![GSA logo]

Privacy Office Contact Information

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Document Purpose

This document contains important details about a GSA managed System, Application, or Project (identified below by the Authorization Package name). To accomplish its mission the GSA Office it supports must, in the course of business operations, collect personally identifiable information (PII) about the people who use such products and services. PII is any information [1] that can be used to distinguish or trace an individual's identity like a name, address, or place and date of birth.

GSA uses Privacy Impact Assessments (PIAs) to explain how it collects, maintains, disseminates, uses, secures, and destroys information in ways that protect privacy. This PIA comprises sections that reflect GSA's privacy policy and program goals. The sections also align to the Fair Information Practice Principles (FIPPs), a set of eight precepts codified in the Privacy Act of 1974.[2]

[1]OMB Memorandum Preparing for and Responding to the Breach of Personally Identifiable Information (OMB M-17-12) defines PII as: "information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual." The memorandum notes that "because there are many different types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad."

[2] Privacy Act of 1974, 5 U.S.C. § 552a, as amended.

General Information

PIA Identifier: 345
System Name: Personal Property Management System (PPMS)
CPO Approval Date: 4/6/2022
PIA Expiration Date: 4/5/2025

Information System Security Manager (ISSM) Approval

Joseph Hoyt

System Owner/Program Manager Approval

Narendra Rao Namana Mohanakrishna

Chief Privacy Officer (CPO) Approval

Richard Speidel

PIA Overview

A: System, Application, or Project Name:
Personal Property Management System (PPMS)

B: System, application, or project includes information about:
Personal Property Management System modernization

C: For the categories listed above, how many records are there for each?

500 Internal GSA users, 12,000 federal and state users and approximately 100,000 general public, public company, schools and other organizational users

D: System, application, or project includes these data elements:

General Public:
Name and date of birth
Contact Information (addresses, telephone numbers, and email address)
Social Security Number
Financial Information (credit card numbers and expiration dates)
Information about individuals provided by third parties (accept or refer decision from Experian PreciseID identity proofing service)

Public Companies:
Representative Name
Business name
Contact Information (addresses, telephone numbers, and email address)
TIN
Information about Company provided by third parties (accept or refer decision from Experian BizId identity proofing service)

Schools / Universities:
Representative Name
School Information
Contact Information (addresses, telephone numbers, and email address)
Government-issued Organization identifiers

Federal and State Users:
Name
Agency Information
Contact Information (addresses, telephone numbers, and email address)

Overview:

The Personal Property Management System (PPMS) comprises several modules that support the disposal functions of surplus federal personal property. The two primary disposal functions or modules are re-utilization & donation, and sales.

Re-utilization and donations module provides the following sub-modules:
● Agency Asset Management System (AAMS) or Internal Screening
● Firearms
● Foreign Gifts
● NASA Prescreening
● ComputersForLearning (CFL)

The sales module provides the following sub-modules:
● Auction
● Payment

The PPMS has several different types of users including internal GSA users, federal agency users, state and local government users, schools, museums, other entities eligible for federal donations, businesses and US citizens. For the sales module, the PPMS system collects user PII and utilizes Experian products PreciseID and BizId in order to validate the authenticity of users. PPM will operate under the authorities of 40 U.S.C. 521, 541, 545 and 549.

Utilization and Donation users include: GSA-internal users, Federal agencies and their non-Federal grantees, State and local government agencies, and non-profit organizations. The following PII is captured for these users during registration: first and last name, work address, email address and telephone number. Additionally, for educational non-profits registering for the GSA-hosted CFL website, the organization's TIN is captured.

Utilization and Donation Module (U&D):

The Utilization and Donation (U&D) module provides Federal Agencies with the ability to report, transfer and donate surplus federal property. The U&D module is used for utilization and donation of surplus property which is previously used and/or unwanted. U&D provides agencies a means of electronically reporting their unneeded personal property to GSA. U&D is a web enabled platform that eligible customers can use to access all customer functions: reporting, searching and selecting property. U&D is also used as a source of supply for customers seeking property that has been reported and is available for transfer. Agencies may search our inventory through a process known as screening, and they may request property for transfer by selecting specific property items and placing these property items in a virtual shopping cart. EPM is not provided to the general public. The property system is available to three groups of users: (1) Federal Agencies, (2) authorized non-federal excess recipients, and (3) surplus customers. The U&D module provides several sub-modules that support the reuse and donation of surplus federal assets. These are:
● Agency Asset Management System (AAMS) or Internal Screening
● Firearms (FA)
● Foreign Gifts (FG)
● NASA Prescreening (NP)
● ComputersForLearning (CFL)

Agency Asset Management System (AAMS) or Internal Screening
The AAMS sub-module allows agencies to meet their agency internal screening requirements. Agencies report their excess property to AAMS which makes it available to other users in their agency prior to rolling over to EPM for federal screening. Internal screening is a process based on an agency configurable time window (typically 1-2 weeks) where property is listed on the AAMS for internal agency users to reuse their own agency property.
Firearms
The firearms sub-module allows for the tracking, and inventory of donated firearms that are transferred from the federal government to state and local law enforcement. The Firearms submodule provides Law Enforcement Agencies (LEA), the custodian of the firearm property, the ability to certify the possession of the firearm.
NASA Prescreening
The National Aeronautics and Space Administration (NASA) prescreening sub-module supports the donation of historical NASA shuttle program artifacts to museums and schools that are qualified to receive them. The NASA Prescreening sub-module lists NASA shuttle program artifacts. The schools and museums can preview the artifacts and request the artifacts.
Foreign Gifts (FG)

Foreign gifts (FG) that are received by federal officials whose value exceeds a set limit are managed by FG coordination. The FG are stored in a vault and information about the asset is also recorded. Agencies report Foreign gifts via FG sub-module, or are manually entered by the FG coordinator. Agencies can search for FG items that they would like to use. Items can be selected for sale which are approved by the Department of State (DOS). The item status is updated in PPMS and transmitted to Sales.

Warehouse Inventory

The Warehouse Inventory sub-module provides GSA warehouse facility to tag, report and dispose of excess federal agency properties. Inventories are tagged for easy retrieval and are received from agencies with established contracts. Disposal process can also involve selling via the Sales module.

ComputersForLearning (CFL)

The CFL program evolved as a guide for implementing Executive Order 12999, Educational Technology: Ensuring Opportunity for all Children in the Next Century. The order encourages agencies, to the extent permitted by law, to transfer computers and related peripheral equipment excess to their needs directly to schools and educational nonprofit organizations. The CFL website allows eligible recipients to view and select the computer equipment that federal agencies have reported as excess.

In addition, U&D module supports the following business stakeholders in the reuse of federal surplus property.
● GSA FAS GSS Office of Personal Property Management Division who is responsible for the disposal, reuse or sale of all government owned personal property reported to GSA.
● The property reported by Federal Agencies which was previously acquired by individual agencies.

Sales module

The Sales Module (SM) is used to process the receipt and sale of surplus government property in an efficient, expeditious manner and obtain maximum net returns with a minimum of inconvenience to holding agencies. The application supports GSA regulations pertaining to excess/surplus property utilization and disposal for GSA Federal Acquisition Service (FAS) domestic regional agencies. Property is entered directly in the sales module or received from the U&D module. The U&D property which has not been utilized or donated and is tagged to be sold by GSA, end up in the GSA Sales module. Sales module provides automated inventory control of
this surplus in support of GSA's mission to provide the most efficient and cost-effective method for Federal Agencies to use and dispose of personal property.

Auction module

The Auction sub-module offers the general public the opportunity to bid on a wide array of Federal assets. The auction platform offers Federal personal property and real estate assets ranging from commonplace items (such as office equipment and furniture) to more select products like scientific equipment, heavy machinery, airplanes, vessels, vehicles, residential and commercial real estate. The auctions are web based or live events. Web auctions allow all registered participants to bid on items within specified timeframes. Live auction listings display information about the asset including where and when the auction will be conducted. Bidders

may register, browse and search for items, and bid on items. To reduce fraud, the auction module interfaces with Experian's Precise ID and Biz ID to authenticate individual and company registrants, respectively.

The administrator interface is used by agency users to create and manage auctions and by system and account admins to perform auction and user account management functions.

GSA Public Building Service (PBS) users can create and manage real estate auctions.

Department of Interior (DOI) users can create and manage aircraft auctions.

GSA Office of Personal Property Management (OPPM) can manage auctions and user accounts.

Once the bidding process is complete, the winning bidder uses the Payment sub-module. If a bidder does not retrieve the property or submit full payment, the bidder is defaulted.

The Sales module collects bidders (individuals or businesses) information including PCI DSS information at the time of registration and payment from individuals that register, bid, and pay for surplus property.

Payment module
The Payment sub-module provides credit card payment transmission and processing functionality for all Properties sold by PPM. The sub-module provides (1) bidder the ability to pay for their awards, (2) Sales office and Fleet auction houses to pay on behalf of bidders for awards. The sub-module uses Pay.Gov's Hosted Collections Service (HCP) to process credit card payments.
The application collects the following user information (some information is collected for certain user groups):

- Individual Users
  - First and Last Name
  - Home address
  - Email address
  - Telephone number
  - Date of birth
  - Social Security Number
  - Credit card number (Payment Card Industry Data Security Standard (PCI DSS))
  - Credit Card Expiration date (PCI DSS)
- Company/Business Users
  - First and Last Name
  - Company Name
  - Work Address
  - Email address
  - Telephone number
  - Tax Identification Number

- Credit card number (Payment Card Industry Data Security Standard (PCI DSS))
- Credit Card Expiration date (PCI DSS)

The Sales module collects individual information including Credit Card at the time of bidder account creation and payment for individuals that register, bid, and pay for surplus property sold at online auction or via other sale methods and elect to pay online in person, or over the phone.

1.0 Purpose of Collection

1.1: What legal authority and/or agreements allow GSA to collect, maintain, use, or disseminate the information?

- 1878.2A CIO P Conducting Privacy Impact Assessments (PIAs) in GSA: This directive establishes policy and procedures for addressing privacy issues in GSA Information Technology (IT) systems, online Web sites, and social media venues containing personal information about individuals.
- 2180.1 CIO P GSA Rules of Behavior for Handling Personally Identifiable Information (PII): This directive provides GSA's policy on how to properly handle PII and the consequences and corrective actions that will be taken when a breach has occurred
- Privacy Act of 1974; Revised Privacy Act System of Records
- OMB M-07-16: Safeguarding Against and Responding to the Breach of Personally Identifiable Information
- 40 U.S.C. § 521- Requires GSA to prescribe policies and methods to maximize the reuse of excess property.   The implementing regulations can be found in FMR 102-35 and FMR 102-36.
- 40 U.S.C. § 545 - Requires GSA to sell property in accordance with this statute. The implementing regulations can be found in FMR 102-38.
- 40 U.S.C. § 549 - Authorizes GSA to transfer surplus property to State agencies for subsequent donation to eligible recipients. The implementing regulations can be found in FMR 102-37.
- E.O. 12999 - GSA hosts a website that enables agencies to transfer excess computer equipment to schools and educational non-profits under the Stevenson Wydler authority. https://computersforlearning.gov/htm/hp_eo12999.htm

The Federal Property And Administrative Services Act of 1949. The act was designed, in part, to increase the efficiency and economy of Federal government operations with regard to the procurement, utilization and disposal of property.

The Federal Property And Administrative Services Act of 1949 Section 484 - "Disposal of Surplus property" Provides that the care and handling of surplus property pending its disposition, and the disposal of surplus property, may be performed by GSA or any executive agency designated by the Administrator.

1.2: Is the information searchable by a personal identifier, for example a name or Social Security number?
Yes

1.2a: If so, what Privacy Act System of Records Notice(s) (SORN(s) applies to the information being collected?
New SORN required

1.2: System of Records Notice(s) (Legacy Text): What System of Records Notice(s) apply/applies to the information?

This is a new modernization system and it's currently in development. The system is scheduled to Go-Live on October 31, 2021

1.2b: Explain why a SORN is not required.
This is a new system and

1.3: Has an information collection request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)?

1.3: Information Collection Request: Provide the relevant names, OMB control numbers, and expiration dates.

1.4: What is the records retention schedule for the information systems(s)? Explain how long and for what reason the information is kept.
Not Applicable. This is a new modernization system and it's currently in development. The system is scheduled to Go-Live on October 31, 2021

2.0 Openness and Transparency
2.1: Will individuals be given notice before the collection, maintenance, use or dissemination and/or sharing of personal information about them? Yes

2.1 Explain: If not, please explain.

3.0 Data Minimization
3.1: Why is the collection and use of the PII necessary to the project or system?

The collection of PII is necessary for the PPMS mission because:

1) We need to confirm the eligibility of bidders. (Are bidders 18 or older? Are they restricted from doing business with the government? Are they in debt to the government?)

2) Debt Collection Improvement Act of 1996. In accordance with Public Law No. 104-134, Section 31001, The Debt Collection Improvement Act of 1996, the Tax Identification Number (TIN) must be provided by anyone conducting business with the Federal Government, from which a debt to the Government may arise. Individuals cannot successfully register to bid on items without providing a TIN. A TIN is defined as an individual's Social Security Number (SSN) or business entity's Employer Identification Number (EIN). TIN validation also assists in the prevention of fraudulent bidding activity and ensures that bidders are prepared to accept responsibility for their bidding activity and all submitted bids are valid.

3) If bidders default on a sales contract, we put them in default, and if it remains unpaid, all of their PII is securely made accessible to the U.S. Treasury so the debt can be collected. GSA sends this information to the Treasury Department via secure system-to-system API calls. No Treasury Department user has access to PPMS. Any PII that is made available to the Treasury Department is via GSA Finance Office for payments that are in default under the Debt Collection Act. All other PII information made available would likely be from the individual and any agreement or information that they have provided via their credit card company. We do not otherwise forward anything directly to the Treasury.

4) PPM sends a majority of our communication through email, but needs their phone number in case we are not able to contact them.

3.2: Will the system, application, or project create or aggregate new data about the individual?
Yes

3.2 Explained: If so, how will this data be maintained and used?

PPMS will use past bidding history data based on product categories to identify target users to send marketing emails for upcoming sales. The bidders will be selected by random (50% sampling) where marketing emails will be sent on a daily basis. The results will be used for marketing purposes only. The data will not be used to determine bidder patterns, behavior, and aggregate or derive additional data about the user.

3.3 What protections exist to protect the consolidated data and prevent unauthorized access?

Data is secured during transport via HTTPS TLS 1.2, RSA key exchange, and AES_256_GCM cipher. PII Data is secured at rest by: PANs are Key encrypted AES256 using the cryptographic libraries on the Crypto common appliance (based on the Microsoft Crypto SDK) and stored in SASy database. Disk encryption is used in addition to the column-level data key encryption using EMC SAN disk encryption. Pay.Gov Secures their cardholder data environment and complies with PCI DSS requirements

3.4 Will the system monitor the public, GSA employees, or contractors?
Public

3.4 Explain: Please elaborate as needed.

Access to sensitive PII and Credit Card information by system users will be logged, monitored and audited. This will be used for FISMA and PCI DSS compliance. IP Address information will be stored during bidding, payment, and registration and is infrequently used by law enforcement in cases of actual or suspected fraud.

3.5 What kinds of report(s) can be produced on individuals?

Access to sensitive PII and Credit Card information is logged, monitored and audited. This is used for FISMA and PCI DSS compliance. These logs are only available to system administrators.

3.6 Will the data included in any report(s) be de-identified?
No

3.6 Explain: If so, what process(es) will be used to aggregate or de-identify the data?

3.6 Why Not: Why will the data not be de-identified?

The Sales module produces Top 3 bidder report, register of remittance report, successful bidders report, defaulted bidders list.

- Top 3 bidders report: This report is produced for each sale/lot after the sale/lot is closed. The report lists the top 3 bidders for each sale/lot. The PII listed on this reports include bidder name, bidder company name (when available), address, email address, bidder #, and phone #.

- Register of remittance (ROR) report: This report is produced for every register (where payments are posted). ROR is an on-demand report which could be generated anytime after registers are closed. The PII listed in the report includes bidder name and last 4 of credit card # (for payments via credit card).
- Successful bidders report: This is an on-demand report which could be generated anytime after registers are closed. The PII listed in the report includes bidder #, bidder name and address.
- Defaulted bidders report: This report could be produced anytime. The report lists bidder # and bidder name.

All reports are accessible to the GSA Sales office as well as GSA-IT staff supporting the SASy module.

Auctions Reports: The application does not produce any report with PII information.

Sales Reports: The application does not produce any report with PII information.

Payment Reports: The application produces one report which is receipt of the payments made. The receipt prints payment details including payee name.

4.0 Limits on Using and Sharing Information

4.1: Is the information in the system, application, or project limited to only the information that is needed to carry out the purpose of the collection?
Yes

4.2: Will GSA share any of the information with other individuals, federal and/or state agencies, or private-sector organizations?
Other Individuals

4.2How: If so, how will GSA share the information?
The Personal Property Sales program SORN states "System records include: (1) Personal information provided by bidders and buyers, including, but not limited to, names, phone numbers, addresses, Social Security Numbers, birth dates and credit card numbers or other banking information, and (2) contract information on Federal personal property sales, including whether payment was received, the form of the payment, notices of default, and contract claim information

4.3: Is the information collected:
Directly from the Individual

4.3Other Source: What is the other source(s)?

4.4: Will the system, application, or project interact with other systems, applications, or projects, either within or outside of GSA?
Yes

4.4WhoHow: If so, who and how?
Auctions - Experian. The Auctions module shares bidder (Individual and Company) information for identity verification with Experian via the secure HTTPS PreciseID and BizID services. Data

is transmitted electronically via a HTTPS service during user registration. The sharing of information is for the sole purpose of verifying the potential user's identity so as to provide access to Auctions platform. A contract (Experian Data Use Addendum (DUA) to PO 4102859563 executed.pdf) is in place with Experian to provide PreciseID and BizID identity proofing services. The DUA document defines security and sharing parameters for information shared with and received by Experian. Experian will notify GSA of a suspected or confirmed security incident or breach of PII via email to the "HEAD SECURITY DESIGNATE" on file and other agency POCs as appropriate.

The Auctions, and Payment modules use Treasury's Pay.gov interface to process payment for awarded auctions/sales. Agreements "Pay.Gov GSA Auction ACT 082304 revised.doc" and Pay.Gov GSA Auction ACT 082304 revised.doc are in place with the Treasury to provide electronic payment services. Treasury will notify GSA of a suspected or confirmed security incident or breach of PII via email to agency POCs on file and other agency POCs as appropriate.

4.4Formal Agreement: Is a formal agreement(s) in place?
Yes

4.4NoAgreement: Why is there not a formal agreement in place?

5.0 Data Quality and Integrity
5.1: How will the information collected, maintained, used, or disseminated be verified for accuracy and completeness?

The source of the data is the individual providing the data during registration, payment, or profile updates. Identity data is verified on Auctions via Experian PreciseID and BizID services. If that fails, users can manually verify their identities with the Office of Personal Property Management. Email addresses, and email address changes are validated by an email activation link that is sent to the provided email address that the individual must click.

Auctions implemented identity proofing services to ensure that identity data provided by users was accurate and primarily not fraudulent. Experian services were chosen due to cost, ease of implementation, and Experian success providing similar services to other agency customers. These services mitigate risks associated with users attempting to register with another individual's information.

6.0 Security
6.1a: Who or what will have access to the data in the system, application, or project?
Sales: GSA Office of Personal Property Management employees with system administration access, Auctions Help Desk GSAContractors with Help Desk role, and GSAIT Development team members have access to PII data. New system users with privileged access must fill out a system specific User Access Request form which is reviewed and electronically signed by the account group owner defined in the Sales modules.

6.1b: What is the authorization process to gain access?

Access Request Process is filed in the google shared team drive. The account is then created with the following parameters:

- Only the roles and permission necessary for that individual's job function
- Restricted to least privileges necessary to perform job responsibilities

Privileges assigned are based on the individual's job classification and function

6.2: Has a System Security Plan (SSP) been completed for the Information System(s) supporting the project?
Yes

6.2a: Enter the actual or expected ATO date from the associated authorization package.
5/14/2021

6.3: How will the system or application be secured from a physical, technical, and managerial perspective?

This is a new system and the System Security Plan (SSP) has been completed. ATO will be issued in September 2021 before the system go-live

6.4: Are there mechanisms in place to identify and respond to suspected or confirmed security incidents and breaches of PII?
Yes

6.4What: What are they?

All PPMS Modules have role based access where users with need to know have access to the system. All GSA personnel undergo an annual Privacy training to ensure user privacy is maintained. Certain privileged users in Sales and Auctions applications have access to users SSN/TIN and credit card information. These privileged users' activities are logged as a security measure.

7.0 Individual Participation

7.1: What opportunities do individuals have to consent or decline to provide information?

Furnishing a social security number or tax identification number, as well as other data is voluntary, as is participation in the Personal Property Sales Program. Failure to provide this information, however, may result in ineligibility to purchase Federal personal property from the General Services Administration.

The Auctions Terms and Conditions (T&C) provides a statement on the need to collect Social Security Number for Individuals and Tax Identification Number (TIN). Text provided from Auctions T&C. The Debt Collection Improvement Act of 1996 is also referenced in the T&C as well as for fraud purposes. Credit Cards (CC) are not required to be provided during registration, however if a bidder needs to pay using CC, they have to provide one. Other PII information is required for all applications in order to validate user identity as well as have accurate user information.

7.1Opt: Can they opt-in or opt-out?
No

7.1Explain: If there are no opportunities to consent, decline, opt in, or opt out, please explain.

The Debt Collection Improvement Act of 1996 is also referenced in the T&C as well as for fraud purposes. Credit Cards (CC) are not required to be provided during registration, however if a bidder needs to pay using CC, they have to provide one. Other PII information is required for all applications in order to validate user identity as well as have accurate user information.

7.2: What are the procedures that allow individuals to access their information?

Auctions and Payment provide a "Protecting Your Privacy" web page which has a Privacy & Security Notice section that references the Privacy Act of 1974 (5 U.S.C. Section 552a, as amended). All other users have system use notification.

7.3: Can individuals amend information about themselves?

Yes

7.3How: How do individuals amend information about themselves?

Users can login to the system and update their information. They can also contact the respective point of contacts to update their information.

8.0 Awareness and Training

8.1: Describe what privacy training is provided to users, either generally or specifically relevant to the system, application, or project.

All GSA staff and contractors are required to take the mandatory annual Privacy training. GSA IT produces a report to identify individuals who have not taken the training and ensure the training is completed by everyone. GSA/ISP provides annual privacy training to all GSA employees (both federal and contractors).

9.0 Accountability and Auditing

9.1: How does the system owner ensure that the information is used only according to the stated practices in this PIA?

Personal Property Management System (PPMS) is designed with role-based access. The business line determines and assigns application roles/permissions based on business need and need to know basis. During the User Access Request and Approval process, access forms are reviewed, signed and filled out to ensure that roles requested are the roles and permissions that are used for account creation.

Users provided access to the applications can access limited functionality based on user roles. External users do not have privileged access to any applications.

Audit Safeguards: The PPMS application is hosted in AWS Virtual Private Cloud within the GSA network. The server has access to authorized personnel for application support. The application boundaries are defined in PPMS SSP. The PPMS application is accessible via internal to its users.