

**PRIVACY IMPACT ASSESSMENT
JP Morgan Chase PaymentNetG
6/15/2016**

A. Data in the System

Question	Explanation/Instructions
<p>1. What is the specific purpose of the agency's use of the information and how does that use fit with the agency's broader mission?</p>	<p>PaymentNet® allows the customer Agency to manage and perform reporting on their J.P. Morgan Chase provided card programs (Purchase, Travel, Fleet and Integrated). The application allows Agencies to setup Agency-specific details about each card as well as their hierarchical interrelationships. It also loads charge card transaction information daily and allows Agencies to run custom views of this information based on their own hierarchies. Additional modules allow Agencies to create and manage their credit card accounts. They can alter their credit limits and other characteristics real-time. Single-Use is a payables solution that allows Agencies to electronically request custom card numbers tailored to individual payments. Agencies also require the information to process bills and payment reconciliations.</p>
<p>2. Describe all information to be included in the system, including personal data.</p>	<p><i>a.</i> PaymentNet® is a web based application that allows the customer to manage and perform reporting on their J.P. Morgan Chase provided card programs. The application allows customers to setup company-specific details about each card as well as their hierarchical interrelationships. It also loads credit card transaction information daily and allows customers to run custom views of this information based on their own hierarchies. Additional modules allow customer to create and manage their credit card accounts. They can alter their credit limits and other characteristics real-time. Single-Use is a payables solution that allows customers to electronically request custom card numbers tailored to individual payments.</p> <p><i>b.</i> Customer Name Billing Address Phone Number Email Address Account Number Social Security Number Credit Limit Date of Birth</p>
<p>2.a. What stage of the life cycle is the system currently in?</p>	<p>Operation/Maintenance.</p>
<p>2.b. What are the sources of the information in the system?</p>	<p>The Data originates from Client entered information and 3rd party processor information, Total Systems (TSYS) and Electronic Data Systems (EDS).</p>
<p>2.c. What GSA files and databases are used?</p>	<p>None – Information entered into the system by the client.</p>

<p>2.d. What Federal agencies are providing data for use in the system?</p>	<p>Overseas Private Investment Corp Department of the Interior Department of Commerce Department of Transportation US Office of Personnel Management National Credit Union Administration US Holocaust Museum Appalachian Regional Commission Social Security Administration Department of Education National Aeronautics & Space Admin Small Business Administration Office of Finance & Logistics Smithsonian Institution US Senate Environmental Protection Agency National Science Foundation Securities & Exchange Commission Library of Congress Congressional Budget Office Office of Compliance Department of Homeland Security Department of Justice DC Pretrial Service Agency Court Services & Offender Supervision Agency Department of Health and Human Services Federal Deposit Insurance Corp Federal Reserve Board Architect of the Capitol DC Gov't Office of Chief Financial Officer Department of Energy Delta Regional Authority Federal Aviation Administration Federal Communication Commission Gila River Health Care and Gila River Indian Nation Houlton Band of Maliseet Indians Internal Revenue Service Open World Leadership Center Prairie Band of Potawatomie Nation All provide the same data elements listed for their employees.</p>
<p>2.e. What State and local agencies are providing data for use in the system?</p>	<p>NONE. As it pertains to this contract, no state or local agencies are providing data.</p>
<p>2.f. From what other third party sources will the data be collected?</p>	<p>TSYS and EDS..</p>

2.g. What information will be collected from the individual whose record is in the system?	Same as in Line Item #2
3. How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?	<i>The accuracy of personal information is very important. Indicate the steps that will be taken to ensure that the data is accurate and the integrity of the data remains intact.</i> Data validation process of files, including transaction totals are conducted electronically. The process originates at the JP Morgan Chase PaymentNetG system. Transactions are verified at the Agencies and Individuals that did transactions on the Travel Program part of the system.
3.a. How will data be checked for completeness?	Via the data validation process.
3.b. Is the data current? How do you know?	Yes. Daily records to reconcile are provided.
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	Yes. JPMC PaymentNetG IDW Reconciliation and the source of the data elements is the GSA contract for services with JP Morgan Chase under the SmartPay Program.

B. Access to the Data

Question	Explanation/Instructions
1. Who will have access to the data in the system?	Authorized JPMC personnel required to support Commercial Card process. Also Authorized Customer Agency Personnel from Agencies listed in Part II Section A Line Item 2d.
1.a. Is any of the data subject to exclusion from disclosure under the Freedom of Information Act (FOIA)? If yes, explain the policy and rationale supporting this decision.	<p>Personal information, account information – including payment history, and account numbers. The rationale supporting this decision is JPMC's Privacy Policy, which prohibits the release of personal information.</p> <p><i>If so, reference the specific exemption under the FOIA (5 U.S.C. Section (b)(1) through (9)), to support your rationale.</i></p> <p>Each individual Agency can, depending on their needs for security or mission, use any of the FOIA exceptions but that is based on their mission and needs. JPMC does not controls that process but is bind to provide any data requested by the Government, only for the Agency and Approval of the Agency, but not directly to any Outside Government specific Agency requester.</p> <p><i>Dept. of Justice guidance on exemptions:</i> http://www.usdoj.gov/oip/foi-act.htm</p> <p><i>FOIA text:</i> http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm,</p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access is controlled via pre-established protocols by entitlement systems at Agencies which require management approval. Each Agency established a Task Order which defines access protocols, data sets to be transferred and to where in encrypted files or live sessions with PaymentNetG. Yes, procedures are documented on the GSA/JPMC System Security Plan and individual Agency Task Orders.
3. Will users have access to all data in the system or will the users' access be restricted? Explain.	Users will be limited to information that requires them to complete their specific tasks as defined by their Agencies. Access is granted per the Agency Managers request for each type of User. A user CardHolder has access to bills and their own access credentials for verifying the bills and making payments under the Travel Program. Agency users that grant access to Users of all programs are segregated by programs such as Travel, Purchase, Fleet. Credentials that provide access rights are approved for access by pre-approved Agency managers who have been manually validated by Agency and JPMC..

<p>4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?</p>	<p>Risk Managers and Compliance Managers at GSA (Individual Agencies too) and JP Morgan Chase have the ability to review all user activity. Users only have access to that data in which they are allowed to see per User access rights and Job requirements (Agency payment reconciliation, Program Managers for Programs) and have access to only their own Agency data or part of their agency data as defined on Task Orders or GSA Master Contract. Controls defined by GSA master contract, Federal Information Systems Management Regulations, GSA Chief Information Officer and Designated Approval Authority designated and verified controls.</p>
<p>5. Do other systems share data or have access to data in this system? If yes, explain.</p>	<p><i>List any systems that will either send or receive data in this system. Explain the purpose of the connection and the methods used to ensure integrity and security of the data being exchanged.</i> Yes. Other platforms (Systems that perform Security and Compliance functions like Scans to Hardware, Operational Programs, Databases, Internet systems and Networks) are used to support internal reporting and control functions. Modules of PaymentNetG extract data for Agencies functions such as Payments and reconciliation. Data is transferred via pre-approved secured and monitored channels to Agency controlled systems via batch files. All interconnections are defined on system Security Plan and their implementation verified during the System Approval Process or Certification Authorization under GSA guidance and independent assessors.</p>
<p>5.a. Who will be responsible for protecting the privacy rights of the clients and employees affected by the interface?</p>	<p><i>List the title and office of the person(s) responsible to ensure that the privacy data is being handled properly. This typically should be the System Manager.</i> Designated Compliance Managers at JP Morgan Chase, Information Risk Managers, and Senior Management at JP Morgan Chase, GSA SmartPay Program Manager and Agencies Program Managers share this responsibility.</p>
<p>6. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?</p>	<p><i>List any entities that may access the data in this system and specify which data. If there are none, enter None.</i> No. Access is restricted to authorized users of specific agencies approved by GSA for the purpose of using Cards to do payments, reconcile those payments and pay Invoices. One agency does not have the ability to access another agency's data. Any individual information collected is for purposes of issuing cards, mail bills and reconcile payments from the individual.</p>
<p>6.a. How will the data be used by the agency?</p>	<p>Information reporting, accounting, and tracking purposes.</p>
<p>6.b. Who is responsible for assuring proper use of the data?</p>	<p><i>This should typically be the same person(s) listed for question 5.b.</i> Along with GSA SmartPay Program and customer Agencies JPMC management, designated Compliance Managers, Risk Managers, and System Manager.</p>

<p>6.c. How will the system ensure that agencies only get the information to which they are entitled?</p>	<p><i>List the controls and security mechanisms in place to ensure that exchange of data is appropriate.</i> The system restricts access based on Roles and Responsibilities and the access rights granted to each User designated to perform a Role at the agency or JPMC to have access to the agencies data.</p>
<p>7. What is the life expectancy of the data?</p>	<p>Data is maintained online for 36 months and offline for 7 Years, and then archived to tape based on JPMC Information Media Retention and Destruction Policy, Federal Regulatory Requirements, or Individual Agency mandated requirements as defined on Task Order and Master Contract..</p>
<p>8. How will the data be disposed of when it is no longer needed?</p>	<p><i>Provide explanation of data disposal process. Indicate methods for disposing of data from operational databases as well as for archiving systems.</i> After normal data retention time periods have expired, destruction of data will follow JPMC's Information Media Retention and Destruction Policy. JPMC uses destruction, scrubbing and cleaning processes that satisfy GSA required minimums as verified during the Assessment validation process performed by GSA Chief Information Officer.</p>

C. Attributes of the Data

Question	Explanation/Instructions
<p>1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?</p>	<p><i>List each data element and the relevance to the system.</i> YES</p> <p><i>List each data element and the relevance to the system.</i> Customer Name – Needed to issue card Billing Address – Needed to submit Billing statement Phone Number – Needed for Customer contact Email Address – Needed for Customer contact Account Number – Needed for account maintenance Social Security Number – Needed to establish credit limit Date of Birth – Needed to specifically identify a cardholder</p>
<p>2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?</p>	<p>NO</p>
<p>2.a. Will the new data be placed in the individual's record (client or employee)?</p>	<p>NO. Not Applicable.</p>
<p>2.b. Can the system make determinations about individuals that would not be possible without the new data?</p>	<p>N/A</p>
<p>2.c. How will the new data be verified for relevance and accuracy?</p>	<p>N/A</p>
<p>3. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.</p>	<p>N/A</p>
<p>3.a. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.</p>	<p>N/A</p>
<p>4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.</p>	<p>Unique identifiers are generated by the system based on some of the individual Record information and random part of the identifier but no Privacy Data will be used to retrieve client data. No personal identifiers will be used.</p>

<p>5. What are the potential effects on the privacy rights of individuals of:</p> <p>a. Consolidation and linkage of files and systems;</p> <p>b. Derivation of data;</p> <p>c. Accelerated information processing and decisionmaking; and</p> <p>d. Use of new technologies. How are the effects to be mitigated?</p>	<p>a. No data consolidation will be occurring</p> <p>b. No derivation of data is performed on the JPMC System.</p> <p>c. No Privacy information will be used for accelerated processing and decision making.</p> <p>d. The use of any new technologies will be used on the analysis of transaction data and not the individuals privacy information. New technologies used for mining information of the transactions performed by an agency or for the GSA SmartPay program are focused on trends on all data for specific programs (Travel, Fleet and Purchase card) not the individual.</p>
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D. Maintenance of Administrative Controls

Question	Explanation/Instructions
1. Explain how the system and its use will ensure equitable treatment of individuals.	The system does not differentiate amongst users. Everyone is treated the same.
1.a. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites?	The system was built to allow for multiple user interaction. Monitoring tools are in place to ensure system stability.
1.b. Explain any possibility of disparate treatment of individuals or groups.	The system does not differentiate amongst users. Everyone is treated the same.
2. What are the retention periods of data in this system?	Data is retained on the system for at least 36 months on line and additional 7 Years OFFLINE archived to tape.
2.a. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	The procedures for eliminating the data are defined within the JPMC Information Media Retention and Destruction Policy, and are conducted in accordance with the Department of Defense (DOD) Standard for clearing and sanitizing media. All media that cannot be cleared or sanitized must be shredded or otherwise destroyed rendering the media unusable.
2.b. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Daily batch processes occur between the issuing processor (TSYS, EDS) and JPMC to ensure that sufficient and accurate information is kept up to date.
3. Is the system using technologies in ways that Federal agencies have not previously employed (e.g. Caller-ID)?	NO.
3.a. How does the use of this technology affect individuals' privacy?	Does not affect the individual privacy any more than what individuals do on their private life by getting credit or a credit card.
4. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	NO

4.a. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	NO.
4.b. What controls will be used to prevent unauthorized monitoring?	Client determines level of monitoring for their users.
5. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name.	The Privacy Act System of Records notice that PaymentNetG operates under GSA SmartPay contract are Purchase Card Program GSA/PPFM-10 and Travel System GSA/PPFM-3.
5.a. If the system is being modified, will the SOR require amendment or revision? Explain.	NO.