



**Adapted PRIVACY IMPACT ASSESSMENT (Adp-PIA)**

**Third-Party Website or Application Name:**

Civilian Application Tracking System (iCIMS® Talent Platform)

**DoD Component Name:**

US Army Medical Command - DHP 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 iCIMS® Talent Platform web-based application is used for recruiting and tracking applicants for civilian job positions. It is the industry's premier talent acquisition solution that enables HR professionals to manage their organization's entire talent lifecycle from sourcing to recruitment marketing to applicant tracking to onboarding all within a secure single web-based application. Providing innovative HR solutions, iCIMS gives recruiters the necessary tools to make the most informed hiring decisions, every time. The iCIMS Talent Platform is easy to use, scalable, and accessible from anywhere, anytime.

**(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 following PII is likely to become available to the DoD Component through public use of this third-party website: name; citizenship; personal cell telephone number; home telephone number, personal e-mail address; employment information; and education information.

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

The PII becomes available on the third-party website when the applicant completes the job application.

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

The PII will be shared with HR personnel within the Office of The Army Surgeon General and the US Army Medical Command organizations.

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

The PII will be maintained so that job notifications can be pushed to applicants and applicants can queried about job opportunities that were not available when they initially provided their PII. The PII will be retained indefinitely or until applicants removes their PII or report that they are no longer interested in employment with the US Army Medical Command.

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

The confidentiality of the PII will be protected through the use of administrative, physical, and technical safeguards.

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

The PII maintained on the third party website may be subject to privacy risks. The iCIMS Privacy Policy updated on 4 January 2013 is as follows:

Introduction

iCIMS, Inc. ("Company" or "We") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you interact with us through the website [www.icims.com](http://www.icims.com) or its related domains and subdomains (including without limitation, [www.icims.co.uk](http://www.icims.co.uk) or [www.icims.ca](http://www.icims.ca)) (our "Website"), (including without limitation, by requesting a demo, by applying for a position with the Company, or by posting a comment or materials to any blog or other interactive part of the Website) and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In e-mail, text and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be

acceptance of those changes, so please check the policy periodically for updates.

This Website contains links to other sites. We are not responsible for the privacy practices of other sites. Accordingly, we encourage users to read the privacy statements of each and every website that collects your information.

We are a participant in the US-EU Safe Harbor program developed by the US Department of Commerce and the European Union (EU). We have certified that we adhere to the Safe Harbor Privacy Principles (the "Principles") agreed upon by the US and EU. For more information about the Safe Harbor and to view our certification, visit the US Department of Commerce's Safe Harbor website.

#### Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- by which you may be personally identified, such as name, postal address, e-mail address or telephone number ("personal information");
- that is about you but individually does not identify you, including without limitation information about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us, including without limitation information that you provide by (1) filling in forms on our Website including without limitation information provided at the time of registering to use our Website or view a demo of our services, (2) subscribing to our service, posting material or requesting further services, (3) entering a contest or promotion sponsored by us, (4) reporting a problem with our Website, (5) responding to surveys that we might ask you to complete for research purposes, (6) performing search queries on the Website, or (7) or otherwise corresponding with us (including e-mail addresses), if you contact us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.
- From third parties, for example, our business partners.
- You also may provide User Contributions (as defined in our terms of use) to be published or displayed. Your User Contributions are posted on and transmitted to others at your own risk. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

The information we collect automatically is statistical data. It helps us to improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include, without limitation:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. You may refuse to allow flash cookies by activating the appropriate setting through your Adobe Settings Manager.

- Web Beacons. Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). By disabling browser cookies, unique information associated with web beacons will also be disabled.

#### How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information, including without limitation sharing it with third parties with products, services or positions that may be of interest to you.
- For any other purpose with your consent.

#### Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries, affiliates, or their or our successors or assigns.
- To contractors, service providers, and other third parties we use to support our business or third parties with products, services or positions that may be of interest to you, provided such parties provide at least the same level of privacy protection as is required of the Company.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of iCIMS, Inc., our customers or others. This includes without limitation exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

#### Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Promotional Offers from the Company. If you do not wish to have your e-mail address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by following instructions provided in the relevant email or form. If we have sent you a promotional e-mail, you may send us a return e-mail asking to be omitted from future e-mail

distributions.

#### Accessing and Correcting Your Information

You can review and change your personal information by logging into the Website and visiting your account profile page where applicable or otherwise by contacting us at [accounts@icims.com](mailto:accounts@icims.com).

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users.

Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use.

In accordance to the Principles, iCIMS has named the European Data Protection Authorities as the independent recourse mechanism for investigation of individual's complaints and disputes.

#### Transmission of Your Information

By submitting your information to the Company, you acknowledge and agree that the technical processing and transmission of your information, may involve, (a) transmissions over various networks, including the transfer of this information to the United States and/or other countries for storage, processing and use by the Company, its affiliates, and their agents; and (b) changes to conform and adapt to technical requirements of connecting networks or devices. Accordingly, you agree to permit such parties to make such transmissions and changes.

#### Security

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iCIMS is committed to protecting the information you provide us. iCIMS implements and maintains administrative, physical, and technical safeguards reasonably designed to protect the information we collect from loss, misuse, and unauthorized access or disclosure, as further described in our Data Security and Privacy Policy, available at [www.icims.com/gc](http://www.icims.com/gc).

#### Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [accounts@icims.com](mailto:accounts@icims.com).

#### Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [accounts@icims.com](mailto:accounts@icims.com).

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

The DoD Component activities will not create or modify a "system of records" under the Privacy Act. The Privacy Act DoD System of Records Notice - A0690-200 DAPE - addresses the PII in the civilian records maintained within the Office of The Surgeon and US Army Medical Command organizations.