



Adapted PRIVACY IMPACT ASSESSMENT (Adp-PIA)

Third-Party Website or Application Name:

Armed Services Blood Program Newsletter Subscription Tool
(ConstantContact® SafeSubscribe)

DoD Component Name:

US Army Medical Command - Defense Health Program Funded Application

This Adapted PIA (Adp-PIA) Form 2930A is to be used when personally identifiable information (PII) is likely to become available via a third-party website or application (such as Facebook and YouTube). Refer to the Appendix for the definition of third-party websites or applications.

This Adapted PIA (Adp-PIA) is intended to support the management of risk to privacy. If it is likely that personally identifiable information (PII) will become available via a third-party website or application, complete this form.

(1) Describe the specific purpose of the DoD Component's use of the third-party website or application.

The Armed Services Blood Program (ASBP) provides quality blood products for service members, veterans and their families in both peace and war. As a joint operation among the military services (Army, Navy, Air Force), the ASBP has many components working together to collect, process, store, distribute, and transfuse blood worldwide. The ASBP Website (<http://www.militaryblood.dod.mil>) is the official website of the US Military Blood Program. This website uses a third-party application, ConstantContact® SafeSubscribe tool, to collect the e-mail address from individuals who voluntarily sign-up to receive the ASBP newsletters. ConstantContact is an online marketing company specializing in e-mail and social media marketing. To opt-in for the ASBP newsletter, a user must submit an e-mail address through a single field web form located on the ASBP website. When the web form is submitted, the subscriber's e-mail address is sent directly to ConstantContact.com via its SafeSubscribe tool. The subscriber's e-mail address is the only PII collected. Both Federal employees and members of the public subscribe to the ASBP newsletter.

(2) Describe any personally identifiable information (PII) that is likely to become available to the DoD Component through public use of the third-party website or application.

The subscriber's e-mail address will become available to the DoD Component through public use of this third-party application.

(3) Describe the circumstances under which PII will likely become available on the third-party website or application.

The subscriber's e-mail address becomes available on the third-party application when the individual opts-in to receive the ASBP newsletters.

(4) With whom will the DoD Component share PII?

The ASBP staff member who prepares and disseminates the ASBP newsletters has access to the subscriber's PII. When ASBP staff members decide to send a newsletter, they log into the ASBP ConstantContact account, draft the newsletter, attach the newsletter to the e-mail address list and send to

subscribers.

(5) Will the DoD Component maintain PII? If yes, for how long, and under what circumstances?

The DoD Component does not maintain the PII (subscriber's e-mail address). This PII is maintained in the ASBP ConstantContact account.

(6) Describe the means and steps by which the DoD Component will secure PII that it uses or maintains.

The DoD Component does not maintain the PII (user e-mail address). The ConstantContact Privacy Statement effective 9 Septembers 2013 is as follows:

- At Constant Contact, Inc. (including its wholly-owned subsidiary, SinglePlatform, LLC), we respect and protect the privacy of our customers and those who use our websites, products and services. This privacy statement provides details about how your personal information is collected and used. Personal information is any information that identifies you or would enable someone to contact you, such as your name, email address, phone number and other non-public information that is associated with such information. This privacy statement applies to the Constant Contact website, the Single Platform website, products and services that are located in the roving.com, constantcontact.com and single platform.com domains and any other sites owned or operated by Constant Contact (the "Sites"). Constant Contact, Inc. is located at 1601 Trapelo Road, Waltham, MA 02451.
- Statement Summary. The summary below provides the key concepts of the full Constant Contact Privacy Statement. If you have questions, please click the links to view the complete text below.
- Information Collection and Use by Us. (1) We obtain any information that you provide to us on the Sites, including activity on our Sites that we collect by means of log files; (2) We may also obtain information about you that we collect from other sources (such as at seminars and, with your consent, third party social networking sites); (3) We may generally use this information to provide you with requested information or products and services, to tailor the presentation of the Sites or products and services to you, to facilitate your movement through the Sites or your use of our products and services, to improve our products and services and do a better job of marketing them, or to communicate with you; (4) We may monitor or record any of your telephone conversations with us for quality control purposes, for purposes of training our employees and for our own protection; and (5) We acknowledge your ownership rights in your contact lists, content and phone numbers. We will never sell or rent this information without your permission, and will never use it for any purpose other than providing you with and improving our products and services or as described in this privacy statement.
- Security and Privacy. We employ reasonable technical, administrative and physical safeguards to protect the confidentiality and security of your personal information.
- Sharing of Information. We will never sell or rent your personal information to third parties for their use without your consent. We may share your contact and other information with our partners for limited purposes, with certain third parties (who may only use the information for the purpose for which it was provided), with courts, law enforcement and other relevant third parties, or with our acquirer if we are ever acquired.
- Cookies. We use cookies and other technology to keep track of your online interaction with our Sites. Information gathered through usage of a cookie is not linked to any personal identifying information, unless you become a trial or paying customer.
- Access to Personal Information. (1) You can update your Constant Contact account information by logging in to your account. If you would like to suspend or cancel your Constant Contact account or obtain further information about or access to your personal information, you can do so by contacting Constant Contact customer support; (2) You can update your SinglePlatform account information, suspend or cancel your account or obtain further information about or access to your personal information, by contacting the SinglePlatform account management team at (877) 564-8728; and (3) We will retain and use your information for as long as your account is active or as needed to provide you services, as necessary to comply with our legal obligations, resolve disputes and enforce our agreements. Notwithstanding the foregoing, we may continue to disclose your storefront information to third parties in a manner that does not reveal personal information after you suspend or cancel your SinglePlatform account unless you request otherwise.

(7) Describe what other privacy risks exist and how the DoD Component will mitigate those risks.

There are no additional privacy risks.

(8) Will the DoD Component's activities create or modify a "system of records" under the Privacy Act? If yes, describe.

No, the DoD Component's activities will not create or modify a "system of records" under the Privacy Act.