

# **Privacy Impact Assessment Development and Membership Information**

## **I. System Identification**

1. IT System Name: Development and Membership Information System (DMIS)
2. Mission Sponsor: Virginia Clark, Office of External Affairs
3. IT System Sponsor: Zully Dorr, Office of Development
4. IT System Manager: Melanie Dann
5. PIA Author: Melanie Dann & Zully Dorr
6. SI Unit Director or Designee: Zully Dorr
7. Date: 06/17/09
8. Brief description of the system: DMIS supports fundraising management, gift recording and membership.

## **II. Privacy Assessment**

### **1. What information is being (or will be) collected.**

The Development and Membership Information System (DMIS) collects biographical and financial information for constituents and members.

For members, the information collected consists of: name, address and payment amount and tender type. For credit card pledge transactions, the credit card type, number and expiration date are collected. For security transactions, the stock type, number of shares, date and price are collected.

For donors, the information collected consists of: name, address and payment amount. For check transactions, the check number is collected. For security transactions, the stock type, number of shares, date and price are collected.

For prospects, the information collected consists of name, address, biographical and demographic information such as employment, education and interests and interactions with Smithsonian staff and

volunteers. Prospects may identify themselves to the Smithsonian electronically, by using the forms on the site [http://www.si-giftlegacy.com/plgive\\_main.jsp?WebID=GL2005-0469](http://www.si-giftlegacy.com/plgive_main.jsp?WebID=GL2005-0469).

The information provided may be recorded in DMIS.

## **2. Why the information is being collected.**

For members, the information is collected to acknowledge and recognize the donation and to provide member benefits.

For donors, the information is collected to acknowledge and recognize the donation.

For prospects, the information is collected to assess a prospects likely interest and affinity with the Smithsonian.

## **3. The intended use of the information.**

For members, the information is used to manage program benefits.

For fundraising constituents, the information is used to manage donations and fundraising efforts.

System reports are labeled confidential, and system users receive training on treating information in the system with appropriate care.

## **4. With whom the information will be shared.**

For members, name and address information is shared with outside vendors that provide benefit fulfillment and print and mail renewal notices and appeals. Names and addresses are exchanged with other organizations. Smithsonian membership staff members have access to member information in order to provide member services.

For fundraising constituents, Smithsonian staff members involved with managing donations and fundraising efforts have access to fundraising constituent information. Fundraising constituent name and address information may be shared with outside vendors that provide mail shop and data integrity services.

Information on members and fundraising constituents that is provided to outside vendors is labeled as confidential and vendors are instructed to use it only for the original purpose and to destroy it after use.

**5. What notice or opportunities for consent would be provided to individuals regarding what information is collected and how that information is shared.**

Members may opt out of information exchange with external organizations and fundraising appeals by contacting the Contributing Membership office Contributing Membership, PO Box 37012, MRC 712, Washington, DC 20013-7012.

In the area of recognition, members may request anonymity. Members may request changes to their records.

Fundraising constituent information is not exchanged with external organizations. Fundraising constituents may request no contact, anonymity and changes to their records by contacting the Development Office, PO Box 37012, MRC 035, Washington, DC 20013-7012.

**6. How the information will be secured.**

Access to DMIS is controlled through user IDs and user roles that limit data that a user can access and update to the information necessary for their job functions. The system is only accessible from within the Smithsonian's internal network, or from outside via VPN. The Smithsonian's internal network is secured by the Smithsonian firewall and other institutional security technical controls which prevent access from outside the network.

The DMIS server is managed by key personnel having role-based permissions to view and manage this data. The system has anti-virus protection that is automatically updated. System logs are reviewed periodically and unusual activity is investigated.

The DMIS server is located in an access controlled computer room. Electronic media used for system backups is disposed of in a secure manner.

DMIS is certified and accredited using guidance contained in the National Institute of Standards and Technology Special Publication 800-37, Guide for the Certification and Accreditation of Federal Information Systems. The Smithsonian's certification and accreditation program is based on a risk assessment and testing of controls commensurate with the importance and sensitivity of the system and acceptance of risk and authorization to operate the program.