



Federal Trade Commission
Privacy Impact Assessment

Publication Bulk Order

Reviewed and Updated

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Table of Contents

1	System Overview	3
2	Data Type, Sources, and Use	4
3	Data Access and Sharing	6
4	Data Accuracy and Security	8
5	Data Retention and Disposal	9
6	Website Privacy Evaluation	10
7	Privacy Risks and Evaluation	10

1 System Overview

1.1 Describe the project/system and its purpose.

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 is a contractor-hosted, custom-designed FTC website that collects, stores, and manages customer orders and shipping information in a secure database. Publication Bulk Order 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 Federal Citizen Information Center (FCIC) Publication Distribution Center in Pueblo, CO, handles order fulfillment. This facility pulls, packs, and ships the publications. The FTC uses information gathered from customers to process their orders and to contact customers if there are any issues; the FTC may also use this information to provide updates and other FTC communications to customers who request them.

When customers fill out the bulk order form, they can also choose to receive future similar publications and communications from the FTC about consumer and business education by checking a box to "opt in" to future FTC communications. These FTC communications may include notices about new materials, requests for feedback about FTC materials, and other announcements. All FTC communications include information about how the customer can unsubscribe from future communications.

1.2 What specific legal authority allows for the collection, maintenance, or dissemination of information for this project/system?

The Federal Trade Commission Act, 15 U.S.C. §§ 41-58, the Commission Rules of Practice, and other statutes and regulations enforced by the agency authorizes the FTC to collect the information that is sent, received, and maintained in the system.

2 Data Type, Sources, and Use

2.1 Specify in the table below what types of personally identifiable information (PII)¹ may be collected or maintained in the system/project. Check all that apply.

<i>PII Elements: This is not intended to be an exhaustive list. Specify other categories of PII as needed.</i>		
<input checked="" type="checkbox"/> Full Name	<input type="checkbox"/> Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/> User ID
<input type="checkbox"/> Date of Birth	<input type="checkbox"/> Audio Recordings	<input type="checkbox"/> Internet Cookie Containing PII
<input checked="" type="checkbox"/> Home Address	<input type="checkbox"/> Photographic Identifiers (e.g., image, x-ray, video)	<input type="checkbox"/> Employment Status, History, or Information
<input checked="" type="checkbox"/> Phone Number(s)	<input type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.)	<input type="checkbox"/> Employee Identification Number (EIN)
<input type="checkbox"/> Place of Birth	<input type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.)	<input type="checkbox"/> Salary
<input type="checkbox"/> Age	<input type="checkbox"/> Vehicle Identifiers (e.g., license plates)	<input type="checkbox"/> Military Status/Records/ ID Number
<input type="checkbox"/> Race/ethnicity	<input type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.)	<input checked="" type="checkbox"/> IP/MAC Address
<input type="checkbox"/> Alias	<input type="checkbox"/> Geolocation Information	<input type="checkbox"/> Investigation Report or Database
<input type="checkbox"/> Sex	<input type="checkbox"/> Passport Number	<input type="checkbox"/> Driver's License/State ID Number (or foreign country equivalent)
<input checked="" type="checkbox"/> Email Address		<input type="checkbox"/> Other (<i>Please Specify</i>): _____
<input checked="" type="checkbox"/> Work Address		
<input type="checkbox"/> Taxpayer ID		
<input type="checkbox"/> Credit Card Number		
<input type="checkbox"/> Facsimile Number		
<input type="checkbox"/> Medical Information		
<input type="checkbox"/> Education Records		
<input type="checkbox"/> Social Security Number		
<input type="checkbox"/> Mother's Maiden Name		

2.2 What types of information other than PII will be collected, disseminated, or maintained by the project/system? Provide a general description below and be sure to include all data elements.

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 business affiliation, titles and quantities of publications ordered, whether the customer wishes to receive future FTC communications, and whether the customer agrees to be contacted to provide feedback about FTC materials. The customer provides this information directly and voluntarily.

Customers who wish to receive additional information from the FTC can opt-in by checking a box at the bottom of the order form. That check box, which is not pre-checked, contains the following text:

“Check here if you would like to receive communications from the FTC, including:

¹ Per OMB Circular A-130, personally identifiable information (PII) means 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.

notices about new publications like the ones you've ordered requests for your feedback the FTC's monthly e-newsletter."²

Servers managed by the FTC's web hosting contractor automatically collect the following information from visitors: IP address, date and time of visit, referrer, entry page, exit page, browser, and operating system. The system also collects an email address for those customers who choose to receive additional information from the FTC. The system also uses cookies that temporarily collect and keep track of the user's "shopping cart" items until checkout and other cookies that maintain data for other general analytic and performance purposes (e.g., remembering the user's preferences). The system does not collect IP addresses related to form submissions and instead uses captchas as a spam prevention tool.

2.3 What is the purpose for collection of the information listed above?

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 the consumer's opt-in preference so that the FTC knows whether to send additional FTC communications to the customer. As noted above, cookie data are collected and used for order processing and other analytic and performance purposes.

In addition, the FTC may contact customers who choose to receive future FTC communications to ask for their feedback on its materials. This feedback would be optional and voluntary. Such requests are conducted in compliance with the Paperwork Reduction Act and applicable OMB guidance.

2.4 What are the sources of the information in the system/project? How is the information collected?

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
Members of the Public	The FTC collects the customer's 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 orders to determine whether to send communications to a particular customer.
FTC Staff	The FTC processes the customer's mailing address through an address verification system to verify the accuracy of the

² Customers who opt in are added to the FTC's GovDelivery email subscription service and will receive the monthly e-newsletter, Penn Corner. For more information, see the [GovDelivery PIA](#).

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
	provided address. Only the street address, city, state and zip code are processed. No information about the customers' name, telephone number, email address, business affiliation, titles and quantities of publications ordered, or "opt in" status is transmitted. Customers are given the opportunity to correct any address issues that are noted, or they can proceed to checkout with the address as provided. No information about the customers' address is stored by the verification system.

3 Data Access and Sharing

3.1 In the table below, specify the systems/applications and groups (both FTC and non-FTC) that will have access to or share data in the system/project.

<i>Data Will Be Accessed By and/or Provided To:</i>	<i>How and Why the Data Will Be Accessed/Shared</i>
FTC Staff	<p>Authorized 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 authorized FTC staff who provide internal reports on visits to FTC websites have access to the web log information.</p> <p>Cookie data are not shared, although the contractor may make site analytics data available in aggregate form (not identifiable by individual user) to the FTC.</p> <p>The FTC collects basic weblog and analytics information from all visitors to FTC websites, including the Bulk Order page, in compliance with applicable federal guidance and OMB requirements and as described in the FTC Privacy Policy and the PIA for FTC websites.³</p>
FCIC Fulfillment Center	The FTC securely shares customer order information with the FCIC fulfillment center in Pueblo, CO. Staff at the fulfillment center use the information to ship orders.
Other External Parties	When required, the FTC may share customer information with other external parties 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.

³ For more information, please see the [FTC Public Informational Websites PIA](#).

3.2 Do contractors and/or third party service providers have access to data in the project/system? If yes, explain what privacy requirements are in place to ensure that data is properly protected.

Authorized FTC contractors are required to sign nondisclosure agreements and complete security and privacy training prior to obtaining access to any systems, and thereafter complete annual security and privacy training to maintain network access and access to those systems.

3.3 If you answered “yes” to 3.2, describe the privacy incident response plan maintained by the contractor’s organization or third party service provider.

FTC contractors and Drupal system administrators who have access to the Bulkorder.ftc.gov website are subject to the same agency rules and policies followed by FTC staff. All contractors must also abide by the FTC’s Breach Notification Response Plan in the event of an incident or breach.

Notice and Consent

3.4 How are individuals provided with notice prior to the collection of their PII? If notice is not provided, explain why.

- Notice is provided via (*check all that apply*):
- Privacy Act Statement (Written Oral)
 - FTC Website Privacy Policy
 - Privacy Notice (e.g., on Social Media platforms)
 - Login banner
 - Other (*explain*): _____
- Notice is not provided (explain): _____

3.5 Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?

Individuals may decline to provide customer information, but customer orders for FTC publications cannot be processed without accurate personal information required for shipping and for shipment-related communications. The same publications are available [online](#), so individuals are able to obtain information through the FTC website.

Customers who choose to receive FTC communications but later decide that they no longer wish to receive FTC communications may request to be removed from FTC contact lists. All FTC communications sent to customers include instructions for opting out of future communications.

3.6 Are there procedures in place to allow individuals access to their personally identifiable information? Explain.

An individual may make a [request under the Privacy Act](#) for access to information maintained by the FTC about themselves in the Publication Bulk Order system. The FTC's privacy policy provides links to the FTC's [SORNs](#), as well as information about making [Freedom of Information Act \(FOIA\) requests](#) and the [online FOIA request form](#). Individuals must follow the FTC's Privacy Act rules and procedures, published in the Code of Federal Regulations (C.F.R.) at 16 C.F.R. 4.13. Access to information under the Privacy Act is subject to certain exemptions.

3.7 Are there procedures in place to allow individuals the ability to correct inaccurate or erroneous information? What is the process for receiving and responding to complaints, concerns, or questions from individuals? Explain.

The FTC provides a process for individuals to correct or amend any inaccurate PII maintained by the Agency. The FTC's privacy policy provides links to the FTC's SORNs, which include information about how to correct or amend records. An individual may make a request under the Privacy Act for access to information maintained by the FTC about themselves in the Publication Bulk Order system. Access to the information under the Privacy Act is subject to certain exemptions. Individuals may also file requests under the FTC under the FOIA for agency records that may be about them (if they are not exempt from disclosure to them under those laws).⁴ Additionally, individuals may contact the FTC with any complaints, questions or concerns via phone or email available on www.ftc.gov or contact the Chief Privacy Officer directly.

4 Data Accuracy and Security

4.1 Are there procedures in place to ensure that the information maintained is accurate, complete, and up-to-date?

The FTC processes the customer's mailing address through an address verification system to verify the accuracy of the provided address. Only the street address, city, state and zip code are processed. Customers are given the opportunity to correct any address issues that are noted, or they can proceed to checkout with the address as provided. It is the customer's responsibility to provide an accurate telephone number, email address, business affiliation, titles and quantities of publications ordered.

4.2 Are there administrative procedures and technical safeguards in place to protect the data in the system/project? What controls are in place to ensure proper use of the data? Please specify.

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

⁴ See 16 C.F.R. 4.11(a) (FTC FOIA rules), 4.13 (FTC Privacy Act rules).

on a secure server. Order information is compiled and provided to the Pueblo fulfillment center through secure web-based access. Access to the order information is restricted by IP address to only FTC or FCIC (at Pueblo) systems. The information on the collecting server is stored for not more than two years on a first-in, first-out (FIFO) basis.

Once received by FCIC fulfillment center, data 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.

Technical information – including IP address, date and time of visit, referrer, entry page, exit page, browser, and operating system – is recorded in web server log files and retained on servers for 90 days and on tape for six months. This information is collected for security and internal operations purposes only.

The FTC limits access to the information in Publication Bulk Order to only those individuals who have a business purpose for seeing the data. Additionally, the FTC ensures that appropriate safeguards are in place to protect the information from internal misuse or external threats, such as hacking. The online order form includes a Privacy Act Statement and a link to the FTC's [privacy policy](#), so customers can make an informed decision about sharing their information with us. Lastly, the FTC requires that all outgoing communications include opt-out instructions for consumers who no longer wish to receive communications from the FTC.

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

4.3 Is PII used in the course of system testing, training, or research? If so, what steps are taken to minimize and protect PII during this process?

Not Applicable. PII is not used for system testing, training, or research.

5 Data Retention and Disposal

5.1 Specify the period of time that data is retained in the system/project. What are the specific procedures for disposing of the data at the end of the retention period?

The FTC will maintain and dispose of PII and other information collected by Bulk Order in accordance with FTC regulations, policies, and procedures as well as with the FTC records disposition schedule and General Records Schedules approved by the National Archives and Records Administration (NARA).

6 Website Privacy Evaluation

6.1 Does the project/system employ the use of a website? If so, describe any tracking technology used by the website and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, web beacon). Describe the purpose of using such tracking technology.

Yes, the Publication Bulk Order website makes limited use of persistent and session cookies to provide analysis of site use and to improve the website experience for site visitors. Session cookies keep track of items in the “shopping cart” until checkout, and persistent cookies allow the FTC to analyze site traffic and remember when a site visitor has declined the FTC’s customer satisfaction survey. Information on the [FTC’s use of cookies](#) is also available online, including options for users who wish to decline such cookies.

The FTC collects basic weblog and analytics information from all visitors to FTC websites, including the Bulk Order page, in compliance with applicable federal guidance and OMB requirements. Users’ options for declining the system’s use of cookies are explained in the FTC’s [Privacy Policy](#).

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).

7 Privacy Risks and Evaluation

7.1 Considering the type of information collected and sources of collection, what privacy risks were identified and how were these risks mitigated?

<i>Risk</i>	<i>Mitigation Strategy</i>
Individuals who have access to PII could exceed their authority and use the data for unofficial/unauthorized purposes.	System administrators strictly manage access control and limit the use and access of all data to purposes for which it was collected. A system log is maintained that reflects who accessed the data at any given time, and whether the data was tampered with or edited. Data is also purged after a set period of time to ensure that only relevant and up to date information is maintained in the system.
An individual may enter his/her full SSN in the free text field	System administrators have the ability to access individual records and delete information as necessary, including SSNs. SSNs are not required by the system, but if individuals do opt to provide the information, it is the system admin’s responsibility to delete the data as it is not necessary for the purposes of this system.

7.2 Does the project/system employ the use of automated privacy controls or enhanced capabilities designed to support privacy? Explain.

Bulkorder.ftc.gov is designed to automatically purge customer order data after five years. Order data is only accessible by authorized users who are subject to the same privacy controls that are in place for the FTC's public facing websites (e.g., www.ftc.gov and www.consumer.ftc.gov). All files shared with the vendor for processing are transmitted using data encryption to ensure user information is maintained in a secure manner.

7.3 Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register for this system/project? If so, list the applicable SORN(s).

The customer information maintained in the Publication Bulk Order system is covered by an existing Privacy Act System of Records Notice (SORN), [FTC VI-I, Mailing Lists](#).⁵

7.4 How does the project/system ensure that the information is collected, used, stored, or disseminated in accordance with stated practices in this PIA?

The FTC and its contractors follow applicable federal IT security requirements and FTC policy and procedures to ensure that personal 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 occur on a regular basis to ensure that controls continue to work properly and that information is safeguarded.

⁵ All of the FTC's SORNs are available [online](#).