

## 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:**

Human Resource & Transactional - Enterprise Data Warehouse (EDW)

**2. DOD COMPONENT NAME:**

Defense Commissary Agency

**3. PIA APPROVAL DATE:**

10/01/25

### 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 type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" 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 type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection                 |
| <input type="checkbox"/> Existing DoD Information System               | <input checked="" 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.**

EDW is composed of Human Resource (HR) Data and Point of Sales (POS) Transactional Data.

HR Data is collected from the Defense Civilian Personnel Data System (DCPDS).

The purpose of collecting this data is (1) to track the processing of personnel actions in the DCPDS; (2) to meet Agency, OPM and DoD reporting requirements; and (3) to provide information to Defense Commissary Agency (DeCA) managers and HR professionals to assist in making business decisions.

Transactional Data is collected through the Emerald POS system.

The purpose of collecting this data is for system-to-system data-sharing.

The types of HR Data collected are Social Security Number, name, home address, date of birth, gender, race / ethnicity, citizenship, security clearance, disability information, pay plan / schedule, grade / band, and education information.

The types of Transactional Data collected are masked credit and debit card numbers.

**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)

HR Data is collected for ad-hoc query and reporting capabilities.

Transactional Data is collected for reporting sales.

**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.

**HR Data:**

As a condition of their employment, records on Federal employees are electronically maintained at the designated Agency that currently employs the individual. This is authorized by the Office of Personnel Management, Federal Register Document 06-5459.

**Transactional Data:**

Transactional Data is not collected from individuals. It is collected from the Emerald POS system and existing DoD / DeCA IT systems via a system-to-system interface.

**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.

**HR Data:**

As a condition of their employment, records on Federal employees are electronically maintained at the designated Agency that currently employs the individual. This is authorized by the Office of Personnel Management, Federal Register Document 06-5459.

**Transactional Data:**

Transactional Data is not collected from individuals. It is collected from the Emerald POS system and existing DoD / DeCA IT systems via a system-to-system interface.

**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

**DCPDS PRIVACY ADVISORY**

1. Defense Civilian Personnel Data System (DCPDS) is provided as a service by Defense Civilian Personnel Advisory Service (DCPAS).
2. Information presented on DCPDS is considered private information and may not be distributed or copied.
3. For site management, Internet Protocol (IP) addresses of clients accessing DCPDS are collected for statistical purposes. This government computer system uses software programs to create summary statistics, which are used for such purposes as determining technical design specifications, and identifying system performance or problem areas.
4. For site security purposes and to ensure that this service remains available to all users, this government computer system employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.
5. Except for authorized law enforcement investigations, no other attempts are made to identify individual users or their usage habits. Raw data logs are used for no other purposes and are scheduled for regular destruction.
6. Unauthorized attempts to upload information or change information on this service are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1987 and the National Information Infrastructure Protection Act.
7. Cookie Disclaimer. DCPDS does not use persistent cookies, i.e., tokens that pass information back and forth from your machine to the server and remain after you close your browser. DCPDS does use session cookies, i.e., tokens that remain active only until you close your browser. No database of information obtained from these cookies is kept and when you close your browser, the cookie is deleted from your computer. You can choose not to accept these cookies and still use the site, but the site may not function as expected. The help information in your browser software should provide you with instruction on how to disable cookies.
8. If you have any questions or comments about the information presented here, please forward them to: [hr-bits@cpms.osd.mil](mailto:hr-bits@cpms.osd.mil)

**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 type="checkbox"/> Within the DoD Component  | Specify. | <input type="text" value="N/A"/>  |
| <input checked="" type="checkbox"/> Other DoD Components   | Specify. | <input type="text" value="United States Forces Korea (USFK - rationing data)"/> |
| <input type="checkbox"/> Other Federal Agencies  | Specify. | <input type="text" value="N/A"/>  |
| <input type="checkbox"/> State and Local Agencies  | Specify. | <input type="text" value="N/A"/>  |
| <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="text" value="N/A"/>  |
| <input type="checkbox"/> Other (e.g., commercial providers, colleges).   | Specify. | <input type="text" value="N/A"/>  |

**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 type="checkbox"/> Other Federal Information Systems           |   |

HR Data is collected from DCPDS and the Transactional Data is collected from the Emerald POS system.

**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                                   |

Information Sharing - System to System  Website/E-Form

Other (If Other, enter the information in the box below)

N/A

**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://dpcltd.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.

N/A

**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.

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

(3) Retention Instructions.

GRS 1.1, Financial Management and Reporting Records. DAA-GRS-2013-0003-0001, Item 010

**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.

**HR Data:**

1. Privacy Act SORN: DoD requested that all component personnel systems attach to OPM's system notice - OPM-GOVT-1
2. Authority for DoD electronic collection: Authority to create the Defense Civilian Personnel Data System (DCPDS) which includes the reporting tool (database), was directed by Program Budget Decision 711, "Corporate Information Management Initiatives", December 5, 1994.

**Transactional Data:**

DoD Directive 1330.17, Military Commissaries, and Executive Order 9397 (SSN)

**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.

OMB approval is not required because EDW's internal information collections do not collect information from members of the public per DoD Manual 8910.01, Volume 2, section 2, b. (1).