



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

**GoldMine Contacts Database
Privacy Impact Assessment**

Updated July 2008

Introduction

The Federal Trade Commission's ("FTC") organizations routinely maintain mailing lists used to carry out the agency's law enforcement and regulatory mission. To better maintain its mailing lists, manage contact information, and facilitate communications with individuals interested in the FTC's work, the agency has licensed GoldMine commercial software. GoldMine is database software that will store personal information relating primarily to individuals in their business capacities that are interested in the FTC's work (e.g., lists of consumer group, business, media, and Congressional contacts). Each office that uses GoldMine will have access to only its contacts.

System Overview

The GoldMine database software is a commercial off-the-shelf product used to store and manage contact information and to send communications to contacts maintained in the database. The database software will replace a number of smaller databases and Excel spreadsheets and will provide more capabilities for staff to sort, query, and generate correspondence to the contacts contained within. The FTC conducted a privacy impact assessment to determine whether the GoldMine database software raises any privacy issues. The database is secure and only allows specified users access to this data.

Analysis

1. The Information That Will Be Collected (Nature and Source)

The GoldMine database will maintain information relating to individuals who are interested in receiving updates, news releases, educational materials, or other information from the FTC. The initial office using the system will be the FTC's Division of Consumer and Business Education (DCBE). The information maintained by that office in the database may include the contact's name, mailing address, email address, fax number, telephone number, business affiliation, contact preference (i.e., whether the person prefers to be contacted by email, mail, phone, or fax, or not at all), subject matter preference, the source of the contact's information, and notes or follow-up instructions. For the purposes of outreach and education, the FTC does not solicit – nor intend to maintain – sensitive or personally identifiable information (other than the categories listed above). The information generally is collected directly from the contact individual (such as from a business card). Other sources of contact information include organizations with which the FTC works or partners for particular consumer protection initiatives, business publications to which the agency subscribes, and publicly available business and industry directories like the phone book or those found online. DCBE will not import complete directories or third party databases into GoldMine; instead, we gather business contact information on a one-by-one basis for the purpose of outreach and education. In addition, the FTC's [bulk ordering system](#) currently allows orderers to opt-in to receive email communications from the FTC; those who opt in would be entered into GoldMine manually, through import from an Access database on a regular basis. The Access and GoldMine databases will not be linked.

2. Why The Information Is Being Collected (Purpose)

The FTC collects contact information to help fulfill its law enforcement and regulatory mission, which includes consumer and business education, as well as alerting the media and Congress to the agency's recent activities. For example, the FTC's Division of Consumer and Business Education collects contact information so that it can send consumer and business information to individuals and organizations that request to receive such information. The consumer and business education program constitutes a significant component of the consumer protection mission. Education and outreach are key tools to prevent consumer injury from unfair or deceptive practices in the marketplace and to educate businesses in how to comply with the law. Through the FTC's publications, online activities, efforts with other agencies and organizations, marketing initiatives, and media outreach, the agency reaches tens of millions of consumers and business people each year.

3. The Opportunities Individuals Will Have To Decline To Provide Information Or To Consent To Particular Uses Of The Information And How Individuals Grant Consent

Individuals may decline when asked to provide contact information if they are not interested in receiving press releases, advisories, alerts, guidance, and other information from the FTC. This information is also publicly available on the FTC Web site, www.ftc.gov, so individuals may search for and obtain the information through the site. Whether such individuals directly provided their contact information to the FTC or the FTC gathered it elsewhere, individuals who are currently receiving FTC information and no longer wish to continue receiving it may contact the FTC and request to be removed from our mailing lists.

Email communications sent through the GoldMine database system will include instructions on how individuals may request to be removed from FTC mailing lists. The GoldMine database system will maintain information about an individual's contact preferences, including that the person not be contacted. The GoldMine application has the ability to create and use email templates and each office has the ability to create their own templates. There is a field in the database that defines whether or not this person has elected to be contacted. Contacts can easily be removed from the Goldmine database. Although individuals who choose to remain on an FTC mailing list do not have an opportunity to consent to particular uses of their contact data, other than for receiving FTC publications, the Privacy Act of 1974 prohibits agencies, unless authorized by law, from selling or renting an individual's name or address for any purpose. 5 U.S.C. § 552a(n).

4. Intended Uses Of The Information Collected

Name, organization, mailing address, phone number, fax number, and email address will be used to contact and send communications to individuals, organizations, and agencies that are interested in receiving current information about the agencies activities. Any information about the organization, industry, or topics of interest will be used to identify individuals and

organizations likely to be interested in a particular FTC news release, alerts, or other communication. Information about contact preferences and prior communications will be used to determine how and whether to send communications to a particular individual or organization. The FTC may also use information in the GoldMine database to evaluate the effectiveness of its outreach efforts.

5. With Whom The Information Will Be Shared (Disclosures)

Employees with a specific need to know to carry out official duties will have no more access to the GoldMine database than is necessary for their particular organization. Only authorized organizations within the FTC will be able to access the database, and information in the database will be segregated by organization. Contact information may be shared in accordance with routine uses permitted by the Privacy Act, including disclosures that may be required in response to Freedom of Information Act requests from private individuals or companies, requests from Congress, or in litigation.

6. Security (Administrative and Technological Controls, Including Maintenance and Disposal)

Personal information within the GoldMine database will be safeguarded in several ways. First, the system uses access controls to limit people's ability to view, change, or delete information in the database and to protect the information from internal threats. Only authorized users from within the FTC will be granted access to the database. Authorized users will receive a user-id and password. The password will expire every 90 days in accordance with the FTC's Password Policy. Users within a particular organization will have access to only that organization's contacts. Users outside of the particular organization may access the contacts of that organization in limited circumstances when such access is required for that user to carry out official duties on behalf of the agency and upon the written approval of a manager from the organization that collected the contact information. The system tracks the latest updates to each record. It captures username and date of last change. Second, the SQL server on which the database is stored is protected by a firewall and is not accessible from outside FTC.

As required by OMB Memorandum 03-22, and consistent with agency requirements under the Federal Information Security Management Act, the FTC affirms that it follows IT security requirements and procedures required by federal law and policy to ensure that information is appropriately secured in the relevant system, acknowledges that the FTC has conducted an appropriate risk assessment for such system, has identified appropriate security controls to protect against that risk, has implemented those controls, and that there is appropriate monitoring, testing and evaluation on a regular basis by either the FTC (or contractor or subcontractor, where applicable) to ensure that controls continue to work properly, safeguarding the information. The point of contact for any additional questions from users is the FTC's Chief Information Security Officer. The GoldMine database is not a "major" FTC information system within the meaning of OMB Circular A-130, and based on Federal Information Processing Standards (FIPS) 199, would be assessed and categorized as "low" impact in terms of sensitivity.

Records are retained until an individual requests deletion or distribution of information to the individual is no longer anticipated.

7. Privacy Act

The contact information maintained in the GoldMine database system is covered by an existing Privacy Act System of Records Notice, available at 57 FR 45678 (Oct. 2, 1992) (FTC VI-I, Mailing Lists).

8. Other Privacy Considerations And Analysis

To protect individuals' privacy, the FTC made the following decisions in configuring the GoldMine database system. First, we limited access to contact information to the organization that collected it. We also limited access to the database to those individuals who have a business purpose for seeing the data. Second, we ensured that safeguards were in place to protect the information from internal misuse or external threats, such as hacking. Lastly, we required that all outgoing email communications include instructions on how consumers can stop receiving communications from the FTC. We believe these safeguards are sufficient to address the privacy of the data being maintained in the system, given its relatively low sensitivity. For example, even if the data were accessed, used, or disclosed without authority, it appears unlikely the data could be easily used, if at all, for identity theft purposes.

Prepared for the Business Owners of the System by:

Nathaniel C. Wood, Assistant Director,
Division of Consumer and Business Education
Bureau of Consumer Protection

Review:

Alexander C. Tang, Attorney
Office of the General Counsel

Marc Groman
Chief Privacy Officer

Margaret Mech
Chief Information Security Officer

Approved:

Stan Lowe
Chief Information Officer
Federal Trade Commission

Date: _____