

**U.S. Securities and Exchange Commission**

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**ARCHIBUS  
PRIVACY IMPACT ASSESSMENT (PIA)**



**July 26, 2021**

**Office of Support Operations**

# Privacy Impact Assessment

## ARCHIBUS

### Section 1: System Overview

#### 1.1 Name of Project or System

ARCHIBUS

#### 1.2 Is the system internally or externally hosted?

- Internally Hosted Office of Information Technology (OIT)
- Externally Hosted  
(Contractor or other agency/organization)

#### 1.3 Reason for completing PIA

- New project or system
- This is an existing system undergoing an update
- First developed: 6/29/2016
- Last updated: 4/30/2020
- Description of update: ARCHIBUS replaces Integrated Workplace Management System (IWMS)

#### 1.4 Does the system or program employ any of the following technologies?

- Enterprise Data Warehouse (EDW)
- Social Media
- Mobile Application (or GPS)
- Cloud Computing Services
- Web Portal
- None of the Above

### Section 2: Authority and Purpose of Collection

#### 2.1 Describe the project and its purpose or function in the SEC's IT environment

ARCHIBUS is an internally hosted architectural drawings/space management software tool used to facilitate the management of physical space throughout the SEC as well as improve management and currency of delivered architectural drawings. The SEC uses ARCHIBUS to perform the following business functions:

- Manage geographically dispersed facilities and infrastructures
- Plan and manage maintenance projects and activities
- Assign and track occupancy and space utilization across all facilities, geographic locations
- Track furniture, general office equipment, capital and computing assets and link these assets to organizations, employees and locations
- Access, sort and display rooms and space by category, type, organization, and assignment
- Plan and orchestrate employee moves
- Create and maintain "as-built" architectural drawings of facilities with all standard AutoCAD features of "Zoom, Pan, Layer Filtering, Colorization, Hatching" and Space Planning scenarios
- Provide for employee locator by highlighting in the "floor plan" the location assigned to an employee
- Manage work orders based on work-flows customizable by users to track employee moves, requests for services and route/work through approval processes
- Produce reports (custom or regulatory) and queries exportable to standard Microsoft Excel and document formats

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- Real estate tracking and reporting: Building Owners and Managers Association (BOMA) space area calculations including: Leased Rentable, Calculated Rentable, Usable, Gross and Common Areas  
Enable collaboration among users regarding Employee Moves, Facilities Maintenance and Planning

ARCHIBUS is comprised of four components: application software, client software for drawing management, and relational database management system. The application retains metadata from SEC AutoCAD facility floor plan drawings and SEC employee and contractor office/contact information headquarters and regional offices. Collected data may be used to maintain the accuracy of the mailroom recipient table (address book) to facilitate accurate delivery of packages.

The SEC performs a monthly personnel inventory, which is referred to as the “data call,” which is sent to the Divisional Administrative Officers for review and update. The results provide size and distribution data regarding SEC personnel and supporting staff across the agency and are used to facilitate personnel seating, move management activities, and other space management planning-related activities at headquarters and regional offices. A typical transaction in ARCHIBUS involves the monthly dissemination of Excel spreadsheets containing office location and usage data for all assigned/unassigned space for a division or office. Personnel are associated with occupied space, and the data call spreadsheet is used to verify occupancy of a specific space. The content of the current month’s data call is that which was verified by the employee’s organization during the previous month. ARCHIBUS receives updates and corrections via a data feed from the Enterprise Human Capital Repository (EHCR), a single centralized repository for SEC worker data covering employees, contractors, interns, and other workers.

### 2.2 What specific legal authorities, arrangements, and/or agreements allow the information to be collected?

SORN [SEC-10](#) authorities are 5 CFR, Parts 213, 293, 302, and 335; 5 U.S.C. 3109; and Civil Service Regulations promulgated thereunder. SORN [SEC-20](#) authorities are the *Federal Property and Administrative Services Act of 1949* (63 Stat. 377), as amended and *Homeland Security Presidential Directive 12* (HSPD-12), *Policy for a Common Identification Standard for Federal Employees and Contractors* (August 27, 2004). Additional authorities are 5 U.S. Code § 302, *Delegation of Authority*, and the *E-Government Act of 2002*, as amended (Public Law 107-347).

### 2.3 Does the project use, collect, or maintain Social Security numbers (SSNs)? This includes truncated SSNs.

- No  
 Yes

If yes, provide the purpose of collection:

If yes, provide the legal authority:

### 2.4 Do you retrieve data in the system by using a personal identifier?

- No  
 Yes, a SORN is in progress  
 Yes, there is an existing SORN

SEC-10 Personnel Management Employment and Staffing Files  
SEC-20 Facilities Access Badge System

### 2.5 Is the information covered by the Paperwork Reduction Act of 1995 (PRA)?

- No  
 Yes

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### 2.6 Considering the purpose of the collection, what privacy risks were identified and how were those risks mitigated?

Unauthorized alteration of the employee identification number (EID) is a potential privacy risk. This risk is mitigated because the EID is not displayed to users who are not assigned to the EID security group. Only users in the EID security group can view or edit the EID.

### Section 3: Data Collection, Minimization, and Retention

#### 3.1 What information is collected, maintained, used, or disseminated about individuals? *Check all that apply.*

The system does not collect, maintain, use, or disseminate information about individuals.

#### Identifying Numbers

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Social Security Number | <input type="checkbox"/> Alien Registration      | <input type="checkbox"/> Financial Accounts     |
| <input type="checkbox"/> Taxpayer ID            | <input type="checkbox"/> Driver's License Number | <input type="checkbox"/> Financial Transactions |
| <input checked="" type="checkbox"/> Employee ID | <input type="checkbox"/> Passport Information    | <input type="checkbox"/> Vehicle Identifiers    |
| <input type="checkbox"/> File/Case ID           | <input type="checkbox"/> Credit Card Number      | <input type="checkbox"/> Employer ID            |
| <input type="checkbox"/> Other:                 |  |   |

#### General Personal Data

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Name           | <input type="checkbox"/> Date of Birth     | <input type="checkbox"/> Marriage Records      |
| <input type="checkbox"/> Maiden Name               | <input type="checkbox"/> Place of Birth    | <input type="checkbox"/> Financial Information |
| <input checked="" type="checkbox"/> Alias          | <input type="checkbox"/> Home Address      | <input type="checkbox"/> Medical Information   |
| <input type="checkbox"/> Gender                    | <input type="checkbox"/> Telephone Number  | <input type="checkbox"/> Military Service      |
| <input type="checkbox"/> Age                       | <input type="checkbox"/> Email Address     | <input type="checkbox"/> Mother's Maiden Name  |
| <input type="checkbox"/> Race/Ethnicity            | <input type="checkbox"/> Education Records | <input type="checkbox"/> Health Plan Numbers   |
| <input type="checkbox"/> Civil or Criminal History | <input type="checkbox"/> Zip Code          |  |
| <input type="checkbox"/> Other:                    |  |  |

#### Work-Related Data

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Occupation                                 | <input type="checkbox"/> Telephone Number           | <input type="checkbox"/> Salary                  |
| <input checked="" type="checkbox"/> Job Title                       | <input checked="" type="checkbox"/> Email Address   | <input checked="" type="checkbox"/> Work History |
| <input checked="" type="checkbox"/> Work Address                    | <input type="checkbox"/> Certificate/License Number | <input type="checkbox"/> Business Associates     |
| <input type="checkbox"/> PIV Card Information                       | <input type="checkbox"/> Fax Number                 |  |
| <input checked="" type="checkbox"/> Other: Grade and telework data. |   |  |

#### Distinguishing Features/Biometrics

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Fingerprints    | <input type="checkbox"/> Photographs      | <input type="checkbox"/> Genetic Information |
| <input type="checkbox"/> Voice Recording | <input type="checkbox"/> Video Recordings | <input type="checkbox"/> Voice Signature     |
| <input type="checkbox"/> Other:          |   |  |

#### System Administration/Audit Data

- |   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> User ID     | <input checked="" type="checkbox"/> Date/Time of Access | <input type="checkbox"/> ID Files Accessed |
| <input type="checkbox"/> IP Address             | <input checked="" type="checkbox"/> Queries Ran         | <input type="checkbox"/> Contents of Files |
| <input checked="" type="checkbox"/> Other: Role |   |  |

NOTE: Data in Section 3.1 is not collected directly from individuals but rather is pushed via data feed from EHCR.

#### 3.2 Why is the PII listed in Question 3.1 collected, used, shared, or maintained by the system or project?

The PII contained within ARCHIBUS is used solely for space allocation and office occupancy planning.

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### 3.3 Whose information may be collected, used, shared, or maintained by the system?

- SEC Employees  
Purpose: Workspace assignment
- SEC Federal Contractors  
Purpose: Workspace assignment
- Interns  
Purpose: Workspace assignment
- Members of the Public  
Purpose:
- Employee Family Members  
Purpose:
- Former Employees  
Purpose:
- Job Applicants  
Purpose:
- Vendors  
Purpose:
- Other: Detailees, secondees, and those employed under the Intergovernmental Personnel Act (IPA).  
Purpose: Workspace assignment

### 3.4 Describe the PII minimizing mechanisms and if the PII from the system is being used for testing, training, and/or research efforts.

PII is not used for testing, training, or research efforts.

### 3.5 Has a retention schedule been established by the National Archives and Records Administration (NARA)?

- No.
- Yes.  
3 years. General Records Schedule [\(GRS\) 5.4](#), item 010 (DAA GRS-2016-0011-0001) *Facility, space, vehicle, equipment, stock, and supply administrative and operational records.*

### 3.6 What are the procedures for identification and disposition at the end of the retention period?

PII in ARCHIBUS is not native to the application but comes from EHCR. Whenever disposition occurs, it happens in EHCR, which would subsequently cause an update to ARCHIBUS. Drawings contain no PII (e.g., names) and are properly discarded when no longer needed for business use. Printed versions of the data calls are shredded. Digital versions of the drawings and the data calls are currently kept indefinitely.

### 3.7 Will the system monitor members of the public, employees, and/or contractors?

- N/A
- Members of the Public  
Purpose:
- Employees

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Purpose:

- Contractors

Purpose:

### 3.8 Considering the type of information collected, what privacy risks were identified and how were those risks mitigated?

There is potential risk of unauthorized access to PII. Role-based access control (RBAC) is in place and access to ARCHIBUS is restricted to only those individuals whose job requires them to be involved in space management and planning. All SEC employees are required to take annual privacy and information security awareness training, which addresses the issues of proper handling and appropriate uses of PII. The SEC also maintains rules of behavior for employees who use SEC systems.

## Section 4: Openness and Transparency

### 4.1 What forms of privacy notice were provided to the individuals prior to collection of data? *Check all that apply.*

- Privacy Act Statement
- System of Records Notice  
[SEC-10](#) Automated Personnel Management Information System; [SEC-20](#), Facilities Access Badge System
- Privacy Impact Assessment Integrated Workplace Management System (IWMS) (see 1.3 above)  
Date of Last Update: 3/21/2013
- Web Privacy Policy
- Other notice:
- Notice was not provided.

### 4.2 Considering the method(s) of notice provided, what privacy risks were identified regarding adequate notice and how were those risks mitigated?

The identified potential risk is inadequate privacy notice. Notice is provided through publication of SORNs and a PIA, as identified in Section 4.1.

## Section 5: Limits on Uses and Sharing of Information

### 5.1 What methods are used to analyze the data?

The EID number is obtained manually from an extraction of data from HSPD-12 data provided each month by the Office of Human Resources (OHR) and is not analyzed further.

### 5.2 Will internal organizations have access to the data?

- No
- Yes

Organizations: All divisions/offices at SEC headquarters and the regional offices are provided, on a monthly cycle, a spreadsheet listing of the space that they own along with the names of the individuals associated with each owned space. The divisions/offices verify or correct the individual space assignments and their related contact data and then return the

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spreadsheet to OSO. Contact data and associated space of newly assigned personnel are then added or updated in the database.

### 5.3 Describe the risk to privacy from internal sharing and describe how the risks are mitigated.

ARCHIBUS employee information is updated weekly via data received from EHCR. The primary potential privacy risk is inadvertent sharing of non-public information to unauthorized users. The risk is mitigated because role based access control is implemented for ARCHIBUS and an automated ARCHIBUS workflow rule is used to receive data from EHCR.

### 5.4 Will external organizations have access to the data?

- No
- Yes

Organizations:

### 5.5 Describe the risk to privacy from external sharing and describe how the risks are mitigated.

There is no risk resulting from external sharing, because data is not shared externally.

## Section 6: Data Quality and Integrity

### 6.1 Is the information collected directly from the individual or from another source?

- Directly from the individual.
- Other source(s): Division/Office Administrative Officers, OHR and EHCR

### 6.2 What methods will be used to collect the data?

Employee information, received via a data feed from EHCR, is added or updated weekly in ARCHIBUS. In addition, seat assignment data is collected via spreadsheets (data calls) and distributed monthly to divisions/offices and the regional offices.

### 6.3 How will the data collected from individuals, or derived by the system, be checked for accuracy and completeness?

Data is reviewed monthly by divisions/offices and regional offices. Verification/clarification with individuals is performed by email, phone, and direct contact. When an individual's information is updated in EHCR, the updated information is fed into ARCHIBUS.

### 6.4 Does the project or system process, or access, PII in any other SEC system?

- No
- Yes.

System(s): EHCR, information is received from this application

### 6.5 Consider the sources of the data and methods of collection and discuss the privacy risk for this system related to data quality and integrity? How are these risks mitigated?

The potential identified risk is incorrect association of an individual with office number and work address information. The divisions/offices and regional office users are responsible for providing accurate reporting of space usage and allocation. Follow-up verification/clarification is performed via email, phone, and direct contact.

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### Section 7: Individual Participation

#### 7.1 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project? If no opportunities are available to consent, decline or opt out, please explain.

Personnel may decline to provide information requested as part of the onboarding process, but employment may be impacted. SORNs SEC-10 and SEC-20 adequately address how the data is collected and used. No additional consent is required. The information collected in EHCR populates ARCHIBUS.

#### 7.2 What procedures are in place to allow individuals to access their information?

Individuals seeking access to any record contained in this system of records may submit a request in writing to the FOIA/PA Officer, Securities and Exchange Commission, 100 F Street NE, Washington, DC 20549-2736. Individuals may work with their Administrative Officers to update information that comes from EHCR.

#### 7.3 Can individuals amend information about themselves in the system? If so, how?

Individuals do not have an opportunity to directly amend their information. However, individuals are encouraged to ensure their Active Directory (AD) contact information is current and to contact the Administrative Officer of their respective division/office or regional office in order to correct inaccurate data. The information is not directly corrected within the ARCHIBUS application but comes from EHCR, as the information is updated.

#### 7.4 Discuss the privacy risks related to individual participation and redress. How were these risks mitigated?

There is the potential risk of inaccurate or outdated information residing in the database, and this risk is minimal. Any risk would be the result of individuals' relationship with their Division/Office or Regional Office and communication between the parties. Individuals are encouraged to contact the Administrative Officer of their respective division/office or regional office in order to correct inaccurate data. ARCHIBUS personnel data is updated weekly to match EHCR.

### Section 8: Security

#### 8.1 Can the system be accessed outside of a connected SEC network?

- No  
 Yes

If yes, is secured authentication required?  No  Yes  Not Applicable  
Is the session encrypted?  No  Yes  Not Applicable

#### 8.2 Does the project or system involve an online collection of personal data?

- No  
 Yes  
Public  
URL:

#### 8.3 Does the site have a posted privacy notice?

- No  
 Yes  
 N/A

### Section 9: Accountability and Auditing



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### 9.1 Describe what privacy training is provided to users, either general or specific to the system or project.

All SEC staff and contractors receive initial and annual privacy awareness training, which outlines roles and responsibilities for proper handling and protection of PII. SEC Rules of the Road (OP 24-04B) ensure that employees and contractors are aware of their security responsibilities and how to fulfill them.

### 9.2 Does the system generate reports that contain information on individuals?

- No
- Yes

### 9.3 Do contracts for the system include Federal Acquisition Regulation (FAR) and other applicable clauses ensuring adherence to the privacy provisions and practices?

- No
- Yes
- This is not a contractor operated system.

### 9.4 Does the system employ audit logging or event logging?

- No
- Yes

### 9.5 Given the sensitivity of the PII in the system, manner of use, and established safeguards, describe the expected residual risk related to access.

Although access to ARCHIBUS is limited only to authorized SEC staff, risk related to access can include the inadvertent handling or misuse of data. To mitigate this risk, user accounts for employees are synched with SEC's Active Directory, and system privileges are granted based on defined roles.