

## 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:**

Department of Defense 365 (DoD365)

**2. DOD COMPONENT NAME:**

Defense Information Systems Agency

**3. PIA APPROVAL DATE:**

8/26/2021

DoD365 is a National Security System (NSS). PIA not applicable.

### 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 checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input 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.**

There is no organized collection of PII/PHI as part of the DOD365 system beyond user email, name, phone number, and service/Agency affiliation for the specific purpose of email address lookup and user authentication. Any "user entered" personal information stored within DOD365 is the responsibility of the user/user's organization to ensure it's properly protected, categorized, reported, etc.

**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)

From the systems perspective, there is no collection of PII/PHI within DoD365 beyond user email, name, phone number, and service/Agency affiliation for the specific purpose of identity establishment, user email address list, and user authentication.

**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.

User information is stored in the Azure Active Directory (AAD) which is a critical component of the system supporting the provisioning process for identification and authentication. The information is necessary to support the establishment of a users email address and maintain their organization affiliation, contact information, etc. There is no opportunity for the users to opt-out.

**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.

Standard information is populated as part of the DOD365 global user directory. DOD standards dictate the information populated based on their milConnect profile (separate system managed by the Defense Manpower Data Center (DMDC) which ultimately is used to populate information into DOD365 as well as the enterprise user directory.

**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.)

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory | <input checked="" type="checkbox"/> Not Applicable |
|--|---|--|

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

- |  |          |   |
|--|----------|---|
| <input checked="" type="checkbox"/> Within the DoD Component   | Specify. | Identification of the users of the service (email, name, phone) |
| <input checked="" type="checkbox"/> Other DoD Components   | Specify. | Identification of the users of the service (email, name, phone) |
| <input type="checkbox"/> Other Federal Agencies  | Specify. |   |
| <input type="checkbox"/> State and Local Agencies  | Specify. |   |
| <input type="checkbox"/> 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. |   |
| <input type="checkbox"/> 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 type="checkbox"/> Individuals                                  | <input checked="" type="checkbox"/> Databases |
| <input checked="" type="checkbox"/> Existing DoD Information Systems  | <input type="checkbox"/> Commercial Systems   |
| <input checked="" type="checkbox"/> Other Federal Information Systems |   |

Information is obtained via milConnect and the enterprise records feeding from the enterprise user directory.

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

All PII/PHI is unique to the users and there is no DoD365 collection, retention, and reporting of PII/PHI beyond the identity of the users of the service.

**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.

No SORN is needed because this is an office automation and collaboration capability. O365 is not the initial point of collection. PII/PHI maintained in the system is covered by a SORN at the initial point of collection, as required.

**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. N/A

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

(3) Retention Instructions.

This system does not retain any records.

**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.

IAW DoD Instruction 5400.16, DoD Privacy Impact Assessment (PIA):

ENCLOSURE 3

(2) The information system is a National Security System in accordance with References (c) and (d). Although the PIA requirements exclude National Security Systems, privacy implications are to be considered for all DoD information systems and electronic collections that collect PII. When assessing the impact on privacy, DoD Components will be guided by the privacy principles set forth in References (g) and (i).

**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 an office automation and collaboration capability. DoD365 is not a system of record for PII and PHI. It also does not provide capabilities to the public.