

U.S. Securities and Exchange Commission

SEC Office of International Affairs (SECOIA)
PRIVACY IMPACT ASSESSMENT (PIA)



June 24, 2021

Office of International Affairs

Privacy Impact Assessment

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Section 1: System Overview

1.1 Name of Project or System

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1.2 Is the system internally or externally hosted?

- Internally Hosted (SEC)
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: 10/25/2017
Last updated: 10/1/2019
Description of update: Reports and Dashboards implemented

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

The Securities and Exchange Commission (SEC), Office of International Affairs (OIA), uses the SECOIA system to manage the receipt, creation, assignment, tracking, and storage of information related to office activities for reporting to Congress and the SEC Chairman. SECOIA provides support to OIA in the following areas:

- **Technical Assistance (TA)**: SECOIA is a single consolidated document repository for documenting and tracking requests for OIA TA assistance and any activity needed to complete a request, evaluate a completed event, and/or run reports on the progress related to specific tasks.
- **International Regulatory Policy Request Tracking**: SECOIA helps OIA track international regulatory policy matters designed to protect investors, improve market efficiency, and eliminate opportunities for regulatory arbitrage. This capability supports international efforts to raise regulatory standards and promote cooperation among the world's securities regulators.
- **Enforcement Assistance**: Each year, the SEC receives requests from foreign securities authorities for assistance with cross-border investigations. OIA uses SECOIA to track and process requests for such assistance from foreign regulators and law enforcement agencies.
- **Supervisory Cooperation**: OIA uses SECOIA to track and process requests for global regulatory cooperation regarding oversight of market participants that operate across borders.

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The SECOIA and HUB/ Memo Tracking System - Enforcement (MTS-E) integration allows for the automatic transfer of selected fields in records from the HUB/MTS-E to SECOIA. The interface with MTS-E also provides an automated means to pull Action Memos from MTS-E SharePoint into SECOIA for tracking purposes.

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

Securities and Exchange Act of 1934 Sec. 4(f), 15 U.S.C. 77s, 77t, 78u, 77uuu, 80a-41, 80b-9, and 17 CFR 202.5 Section 24(c) of the Exchange Act and 17 C.F.R. § 240.24c-1 (Rule 24c-1)

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-27 Office of International Affairs Records

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

- No
- Yes

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

A privacy risk is that information provided for one purpose may be used inappropriately for another purpose. This risk is low, as information is not collected without a clear purpose or legal authority. The System of Records Notice (SORN) SEC-27, identified in Section 2.4 above, states the intended and authorized purpose for the data collection.

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 type="checkbox"/> Employee ID | <input type="checkbox"/> Passport Information | <input type="checkbox"/> Vehicle Identifiers |
| <input checked="" type="checkbox"/> File/Case ID | <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Employer ID |
| <input type="checkbox"/> Other: Click here to enter text. | | |

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 |

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- | | | |
|---|--|---|
| <input type="checkbox"/> Alias | <input type="checkbox"/> Home Address | <input type="checkbox"/> Medical Information |
| <input type="checkbox"/> Gender | <input checked="" type="checkbox"/> Telephone Number | <input type="checkbox"/> Military Service |
| <input type="checkbox"/> Age | <input checked="" 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: Click here to enter text. | | |

Work-Related Data

- | | | |
|---|--|--|
| <input type="checkbox"/> Occupation | <input checked="" 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 type="checkbox"/> Other: Click here to enter text. | | |

Distinguishing Features/Biometrics

- | | | |
|---|---|--|
| <input type="checkbox"/> Fingerprints | <input checked="" 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: Click here to enter text. | | |

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 checked="" type="checkbox"/> IP Address | <input checked="" type="checkbox"/> Queries Ran | <input type="checkbox"/> Contents of Files |
| <input type="checkbox"/> Other: Click here to enter text. | | |

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

Information is collected to support OIA in processing (1) requests for enforcement cooperation with foreign regulators and law enforcement agencies; (2) international regulatory policy matters designed to protect investors, improve market efficiency, and eliminate opportunities for regulatory arbitrage; (3) technical assistance and international training programs for emerging securities markets; (4) directory of contacts for foreign regulators and stock exchanges; (5) SEC staff foreign travel; and (6) United States Agency for International Development (USAID) reimbursement.

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

- SEC Employees
Purpose: Information is collected from SEC employees for authentication purposes.
- SEC Federal Contractors
Purpose: Information is collected from SEC federal contractors for authentication purposes.
- Interns
Purpose:
- Members of the Public
Purpose: Data about members of the public is transferred from the HUB/MTS-E to SECOIA or manually input by SEC personnel to provide assistance with supervisory cooperation, international regulatory policy, enforcement, and technical assistance.
- Employee Family Members
Purpose:
- Former Employees
Purpose:
- Job Applicants
Purpose:
- Vendors

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- Purpose:
 Other:
Purpose:

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

Only the minimal amount of PII required to support OIA in its mission is either transferred to SECOIA from preselected fields located in the HUB/MTS-E or manually entered into the case record in SECOIA. PII is not used for testing, training, and/or research efforts.

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

- No.
 Yes.

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

Records are maintained until they become inactive, at which time they are be retired and/or destroyed in accordance with their associated record schedules.

- NI-266-96-001, Item 008a, OIA Investigative Case Files – Cut off at close of case. Destroy 15 years after cutoff.
- NI-266-96-001, Item 008b, OIA – Foreign Requests to the SEC Cases – Cut off files at close of case. Destroy 15 years after cutoff.
- NI-266-96-001, Item 002a, OIA Institute Files (Subject Files) – Cut off annually. Transfer to NARA when 7 years old.
- NI-266-96-001, Item 002b, OIA Institute Files (Participant Files) – Destroy when no longer needed.

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

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

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

The primary privacy risk is inadvertent disclosure of Identifying Numbers and General Personal Data in Section 3.1 that are collected to assist foreign securities authorities with cross-border investigations and for other collection purposes identified in Section 3.2. This risk is mitigated by implementing technological controls to authenticate users and encrypt data in-transit and at-rest.

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.*

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- Privacy Act Statement
- System of Records Notice
SEC-27 Office of International Affairs Records
- Privacy Impact Assessment
Date of Last Update: 3/16/2018
- 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 risk to privacy regarding adequate notice is minimal because SECOIA is not a public-facing system and does not collect information directly from members of the public. SORN SEC-27 and this PIA provide adequate notice.

Section 5: Limits on Uses and Sharing of Information

5.1 What methods are used to analyze the data?

Data collected in SECOIA is not analyzed.

5.2 Will internal organizations have access to the data?

- No
 - Yes
- Organizations:

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

There is minimal risk to privacy from internal sharing because the use of SECOIA is limited to OIA and information is not shared with other SEC divisions and offices.

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 to privacy from external sharing because information is not shared with external organizations.

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): Information from individuals contained in internal staff memoranda, working papers, and other documents.

6.2 What methods will be used to collect the data?

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Data is collected electronically through email, online survey tools, internal staff memoranda, Commission minutes and orders, and staff working papers. Data collected from registrations for SEC Institutes and completed survey forms is input into SECOIA by OIA staff.

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

Information collected about individuals is presumed to be accurate because information in SECOIA is not collected directly from individuals, other than SEC employees and contractors, and is not checked or verified against the source. However, certain fields in SECOIA are marked required and, if not populated, will generate an error message.

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

- No
- Yes.

System(s): HUB and MTS-E provide daily extracts to a SharePoint file and an integration utility tool is used to import the files into SECOIA.

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?

There is a privacy risk that SECOIA may contain inaccurate or outdated information. This risk is minimized because information collected directly from the individuals is assumed to be accurate. It is also assumed that information received from other systems was checked for quality and integrity at the original point of collection.

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.

There is no opportunity for individuals to consent, decline, or opt out of providing information in SECOIA. Information is either transferred from HUB/MTS-E to SECOIA or entered manually into SECOIA by OIA staff.

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

Individuals wishing to obtain information on the procedures for amending information about themselves in the system may contact the Freedom of Information Act (FOIA)/Privacy Act Officer, Securities and Exchange Commission, 100 F Street, N.E., Washington, D.C. 20549-2736 or may submit [online](#). Certain information within this collection (namely, investigatory materials compiled for law enforcement purposes) cannot be amended by the individual.

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

Individuals cannot amend information about themselves directly using SECOIA. They may contact the FOIA/Privacy Act Officer, Securities and Exchange Commission, 100 F Street, N.E., Washington, D.C. 20549-2736.

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

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The risks related to individual participation are lack of access to view their information and inability to seek redress and correction. Investigatory information compiled for law enforcement purposes is exempt from Privacy Act provisions. Other information may be requested by contacting the FOIA/Privacy Act Officer, Securities and Exchange Commission, 100 F Street, N.E., Washington, D.C. 20549-2736.

Section 8: Security

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

- No
- Yes

Public URL:

8.2 Does the site have a posted privacy notice?

- No
- Yes
- N/A

8.3 Does the project or system use web measurement and/or customization technologies?

- No
- Yes, but they do not collect PII
- Yes, and they collect PII

Section 9: Accountability and Auditing

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

Reports may contain the names and contact information of individuals who request assistance from OIA.

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

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

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Residual risk related to access can include the inadvertent handling or misuse of data. To minimize this risk, authentication to SECOIA is achieved via SSO (once a user has authenticated to the SEC network) and system privileges (including access to information) are granted based on defined roles.