

## 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:

Upload Download System (UDS)

### 2. DOD COMPONENT NAME:

Department of Defense Human Resources Activity

### 3. PIA APPROVAL DATE:

07/29/24

Defense Manpower Data Center

### 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.**

UDS is a suite of tools available to all DMDC applications to provide file storage and retrieval system. It consists of a user interface to allow DMDC personnel to upload documents that they would like to make available to the users of their DMDC applications. The DMDC applications would then expose a link to allow an end user to download a document. The DMDC application would be using a UDS REST web service behind the scenes to download the file to the end user. All consumers of UDS can upload documents either through the UI or they can use a REST call to upload a document. Some of the documents uploaded to UDS contain PII. DMDCRS is one the consumers of UDS that stores documents that contain PII.

**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)

Administrative use, data matching: UDS does not directly use PII. UDS is file storage and retrieval system, consumers of UDS are the users of the PII that they store.

**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.

DMDC does not solicit PII directly from the individual. Any PII received from a requester is used for matching purposes and not stored in a Privacy Act System of Records.

**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.

DMDC does not solicit PII directly from the individual. Any PII received from a requester is used for matching purposes and not stored in a Privacy Act System of Records.

**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

DATA YOU ARE ABOUT TO ACCESS COULD POTENTIALLY BE PROTECTED BY THE PRIVACY ACT OF 1974. You must:

- Have completed the necessary training with regards to Security Awareness and safe-guarding Personally Identifiable Information.
- Ensure that data is not posted, stored or available in any way for uncontrolled access on any media.
- Ensure that data is protected at all times as required by the Privacy Act of 1974 (5 USC 552a(I)(3)) as amended and other applicable DOD regulatory and statutory authority; data will not be shared with offshore contractors; data from the application, or any information derived from the application, shall not be published, disclosed, released, revealed, shown, sold, rented, leased or loaned to anyone outside of the performance of official duties without prior DMDC approval.
- Delete or destroy data from downloaded reports upon completion of the requirement for their use on individual projects.
- Ensure data will not be used for marketing purposes.
- Ensure distribution of data from a DMDC application is restricted to those with a need-to-know. In no case shall data be shared with persons or entities that do not provide documented proof of a need-to-know.
- Be aware that criminal penalties under section 1106(a) of the Social Security Act (42 USC 1306(a)), including possible imprisonment, may apply with respect to any disclosure of information in the application(s) that is inconsistent with the terms of application access. The user further acknowledges that criminal penalties under the Privacy Act (5 USC 552a(I)(3)) may apply if it is determined that the user has knowingly and willfully obtained access to the application(s) under false pretenses.

**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)

<input checked="" type="checkbox"/> Within the DoD Component	Specify.	Varies by requester
<input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	Army, Marine Corps, Air Force, Navy, Space and Reserve components
<input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	Varies by requester
<input checked="" type="checkbox"/> State and Local Agencies	Specify.	Varies by requester
<input checked="" 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.	Federally Funded Research Centers (FFRDC)
<input checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).	Specify.	Varies by requester

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

<input type="checkbox"/> Individuals	<input type="checkbox"/> Databases
<input checked="" type="checkbox"/> Existing DoD Information Systems	<input type="checkbox"/> Commercial Systems
<input checked="" type="checkbox"/> Other Federal Information Systems	

UDS does not directly collect/use/share PII. Consumers of UDS may collect/use/share PII that they store in the UDS repository.

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

<input checked="" type="checkbox"/> E-mail	<input type="checkbox"/> Official Form (Enter Form Number(s) in the box below)
<input type="checkbox"/> In-Person Contact	<input type="checkbox"/> Paper
<input type="checkbox"/> Fax	<input type="checkbox"/> Telephone Interview
<input checked="" type="checkbox"/> Information Sharing - System to System	<input checked="" type="checkbox"/> Website/E-Form
<input type="checkbox"/> 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.

UDS is an application that stores files for various DMDC applications, including but not limited to DMD CRS. The application is not a Privacy Act System of Records, as defined by the Privacy Act.

**I. 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.

GRS 5.2, item 010 (DAA-GRS-2022-0009-0001)

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

(3) Retention Instructions.

Temporary. Destroy when no longer needed for business use, or according to an agency predetermined time period or business rule.

**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.

10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness

**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 application that facilitates the request for and transmission of reports using information from existing system of records. No information is solicited directly from individuals or stored in System of Records.