



USAID
FROM THE AMERICAN PEOPLE

AIDConnect Privacy Impact Assessment (PIA)

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

Office of the Chief Information Officer (M/CIO)

Information Assurance Division

AIDConnect

Approved Date: 5/17/2012

Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

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1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

2 Information

2.1 Program and System Information

2.1.1 Describe the PROGRAM and its PURPOSE.
AIDConnect is USAID’s primary collaboration tool. Authorized users are verified by comparing user names and work email addresses with Active Directory. Event hosts and/or presenters must invite participants external to USAID. Without an invitation, external users cannot access the session.
2.1.2 Describe the SYSTEM and its PURPOSE.
See 2.1.1 above. USAID has the latest version of AIDConnect (v9.2). USAID users, partners, and stakeholders will have an enhanced collaboration tool to create, upload, and share content both within Washington, DC and to facilities and staff throughout the globe.
2.1.3 What is the SYSTEM STATUS?
<input type="checkbox"/> New System Development or Procurement
<input type="checkbox"/> Pilot Project for New System Development or Procurement
<input checked="" type="checkbox"/> Existing System Being Updated
<input type="checkbox"/> Existing Information Collection Form or Survey OMB Control Number:
<input type="checkbox"/> New Information Collection Form or Survey
<input type="checkbox"/> Request for Dataset to be Published on an External Website
<input type="checkbox"/> Other:
2.1.4 What types of INFORMATION FORMATS are involved with the program?
<input type="checkbox"/> Physical only
<input type="checkbox"/> Electronic only
<input checked="" type="checkbox"/> Physical and electronic combined

2.1.5 Does your program participate in PUBLIC ENGAGEMENT?
<input type="checkbox"/> No.
<input checked="" type="checkbox"/> Yes:
<input type="checkbox"/> Information Collection Forms or Surveys
<input type="checkbox"/> Third Party Web Site or Application
<input type="checkbox"/> Collaboration Tool
2.1.6 What type of system and/or TECHNOLOGY is involved?
<input checked="" type="checkbox"/> Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
<input checked="" type="checkbox"/> Network
<input type="checkbox"/> Database
<input type="checkbox"/> Software
<input type="checkbox"/> Hardware
<input checked="" type="checkbox"/> Mobile Application or Platform
<input checked="" type="checkbox"/> Mobile Device Hardware (cameras, microphones, etc.)
<input type="checkbox"/> Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
<input type="checkbox"/> Wireless Network
<input type="checkbox"/> Social Media
<input checked="" type="checkbox"/> Web Site or Application Used for Collaboration with the Public
<input type="checkbox"/> Advertising Platform
<input checked="" type="checkbox"/> Website or Webserver
<input checked="" type="checkbox"/> Web Application
<input checked="" type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input checked="" type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices

2.1.5 Does your program participate in PUBLIC ENGAGEMENT?
<input checked="" type="checkbox"/> Bring Your Own Device (BYOD)
<input checked="" type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None
2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?
<input checked="" type="checkbox"/> Citizens of the United States
<input checked="" type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input checked="" type="checkbox"/> USAID employees and personal services contractors
<input checked="" type="checkbox"/> Employees of USAID contractors and/or services providers
<input checked="" type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input checked="" type="checkbox"/> Others: Implementing partners email address to extend invitation to participate session
<input type="checkbox"/> None
2.2 Information Collection, Use, Maintenance, and Dissemination
2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Social Security Number or Truncated SSN
<input type="checkbox"/> Date of Birth
<input type="checkbox"/> Place of Birth
<input type="checkbox"/> Home Address
<input type="checkbox"/> Home Phone Number
<input type="checkbox"/> Personal Cell Phone Number
<input checked="" type="checkbox"/> Personal E-Mail Address
<input type="checkbox"/> Work Phone Number
<input checked="" type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Passport Number or Green Card Number

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input type="checkbox"/> Employment or Salary Record
<input type="checkbox"/> Medical Record
<input type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input type="checkbox"/> Financial Record
<input type="checkbox"/> Education Record
<input type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input type="checkbox"/> Sex or Gender
<input type="checkbox"/> Age
<input type="checkbox"/> Other Physical Characteristic (eye color, hair color, height, tattoo)
<input type="checkbox"/> Sexual Orientation
<input type="checkbox"/> Marital status or Family Information
<input type="checkbox"/> Race or Ethnicity
<input type="checkbox"/> Religion
<input type="checkbox"/> Citizenship
<input type="checkbox"/> Other:
<input type="checkbox"/> No PII is collected, used, maintained, or disseminated
2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Log Data (IP address, time, date, referrer site, browser type)
<input type="checkbox"/> Tracking Data (single- or multi-session cookies, beacons)
<input type="checkbox"/> Form Data
<input checked="" type="checkbox"/> User Names (for USAID users)
<input type="checkbox"/> Passwords

2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

- Unique Device Identifier
- Location or GPS Data
- Camera Controls (photo, video, videoconference) – only for hosts/presenters to show who is speaking
- Microphone Controls
- Other Hardware or Software Controls
- Photo Data
- Audio or Sound Data
- Other Device Sensor Controls or Data
- On/Off Status and Controls
- Cell Tower Records (logs, user location, time, date)
- Data Collected by Apps (itemize)
- Contact List and Directories
- Biometric Data or Related Data
- SD Card or Other Stored Data
- Network Status
- Network Communications Data
- Device Settings or Preferences (security, sharing, status)
- Other:
- None

2.2.4 Who owns and/or controls the system involved?

- USAID Office:
- Another Federal Agency:
- Contractor:
- Cloud Computing Services Provider: Connect Solutions
- Third-Party Website or Application Services Provider:
- Mobile Services Provider:
- Digital Collaboration Tools or Services Provider:
- Other:

3 Privacy Risks and Controls

3.1 Authority and Purpose (AP)

3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?

5 U.S.C. 301 (see 3.7.3).

3.1.2 Why is the PII collected and how do you use it?

AIDConnect uses individual email addresses to invite authorized users to collaborate on the AIDConnect platform.

3.1.3 How will you identify and evaluate any possible new uses of the PII?

Any new uses of the PII will be reconciled to the authorized uses identified in the SORN (see 3.7.3). Should a new use fall outside of the SORN, the system owner and Privacy Office will develop new guidance.

3.2 Accountability, Audit, and Risk Management (AR)

3.2.1 Do you use any data collection forms or surveys?

No:

Yes: AIDConnect has a polling function which allows meeting invitees to provide feedback on the quality and usefulness of the session.

Form or Survey (Please attach)

OMB Number, if applicable:

Privacy Act Statement (Please provide link or attach PA Statement)

3.2.3 Who owns and/or controls the personal information?

USAID Office:

Another Federal Agency:

Contractor:

Cloud Computing Services Provider:

Third-Party Web Services Provider:

Mobile Services Provider:

Digital Collaboration Tools or Services Provider:

Other:

3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:

3.3 Data Quality and Integrity (DI)

3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?
Agency users are validated against Active Directory. Non-Agency users can only access AIDConnect if they provide an email address and are approved by a valid USAID user hosting a specific AIDConnect session.
3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?
See 3.3.1 above. Agency users are validated against Active Directory. Non-agency users not in Active Directory must be invited to attend a session. The host/presenter then grants the invitee access to the session.
3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?
See 3.3.1 – AIDConnect validates Agency users against Active Directory. AIDConnect does not store guest users' data after the session they participated in is complete. If they choose, guest users can simply use a different email address to receive invitations in the future.

3.4 Data Minimization and Retention (DM)

3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?
Name and email address (for users outside the Agency to receive an invite). Agency users are validated against their usernames in Active Directory.
3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:
3.4.4 What types of reports about individuals can you produce from the system?
No reports about individuals can be produced from AIDConnect.
3.4.6 Does the system monitor or track individuals? <i>(If you choose Yes, please explain the monitoring capability.)</i>
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:

3.5 Individual Participation and Redress (IP)

3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?

Yes, for users outside the Agency (see 3.3.1).

3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?

Access and amendment mechanisms are covered by the relevant SORN (see 3.7.3).

3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?

While AIDConnect relies on a cloud provider (see 2.2.4) the data exist entirely within the USAID network. See 3.7.3 to see which SORN governs access to and amendment of PII.

3.7 Transparency (TR)

3.7.1 Do you retrieve information by personal identifiers, such as name or number?

(If you choose Yes, please provide the types of personal identifiers that are used.)

- No.
- Yes:

3.7.2 How do you provide notice to individuals regarding?

- 1) The authority to collect PII: 5 U.S.C. 301 (see 3.7.3 for the governing SORN).
 - 2) The principal purposes for which the PII will be used: To register participants for collaborative activities. (See 3.7.3 for the governing SORN).
 - 3) The routine uses of the PII: USAID-029 On-Line Collaboration and Social Media Records. 75 FR 4526.
 - 4) The effects on the individual, if any, of not providing all or any part of the PII: Individuals who do not provide an email address will be unable to receive AIDConnect invitations, and will not be able to collaborate with Agency personnel over AIDConnect.
- See 3.9.2 - AIDConnect will also include a privacy policy link to the website's privacy policy which includes this Privacy Act notice.

3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

- No
- Yes: USAID-029 On-Line Collaboration and Social Media Records. 75 FR 4526.

3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

USAID-29 On-Line Collaboration and Social Media Records (75 FR 4526) has notice of the PII's location.

3.8 Use Limitation (UL)

3.8.1 Who has access to the PII at USAID?

Agency PII is stored in Active Directory and governed by its system access policies. PII (i.e. names and email addresses) from non-Agency users is only used for specific sessions and not stored on any USAID system.

3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

PII is not shared outside of the Agency.

3.8.4 Do you share PII outside of USAID? If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?

- No.
- Yes:

3.9 Third-Party Web Sites and Applications

3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?

AIDConnect is not a third-party website, but there are no restrictions to content being uploaded and shared through AIDConnect, an authorized user could post and share any kind of PII. See 3.2.9 for a discussion on mitigation policies and practices.

Appendix A. Links and Artifacts

A.1 Privacy Compliance Documents or Links

- | |
|----------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> None. There are no documents or links that I need to provide. |
| <input type="checkbox"/> Privacy Threshold Analysis (PTA) |
| <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) |
| <input checked="" type="checkbox"/> System of Records Notice (SORN) |
| <input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA) |
| <input type="checkbox"/> Data Collection Forms or Surveys |
| <input checked="" type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices |
| <input checked="" type="checkbox"/> USAID Web Site Privacy Policy |
| <input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application |
| <input checked="" type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents |