



Personally Identifiable Information

Protective Measures

Definition of PII

Information that identifies, links, relates, is unique to, or describes the individual, such as name, SSN, date and place of birth, mother's maiden name, biometric records, home phone numbers, other demographic, personnel, medical, and financial information, or any other PII which is linked or linkable to a specified individual. This definition of PII is not anchored to any single category of information or technology. Non-PII can become PII when information is publically available and when combined could identify an individual.

Collecting PII

It is your responsibility to:

- Ensure that the information entrusted to you in the course of your work is secure and protected. PII must only be accessible to those with an "official need to know."
- Minimize the use, display or storage of SSNs and all other PII. The DoD ID number or other unique identifier should be used in place of the SSN whenever possible.
- Keep personal information timely, accurate and relevant to the purpose for which it was collected. Delete the information when no longer required. Always adhere to AR 25-400-2, "The Army Records Information Management System" (ARIMS) regarding retention and disposition requirements.
- Delete personal information when no longer required and remember to follow ARIMS Records Management retention and disposition requirements.
- Immediately notify your supervisor if you suspect or discover that PII has been lost or compromised.

Protective Measures

SSN Reduction-DoDI 1000.30 1 August 2012 Reduction of Social Security Number (SSN) Use Within DoD . Limit the use of the SSN, in any form (including the last four digits), substituting the DoD ID number or other unique identifier whenever possible.

- Continued collection of the SSN must meet one of the acceptable use criteria and be formally justified in writing.
- Never include the SSN in a personnel roster.
- Use only officially issued forms. Those that collect PII should also have a Privacy Act Statement (PAS).
- The SSN must not be posted on any public facing websites.

IT Equipment

- Keep your laptop in a secure government space or secured under lock and key when not in use.
- Laptops and mobile electronic equipment must have full disk/Data at Rest (DAR) encryption.
- Mark all Government furnished external drives or mobile media containing PII with "FOUO-Privacy Sensitive."
- Do not create, store or transmit PII on IT equipment when the information is not encrypted.
- Never store PII on personal devices.
- Do not maintain PII on a public website or electronic bulletin board.
- Do not leave your laptop unattended in a car or car trunk, even if the car and trunk are locked.
- Do not check your laptop with or in your luggage when you travel.

Email

- Email containing PII must be digitally signed and encrypted.
- Under no circumstance should PII be transmitted from a Government server to a private server i.e., .mil to a .com email address.

- As a best practice, ensure the email subject line contains "FOUO" if the email contains PII.
- Ensure the body of the email containing PII includes the following warning: "FOR OFFICIAL USE ONLY."
- Ensure you are sending the email to the correct recipients and all have an official need to know.
- Ensure you know what your attachment contains (i.e., PII) prior to sending. Be sure to check all tabs if the attachment is an Excel spreadsheet.
- Phishing continues to be on the rise. Ensure you only open and respond to legitimate emails.

Printed Material

- Verify the printer location prior to printing a document containing PII.
- Ensure all printed documents with PII are properly marked with "FOR OFFICIAL USE ONLY."
- As a best practice, use a "Privacy Act Cover Sheet" (DD Form 2923) as a cover when handling PII.
- Safeguard all documents when not in your direct possession by prohibiting access by those without an official need to know.

Scanning

Scanned documents containing PII shall be transmitted using a secure means.

Remember that "Scan to file" or "scan to network share" functionality may be used only if the sender can verify that all users are authorized to have access to the scanned file or network share location.

Department of the Army

Records Management and Declassification Agency (RMDA)
Privacy and Civil Liberties
9301 Chapek Road, Building 1458
Fort Belvoir, Virginia 22060-5605

Phone: 571-515-0248

DSN: 312-515-0248

Email: usarmy.belvoir.hqda-oaa-aha.mbx.rmda-foia-privacy-alert@mail.mil



FAXing

Facsimile transmission of PII is prohibited except:

- When another more secure means is not practical.
- When a non-Army process requires faxing.
- When required by operational necessity.
- When faxing Internal Government Operations PII (e.g., office phone, office email).

As a best practice, use a "Privacy Act Cover Sheet" (DD Form 2923) as a cover.

Verify receipt by the correct recipient.

External customers should be encouraged to use the US Postal Service or transmission by another secure means.

Electronic Storage Media

All Internal and removable electronic storage media must be properly marked and secured. The devices include, but are not limited to: laptops, printers, copiers, scanners, multi-function devices, hand held devices, CDs/DVDs, removable and external hard drives, and flash-based storage media. Classified electronic storage devices must be physically destroyed.

Disposal

(AR 380-5, Department of the Army Information Security Program.)

- Disposal methods are considered adequate if records are rendered unrecognizable or beyond reconstruction (e.g., tearing, burning, melting, chemical decomposition, burying, pulping, pulverizing, shredding, or mutilation).
- Do not discard documents containing PII in trash or recycle bins.

Network Shared Drives

(AR 25-2, *Information Management Information Assurance*)

- For files/folders containing PII, ensure that controls are in place restricting access to only those with an official need to know.
- Limit storage of PII on shared drives whenever possible.
- Delete files containing PII in accordance with AR 380- 5.
- Verify that access controls/permissions are properly restored following maintenance.

Shredding

- It is highly recommended and considered a best practice to use a cross-cut shredder.
- For shredder residue size as a best practice, refer to NIST Special Publication 800-88.
- An alternative to purchasing a shredder is to contract with a GSA approved shredder service.
- In lieu of shredding, the use of burn bags is a recommended alternative.

PII Breach Reporting

- Contact your privacy coordinator or supervisor as soon as you suspect or have an actual loss or compromise of PII.
- Report all incidents involving actual or suspected breaches/compromises of PII to <http://www.us-cert.gov> within one hour of discovery.
- Report all incidents involving actual or suspected breaches/compromises of PII to the HQ Army Privacy Office within 24 hours of discovery at <https://www.foia.army.mil/PATS/>.
- If your PII is compromised, monitor financial accounts for suspicious activity.
- If your identity is stolen, immediately visit the Federal Trade Commission website for more information and recommended actions <http://www.ftc.gov> or call 1-877-IDTHEFT.

Training and Compliance

(<https://www.rmda.army.mil/privacy/RMDA-PO-Training.html>)

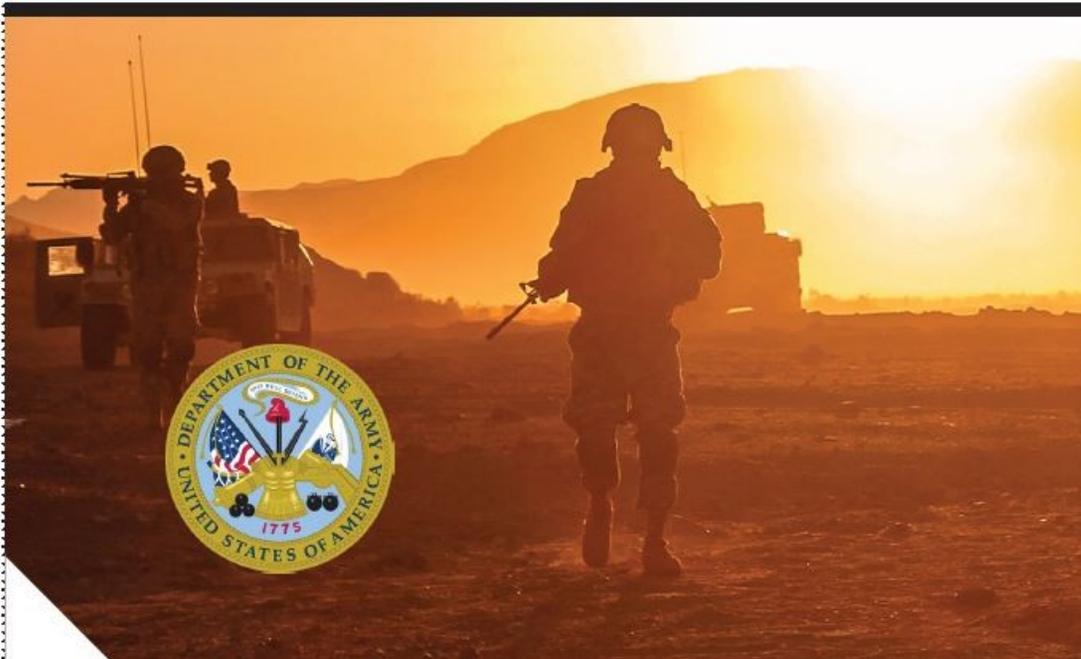
All new employees are required to take Information Assurance (IA) PII training obtaining access to networks.

All Army personnel, including contractors, must complete annual IA PII training. Local Privacy Officers must maintain record of completion by an organized method (e.g., a spreadsheet log).

The mandatory training for Army personnel is available through the DISA IA Education, Training and Awareness website at <http://iase.disa.mil/eta/>.

- Additional training is available on the RMDA website at <https://www.rmda.army.mil/privacy/RMDA-PO-Guidance.html>.
- Army personnel who mishandle PII are required to take refresher training.





Social Media

- Assume all information shared on social media sites could be made public.
- Do not post or discuss work related information, especially sensitive/classified information.
- Use privacy settings and controls to limit access to all PII (e.g., creating a folder on AKO that stores PII).

PII Facts

- The majority of PII breaches are due to human error.
- SSNs are the most valuable commodity to an identity thief.
- Insider threat continues to grow; risk is greatest when PII is stolen by a hacker or thief.

FOR MORE INFORMATION

Email:
usarmy.belvoir.hqda-oaa-aha.mbx.rmda-foia-privacy-alert@mail.mil

Visit the web at:
<https://www.rmda.army.mil/privacy/RMDA-PO-Division.html>