WIDEPOINT PERSONAL IDENTITY VERIFICATION SHARED SERVICE PROVIDER PROGRAM (WIDEPOINT PIV SSP)

PRIVACY IMPACT ASSESSMENT

WIDEPOINT PIV SSP PIA

Version 2.3

March 30, 2020

WidePoint Cybersecurity Solutions Corporation
11250 Waples Mill Road
South Tower, Suite 210
Fairfax, VA 22030

<u>Notice</u>: Operational Research Consultants, Inc. (ORC), a wholly-owned subsidiary of WidePoint Corporation, has changed its legal name to WidePoint Cybersecurity Solutions Corporation, hereafter referred to simply as WidePoint. This is a legal name change only for branding purposes with no change to ownership, corporation type or other status. Any and all references to "WidePoint" within this document refers specifically and only to WidePoint Cybersecurity Solutions Corporation, the wholly-owned subsidiary of WidePoint Corporation, and not to WidePoint Corporation as a whole. Any reference or citing of personnel within this document, such as "WidePoint CEO", refers to the CEO of WidePoint Cybersecurity Solutions Corporation and not the CEO of WidePoint Corporation.

DOCUMENT REVISION HISTORY

Date	Comments	Version	Author
4/12/2017	Initial Version	1.0	Michael Boorom
1/13/2018	Updated to follow new format	2.0	Richard Webb
10/17/2019	Annual review and update	2.1	Richard Webb
3/27/2020	Updates and responses to GSA Privacy officials' comments	2.2	
3/30/2020	Added Signature Page	2.3	Qamar Hasan (Privacy Office)

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Stakeholders

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Name of Program Manager/System Owner:

- Cheryl Jenkins

Signature Page

Signed:

DocuSigned by:
Joseph Hoyt
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Information System Security Manager (ISSM)

DocuSigned by:
Cheryl Jenkins
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Program Manager/System Owner

DocuSigned by:
Richard Speidel
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Chief Privacy Officer (CPO) - Under the direction of the Senior Agency Official for Privacy (SAOP), the CPO is responsible for evaluating the PIA and ensuring the program manager/system owner has provided complete privacy-related information.

TABLE OF CONTENTS

1 SECTION 1.0 PURPOSE OF COLLECTION

1.1 WHY IS WIDEPOINT COLLECTING THE INFORMATION?

WidePoint operates as a Federal Personal Identity Verification (PIV) Shared Service Provider, hereafter referred to as "The WidePoint PIV SSP", for federal agencies that issues PIV credentials and digital certificates that identify individuals and devices for use with electronic authorizations such as digital signing, smart card logon to networks, access to websites and applications as well as physical access authorizations. The WidePoint PIV SSP operates a certification authority infrastructure that issues digital certificates contained on HSPD-12 PIV credentials issued to federal agencies and their contractors. Additionally, The WidePoint PIV SSP manages the life cycle of those issued credentials and certificates to include revocation, renewal, and expiration. In order to issue digital certificates and PIV credentials that identify a human or a device digitally, identification information is collected to ensure that human or device that the certificate or credential represents is who they say they are. The WidePoint PIV SSP Digital Certificate Credentials are utilized to provide secure authentication and trusted transactions for Federal employees and contractors, and their devices (including web services and domain authentication). These Credentials can be used to:

- Authenticate to government and organization websites
- Contract for the purchase of goods or services
- Verify the identity of electronic mail correspondents
- Verify the identity of web/application servers and devices
- Verify the identity of individuals and devices accessing data servers
- Verify the identity of individuals for physical access

1.2 WHAT LEGAL AUTHORITY AND/OR AGREEMENTS ALLOW WIDEPOINT TO COLLECT THE INFORMATION?

The WidePoint PIV SSP is approved by the Federal PKI Policy Authority to issue certificates under the Federal PKI Common Policy Framework, hereafter referred to as "FPCPF" see here - https://www.idmanagement.gov/topics/fpki/#certificate-policies. WidePoint PIV SSP has been an approved provider of credentials under the FPCPF since 2007. WidePoint's most recent Memorandum of Agreement (MOA) with the Federal PKI Policy Authority can be found in APPENDIX A.

1.3 Is the information searchable by a personal identifier, for example a name or Social Security Number? If so, what System of Records Notice(s) apply/applies to the information being collected?

In accordance with Federal Information Processing Standard 201-2 Personal Identity Verification (PIV) of Federal Employees and Contractors published August 2013, hereafter referred to as "FIPS 201-2", The WidePoint PIV SSP does collect information that is personally identifiable in order to issue a PIV credential to a Federal Employee or a Contractor. The types of Personally Identifiable Information, hereafter referred to as "PII", is detailed by Section 2 of FIPS 201-2, in particular Section 2.4 – Biometric Data Collection for PIV Card, and Section 2.6 – Chain of Trust which describes the data captured to tie an individual to the biometric data captured as described in Section 2.4.

Individual agencies are responsible for creating their own System of Records Notice(s), hereafter referred to as "SORNs".

1.4 Has any information collection request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)? If yes, provide the relevant names, OMB control numbers, and expiration dates.

No.

1.5 Has a records retention schedule been approved by the National Archives and Records Administration (NARA)? Explain how long and for what reason the information is retained.

In accordance with FPCPF Section 5.5 – Records Archival and Section 5.5.2 - Retention Period for Archive, (see here - https://www.idmanagement.gov/wp-content/uploads/sites/1171/uploads/fpki-x509-cert-policy-common.pdf) and The WidePoint PIV SSP Certificate Practice Statement Section 5.5 – Records Archival and Section 5.5.2 - Retention Period for Archive, The WidePoint PIV SSP maintains collected information for 10 years and 6 months. WidePoint is currently going back to the CP to provide an artifact showing they issue at Medium/moderate assurance, not High. This would mean the 10yr retention would be satisfactory based on FPCPF guide.

1.6 Are there any privacy risks that relate to the purpose of the collection? If so, how will GSA mitigate these risks?

Privacy Risk: User information may be exposed during the request process.

Mitigation: Request processes are performed under Secure SSL sessions by an FIPS 201 approved Card Management System and the WidePoint PIV SSP Certificate Authority. These instances are protected by SSL certificates that are issued in accordance with the WidePoint PIV SSP Certificate Practice Statement and the FPCPF.

2 SECTION 2.0 OPENNESS AND TRANSPARENCY

2.1 WILL INDIVIDUALS BE GIVEN NOTICE PRIOR TO THE COLLECTION AND/OR SHARING OF PERSONAL INFORMATION ABOUT THEMSELVES? IF NOT, PLEASE EXPLAIN.

The FPCPF Certificate Policy Section 9.4 – Privacy of Personal Information and subsections along with the WidePoint PIV SSP CPS Section 9.4 – Privacy of Personal Information and subsections provide public notice of what data is collected, what data is treated as private and what data is deemed not private, and how that data is to be protected. Additional notices are determined by the Federal Department/Agency that is sponsoring the individual for a PIV Card.

2.2 ARE THERE ANY PRIVACY RISKS FOR THIS SYSTEM THAT RELATE TO OPENNESS AND TRANSPARENCY? IF SO, HOW WILL GSA MITIGATE THESE RISKS?

No. WidePoint's Privacy Act Notice is posted on all WidePoint sites (Web and physical) and describes WidePoint's actions with respect to PII.
As part of the application process for any WidePoint credential, a prospective Subscriber must agree to a set of obligations which include acknowledgement of WidePoint's Privacy Act Notice

3 SECTION 3.0 DATA MINIMIZATION

3.1 WHOSE INFORMATION IS INCLUDED IN THE SYSTEM, APPLICATION OR PROJECT?

Employees and contractors requiring PIV credentials for Federal agencies.

3.2 WHAT PII WILL THE SYSTEM, APPLICATION OR PROJECT INCLUDE?

In accordance with Federal Information Processing Standard 201-2 Personal Identity Verification (PIV) of Federal Employees and Contractors published August 2013, hereafter referred to as "FIPS 201-2", the WidePoint PIV SSP does collect information that is personally identifiable in order to issue a PIV credential to a Federal Employee or a Contractor. The types of Personally Identifiable Information, hereafter referred to as "PII", is detailed by Section 2 of FIPS 201-2, in particular Section 2.4 – Biometric Data Collection for PIV Card, and Section 2.6 – Chain of Trust which describes the data captured to tie an individual to the biometric data captured as described in Section 2.4.

As such, the WidePoint PIV SSP collects name, date of birth, email address, photograph, and fingerprint minutiae. SSN is used for individuals who choose (optional) to provide it for identity-proofing purposes. Other identity source documents are available as alternatives. As a general rule, the WidePoint PIV SSP does not collect Social Security Numbers. If it is collected as a form of identification, the SSN is stored as the document name for the document presented for identification purposes.

3.3 WHY IS THE COLLECTION AND USE OF THE PII NECESSARY TO THE SYSTEM, APPLICATION OR PROJECT?

In accordance with Federal Information Processing Standard 201-2 Personal Identity Verification (PIV) of Federal Employees and Contractors published August 2013, hereafter referred to as “FIPS 201-2”, the WidePoint PIV SSP does collect information that is personably identifiable in order to issue a PIV credential to a Federal Employee or a Contractor. The types of Personally Identifiable Information, hereafter referred to as “PII”, is detailed by Section 2 of FIPS 201-2, in particular Section 2.4 – Biometric Data Collection for PIV Card, and Section 2.6 – Chain of Trust which describes the data captured to tie an individual to the biometric data captured as described in Section 2.4.

3.4 WILL THE SYSTEM, APPLICATION OR PROJECT CREATE OR AGGREGATE NEW DATA ABOUT THE INDIVIDUAL? IF SO, HOW WILL THIS DATA BE MAINTAINED AND USED?

Yes. The WidePoint PIV SSP collects PII information as defined in Section 3.3 of this document and ties that information to digital certificates that are issued to PIV credentials so that PIV Credential holders may assert their identity electronically. Only Name, email address and affiliation are tied to the certificate (not SSN).

3.5 WHAT PROTECTIONS EXIST TO PROTECT THE CONSOLIDATED DATA AND PREVENT UNAUTHORIZED ACCESS?

The WidePoint PIV SSP systems that collect PII data and issue digital certificates in accordance with the FPCPF are certified by the General Services Administration (GSA) up to FISMA-Moderate. The latest FISMA-Moderate ATO can be found in APPENDIX B of this document.

In order to protect data and prevent unauthorized access, roles are defined within the WidePoint PIV SSP CPS in Section 5.2.1 – Trusted Roles. There are 4 trusted roles:

Administrator – responsible for installation, configuration and operation of the WidePoint PIV SSP Certificate Authorities and Certificate Status Authorities.

Officer – responsible for issuing and revoking certificates/credentials. The role is generally referred to as a Registration Authority (RA) and may have further sub classification in terms of the issuance of PIV credentials (i.e., Registrar and Issuer).

Auditor - The Corporate Security Auditor is responsible for backing up and archiving all audit data and reviewing the audit logs recorded by WidePoint PIV SSP CMS, CAs, RAs, and CSSs.

Operator - The WidePoint PIV SSP refers to the Operator as the System Administrator (SA). The WidePoint PIV SSP SA is primarily responsible for administration of WidePoint PIV SSP CAs, RAs, and CSSs host computers and operating systems to include initial configuration, account management, network configuration and system backup and recovery among other things.

Privacy data is protected at several levels. With respect to the application and the machine running those applications, two party control is implemented. Administrators are responsible for the application that hosts the PII data – i.e. CMS, CAs and CSSs. Operators are responsible for the machine that hosts these applications. The applications and machines are physically hosted within the WidePoint Secure Network Operations Center (SNOC) in a cage that requires one Administrator and one Operator in order to access the cage hosting the systems. Additionally, Operators have root access privileges to the systems but do not have the ability to operate the applications. Operators must grant Administrators root privileges in order for the Administrator to administer the applications of CMS, CA or CSS. All work is done under two party control.

With respect to the process of issuing PIV credentials to individual subscribers, the Registrar role is responsible for gathering user information and vetting that information before passing that information onto the Issuer role who is responsible for the issuance of the PIV credential to the user. Issuance of a PIV credential requires both a Registrar and Issuer to complete. No person may act as both a Registrar and Issuer for the issuance of a particular PIV credential. Registrar and Issuers must authenticate under a secure session using their individual PIV credential to the WidePoint PIV SSP Card Management System (WidePoint PIV SSP CPS) in order perform their duties with respect to PIV credential issuance. User privacy data is restricted to authenticated access by either the Registrar or Issuer.

3.6 WILL THE SYSTEM MONITOR THE PUBLIC, GSA EMPLOYEES OR CONTRACTORS?

No. Performance monitoring is at the operating system level. Since this is not a system that does continuous monitoring of the credentials that it issues or performs periodic re-vetting of individuals who already have credentials,

3.7 WHAT KINDS OF REPORT(S) CAN BE PRODUCED ON INDIVIDUALS?

Monthly reports of active PIV Credentials that show user name, email address, issuance date and expiration date, employee or contractor status are generated and submitted to customer departments/agencies. Reports are encrypted and provided to the departments/agencies through a secure portal that requires access by a designated Point of Contact within the department/agency. Only the designated Point of Contact can download the report.

3.8 WILL THE DATA INCLUDED IN ANY REPORT(S) BE DE-IDENTIFIED? IF SO, WHAT PROCESS(ES) WILL BE USED TO AGGREGATE OR DE-IDENTIFY THE DATA?

No.

3.9 ARE THERE ANY PRIVACY RISKS FOR THIS SYSTEM THAT RELATE TO DATA MINIMIZATION? IF SO, HOW WILL GSA MITIGATE THESE RISKS?

N/A.

4 SECTION 4.0 LIMITS ON USES AND SHARING OF 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, PII collected by the WidePoint PIV SSP is limited to the information required by FIPS 201-2, the FPCPF Certificate Policy, and the WidePoint PIV SSP CPS.

4.2 WILL GSA SHARE ANY OF THE INFORMATION WITH OTHER INDIVIDUALS, FEDERAL AND/OR STATE AGENCIES, OR PRIVATE SECTOR ORGANIZATIONS? IF SO, HOW WILL GSA SHARE THE INFORMATION?

PII information collected by the WidePoint PIV SSP is not shared with other individuals, Federal and/or state agencies, except those departments/agencies who are subscribers to the WidePoint PIV SSP for issuance of PIV credentials to their Federal employees or Contractors. Individuals may view their own PII data and, as stipulated in section 4.1.1 – Who can submit a Key Recovery Application of the FPKI Key Recovery Policy (see here - https://www.idmanagement.gov/wp-content/uploads/sites/1171/uploads/fpki-krp-v1.0-10-6-2017.pdf), authorized third-party requestors (e.g. law enforcement personnel) with a court order from a competent court.

4.3 IS THE INFORMATION COLLECTED DIRECTLY FROM THE INDIVIDUAL OR IS IT TAKEN FROM ANOTHER SOURCE? IF SO, WHAT IS THE OTHER SOURCE(S)?

Biometric PII information – including fingerprints, eye and hair color, height - is collected directly from the user during an in-person enrollment process as described in FIPS 201-2, FPCPF, and the WidePoint PIV SSP CPS. PII information of non-biometric data may be directly uploaded by the department/agency for which the individual is a Federal Employee or Contractor.

4.4 WILL THE SYSTEM, APPLICATION OR PROJECT INTERACT WITH OTHER SYSTEMS, APPLICATIONS OR PROJECTS, EITHER WITHIN OR OUTSIDE OF GSA? IF SO, WHO, HOW AND IS A FORMAL AGREEMENT(S) IN PLACE?

No. The WidePoint PIV SSP does not share data with any other systems. The WidePoint PIV SSP has no Interconnection agreements. Data may only be shared as previously stipulated and in accordance with the governing documents: FIPS 201-2, FPCPF Certificate Policy, the FPKI Key Recovery Policy and the WidePoint PIV SSP CPS.

4.5 ARE THERE ANY PRIVACY RISKS FOR THIS SYSTEM, APPLICATION OR PROJECT THAT RELATE TO USE LIMITATION? IF SO, HOW WILL GSA MITIGATE THESE RISKS?

N/A.

5 SECTION 5.0 DATA QUALITY AND INTEGRITY

5.1 HOW WILL THE INFORMATION COLLECTED BE VERIFIED FOR ACCURACY AND COMPLETENESS?

PII data collected is verified against physical documentation that is used to establish the identity of the PIV credential recipient. The biometric capture devices use algorithms to determine if the capture is a good capture and repeatable in the case of fingerprint capture.

5.2 ARE THERE ANY PRIVACY RISKS FOR INDIVIDUALS WHOSE INFORMATION IS COLLECTED OR USED THAT RELATE TO DATA QUALITY AND INTEGRITY? IF SO, HOW WILL GSA MITIGATE THESE RISKS?

No. The biometric data captured during the enrollment process for a PIV Credential is in accordance with NIST Special Publication 800-76-2Biometric Specifications for Personal Identity Verification.

6 SECTION 6.0 SECURITY

6.1 WHO OR WHAT WILL HAVE ACCESS TO THE DATA IN THE SYSTEM, APPLICATION OR PROJECT? WHAT IS THE AUTHORIZATION PROCESS TO GAIN ACCESS?

Employees of the the WidePoint PIV SSP who have access to PII contained within the WidePoint PIV SSP are in trusted roles assigned by the WidePoint Chief Security Officer and who have undergone role-based training as outlined in the WidePoint System Security Plan, Awareness and Training Control AT-3 – Role-Based Security Training. AT-3 Role-Based Training applies to Certificate Authority Administrators who are responsible for the WidePoint PIV SSP applications, hereafter referred to as CAA, System Administrators who are responsible for the WidePoint PIV SSP systems and operating systems, hereafter referred to as SA, Issuers who approve the issuance of the PIV Credential, and Registrars who perform the vetting of the individual to receive the PIV Credential. These role assignments include review of all governing policy, practice and procedure documents.

Role Based users may have access to PII Data contained within the system as previously detailed in Section 3.5 of this document. For SAs and CAAs that govern the operating system and the application respectively, risk is mitigated by having two-party control on all systems that contain PII data (i.e. One (1) CAA and One (1) SA must authenticate to the system before any action can be accomplished). The WidePoint systems that collect PII data and issue digital certificates in accordance with the FPCPF are certified by the General Services Administration (GSA) up to FISMA-Moderate.

6.2 HAS WIDEPOINT COMPLETED A SYSTEM SECURITY PLAN FOR THE INFORMATION SYSTEM(S) OR APPLICATION?

Yes. The current version is 6.2.2 dated 31 May 2019.

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

The WidePoint systems that collect PII data and issue digital certificates in accordance with the FPCPF are certified by the General Services Administration (GSA) up to FISMA-Moderate. The latest FISMA-Moderate ATO can be found in APPENDIX B of this document.

Physical and technological controls are defined in the WidePoint PIV SSP CPS Section 5 – Facility, Management, and Operational Controls and Section 6 – Technical Security Controls. These are further defined in the WidePoint System Security Plan through Control Family Physical and Environmental Protection – all controls, Control Family System and Services Acquisition Control, in particular SA-4: Acquisition Process, Control Family Personnel Security – all controls, Control Family Media Protection – all controls, Control Family Maintenance – all controls.

6.4 Are there mechanisms in place to identify suspected or confirmed security incidents and breaches of PII? If so, what are they?

The WidePoint PIV SSP is certified at FISMA-Moderate and is audited by a third party auditor. Systems are configured to provide audit logging capabilities in compliance with the WidePoint IA/IDM System Security Plan Audit and Accountability Control AU-2 – Type of events and collected to a Splunk system that is used to analyze operating system level logging. Systems are evaluated by Nessus and OWASP scans and internal POA&Ms in accordance with Security Assessment and Authorization Control CA-5- Plan of Action and Milestones are conducted to address any findings. Penetration tests are performed in accordance with Security Assessment and Authorization Control CA-8 Penetration Testing.

Additionally, WidePoint conducts annual exercises for incident responses and is detailed in the WidePoint PIV SSP Incident Response Plan. WidePoint has also developed and conducts exercises in incident response separate from contingency planning

6.5 Are there any privacy risks for this system, application or project that relate to security? If so, how will the WidePoint PIV SSP mitigate these risks?

Yes. There is a possibility that reporting data involving incidents may involve PII data. Security reporting is scrubbed of PII data during the compilation. In addition, any audit data that is removed from the system is encrypted, password protected and placed on unalterable media (i.e. CDs/DVDs).

7 SECTION 7.0 INDIVIDUAL PARTICIPATION

7.1 WHAT OPPORTUNITIES ARE AVAILABLE FOR INDIVIDUALS TO CONSENT TO USES, DECLINE TO PROVIDE INFORMATION OR OPT OUT OF PROVIDING INFORMATION? IF NO OPPORTUNITIES EXIST TO CONSENT, DECLINE OR OPT OUT, PLEASE EXPLAIN.

In order for Federal Employees and Contractors to obtain PIV credentials consistent with FIPS 201-2, Federal Employees and Contractors must present PII data as specified in Section 3.2 of this document. Federal Employees and Contractors who decline to provide information are not eligible to receive a PIV from the WidePoint PIV SSP. Additionally, PIV Card applicants are employees or contractors of Federal Departments or Agencies, and are governed by the policies of their respective Department or Agency. PIV Card applicants are advised by the WidePoint PIV SSP system of the Conditions of Use for their PIV Card. These conditions are spelled out below:

□ The PIV Card is your identification for the Agency. The PIV Card is the property of the Agency, is issued by the Agency to the Cardholder only, and is non-transferable.

□ Use of the PIV Card may be revoked at the Agency's and/or Certificate Authority’s sole discretion for violation of the Agency's and or Certificate Authority’s policies and procedures. Employees and contractors must relinquish the card upon separation from the Agency. The Agency must revoke the card and properly destroy.

□ The PIV Card must be presented upon request at the time of use to obtain access or to establish official Agency status. The PIV Card is to be used only by the person to whom it is issued. Only the cardholder can present the PIV Card for access and other privileges. The PIV Card will be confiscated, certificates revoked, and card destroyed if presented by someone other than the Cardholder.

□ The Agency Rules and Regulations govern the use of the PIV Card.

7.2 WHAT PROCEDURES ALLOW INDIVIDUALS TO ACCESS THEIR INFORMATION?

This is governed by the policies of the WidePoint PIV SSP department/agency customers.

Additionally, the WidePoint PIV SSP Digital Identity Acceptance Statement under Identification and Authentication Control IA-1: Identification and Authentication Policy and Procedures defines the respective Assurance Levels of the WidePoint PIV SSP.

The Identity Assurance Level for the WidePoint PIV SSP is IAL3 as the PIV Credential issuance process requires physical presence for identity proofing.

The Authentication Assurance Level for the WidePoint PIV SSP is AAL2 as the PIV Credential issued through this process is a multi-factor authentication vehicle for the PIV Credential holder. The PIV Credential provides three (3) levels of authentication:

Have: individual has PIV credential/certificates on that credential that uniquely identify the holder of that credential.

Know: Certificates and biometric data that are stored in the secure container of the PIV credential are protected by a strong PIN.

Are: Biometrics (fingerprints, photo) are stored in the secure container of the PIV credential and protected by a strong PIN.

The Federation Assurance Level for the WidePoint PIV SSP is Not Applicable. The WidePoint PIV SSP requires in person vetting of individuals and does not have any Federation process to receive information about that individual during the vetting process. The WidePoint PIV SSP requires I-9 documentation from the individual prior to allowing PIV Credential issuance. The WidePoint PIV SSP does not federate any individual PII data post issuance. PII Data is maintained solely by the WidePoint PIV SSP as a means to prove that sufficient identifying information was gathered to allow for the creation of a PIV Credential to that individual.

7.3 CAN INDIVIDUALS AMEND INFORMATION ABOUT THEMSELVES? IF SO, HOW?

Individuals may amend data about themselves as stipulated in Section 2.9.2 – PIV Card Post Issuance Update Requirements of FIPS 201-2, Section 4.8 – Certificate Modification of the FPCPF CP, and Section 4.8 – Certificate Modification of the WidePoint PIV SSP CPS. They are not able to update their data without the help of an approved Issuer that has role-based access to the system. A WidePoint PIV SSP approved Issuer must act in accordance with the provisions stipulated in the listed governing documents.

7.4 ARE THERE ANY PRIVACY RISKS FOR THIS SYSTEM, APPLICATION OR PROJECT THAT RELATE TO INDIVIDUAL PARTICIPATION? IF SO, HOW WILL THE WIDEPOINT PIV SSP MITIGATE THESE RISKS?

No. Individual access is only granted through authentication of that individual's PIV credential. The WidePoint PIV SSP Issuers are the only role that can change that information post-capture.

8 SECTION 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.

The WidePoint PIV SSP conducts privacy and security training in accordance with the WidePoint IA/IDM System Security Plan, Awareness and Training Control AT-2 – Security Awareness Training which is mandatory for all employees. Employees who have access to PII contained within the WidePoint PIV SSP are in trusted roles assigned by WidePoint with executive authorization and who have undergone role-based training as outlined in the WidePoint System Security Plan, Awareness and Training Control AT-3 – Role-Based Security Training. AT-3 Role-Based Training applies to CAAs, SAs, Issuers, and Registrars. These role assignments include review of all governing policy and practice documents as previously defined.

8.2 ARE THERE ANY PRIVACY RISKS FOR THIS SYSTEM, APPLICATION OR PROJECT THAT RELATE TO AWARENESS AND TRAINING? IF SO, HOW WILL GSA MITIGATE THESE RISKS?

Yes. Role Based users may have access to PII Data contained within the system as stipulated earlier in Section 3.5 of this document (The WidePoint PIV SSP systems that collect PII data and issue digital certificates in accordance with the FPCPF are certified by the General Services Administration (GSA) up to FISMA-Moderate). For System Administrators and Certificate Authority Administrators that govern the operating system and the application respectively, risk is mitigated by having two-party control on all systems that contain PII data (i.e. One (1) Certificate Authority Administrator and One (1) System Administrator must authenticate to the system before any action can be accomplished).

9 SECTION 9.0 ACCOUNTABILITY AND AUDITING

9.1 HOW DOES THE SYSTEM, APPLICATION OR PROJECT ENSURE THAT THE INFORMATION IS USED IN ACCORDANCE WITH THE STATED PRACTICES IN THIS PIA?

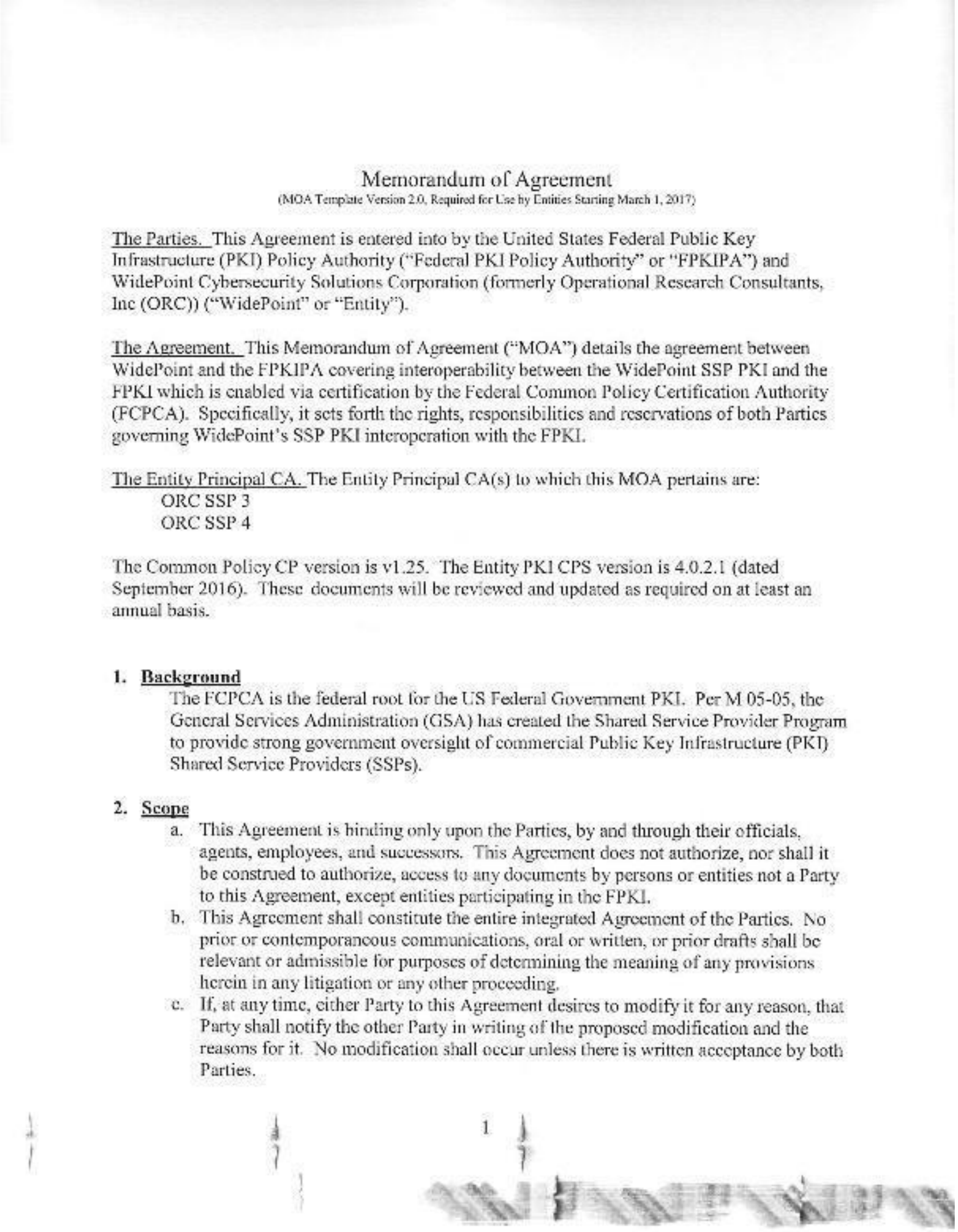
The WidePoint SSP is audited and accredited by an independent third party in accordance with the FPKIPA Certificate Policy and the WidePoint SSP Certification Practice Statement. The audits are performed on an annual basis and submitted to the FPKIPA. WidePoint has an internal Corporate Security Auditor that reviews audit log data gathered as referenced in section 6.5 of this document, and in accordance with the certificate policy which states that logs are reviewed at a minimum every 2 months. Reports are posted to an internal share and management is notified of the report and any issues that may arise from that report.

9.2 ARE THERE ANY PRIVACY RISKS FOR THIS SYSTEM, APPLICATION OR PROJECT THAT RELATE TO ACCOUNTABILITY AND AUDITING? IF SO, HOW WILL GSA MITIGATE THESE RISKS?

No. Privacy data is not included in the audit and accountability reports. Audit data reports are reduced to block out user names and any personal identifying information. Audit reports are to ensure that certificates are issued properly and that the system is functioning in accordance with the System Security Plan, the Common Policy and the Certificate Practice Statement.

APPENDIX A

WidePoint PIV SSP Memorandum of Agreement (MOA) granted by the Federal PKI Policy Authority.



Memorandum of Agreement

(MOA Template Version 2.0, Required for Use by Entities Starting March 1, 2017)

The Parties. This Agreement is entered into by the United States Federal Public Key Infrastructure (PKI) Policy Authority ("Federal PKI Policy Authority" or "FPKIPA") and WidePoint Cybersecurity Solutions Corporation (formerly Operational Research Consultants, Inc (ORC)) ("WidePoint" or "Entity").

The Agreement. This Memorandum of Agreement ("MOA") details the agreement between WidePoint and the FPKIPA covering interoperability between the WidePoint SSP PKI and the FPKI which is enabled via certification by the Federal Common Policy Certification Authority (FCPCA). Specifically, it sets forth the rights, responsibilities and reservations of both Parties governing WidePoint's SSP PKI interoperation with the FPKI.

The Entity Principal CA. The Entity Principal CA(s) to which this MOA pertains are:

ORC SSP 3
ORC SSP 4

The Common Policy CP version is v1.25. The Entity PKI CPS version is 4.0.2.1 (dated September 2016). These documents will be reviewed and updated as required on at least an annual basis.

1. **Background**

The FCPCA is the federal root for the US Federal Government PKI. Per M 05-05, the General Services Administration (GSA) has created the Shared Service Provider Program to provide strong government oversight of commercial Public Key Infrastructure (PKI) Shared Service Providers (SSPs).

2. **Scope**

a. This Agreement is binding only upon the Parties, by and through their officials, agents, employees, and successors. This Agreement does not authorize, nor shall it be construed to authorize, access to any documents by persons or entities not a Party to this Agreement, except entities participating in the FPKI.

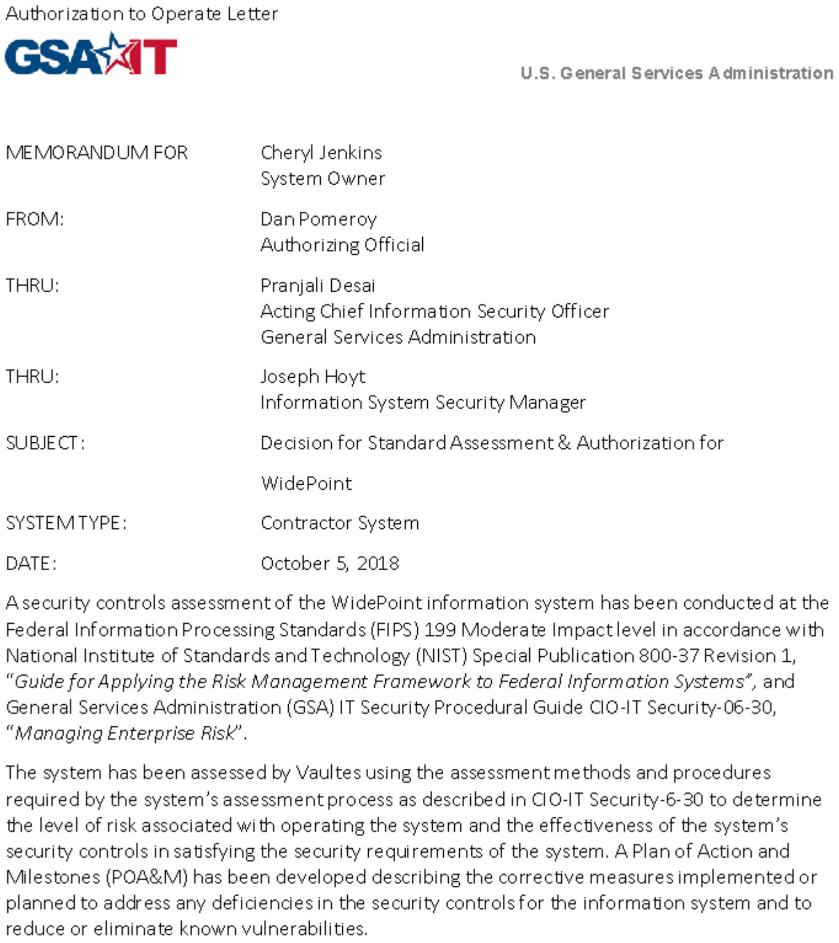
b. This Agreement shall constitute the entire integrated Agreement of the Parties. No prior or contemporaneous communications, oral or written, or prior drafts shall be relevant or admissible for purposes of determining the meaning of any provisions herein in any litigation or any other proceeding.

c. If, at any time, either Party to this Agreement desires to modify it for any reason, that Party shall notify the other Party in writing of the proposed modification and the reasons for it. No modification shall occur unless there is written acceptance by both Parties.

1

10 APPENDIX B

WidePoint PIV SSP Authority to Operate (ATO) at FIPS 199 Moderate Impact level.



Authorization to Operate Letter

GSA IT

U.S. General Services Administration

MEMORANDUM FOR	Cheryl Jenkins System Owner
FROM:	Dan Pomeroy Authorizing Official
THRU:	Pranjali Desai Acting Chief Information Security Officer General Services Administration
THRU:	Joseph Hoyt Information System Security Manager
SUBJECT:	Decision for Standard Assessment & Authorization for WidePoint
SYSTEM TYPE:	Contractor System
DATE:	October 5, 2018

A security controls assessment of the WidePoint information system has been conducted at the Federal Information Processing Standards (FIPS) 199 Moderate Impact level in accordance with National Institute of Standards and Technology (NIST) Special Publication 800-37 Revision 1, "*Guide for Applying the Risk Management Framework to Federal Information Systems*", and General Services Administration (GSA) IT Security Procedural Guide CIO-IT Security-06-30, "*Managing Enterprise Risk*".

The system has been assessed by Vaultes using the assessment methods and procedures required by the system's assessment process as described in CIO-IT Security-6-30 to determine the level of risk associated with operating the system and the effectiveness of the system's security controls in satisfying the security requirements of the system. A Plan of Action and Milestones (POA&M) has been developed describing the corrective measures implemented or planned to address any deficiencies in the security controls for the information system and to reduce or eliminate known vulnerabilities.