

Privacy Impact Assessment Online Fundraising

I. System Identification

1. IT System Name: Online Fundraising
2. Mission Sponsor: Virginia Clark, Office of External Affairs
3. System Sponsor Unit: Zully Dorr, Office of Development
4. IT System Manager: Melanie Dann, Office of Development
5. PIA Author: Melanie Dann
6. SI Unit Director or Designee: Zully Dorr
7. Date: June 2009
8. Brief description of the system: Online fundraising provides Smithsonian supporters with the ability to make a credit card donation to the Smithsonian online, and to receive e-newsletters from the Smithsonian. These functions are provided by an application service provider, Convio Software.

II. Privacy Assessment

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

The information collected from e-newsletter subscribers signing up on the web consists of: name, address, email address and promotion code.

The information collected from the donor making an online donation consists of: donation amount, name, address, email address, credit card type, credit card number, credit card expiration date, credit card verification number, promotion code and interest in receiving email information from the Smithsonian.

Preference information will be collected from subscribers in response to survey questions or click-thru in e-newsletters.

2. Why the information is being collected.

For e-newsletter subscribers, the information is collected to enable delivery of the e-newsletter and other information about the Smithsonian,

including fundraising messages. Preference information is collected to provide subscribers with content that is of interest.

For donations, the information is collected to enable online processing of the donation and to acknowledge the donation.

3. The intended use of the information.

Information collected from e-newsletter subscribers is used to deliver the e-newsletter and other information about the Smithsonian, including fundraising messages.

Information collected from donors is used to process the donation, including acknowledgment, and if the donor consents, to provide further information about the Smithsonian via email. After the donation has been processed, the name, address, email, last four digits of the credit card number and a transaction identifier from the credit card processor are stored as a historical transaction. This information is used to resolve any subsequent customer service issues.

Historical transactions can be retrieved using an on-line query. Hard copy printouts of the information are deposited in secure bins and shredded.

4. With whom the information will be shared.

Direct access to the Smithsonian supporter information in Convio is limited to select employees in the Office of Development who have password controlled accounts. The Director of Development Services approves the creation of user accounts in the Office of Development. Convio treats client data as confidential information, and requires that all staff and technology partners execute confidentiality agreements to ensure these data are protected from disclosure. The name, address and credit card information is sent to the credit card processor, for credit card verification and transaction processing. This combination of information is necessary to protect against fraudulent credit card use.

The name, address, email address, donation amount and transaction identifier are extracted from the Online Fundraising application by Smithsonian employees and entered into the Development and Membership Information System (DMIS). DMIS is used by Smithsonian customer service representatives to prepare donor acknowledgments and to resolve any subsequent customer service issues. Online fundraising donors may receive direct mail fundraising appeals.

The information will not be shared outside the Smithsonian, except as described above to process the transaction.

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

The information described is required to process and acknowledge an online donation or to deliver the e-newsletter. Supporters may read the e-newsletter without subscribing by visiting the e-newsletter website. Newsletter subscribers may unsubscribe at anytime.

Donors may make contributions in other ways (mail, donation boxes, stock transfer), so they have the opportunity to decline the provision of this information. The acknowledgment process provides donors with the ability to review their donation information, and provides contact information.

Online Fundraising donors may opt out of receiving direct mail fundraising appeals by contacting the Smithsonian at Online Support, Office of Development, MRC 035, PO Box 37012, Washington, DC 20013-7012.

6. How the information will be secured.

The Online Fundraising application uses Secure Socket Layer (SSL) communication to protect the transaction between the donor and Convio. The Convio application complies fully with industry standard financial transaction security requirements. All fundraising transactions take place on secure Convio web pages, and subsequent data flow through the Convio payment gateway provider to various financial institutions also occurs over secure channels

Convio servers and equipment are physically protected in a secured data center. Firewalls protect the Convio network. Convio follows industry best-practices regarding system operations and security monitoring.