

Federal Trade Commission
Privacy Impact Assessment

**JND Claims Administration System
(JND-CAS)**

Table of Contents

1	System Overview	1
2	Data Type, Sources, and Use	2
3	Data Access and Sharing	4
4	Notice and Consent	6
5	Data Accuracy and Security.....	8
6	Data Retention and Disposal.....	10
7	Website Privacy Evaluation	10
8	Privacy Risks and Evaluation	11

1 System Overview

1.1 Describe the project/system and its purpose.

The Federal Trade Commission's (FTC) Bureau of Consumer Protection (BCP) brings law enforcement actions that can result in the recovery of redress money from defendants that is to be returned to injured consumers or businesses. The FTC distributes money pursuant to a distribution plan that is either approved by a court or an administrative law judge or delegated to the FTC's discretion. The FTC Office of Claims and Refunds (OCR) is responsible for administering and coordinating redress activities, and JND Legal Administration (JND), an FTC notice and claims administration contractor, supports OCR's activities. This PIA explains what personally identifiable information (PII) OCR and JND collect throughout the claims administration process, who is allowed to use this information and for what purposes, and what steps are taken to identify, secure, and reduce any privacy risks to that information.

c-6 (r)3 (e)4 ()3 (Iu-2 (ih l) pr)3 (i)zJranoticee TJ0.002 Tc -Tw6-2nThNon.

2 Data Type, Sources, and Use

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

<i>H E d</i>	<i>a # P</i>	<i>II s</i>
<input checked="" type="checkbox"/> Full Name	<input type="checkbox"/> Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/>
<input type="checkbox"/> Date of Birth	<input type="checkbox"/> Audio Recordings	
<input checked="" type="checkbox"/> Home Address	<input type="checkbox"/> Photographic Identifiers (e.g., image, x-ray, video)	
<input checked="" type="checkbox"/> Phone Number(s)	<input checked="" type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.)	
<input type="checkbox"/> Place of Birth	<input checked="" type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.)	
<input type="checkbox"/> Age	<input type="checkbox"/> Vehicle Identifiers (e.g., license plates)	
<input type="checkbox"/> Race/ethnicity	<input checked="" type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.)	
<input type="checkbox"/> Alias	<input type="checkbox"/> Geolocation Information	
<input type="checkbox"/> Sex	<input type="checkbox"/> Passport Number	
<input checked="" type="checkbox"/> Email Address		
<input type="checkbox"/> Work Address		
<input type="checkbox"/> Taxpayer ID		
<input type="checkbox"/> Credit Card Number		
<input 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		

<i>§Du</i>	<i>§Du & Hvt</i>	<i>Is CB</i>
Third Party	Mailing address updates and corrections may be provided by third-	

telephone number for consumers to contact JND should they have any questions or concerns about their information.

- 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*): _____
- 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)?

When the FTC obtains information about injured consumers from a defendant in order to mail checks to such consumers, there is no opportunity for individuals to provide or decline to provide their information. Rather, this use of personal information is consistent with the purpose for which the FTC collects and maintains such consumer information from its defendants and allows the FTC to provide refunds efficiently and effectively to as many injured consumers as possible.

In cases where there is a claims process, individuals can decline to provide their information. If consumers choose to submit a claim, they are consenting to, and may not limit, the routine uses of their information stated in the applicable SORN (see Section 8.3) and Privacy Act statement. The consumer exercises this consent by choosing to complete, sign, and submit a claim form.

4.3 Are there procedures in place to allow individuals access to their personally identifiable information? Explain.

Claimants cannot access their records through the system online, but may request access to their claims records by contacting JND via telephone or hardcopy mail. Before making requested changes to a claimant’s information, JND will confirm the claimant’s identity by asking a series of questions, including the claim record tracking number, name, mailing address on file, or phone number, and instructing the claimant to forward their change request in writing along with supporting documentation if needed. JND accepts written documentation via fax, mail, or email. Finally, claimants can obtain access to their own information through a [Privacy Act request](#)

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.

As stated above in Section 4.3, claimants can request corrections to any inaccurate information by contacting JND, validating their identity, and forwarding the change request in writing along with any supporting documentation as necessary. Claimants also can file a Privacy Act request through the FTC's FOIA Office to obtain access to their own information. The FTC FOIA Office will work with the claimant to respond to any complaints, concerns, or questions.

5 Data Accuracy and Security

5.1 Are there procedures in place to ensure that the information maintained is accurate, complete, and up-to-date?

Various steps are taken to validate the accuracy and timeliness of collected data based on its original source. For example, prior to the contractor mailing a claim form, a redress check, or consumer education material, claimant addresses are standardized and cross-checked against

qui6 (m)n3 (or)3 (m)-2 (,)a (l)-2 (h -2 (ngo)c) (nd up4 (ont-2 (pl)-2 (e)4 (, t2 1(a)4 (. -2 (he)4 (c)4 (l)-2 (a)4 (

5.2 Are there administrative procedures and technical safeguards in place to protect the data in the system/project? What controls are in place to ensure proper use of the data? Please specify.

Access to system data is based on the Principle of Least Privilege (PLP) and only provided to those individuals with authorization to access. In order to access the JND Claims Administration System (CAS), one must first have access to JND's network via Active Directory credentials and

transmitted, processed, or stored in the development environment; and the development team is not permitted access to the production environment. Should FTC data be required for proper User Acceptance Testing, such testing is performed in an environment with security controls commensurate to the Production environment. pr

8.3 Has a

- x Notifying account managers when temporary accounts are no longer required and when users are terminated, transferred, or access requirements change;
- x Deactivating temporary accounts and accounts of terminated users as required;
- x Granting access to the system based on valid access authorization; intended system usage, and other attributes as required by the organization; and
- x Reviewing accounts quarterly, at a minimum.

The collection, use, and disclosure of information from the JND-CAS system has been reviewed to ensure consistency with the FTC's Privacy Policy.