**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:

NAF Retail Point of Sale (RPOS)

### 2. DOD COMPONENT NAME:

Department of the Navy/United States Marine Corps

### 3. PIA APPROVAL DATE:

Marine Corps Manpower and Reserve Affairs (M&RA), Business and Support Services Division (MR)

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

- **a. The PII is:** (Check one. Note: foreign nationals are included in general public.)
  - From members of the general public
  - From both members of the general public and Federal employees and/or Federal contractors
  - From Federal employees and/or Federal contractors
  - Not Collected (if checked proceed to Section 4)

- **b. The PII is in:** (Check one)
  - New DoD Information System
  - Existing DoD Information System
  - Significantly Modified DoD Information System
  - New Electronic Collection
  - Existing Electronic Collection

- **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.**

NAF RPOS is the retail point of sale system software which captures tender data as a result of purchases made by authorized patrons. NAF RPOS includes credit authorization, check processing, tender management, sales transactions, and inventory and reporting data for the Marine Corps Exchanges, package stores, Marine Marts, and Uniform Shops.

To enable the Marine Corps Exchange services to enhance the quality of life for authorized patrons by providing products, goods, and services to ensure the strength and readiness of Service Members, authorized patrons, and their families during peacetime, contingency, crisis, and war.

To enable the Marine Corps Exchange services to generate earnings as a source of funding.

To enable the Marine Corps Exchange services to operate in the most efficient and cost-effective way to meet service-unique needs, maintain good customer service, and ensure competitive pricing.

To control sales; record transactions and payments; account for and deduct coupons and promotional discounts; to determine payment status before finalizing transactions; accept payment by various media; authenticate purchases for fraud and abuse detection and loss prevention; process refunds; process and provide merchandise special orders and shipping/delivery services; record merchandise warranty purchases; and track inventory movement.

To locate order information, to reply to customer inquiries or complaints, and to refund customer remittances or to collect monies due.

To monitor purchases to comply with age restrictions applicable to certain purchases by minors or those under allowable ages.

For an incentives program that rewards authorized patrons for utilizing MCCS businesses and services.

To analyze utilization and purchases to improve business and marketing strategies, define target markets among authorized patrons, determine appropriate product and service availability, and perform data analysis to better meet the current and future needs and wants of authorized patrons, maintain good customer service, improve competitive advantage, and develop new product and service offerings.

To identify and maintain a tracking and accounting system for individuals who have passed a medium of payment with insufficient funds or have account delinquencies.

Records may also be used by the Army and Air Force Exchange Service (AAFES) or its contractor for the purpose of recouping fees.
Records in this system are subject to use in approved computer matching programs authorized under the Privacy Act of 1974, as amended.

Personal information is maintained to support sales control and transactions, individual customer special merchandise orders, tender purchases by check, merchandise returns without receipts, management of insufficient funds data, product warranty registration information, an incentives program, and asset protection analysis.

Types of personal information collected includes: Names, Birth Date, DoD ID Number, Driver's License, Financial Information, Home/Cell Phone, Mailing/Home Address, Official Duty Address, Official Duty Telephone Number, Other ID Number, Personal Email Address, Position/Title, Rank/Grade, Social Security Number, Work Email Address, Other.

Other ID is first 9-digits of DoD ID number, MCCS employee ID number, and customer ID number. Financial information includes medium of payment, type, check number, associated account number(s), and expiration date. Other includes sales and contract records and associated account number(s), passwords, and list of patrons with insufficient funds by check tender.

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)

Verification of eligibility to purchase merchandise; verification of customer information for special merchandise orders; identification and verification for rain checks, check cashing, tender by check, recruit tendering, and returns without receipts; and authentication of purchases or fraud and abuse detection and loss prevention.

Intended use of the PII is mission-related and administrative use.

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.

Individuals may decline to provide PII in person when utilizing the Marine Corps Exchanges businesses and services.

Providing PII is voluntary; however, failure to provide the required information may result in an ineligibility to certain services such as check cashing, tender by check, special orders, rain checks, recruit tendering, and merchandise purchases.

Providing PII when purchasing a product's warranty is voluntary; however, patrons may choose to provide the information directly to the warranty provider as opposed to the personal information being included in the NAF RPOS system at time of purchase.

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.

Providing personal information is considered consent.

Investigatory material compiled for law enforcement purposes, other than material within the scope of subsection 5 U.S.C. 552a (j)(2), may be exempt pursuant to 5 U.S.C. 552a(k)(2). However, if an individual is denied any right, privilege, or benefit for which he would otherwise be entitled by Federal law or for which he would otherwise be eligible, as a result of the maintenance of such information, the individual will be provided access to such information except to the extent that disclosure would reveal the identity of a confidential source.

An exemption rule for this system has been promulgated in accordance with requirements of 5 U.S.C. 553(b)(1), (2), and (3), (c) and (e) and published in 32 CFR part 701, subpart G. For additional information contact the system manager.

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
AUTHORITY: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; E.O. 9397 (SSN), as amended; and SORN NM04060-1.

PRINCIPAL PURPOSE: To manage and administer the Marine Corps Exchanges sales and services.

ROUTINE USES: Information will be accessed by MCCS personnel with a need-to-know to meet the purpose. In addition, a complete list and explanation of applicable Routine Uses is accessible at http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570434/nm04060-1/.

DISCLOSURE: Providing this information is voluntary; however, failure to provide required information may result in an ineligibility to access services provided by the Marine Corps Exchanges.

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
- Other DoD Components
- Other Federal Agencies
- State and Local Agencies

Specify.

Business Intelligence (Cognos); NAF Financial Management System (Computron); Retail Management System (RMS); and Enterprise Electronic Journal (EEJ)

Army & Air Force Exchange Service (AAFES)

NCR Corporation:
Contractor personnel that will work longer than one month on the Contractor’s project under this contract will require a Common Access Card (CAC) issued by the Department of Defense. MCCS will facilitate the issuance of the cards.

Comply with the Privacy Act of 1974 (the Act) and the agency rules and regulations issued under the Act in the design, development, or operation of any system of records on individuals to accomplish an agency function. Include the Privacy Act notification contained in this contract in every solicitation and resulting subcontract and in every subcontract awarded without a solicitation when work statement is subject to the Act.

Privacy Act data shall not be stored on any mobile storage device. If transmitting Privacy Act data, files will be encrypted and password protected or sent via secure file transfer protocol. If used for analysis, the use of unique identifiers or dummy data will be substituted whenever practical. Complete annual Personally Identifiable Information training and provide certificates of completion to Contracting Officer.

The Payment Card Industry (PCI) Data Security Standard (DSS) is required of members, merchants, and service providers that store, process, or transmit card-holder data, to include all payment channels and all system components. The Contractor shall adhere to the then current PCI DSS and/or Payment Application Data Security (“PA DSS”), as it applies to Contractor software or services under this Contract.

GK Software
Privacy language includes requirement to meet PCI and PA-DSS requirements and other data-security requirements throughout its enterprise. Confidentiality clause includes PII relating to any customers or potential customers.
**i. Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

- [x] Individuals
- [ ] Databases
- [x] Existing DoD Information Systems
- [x] Commercial Systems
- [ ] Other Federal Information Systems

PII is collected directly from the individual, AAFES, and banking institutions to include Bank of America.

**j. How will the information be collected?** (Check all that apply and list all Official Form Numbers if applicable)

- [x] E-mail
- [ ] Face-to-Face Contact
- [ ] Fax
- [ ] Information Sharing - System to System
- [x] Other (If Other, enter the information in the box below)

Other is non-cash tender.

**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.

- [x] Yes
- [ ] No

If "Yes," enter SORN System Identifier: **NM04060-1**

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or [http://dpcld.defense.gov/Privacy/SORNs/](http://dpcld.defense.gov/Privacy/SORNs/)

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.

**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: **DAA-NU-2015-0004-002**

2. If pending, provide the date the SF-115 was submitted to NARA.

3. Retention Instructions.

Records are retained for six years and then destroyed.
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.

NM04060-1, Navy and Marine Corps Exchange Sales Control and Security Files:
10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; and E.O. 9397 (SSN), as amended.

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.

This is a combined SORN with the Navy Exchange Service Command (NEXCOM) that requires an OMB control number. The NEXCOM’s SORN representative has been contacted for this coordinated effort; NEXCOM has the lead.