of Records Notice (SORN) DMDC-02-DoD, with the stated purpose of providing a database for determining the eligibility to DoD entitlements and privileges.

PURPOSE: To determine if an individual is authorized to shop at the commissary; to purchase commissary retail products using Commissary Click2Go®; to choose between store pick-up or delivery by a contracted service provider, and to pay for purchases electronically either at the time of ordering or at the time of pick up.

ROUTINE USES: Patrons will provide all PII, to include name, billing address, delivery address, email address, phone number, and EDIPI number via prompts from the online ordering website. This PII will be saved on a secured commercial cloud hosted by DeCA's Enterprise Business Solution (EBS) contractor. The EDIPI number will be used to validated shopping privileges through the Defense Manpower Data Center database. Name, billing address, and payment information will be processed through Pay.gov. Delivery address, phone number and email address will be provided to the delivery contractors.

VOLUNTARY OR MANDATORY: Voluntary

EFFECTS OF NOT PROVIDING INFORMATION: Patron will not be able to purchase products on Commissary Click2Go®.

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

Specify.

IT staff directly involved with online ordering and the EBS system; Resource Management staff directly involved with processing financial transactions; Store Operations staff who are involved in processing orders

Other DoD Components

Specify.

Defense Manpower Database Center, Army & Air Force Exchange Services (Star Card); DoD law enforcement elements conducting authorized investigations; Defense Finance Accounting Service (DFAS) for collections purposes

Other Federal Agencies

Specify.

U.S. Treasury (pay.gov), U.S. Department of Agriculture Food & Nutrition Service (Electronic Benefits Transfer and Supplemental Nutrition Assistance Program (SNAP))

State and Local Agencies

Specify.

State Agencies that administer Women, Infants and Children (WIC) program

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.

1) EBS: HCI028-15-D-0004, Contractor will comply with FAR 52.239-1, Privacy or Security Safeguards (Aug 1996) (5 U.S.C. 552a).
2) Contracted Delivery Service: will be provided with patron's name and delivery address. Contractor will comply with FAR 52.239-1, Privacy or Security Safeguards (Aug 1996) (5 U.S.C. 552a).

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

Patrons will provide their PII, including name, billing address, delivery address, email address, phone number, and EDIPI number. The EDIPI number will be validated by the DMDC DEERS database.

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 checked="" type="checkbox"/> Information Sharing - System to System | <input checked="" type="checkbox"/> Website/E-Form |
| <input checked="" type="checkbox"/> Other (If Other, enter the information in the box below) | |

Patrons will provide all PII, including name, billing address, delivery address, email address, phone number, and EDIPI number via prompts from online ordering website. The EDIPI number will be used to validated shopping privileges through the DMDC database. Name, billing address, and payment information will be processed through Pay.gov. Delivery address, phone number and email address will be provided to delivery contractors.

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://dpcl.dod.mil/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.

SORN Z0035-01 is in the process of being amended to include delivery of products as a stated purpose.

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.

(l Continued) GRS 1.1, Item 011, DAA-GRS-2013-0003-0001

In accordance with NARA Job Number GRS 1.1, Item 011, DAA-GRS-2013-0003-0001, the PII collected, including name, billing address, delivery address, email address, phone number, and payment information will be destroyed after 10 years. "Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting. This includes customer orders. All other transactions defined under GRS 1.1, Item 010. All records are to be destroyed after 10 years."

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.

In accordance with DoD Instruction 1330.17, the patron's EDIPI is required to verify entitlement to shop at Commissary Click2Go. The EDIPI is processed through an encrypted DMDC database to validate the patron's commissary privileges.
10 U.S.C. § 2481, Defense Commissary and Exchange Systems - Authorizes the existence and purpose of the commissary
10 U.S.C. § 1061- 1065, Commissary and Exchange Benefits - Authorizes commissary benefits for Survivors of certain Reservist, Guard members, certain former spouses, Reservist retirees, Guard members serving in a federally declared emergency, certain veterans and caregivers, Foreign Service officers, and protected services civilian employees
10 U.S.C. §2485, Commissary Stores: Operation - Authorizes the collection of information (at section 2A) but prohibits the release of any PII (at section 4)
DoD Instruction 1330.17, Armed Services Commissary Operations - Requires the verification of Commissary shopping privileges (at Enclosure 2, Paragraph 2)
Financial Management Regulation (FMR) volume 11b, section 2.2.2.3.3.2, authorizes the collection of resale payments to offset Defense Working Capital Fund debts.

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.

Commissaries Click2Go is a down stream user of the EDIPI. Completing a user account for a website is exempt from OMB approval. In accordance with 10 USC 1782 eCommerce information collection requirements are exempt from OMB Information Collections requirements.