



**Federal Trade Commission
Privacy Impact Assessment**

for:

Publication Bulk Order

Updated November 2011

Introduction

The Federal Trade Commission's (FTC) Division of Consumer and Business Education (DCBE) produces print materials that offer practical advice to help consumers avoid scams and make informed buying decisions and to help businesses comply with the law. The FTC provides these materials – free of charge – to individuals and organizations who request copies.

The FTC distributes over 16 million publications each year to a variety of customers. These include libraries, credit counseling services, police departments, Congressional offices, community-based organizations, trade associations, corporations, and federal, state, and local government offices and other institutions.

The Publication Bulk Order System provides an online resource for customers to order FTC publications quickly and efficiently. The web-based order system allows customers to select publications from a catalog, add them to their "shopping cart," and "check out" by providing their shipping information. The order system is hosted by the FTC's contractor or subcontractor. The FCIC Publication Distribution Center in Pueblo, CO, handles order fulfillment. This facility pulls, packs, and ships the publications.

When customers fill out the bulk order form, they also can opt in to receive future communications from the FTC about consumer and business education. Communications may include notices about new materials, requests for feedback about FTC materials, and other announcements. All communications sent to customers who opt in include information about how the customer can unsubscribe from future communications.

System Overview

The Publication Bulk Order System is a custom designed website that collects, stores, and manages customer order and shipping information in a secure database. The FTC uses information gathered from customers to process their order and to contact customers if there are any problems. The FTC also uses this information to provide updates and other FTC communications to customers who request them.

Analysis

1. The Information That Will Be Collected (Nature and Source)

The web-based order system gathers information from customers who wish to order educational publications from the FTC. The information collected and maintained may include the customer's name, mailing address, telephone number, business affiliation, titles and quantities of publications ordered, and whether the customer agrees to be contacted to provide feedback about FTC materials. The customer provides this information directly and voluntarily.

For customers that “opt-in” to receive additional information from the FTC, the system also collects an email address. To opt-in, customers check a box at the bottom of the order form. The check box is **not** pre-checked. The text says:

Check here if you would like to receive communications from the FTC about consumer or business education. Communications may include:

- notices about new materials
- requests for your feedback
- other announcements

FTC servers automatically collect the following information from visitors: IP address, date and time of visit, referrer, entry page, exit page, browser, and operating system.

2. Why The Information Is Being Collected (Purpose)

The FTC bulk order site helps the agency accomplish its consumer and business education mission by allowing customers to request free publications. The FTC collects shipping information to send consumer and business education publications to customers who request them. In addition, the FTC collects an opt-in preference so that we know whether to send additional FTC communications to the customer.

The FTC may contact customers who opt-in to ask for their feedback on its materials. This feedback would be optional and voluntary. Such requests will comply with the Paperwork Reduction Act and OMB Guidance.

3. The Opportunities Individuals Will Have To Decline To Provide Information Or To Consent To Particular Uses Of The Information And How Individuals Grant Consent

Individuals may decline to provide customer information, but customer orders for FTC publications cannot be processed without accurate personal information required for shipping. The same publications are available at www.ftc.gov, so individuals may obtain the information through the website.

Customers who no longer wish to receive FTC updates may request to be removed from our contact lists. All FTC communications sent to customers include instructions for opting out of future communications.

All site visitors agree to the automatic collection of weblog information, as described in the FTC privacy policy.

4. Intended Uses Of The Information Collected

The FTC collects the customers' name, organization, mailing address, phone number, and email address in order to send them the publications they request, and to contact them in the event of delivery or fulfillment problems. Additionally, the FTC uses contact information to send communications to individuals, organizations, and agencies that "opt-in" to receive additional communications. The FTC uses Information about customer preferences to determine whether to send communications to a particular customer.

The FTC collects web log files to analyze overall traffic to the site and better serve visitors.

5. With Whom The Information Will Be Shared (Disclosures)

The FTC sends customer orders to the FCIC fulfillment center in Pueblo, CO. Staff at the fulfillment center use the information to ship orders.

Customer information may be shared in accordance with routine uses permitted by the Privacy Act, including in response to Freedom of Information Act requests from private individuals or companies, requests from Congress, or in litigation.

DCBE staff may use opt-in information to provide customers with additional information that may be of interest to them, or to solicit their feedback on FTC materials.

A limited number of FTC staff who provide internal reports on visits to FTC websites has access to the web log information.

6. Security (Administrative and Technological Controls, Including Maintenance and Disposal)

Personal information collected by the Publication Bulk Order System is safeguarded in several ways. The FTC uses a secure website to collect customer information, and stores the information on a secure server. Order information is compiled weekly, encrypted using PGP protocols, and sent via secure FTP to the Pueblo fulfillment center. The information on the collecting server is stored for not more than two years on a first-in, first-out (FIFO) basis.

Data sent to the Pueblo fulfillment center is decrypted strictly for purposes of processing customer orders. It is stored on a secure system for one year and deleted on a FIFO basis.

FTC staff stores information from customers who "opt-in" on FTC computers and systems until the individual requests deletion or we no longer anticipate sending information to that individual.

The FTC and its contractors follow applicable IT security requirements and procedures required by federal law and policy to ensure that information is secured appropriately. The FTC has conducted a risk assessment to identify appropriate security controls to protect against risks, and those controls are implemented. Monitoring, testing, and evaluation occurs on a regular basis to ensure that controls continue to work properly and that information is safeguarded. The FTC's Chief Information Security Officer is the point of contact for any security questions relating to this project.

7. Privacy Act

The customer information maintained in the Publication Bulk Order system is covered by an existing Privacy Act System of Records Notice, available at 57 FR 45678 (Oct. 2, 1992) (FTC VI-I, Mailing Lists).

8. Other Privacy Considerations And Analysis

To protect individuals' privacy, the FTC made the following decisions in configuring the Publication Bulk Order System. We limit access to the information to those individuals who have a business purpose for seeing the data. Second, we ensure that safeguards are in place to protect the information from internal misuse or external threats, such as hacking. We include a Privacy Act Statement and a link to our privacy policy on the online order form, so customers can make an informed decision about sharing their information with us. Lastly, we require that all outgoing communications include opt-out instructions for consumers who no longer wish to receive communications from the FTC.

The FTC has determined that the online ordering system's security protocols are sufficient to protect any electronic privacy interests, since the sensitivity of the information being collected is relatively low, i.e., contact information mostly from organizations, not individuals, without any financial or other personal information included. The FTC will ensure that these same or greater security controls are in effect with any successor contractor.

Additionally, the FTC's contractor or subcontractor has instituted safeguards for this information, including physical security of data resources, limited employee access to the data, data encryption, and secure data archive storage.

The website is not intended to collect information from children age 13 or under within the meaning of the Children's Online Privacy Protection Act (COPPA).

The website does not use persistent cookies or tracking mechanisms that collect personally identifiable information. The website uses non-persistent session cookies to collect a visitor's IP address and the date and time of the visit and to keep track of items in the "shopping cart" until checkout. These session cookies are temporary files that are erased when the user closes all browsers. Accepting session cookies on this website is required in order to process an order for publications.

10 Approval and Signature Page

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