

## 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 FOOD AND BEVERAGE POINT OF SALE SYSTEM (FPOS)

**2. DOD COMPONENT NAME:**

Department of the Navy

**3. PIA APPROVAL DATE:**

01/07/19

United States Marine Corps - Marine Corps Community Services (MCCS)

### 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 checked="" type="checkbox"/> New DoD Information System         | <input type="checkbox"/> New Electronic Collection      |
| <input 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.**

The scope of service shall include approximately 120 restaurant locations with varying styles of service including full service dining, quick service, and mobile sites. Capabilities include inventory and recipe management, sales control, a rewards program, mobile applications-based ordering, and on-line payment processing. Implementation of capabilities will be rolled-out in a phased approach.

To manage and administer MCCS restaurant business transactions and services provided; to capture and process orders; to control sales; to process and record payments; for cash control; and to generate reports.

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 create and maintain a patron profile to manage and administer a customer rewards program, process orders received over the phone or through digital means, and provide delivery services.

To authenticate authorization for patron access to services and spaces, and employee access to system information and data.

To provide information to authorized personnel with a need-to-know for the purposes of detection, prevention, and investigation of property loss, fraud, theft, or abuse of privileges.

To provide information to authorized personnel with a need-to-know for the purposes of identifying, recovering, and collecting debts owed, as appropriate.

Types of personal information includes: full name; DoD ID number; contact information (personal and work); date of birth; medium of payment; date, location, and associated price of transaction or service provided; and coupons or promotions redeemed. A complete listing and explanation of personal information collected is provided in section 2.

**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 collected to authenticate authorization for access to services and spaces; verify payments; provide delivery services; control sales and transactions; manage the customer rewards program; and contact guests regarding products and services requested and/or received.

The intended use of the PII collected is for 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 personal information when requesting delivery services, making a payment by a non-cash method, or placing orders over the phone or by digital means.

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.

By providing information, individual consent is given.

The Department of the Navy has exempted records maintained in MCCS Restaurant System, MXXXX, from subsections (c)(3), (d), (e)(1), (e)(4)(G) through (I), and (f) of the Privacy Act pursuant to 5 U.S.C. 552a (k)(2).

Investigative material compiled for law enforcement purposes 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 the 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; 10 U.S.C. 5041; E.O. 13571; DoDI 1015.10; DoDI 1330.21; MCO P1700.27B W CH1; MCO 1700.30; and SORN XXXX.

PRINCIPAL PURPOSE: Information requested is used for the purpose of managing and administering Marine Corps Community Services (MCCS) Restaurant System's orders, sales transactions, deliveries, and services provided.

ROUTINE USES: To MCCS personnel with a need-to-know to meet the purpose. In addition, information may be disclosed to current authorized contractors and vendors to accomplish a function related to this system of records and to credit card processors, banks, and other financial institutions to process payments made by credit or debit cards, by check, or other non-cash payment methods. A complete list and explanation of applicable Routine Uses is accessible at [SORN link].

DISCLOSURE: Providing this information is voluntary; however, failure to provide required information may result in ineligibility for access to MCCS restaurant services.

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.

Other DoD Components Specify.

Other Federal Agencies Specify.

State and Local Agencies Specify.

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.

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

Specify.

Banking and financial institutions to include BAMS; and third party vendors to include food and beverage product and service providers.

**i. Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

Individuals

Databases

Existing DoD Information Systems

Commercial Systems

Other Federal Information Systems

Databases are MCCA restaurants.

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

E-mail

Official Form (Enter Form Number(s) in the box below)

Face-to-Face Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

Other (If Other, enter the information in the box below)

**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.d.defense.gov/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.

Pending approval of draft SORN, "MCCA Restaurant System," MXXXX

**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.

Destroy when 5 years old or once an audit of cash control procedures has occurred, whichever is earlier.

**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.

SORN NM04060-1, Navy and Marine Corps Exchange Sales Control and Security Files (April 30, 2008, 73 FR 23450), authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; and E.O. 9397 (SSN), as amended.

SORN NM01700-1, DON General Morale, Welfare, and Recreation Records (February 12, 2008, 73 FR 8035), authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; 26 U.S.C. 6041; BUPERS Instruction 1710.11C, Operations of Morale, Welfare and Recreation Programs 2003; MCOP 1700.27, Marine Corps, Morale, Welfare and Recreation Policy Manual, Ch 1; NAVSO P-3520, Financial Management Policies and Procedures for Morale, Welfare and Recreation Programs; and E.O. 9397 (SSN), as amended.

SORN MXXXXX

10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; E.O. 13571, Streamlining Service Delivery and Improving Customer Service; DoDI 1015.10, Military Morale, Welfare, and Recreation (MWR) Programs; DoDI 1330.21, Armed Services Exchange Regulations; MCO P1700.27B W CH1, Marine Corps Community Services Policy Manual; and MCO 1700.30 Marine Corps Community Services Business Operations Manual.

**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 new information collection; currently working with ARDB on OMB Control Number request.