

U.S. Securities and Exchange Commission

**Assurance Notification Manager
PRIVACY IMPACT ASSESSMENT (PIA)**



October 12, 2022

Office of Information Technology

Privacy Impact Assessment

Assurance Notification Manager (SEC Alerts)

Section 1: System Overview

1.1 Name of Project or System

Assurance Notification Manager (SEC Alerts)

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: 2/18/2016
Last updated: 1/12/2021
Description of update: External host changed from Assurance Software Inc. to Castellan Solutions

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

Assurance Notification Manager, hereafter referred to as SEC Alerts, is an automated alerting service that provides high-speed message delivery to SEC employees and contractors. SEC Alerts is used to contact employees and contractors, via communications devices (such as landline phone, cell phone, text message, email, and computer desktop), to alert or notify them of important information during an actual emergency or an SEC scheduled exercise of emergency preparedness. Alerts and notifications are usually generated in response to threat alerts issued by the Department of Homeland Security, weather related emergencies, or other critical situations that disrupt the operations and accessibility of a worksite. SEC Alerts may also be used to account for employees and contractors during an emergency situation outside of the workplace.

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

SEC Alerts collects personal and work contact information directly from individuals. The underlying legal authority for the collection of information is 5 U.S.C. which allows agency heads to make rules for managing agency employees. The information is collected for inclusion in a Continuity of Operations Program, as described in Executive Order 12656 (November 18, 1988) for the purposes of facilitating contact with personnel in case of an emergency.

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

- No

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- 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-22](#) Continuity Support Center

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?

The risk to privacy related to the purpose of the collection is minimal because only contact information is collected from SEC employees and contractors and used for the sole purpose of notification or contacting them during an emergency situation as identified in SORN SEC-22.

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 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 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 type="checkbox"/> Job Title | <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Work History |
| <input 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 type="checkbox"/> Photographs | <input type="checkbox"/> Genetic Information |
|---------------------------------------|--------------------------------------|--|

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

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

PII is collected to contact SEC employees and contractors in the event of an exercise or an actual emergency situation discussed in section 2.1 above.

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

- SEC Employees
Purpose: Information is used to notify and account for employees in the event of an exercise or an actual emergency situation.
- SEC Federal Contractors
Purpose: Information is used to notify and account for contractors in the event of an exercise or an actual emergency situation.
- Interns
Purpose:
- Members of the Public
Purpose:
- Employee Family Members
Purpose:
- Former Employees
Purpose:
- Job Applicants
Purpose:
- Vendors
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.

SEC Alerts collects only the minimal amount of PII from the user required to notify and account for employees and contractors in the event of an exercise or an actual emergency situation. Employees and contractors are reminded through email on a quarterly basis to regularly review the previously collected PII and determine whether it needs to be updated. PII stored in SEC Alerts is not used for testing, training, and research.

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

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- No.
- Yes.

Data is maintained for at least a 30 day period, or as long as required for business use in accordance with the records retention period established by the National Archives and Records Administration (NARA), [General Records Schedule 5.6: Security Records item 090](#) - DAA-GRS-2021-0001-0003.

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 identified to be destroyed in accordance with records schedules of the United States Securities and Exchange Commission and as approved by the NARA General Records Schedule 5.6: Security Records item 090.

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?

There is a risk of inadvertent or unauthorized disclosure of PII. This risk is minimized because SEC employees and contractors can only access their own contact information which they previously entered in SEC Alerts.

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-22](#) Continuity Support Center is not provided to individuals prior to collection, but is published in the Federal Register and available on the SEC's website, www.sec.gov.
- Privacy Impact Assessment
The Assurance NM PIA is not provided to individuals prior to collection, but is available on the SEC's [website, www.sec.gov](http://www.sec.gov).
Date of Last Update: 2/14/2016
- Web Privacy Policy
- Other notice: The SEC Alerts Self Registration page displays a link to the Privacy Policy Terms of Service.
- 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?

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There is no risk to privacy related to notice provided for the collection of information, personal and work related, from individuals because SORN SEC-22 authorizes the collection of the information and this PIA provides adequate notice to individuals regarding information collection purpose and use.

Section 5: Limits on Uses and Sharing of Information

5.1 What methods are used to analyze the data?

SEC employee and contractor contact information stored in SEC Alert is not analyzed.

5.2 Will internal organizations have access to the data?

- No
- Yes

Organizations: Information from SEC Alerts may only be shared with the Office of Support Operations, Office of Human Resources, and Office of Information Technology. Information may also be shared with the Office of Inspector General for an authorized purpose.

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

Privacy risk from internal sharing is minimal because information sharing is limited to the divisions and offices identified in Section 5.2 and SORN SEC-22. However, an SEC employee or contractor can share their contact information with other SEC employees and contractors at their discretion.

5.4 Will external organizations have access to the data?

- No
- Yes

Organizations: SEC does not routinely share SEC Alerts information with external organizations as part of the normal course of operations. However, the SEC may share information with other federal, state, or local government agencies with mission-specific ties. SORN [SEC-22](#) "Continuity Support Center" permits the SEC to contact necessary external organizations in the event of an emergency, natural disasters, or emergency preparedness exercise.

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

Privacy risk from external sharing as described in Section 5.4 is minimal because SORN SEC-22 mitigates risk to external sharing of information by providing adequate notice to individuals regarding information use which includes information sharing. .

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):

6.2 What methods will be used to collect the data?

Information is collected directly from SEC employees and contractors. They login to SEC Alerts using a secure webpage and input their contact information.

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

Information is not checked for accuracy or completeness by the system. However, SEC quarterly emergency exercises are conducted, which require employees and contractors to login to SEC Alerts to verify and/or update their contact information for accuracy and completeness.

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

- No
- Yes.

System(s):

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?

Privacy risk related to inaccurate information is minimal because SEC employees and contractors can update their personal and work contact information at any time and are also notified quarterly by SEC Alerts to review and update their contact information stored in the system.

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.

Individuals have the opportunity to consent, decline, or opt out of providing their personal and work contact information in SEC Alerts at the point of collection and in accordance with SORN SEC-22. They do not have the option to consent to the uses of information collected.

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

Employees and contractors can login to SEC Alerts and directly access their contact information. They may also submit a request in writing to the FOIA/PA Officer, Securities and Exchange Commission, 100 F Street NE, Washington, DC 20549-2736 or email request to foiapa@sec.gov.

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

Employees and contractors can login to SEC Alerts and directly amend their contact information. They may also submit a request in writing to the FOIA/PA Officer, Securities and Exchange Commission, 100 F Street NE, Washington, DC 20549-2736 or email request to foiapa@sec.gov.

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

Privacy risk related to individual participation and redress is minimal because individual participation is voluntary for entering personal contact information and individuals may directly access SEC Alerts at any time to correct their personal contact information in the event it is inaccurate. They may also submit a request to the address in Section 7.2.

Section 8: Security

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

- No

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

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

- No
 Yes
Public <https://secalert.sendwordnow.com/HomePage.aspx>
URL:

8.6 Does the site have a posted privacy notice?

- No
 Yes <https://secalert.sendwordnow.com/HomePage.aspx>
 N/A

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 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.

Residual risk related to access is minimal because contact information in SEC Alerts is limited to email and phone number for SEC employees and contractors who voluntarily enter their information in the system. To minimize this risk, individuals are required to authenticate to SEC Alerts using multifactor authentication and access control is implemented to limit user access to their own personal contact information.