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1 System Overview

1.1 Describe the project/system and its purpose.

The Federal Trade Commission (FTC) is committed to preserving the public's trust by adhering to the various laws and ethics regulations that guide the performance of each FTC employee's official duties. The Ethics Team within the FTC Office of General Counsel (OGC) is responsible for helping agency employees maintain these high standards of ethical behavior. They are responsible for ensuring that FTC staff receive the appropriate ethics training and disclose any potential conflicts of interest to their supervisors and to the Ethics Team. Ensuring that FTC employees perform their duties while adhering to the agency's strong guidelines and principles is an important part of the FTC's mission of protecting consumers. Failure to do so may result in costly ethics violation fines, loss of public trust, and irreparable damage to the agency's reputation.

The Ethics Team utilizes the Financial Disclosure of public officials (5 CFR 2635.502-21)

program that walks employees through the entire filing process, ensuring both the

maintained in FDOnline includes only a listing of assets (e.g., names of securities or mutual funds held) and financial reports. Specific account numbers, account values, PINs, or credit reports are not included.

Additional PII maintained in the system by the FTC Ethics Team includes: employee name, employee office/organization code, GS-level, and potentially the name of an employee's pet (for FTC's K-9 Korner photo consent form). The signatures of the filing employee and the initial reviewer and/or the final reviewing official are also included in

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

Source of Data	Type of Data Provided & How It Is Collected
FTC Employees (OGE Form 450 filers)	FTC employees required to complete OGE Form 450 will access FDOnline

Data Will Be Accessed
By and/or Provided

4 Notice and Consent

4.1 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):

A Privacy Act Statement is included on the OGE Form 450 as it appears within the FD Online system. Additionally, an explanation of the requirement to file the OGE Form 450 report is provided in writing by the FTC Human Capital Management Office (HCMO) during the hiring process. OGE Form 450 and FTC Form 474 (outside employment approval) filing requirements are also discussed orally during ethics orientation (mandatory for all new hires) and during annual ethics training (required for a subset of FTC employees).

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5.3 Has the system/project undergone the appropriate security risk assessment and received authority to operate?

Yes, FDOOnline has undergone a security risk assessment and received an authority to operate. The system is categorized as a moderate system using Federal Information Processing Standards (FIPS) 199, Standards for Security Categorization of Federal Information and Information Systems.

5.4 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

No live PII or production data are used for testing or any other purposes.

6 Data Retention and Disposal

6.1 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 information contained in FDOOnline will be disposed of in accordance with NARA GRS 2.8 (Employee Ethics Records).

7 Website Privacy Evaluation

7.1 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.

Authorized FTC employees access FDOOnline via a web application that uses temporary session cookies. Use of the temporary session cookie is necessary to move the user
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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?

Risk	Mitigation Strategy
<p>Information contained in system/project may be inaccurate or incomplete.</p>	<p>The FTC's Ethics Team is able to review data in iFDOnline and correct errors. The FTC's Ethics Team will perform quality monitoring periodically and can identify, review, correct, and log inaccuracies to prevent recurrence (although all OGE Form 450 reports are tracked, logged, and reviewed by a supervisor, a subset of OGE Form 450 reports are also carefully reviewed by the FTC's Ethics Team each year for accuracy).</p>

Individuals who have access to PII could exceed their authority and use the data for

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