



Privacy Impact Assessment of the Federal Reserve Regulatory Service Ordering System

Program or application name: Federal Reserve Regulatory Service (FRRS) Ordering System

System owner: Board of Governors of the Federal Reserve System's (Board) Office of Board Members

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Description of the IT system:

The FRRS Ordering System is an online ordering platform maintained by a vendor on behalf of the Board (the "FRRS vendor"). The purpose of the FRRS Ordering System is to allow individuals and organizations to subscribe to the Federal Reserve Regulatory Service (FRRS), which is a Board publication that compiles statutes administered by the Board along with regulations, interpretations, policy statements, rulings, and opinions

issued by the Board and its staff. The FRRS also contains select regulations issued by other agencies that are relevant to the Board's responsibilities.

1. The information concerning individuals that is being collected and/or maintained:

The FRRS Ordering System will maintain subscriber's first and last name, FRRS account information (log-in and password information), company name (if applicable), shipping address, billing address, email address, and a phone number (which may be the business or individual subscriber's number). The System will also maintain subscriber order history, order type, and fulfillment information (shipping and delivery instructions).

The FRRS vendor will not be provided with individual online payment information submitted by subscribers. Online payment will be collected using the PayPal Express Checkout API (application programming interface). The PayPal API functions separately from the FRRS Ordering System website and ensures that the subscriber's payment information (from such payment instruments as a credit or debit card, or a direct debit from a bank account) is not shared or transmitted to the FRRS Ordering System itself, but is instead collected and retained only by PayPal through the PayPal API. The FRRS Ordering System alerts subscribers that they are using a commercial payment service and may consult PayPal's privacy policies for details on the applicable safeguards.

The FRRS vendor will collect individual check payments submitted by subscribers if the order is by check. Check payments will be collected and processed offline and payment information will not be shared or transmitted to the FRRS Ordering System website. Online payments will flow from PayPal to the FRRS vendor's PayPal account and offline check payments will flow to the FRRS vendor's bank account and both will be disbursed by the FRRS vendor to the Board on a monthly basis.

The FRRS vendor will provide the Board with a monthly report containing FRRS subscription revenue and selected subscriber and fulfillment information of current FRRS subscribers, including the individual subscriber's name, their company name (if applicable), their address, and order type. The monthly reports will be stored at the Board.

For FRRS subscriptions ordered before the implementation of the FRRS Ordering System, the Board will maintain historical subscription information in paper for six years, which is the National Archives and Record Administration (NARA)-approved record retention period.

2. Source(s) of each category of information listed in item 1:

The individual subscriber generally provides the subscription information. Some organizations may procure enterprise FRRS subscriptions for multi-user access to the FRRS, in which case an enterprise account holder will provide the relevant subscription information on behalf of individual subscribers within the enterprise. In addition, not all FRRS subscribers provide payment as, for example, Board employees do not pay for FRRS subscriptions.

3. Purposes for which the information is being collected:

The Board and its FRRS vendor maintain the records in the FRRS Ordering System in order to allow individuals to subscribe to the FRRS. The FRRS Ordering System allows individuals to become a subscriber by creating an account with the FRRS and ordering a subscription to the FRRS.

4. Who will have access to the information:

The Board and the FRRS vendor restrict access to those whose official duties require them to access the records in the FRRS Ordering System. Within the Board, the Board restricts access to authorized employees and contractors and within the vendor organization, the vendor restricts access to authorized customer support and IT personnel. In addition, the Board may disclose information in the FRRS Ordering System for the purposes set forth in the System of Records entitled BGFRS—40, “FRB—Board Subscription Services.”

5. Whether the individuals to whom the information pertains have an opportunity to decline to provide the information or to consent to particular uses of the information (other than required or authorized uses):

The Board and its FRRS vendor only collect and store information required for official business purposes. The information collected by the FRRS

Ordering System is provided voluntarily; however, if the individual does not provide their information, they will not be able to establish an account and subscribe to the FRRS.

6. Procedure(s) for ensuring that the information maintained is accurate, complete, and up-to-date:

The FRRS Ordering System is designed to capture all the essential information required to complete key FRRS subscription tasks, including subscription purchase (through the PayPal Express Checkout API or by check), account creation, and digital subscription activation. Subscribers who fail to provide any required information are prompted to do so before the task can be completed. Subscribers are also given the opportunity to amend their information before the purchase transaction is completed. In addition, the FRRS Ordering System provides customer service resources to subscribers should he or she wish to update their information.

Authorized vendor customer support personnel will maintain and update subscriber information as needed using a secure HTTPS server administrative console with SSL/TLS encryption.

7. The length of time the data will be retained and how will it be purged:

The NARA-approved retention period for the FRRS records, including the historical paper records, is six years. The Board will dispose of the records at the end of their retention periods, subject to an annual close-out.

8. The administrative and technological procedures used to secure the information against unauthorized access:

The FRRS Ordering System maintains subscriber account/fulfillment information. The FRRS vendor uses encryption to protect PII whenever information needs to be entered or accessed on the FRRS Ordering System. Information entry by subscribers occurs during four processes—login, account creation, subscription activation, and checkout—all of which take place within an encrypted HTTPS session.

The FRRS vendor stores subscriber account/fulfillment information as paper and electronic records. The vendor restricts access to these stored records to authorized personnel who require access for official business purposes. The

vendor maintains the information stored as paper records onsite in locked file cabinets in a secure building. The vendor secures information stored as electronic records via password protection and stores the information on a cloud storage database hosted by a third-party service provider, which delivers both physical and virtual security for the vendor's network and equipment. Authorized vendor personnel with access to the electronic records include select vendor customer support and IT employees. Vendor customer support personnel have access to the electronic records through a secure HTTPS server administrative console with SSL/TLS encryption. Vendor IT personnel responsible for the FRRS Ordering System's operation and maintenance have access to the database only over a Virtual Private Network (VPN) with a secure connection.

The FRRS vendor does not collect individual online payment information, as Paypal processes the payment information. Paypal protects all online payment information collection and processing with SSL/TLS encryption, while also using both physical and electronic safeguards to protect the security of its systems. The FRRS Ordering System utilizes PayPal Express Checkout API to allow the subscriber to use their PayPal balance, bank account, or credit or debit card to pay without sharing or entering any sensitive information on the FRRS Ordering System. The PayPal Express Checkout API uses an integration method which ensures that no payment information is transmitted on the FRRS vendor's servers at any time.

The FRRS vendor collects (in paper form) individual check payments submitted by subscribers if the order is by check. The FRRS vendor stores subscriber check payment information as paper records. The vendor restricts access to these stored records to authorized personnel who require access for official business purposes. The vendor maintains the information stored as paper records onsite in locked file cabinets in a secure building. Online payments flow from PayPal to the FRRS vendor's PayPal account and offline check payments flow to the FRRS vendor's bank account and the vendor disburses both types of payments to the Board on a monthly basis.

In addition, the FRRS vendor provides the Board with a monthly report that contains select FRRS subscriber account/fulfillment information. The Board restricts access to the monthly report to authorized staff with a need-to-know. Board staff will access the monthly report through a secure HTTPS server administrative console with SSL/TLS encryption. The Board will store its copy of the monthly report on a secure sever.

