

Federal Trade Commission  
Privacy

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information of respondents and counsel matters is collected for the purpose of serving these individuals with documents.

## 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.**

|  |   |   |
|--|---|---|
| <input checked="" type="checkbox"/> Full Name        | <input type="checkbox"/> Biometric Identifiers (e.g., fingerprint, voiceprint)                              | <input type="checkbox"/> User ID  |
| <input type="checkbox"/> Date of Birth               | <input type="checkbox"/> Audio Recordings   | <input type="checkbox"/> Internet Cookie Containing PII                                   |
| <input checked="" type="checkbox"/> Home Address     | <input type="checkbox"/> Photographic Identifiers (e.g., image, x-ray, video)                               | <input checked="" type="checkbox"/> Employment Status, History, or Information            |
| <input checked="" type="checkbox"/> Phone Number(s)  | <input type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.)                                  | <input type="checkbox"/> Employee Identification Number (EIN)                             |
| <input type="checkbox"/> Place of Birth              | <input type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.)     | <input type="checkbox"/> Salary   |
| <input type="checkbox"/> Age                         | <input type="checkbox"/> Vehicle Identifiers (e.g., license plates)   | <input type="checkbox"/> Military Status/Records/ ID Number                               |
| <input type="checkbox"/> Race/ethnicity              | <input type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.) | <input type="checkbox"/> IP/MAC Address   |
| <input type="checkbox"/> Alias                       | <input type="checkbox"/> Geolocation Information  | <input checked="" type="checkbox"/> Investigation Report or Database                      |
| <input type="checkbox"/> Sex                         | <input type="checkbox"/> Passport Number  | <input type="checkbox"/> Driver's License/State ID Number (or foreign country equivalent) |
| <input type="checkbox"/> Email Address               |   | <input checked="" type="checkbox"/> Other ( <i>Please Specify</i> ): Organization Name    |
| <input checked="" type="checkbox"/> Work Address     |   |   |
| <input type="checkbox"/> Taxpayer ID                 |   |   |
| <input type="checkbox"/> Credit Card Number          |   |   |
| <input checked="" type="checkbox"/> Facsimile Number |   |   |
| <input type="checkbox"/> Medical Information         |   |   |
| <input type="checkbox"/> Education Records           |   |   |
| <input type="checkbox"/> Social Security Number      |   |   |
| <input type="checkbox"/> Mother's Maiden Name        |   |   |

For each Agency matter, the system collects some or all of the information in the chart above on non-FTC parties (e.g., persons who submit public comments, defendants, opposing counsel, intervening parties, etc.), if any, who are involved in or associated with the particular matter (e.g., subjects of investigations, witnesses, experts, respondents, defendants, outside counsel).

As noted in Section 1.1, MMS2 collects information in identifiable form about individuals who are or have been associated with FTC investigations, rulemakings, and special projects, such as workshops or studies. This information relates to FTC staff and to certain non-FTC parties.

Regarding individuals who submit public comments to the FTC, MMS2 retains only the names of these individuals and the company or association that they are connected to.

Regarding witnesses or experts or any other individuals who may be involved in FTC

<sup>1</sup> Per OMB Circular A-130, personally identifiable information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.

matters, MMS2 does not retain any information other than the name of the individual in event descriptions concerning witnesses or experts involved in FTC matters.

Data in the system about FTC staff (e.g., attorneys, economists, administrative law judges, other FTC officials or managers) involved in or associated with a particular matter include their names, titles, employee numbers, and FTC organizational codes. The system is not designed to, nor does it contain, Social Security or tax identification numbers, bank account numbers, driver's license numbers, passport numbers, other government identification numbers, or other more sensitive personal information. 38 Fed. Reg. 161,441 (8-16-73) (c) (1), (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), (21), (22), (23), (24), (25), (26), (27), (28), (29), (30), (31), (32), (33), (34), (35), (36), (37), (38), (39), (40), (41), (42), (43), (44), (45), (46), (47), (48), (49), (50), (51), (52), (53), (54), (55), (56), (57), (58), (59), (60), (61), (62), (63), (64), (65), (66), (67), (68), (69), (70), (71), (72), (73), (74), (75), (76), (77), (78), (79), (80), (81), (82), (83), (84), (85), (86), (87), (88), (89), (90), (91), (92), (93), (94), (95), (96), (97), (98), (99), (100).

resources. In addition to those regularly distributed reports, MMS2 information is available through a variety of standard reports that each user can produce using Business Objects software.

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

|  |   |
|--|---|
|  |   |
| Individuals who submit public comments to the FTC                    | Public comments are no longer uploaded to MMS2. However, MMS2 contains historical comments that contain Submitters name and organization. |
| Witnesses, experts, or any other individuals involved in FTC matters | This information is collected by other organization within FTC and passed to the RIM office.  |

|  |  |
|--|--|
|  |  |
|--|--|

the nature and sensitivity of the information contained on the system pursuant to the non-





**4.4 Are there procedures in place to allow individuals the ability to correct inaccurate or erroneous information? What is the process for receiving and responding to complaints, concerns, or questions from individuals? Explain.**





The system is covered by an existing Privacy Act system of records notice. See <https://www.ftc.gov/site-information/privacy-policy/privacy-act-systems> (FTC-I-5). It should be noted that, due to the law enforcement nature of the system, records in the system about certain individuals (e.g., defendants) are exempt from mandatory access by such individuals. See 4 U.S.C. 4.13(m) (exemptions applicable to certain FTC Privacy Act system of records). The Privacy Act or other legal authorities may permit or require the disclosure of such records in certain cases.

**8.4 How does the project/system ensure that the information is collected, used, stored, or disseminated in accordance with stated practices in this PIA?**

The Privacy Office routinely collaborates with system/application owners as part of its Privacy Continuous Monitoring Strategy to ensure that the information in PIAs, including this one, is accurate and to mitigate any privacy risks, as needed. Members of the public with questions or comments on the FTC's privacy practices may contact the Chief Privacy Officer using the contact information at [ftc.gov/privacy](https://www.ftc.gov/privacy).