

Federal Trade Commission  
Privacy Impact Assessment

**Microsoft Office 365 (O365)  
Multi-Tenant & Support Service**

**August 2022**





## 2 Data Type, Sources, and Use

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

*PII Elements: This is not intended to be an exhaustive list. Specify other categories of PII as needed.*

- Full Name
- Date of Birth
- Home Address
- Personal Phone Number
- Work Phone Number
- Place of Birth
- Age
- Race/ethnicity
- Alias
- Sex
- Email Address
- Work Address
- Taxpayer ID
- Credit Card Number
- Facsimile Number
- Medical Information
- Education Records
- Social Security Number
- Mother's Maiden Name

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

Information in O365 applications is collected, used, disseminated, and maintained for the Commission to perform its law enforcement, policy, personnel management, and other activities. Due to the range of supported services, personal information may be present for a variety of reasons in the course of conducting



Wherever possible, the FTC provides timely and effective notice to the public and/or to individuals about activities that impact privacy. For information that is collected pursuant to a request from the FTC, notice is provided as part of that request. The FTC's Privacy Act statements are included on all forms, websites, and other instruments by which Privacy Act information is collected from individuals, either in written or oral form. For those occasions where the FTC cannot provide notice at the time the information is collected (e.g., when the information is collected by another law enforcement agency or another organization), the FTC provides notice via its Privacy Policy, its Privacy Act system of records notices (SORNs), and its PIAs, including this one.

- Notice is provided via ( ):  Privacy Act Statement ( Written  Oral)  
 FTC Website Privacy Policy  
 Privacy Notice (e.g., on Social Media platforms)  
 Login banner  
 Other ( ): \_\_\_\_\_

Notice is not provided (explain): \_\_\_\_\_

**4.2 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)?**

The opportunity or right depends on how the information is collected. The FTC does not use O365 to collect information, including PII, directly from the public. However, FTC staff and contractors use O365 in furtherance of the FTC's law enforcement or policy mission. Information collected through other sources, which includes PII, is maintained in O365. Please see the list of the [FTC's Privacy Impact Assessments](#) for more information on how the FTC collects information from the public.

For example, FTC staff may include information obtained from a consumer complaint filed with the FTC's Consumer Sentinel Network in a document (Word) or an email (Outlook) that includes PII from members of the public. In that instance, the consumer has notice and opportunity to decline to provide information prior to filing the complaint. However, when PII obtained from a company pursuant to compulsory process is included in O365, individuals may not have received notice or been provided with an opportunity to decline to provide the information.

**4.3 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 and retrieved according to personal identifier by the FTC about themselves in the FTC's Privacy Act systems, including any data stored in O365 applications. The FTC's Privacy Policy provides links to the FTC's [System of Records Notices \(SORNs\)](#), as well as information about making [Freedom of Information Act \(FOIA\) requests](#) and the [online FOIA](#)







O365 from timing out while a user is logged into it, but these cookies are used for internal purposes only. O365 does not collect information directly from the public.

## 8 Privacy Risks and Evaluation

### 8.1 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>
Misuse of data by authorized users	Prior to receiving access to the FTC's network, all users must agree to the FTC Rules of Behavior, which includes consent to monitoring and restrictions on data usage.
Unauthorized system access	All users must have an FTC account and government-issued personal identity verification (PIV) card to access O365. FTC's user identity management processes include authentication with Active Directory (AD) to control and ma



## Approval and Signature Page

***Prepared By:***

\_\_\_\_\_ **Date:** \_\_\_\_\_  
**Laurie Wallin**  
**Office of the Chief Information Officer (OCIO)**

***Reviewed By:***

\_\_\_\_\_ **Date:** \_\_\_\_\_  
**John Krebs**  
**Office of the Chief Privacy Officer (OCPO)**

\_\_\_\_\_ **Date:** \_\_\_\_\_  
**Richard Gold**  
**Office of the General Counsel (OGC)**

\_\_\_\_\_ **Date:** \_\_\_\_\_  
**Jeffrey Smith**  
**Office of the Chief Information Officer (OCIO)**

\_\_\_\_\_ **Date:** \_\_\_\_\_  
**Yvonne Wilson**  
**Records and Information Management Office (RIM)**

***Approved By:***

\_\_\_\_\_ **Date:** \_\_\_\_\_  
**Mark Gray**  
**Office of the Information Officer (OCIO)**