



USAID
FROM THE AMERICAN PEOPLE

Salesforce CRM Privacy Impact Assessment (PIA)

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

Office of the Chief Information Officer (M/CIO)
Information Assurance Division
App O&M IT IS/Salesforce CRM
Approved Date: May 20, 2015

Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

Table of Contents

<i>1</i>	<i>Introduction</i>	<i>1</i>
<i>2</i>	<i>Information</i>	<i>1</i>
2.1	Program and System Information.....	1
2.2	Information Collection, Use, Maintenance, and Dissemination.....	3
<i>3</i>	<i>Privacy Risks and Controls</i>	<i>6</i>
3.1	Authority and Purpose (AP).....	6
3.2	Accountability, Audit, and Risk Management (AR).....	7
3.3	Data Quality and Integrity (DI).....	7
3.4	Data Minimization and Retention (DM).....	8
3.5	Individual Participation and Redress (IP).....	9
3.7	Transparency (TR).....	9
3.8	Use Limitation (UL).....	10
3.9	Third-Party Web Sites and Applications.....	10

1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

2 Information

2.1 Program and System Information

2.1.1 Describe the PROGRAM and its PURPOSE.

Salesforce CRM enables analysis and reporting that helps the public engagement team develop strategies and provide strategic support to USAID's many relationships and interactions with outside groups. In addition, data will be used to report to the Administrator and Front Office on the breadth and depth of engagement. It will be used to coordinate relationship management and track engagement information by bureau, by issue, and by type of partner for a variety of purposes. Salesforce CRM is an invaluable resource for Agency staff as it provides one-click access to funding information, engagement history, and information management.

2.1.2 Describe the SYSTEM and its PURPOSE.

There are two applications within Salesforce CRM: NGO Partner Outreach and USAID Partnership Tracking. CFBCI, LPA, OTS, Bureaus use NGO Partner Outreach as a repository for grant data and countries of operations for their various partners and grantees, thus making it easier for USAID to track and report. NGO Partner Outreach surrounds itself around the "Engagements" custom object, which was created for the purpose tracking external meetings with USAID stakeholders and partners or any internal meetings that involve the same. USAID Partnership Tracking application tracks the status of partnership activities and services for the CTP U.S. Global Development Lab and Mobile Solutions department.

2.1.3 What is the SYSTEM STATUS?

- New System Development or Procurement
- Pilot Project for New System Development or Procurement
- Existing System Being Updated
- Existing Information Collection Form or Survey
OMB Control Number:
- New Information Collection Form or Survey
- Request for Dataset to be Published on an External Website
- Other:

2.1.4 What types of INFORMATION FORMATS are involved with the program?

- Physical only
- Electronic only
- Physical and electronic combined

2.1.5 Does your program participate in PUBLIC ENGAGEMENT?

- No.
- Yes:
 - Information Collection Forms or Surveys
 - Third Party Web Site or Application
 - Collaboration Tool

2.1.6 What type of system and/or TECHNOLOGY is involved?

- Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
- Network
- Database
- Software
- Hardware
- Mobile Application or Platform
- Mobile Device Hardware (cameras, microphones, etc.)
- Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
- Wireless Network
- Social Media
- Web Site or Application Used for Collaboration with the Public
- Advertising Platform
- Website or Webserver
- Web Application
- Third-Party Website or Application
- Geotagging (locational data embedded in photos and videos)
- Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
- Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)

2.1.6 What type of system and/or TECHNOLOGY is involved?
<input type="checkbox"/> Facial Recognition
<input type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?
<input type="checkbox"/> Citizens of the United States
<input type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input type="checkbox"/> USAID employees and personal services contractors
<input type="checkbox"/> Employees of USAID contractors and/or services providers
<input type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input type="checkbox"/> Others:
<input checked="" type="checkbox"/> None

2.2 Information Collection, Use, Maintenance, and Dissemination

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Social Security Number or Truncated SSN
<input type="checkbox"/> Date of Birth
<input type="checkbox"/> Place of Birth
<input type="checkbox"/> Home Address

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input type="checkbox"/> Home Phone Number
<input type="checkbox"/> Personal Cell Phone Number
<input type="checkbox"/> Personal E-Mail Address
<input checked="" type="checkbox"/> Work Phone Number
<input checked="" type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Passport Number or Green Card Number
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input type="checkbox"/> Employment or Salary Record
<input type="checkbox"/> Medical Record
<input type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input type="checkbox"/> Financial Record
<input type="checkbox"/> Education Record
<input type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input type="checkbox"/> Sex or Gender
<input type="checkbox"/> Age
<input type="checkbox"/> Other Physical Characteristic (eye color, hair color, height, tattoo)
<input type="checkbox"/> Sexual Orientation
<input type="checkbox"/> Marital status or Family Information
<input type="checkbox"/> Race or Ethnicity
<input type="checkbox"/> Religion
<input type="checkbox"/> Citizenship
<input type="checkbox"/> Other:
<input type="checkbox"/> No PII is collected, used, maintained, or disseminated

2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?
<input type="checkbox"/> Log Data (IP address, time, date, referrer site, browser type)
<input type="checkbox"/> Tracking Data (single- or multi-session cookies, beacons)
<input type="checkbox"/> Form Data
<input type="checkbox"/> User Names
<input type="checkbox"/> Passwords
<input type="checkbox"/> Unique Device Identifier
<input type="checkbox"/> Location or GPS Data
<input type="checkbox"/> Camera Controls (photo, video, videoconference)
<input type="checkbox"/> Microphone Controls
<input type="checkbox"/> Other Hardware or Software Controls
<input type="checkbox"/> Photo Data
<input type="checkbox"/> Audio or Sound Data
<input type="checkbox"/> Other Device Sensor Controls or Data
<input type="checkbox"/> On/Off Status and Controls
<input type="checkbox"/> Cell Tower Records (logs, user location, time, date)
<input type="checkbox"/> Data Collected by Apps (itemize)
<input type="checkbox"/> Contact List and Directories
<input type="checkbox"/> Biometric Data or Related Data
<input type="checkbox"/> SD Card or Other Stored Data
<input type="checkbox"/> Network Status
<input type="checkbox"/> Network Communications Data
<input type="checkbox"/> Device Settings or Preferences (security, sharing, status)
<input type="checkbox"/> Other:
<input checked="" type="checkbox"/> None

2.2.4 Who owns and/or controls the system involved?
<input checked="" type="checkbox"/> USAID Office:
<input type="checkbox"/> Another Federal Agency:
<input type="checkbox"/> Contractor:
<input checked="" type="checkbox"/> Cloud Computing Services Provider:
<input type="checkbox"/> Third-Party Website or Application Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input type="checkbox"/> Other:

3 Privacy Risks and Controls

3.1 Authority and Purpose (AP)

3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?

3.1.2 Why is the PII collected and how do you use it?
<p>Within Salesforce CRM a NGO Partner Outreach or a USAID Partnership Tracking user may collect contact information from internal or external partners or USAID stake holders that would otherwise be categorized as "sensitive but unclassified." This includes statuses such as "CEO or VP" of external businesses. The contact information is collected to track points of contact for various partner activities or statuses and also obtain reports on meetings that are tracked by the Front Office. Bureaus such as LPA may collect PII data to compile mailing lists to later send invites for USAID events and collect the results of those who attended.</p> <p>USAID Partnership Tracking users may collect PII information of staff requests that are made to support a mission activity, such as training. Also, contact information for point of contacts of those within the missions or participating partners to use when needed.</p>

3.1.3 How will you identify and evaluate any possible new uses of the PII?
New uses for PII information will be evaluated at each bureau level.

3.2 Accountability, Audit, and Risk Management (AR)

3.2.1 Do you use any data collection forms or surveys?

No:

Yes:

Form or Survey (Please attach)

OMB Number, if applicable:

Privacy Act Statement (Please provide link or attach PA Statement)

3.2.3 Who owns and/or controls the personal information?

USAID Office:

Another Federal Agency:

Contractor:

Cloud Computing Services Provider:

Third-Party Web Services Provider:

Mobile Services Provider:

Digital Collaboration Tools or Services Provider:

Other:

3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?

No.

Yes:

3.3 Data Quality and Integrity (DI)

3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?

Each Salesforce user is responsible for updating and maintaining their data to the highest extent. User profiles and groups have been created to control the access and information that is being inputted by each individual. Only the system administrator has access to all data and settings.

3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?

Each Salesforce user is responsible for updating and maintaining their data as current as possible. The Salesforce system administrator performs data check and system clean up on a monthly basis. The Salesforce system administrator also monitors the system health check and system status at trust.salesforce.com.

3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?

The Salesforce system administrator will work with each bureau point of contact to import their contact information and collect updates via data loader.

3.4 Data Minimization and Retention (DM)

3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?

Salesforce CRM may collect contact information such as first name, last name, work address, work email address or any phone numbers associated with the individual. This information is needed to communicate with partners and USAID Stake holders that perform partner activities and to capture meeting information. Survey data may also be collected to analyze potential customers and partnerships with USAID. If this contact information is not accessible USAID may not be able to track points of contact and reach out to its customers or partners.

3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?

No.

Yes:

3.4.4 What types of reports about individuals can you produce from the system?

Salesforce users are able to generate and create reports by type such as tabular report, summary report, or matrix report. Users are able to analyze the data and control access.

3.4.6 Does the system monitor or track individuals?

(If you choose Yes, please explain the monitoring capability.)

No.

Yes:

3.5 Individual Participation and Redress (IP)

3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?

Collection of PII information is voluntary and collected through surveys, RSVPs, research, or meetings with partners or prospective customers.

3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?

Salesforce user must be a registered user in order to access data in the system.

3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?

There is no data collected outside of USAID.

3.7 Transparency (TR)

3.7.1 Do you retrieve information by personal identifiers, such as name or number?

(If you choose Yes, please provide the types of personal identifiers that are used.)

- No.
 Yes:

3.7.2 How do you provide notice to individuals regarding?

- 1) The authority to collect PII:
- 2) The principal purposes for which the PII will be used:
- 3) The routine uses of the PII:
- 4) The effects on the individual, if any, of not providing all or any part of the PII:

3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

- No
- Yes:

3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

Salesforce.com does not have access to NA21 instance. Salesforce must request access to the system.

3.8 Use Limitation (UL)

3.8.1 Who has access to the PII at USAID?

There are thirty Salesforce users that can access the system. Fourteen from CTP bureau, seven from CFBCI, five from LPA, three from M/CIO. Each bureau has a specific profile that is assigned to it allowing access to that bureau's data. Once the Salesforce user acquires a user license and is registered, the user will be able to access data that is allowed for the user's specific group.

3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

Salesforce CRM neither shares information outside of USAID nor does it engage the public in any way.

3.8.4 Do you share PII outside of USAID? If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?

- No.
- Yes:

3.9 Third-Party Web Sites and Applications

3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?

Salesforce CRM neither shares information outside of USAID nor does it engage the public in any way.

Appendix A. Links and Artifacts

A.1 Privacy Compliance Documents or Links

- | |
|---|
| <input type="checkbox"/> None. There are no documents or links that I need to provide. |
| <input type="checkbox"/> Privacy Threshold Analysis (PTA) |
| <input type="checkbox"/> Privacy Impact Assessment (PIA) |
| <input type="checkbox"/> System of Records Notice (SORN) |
| <input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA) |
| <input type="checkbox"/> Data Collection Forms or Surveys |
| <input type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices |
| <input type="checkbox"/> USAID Web Site Privacy Policy |
| <input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application |
| <input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents |