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:

EBS I3 HQ - Point of Sales / Customer Relation Management (EBS Increment 3 enterprise level - Datacenters East and West)

2. DOD COMPONENT NAME:

Defense Commissary Agency

3. PIA APPROVAL DATE:

03-05-2025

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: *(Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)*

- ☐ From members of the general public
- ☐ From Federal employees
- ☒ from both members of the general public and Federal employees
- ☐ Not Collected *(if checked proceed to Section 4)*

b. The PII is in a: *(Check one.)*

- ☐ New DoD Information System
- ☐ New Electronic Collection
- ☒ Existing DoD Information System
- ☐ Existing Electronic Collection
- ☐ 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 purpose of this system is to (1) authenticate patron privileges and payment methods, (2) track patron purchase data, and (3) manage customer relations and rewards programs.

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 (1) authenticate patron privileges and payment methods, (2) track patron purchase data, and (3) manage customer relations and rewards programs.

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.

DoD policy requires DeCA to validate shopping privileges. U.S. Treasury policy requires a customer ID for electronic check processing through OTCnet (U.S. Treasury's Over The Counter Channel). OTCnet is required by DoD policy.

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.

Customers can choose to use tenders which do not require PII (e.g. use cash instead of a personal check or credit card). If customers do not want to participate in digital coupons or other promotional activities, the customer can elect to not participate in "opt in" registration activities.

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: 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 positively identify authorized patrons of the Defense Commissary Agency; to enable patrons to tender payment for groceries and household goods by means of check; to enable the Defense Commissary Agency to identify writers of previously dishonored checks; and to obtain general aggregated demographic data concerning authorized patrons, including Military Service affiliation and status, from the Defense Enrollment Eligibility Reporting System (DEERS).

ROUTINE USES: Disclosures are permitted under 5 U.S.C. 552a(h), Privacy Act of 1974, as amended. In addition, information may be disclosed to the United States Treasury for electronic check processing and electronic funds transfers related to check charges, and for any Department of Defense Commissary Agency "Blanket Routine Use" as published in the Federal Register.

VOLUNTARY OR MANDATORY: Voluntary

EFFECTS OF NOT PROVIDING INFORMATION: failure to furnish the information requested may result in inability to shop in the commissary and/or refusal to accept a check from the patron and require payment by other means.

h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component? *(Check all that apply)*

☒ Within the DoD Component	Specify.	HQ components of EBS Increment 3; CARTS/RM Service Center; Emerald; Enterprise Data Warehouse; IT staff directly involved with online ordering; IT staff supporting the EBS, Emerald, CLICK2GO and CARTS/RM solution 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 *(i.e. Army, Navy, Air Force)*	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 *(i.e. Veteran's Affairs, Energy, State)*	Specify.	U.S. Treasury (pay.gov), U.S. Department of Agrigculture 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: HC1028-15-D-0004, Contractor will comply with FAR 52.239-1, Privacy or Security Safeguards (Aug 1996) (5 U.S.C. 552a). NCR and IBM are support contractors for the point of sale; contracts for both companies include the appropriate clause citing the need to protect Privacy information
☐ 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)*

- ☒ Individuals
- ☒ Existing DoD Information Systems
- ☒ Other Federal Information Systems
- ☒ Databases
- ☐ Commercial Systems

DMDC DEERS database, Treasury Local Verification Download (LVD) database for bad checks

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

- ☐ E-mail
- ☒ In-Person Contact
- ☐ Fax
- ☐ Information Sharing - System to System
- ☐ Other *(If Other, enter the information in the box below)*
- ☒ Official Form (*Enter Form Number(s) in the box below)*
- ☐ Paper
- ☐ Telephone Interview
- ☒ Website/E-Form

DD Form 2 or Common Access Card (CAC).

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 DoD-0018

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

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. N1-506-07-5 and DAA-GRS-2013-0003-0001

(2) If pending, provide the date the SF-115 was submitted to NARA. N/A

(3) Retention Instructions.

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 statue 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.

DoD policy requires authentication of customers to ensure they are entitled to shop at a commissary; this is achieved by validating the customer has commissary privileges associated with their ID card by querying the DMDC database using encrypted web services. Treasury electronic check processing via OTCnet requires a patron identifier as part of the data exchange which supports the bad check list maintained by Treasury. Offline processing of credit card tenders requires the POS to retain credit card information in an encrypted format until the connection is restored.

In accordance with DoD Instruction 1330.17, the patron's EDIPI is required to verify entitlement to shop at the Commissary. 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.

Information collected as part of DeCA retail operations determined to be exempt from PRA OMB control number requirements by DeCA GC memo of October 22, 2012.