



Pension Benefit
Guaranty Corporation

Information Technology Infrastructure Operations
Department (ITIOD)

ServiceNow (SNow)

Privacy Impact

Assessment (PIA)

Last Updated: 8/24/2023

1 PRIVACY POINT OF CONTACT

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2 PRIVACY IMPACT ASSESSMENT

A Privacy Impact Assessment (PIA) is an analysis of how information is/will be handled:

- i. To ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy,
- ii. To determine risks and effects of collecting, maintaining, and disseminating information in an identifiable form in an electronic information system, and
- iii. To examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

Privacy concerns are highest for systems that contain Personally Identifiable Information (PII). PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad.

For example, consider a person named Mary Jones. There are over 200 million results in an internet search for this name. But if we combine information such as a date of birth, the last four digits of a (or worse, an entire) Social Security Number, or a spouse's name, the number of persons to whom we could be referring begins to narrow quite rapidly. These types of information are considered identifiers. Identifiers that uniquely identify a person are the focus of privacy protection.

2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII	In what system of records (SORN) is this information stored	What is the Legal Authority for collection of this information	Does this system share PII internally (please detail in question 9)
User HiWAVE Support Portal	Secure login portal to manage ServiceNow instances, upgrades and HIWAVE user access. HiWAVE is used for 24/7 support to product documentation, knowledge base articles, customer support, and SNOW developer site resources.	No	N/A	N/A	No
SaaS: User Interface, Platform, Plug-ins, Applications, APIs, Hosted ITIL	SaaS components provides a suite of applications focused primarily on automating processes and workflows. Personnel interact with SNOW service catalog, forms, and knowledge articles via an internally-branded user interface called "GetITail".	Yes	PBGC-(11, 16, 22)	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 6120	Yes
Software: MID Server (Java Application)	MID Server is a Java application that runs as a Windows service or UNIX daemon on a server in PBGC local network. It facilitates communication and data movement between ServiceNow instance and external	Yes	PBGC-(11, 16, 22)	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 6120	Yes

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII	In what system of records (SORN) is this information stored	What is the Legal Authority for collection of this information	Does this system share PII internally (please detail in question 9)
	applications, data sources and services.				

2.2 The System as a Whole

1. Please describe the purpose of the system, when considered as a whole, please include if this is an existing system (either an annual recertification update or a major change).

ServiceNow (SNow) is a SaaS cloud offering from ServiceNow comprised of a suite of natively integrated applications designed to support IT service automation, resource management and shared support services. ServiceNow applications cover all Information Technology Infrastructure Library (ITIL) processes; PBGC has implemented IT Service Management (ITSM) and IT Operator Management (ITOM), which includes such features as Change Management, Incident Management, Knowledge Management, Problem Management, Service Desk, Configuration Management including automated discovery, and Asset Management services through SNow. ServiceNow is an existing system that requires annual recertification.

2. What are the Confidentiality, Availability, and Integrity ratings for the system as a whole?

Confidentiality	Moderate
Integrity	Moderate
Availability	Moderate

3. List and discuss the sources from which the system collects PII (for instance, from an individual, another federal agency, etc.); the format in which PII is collected (for instance, via a form, face-to-face, phone, etc.); the notification given at time of collection from an individual regarding the Privacy Act and the ability to opt-out of collection (and the consequences of opting out). Include a copy of all forms and Privacy Act statements used to collect information.

The ServiceNow system is used for IT service, asset, and configuration, IT business change and release, incident, and problem management. It does not collect PII. ServiceNow pulls personnel data from Active Directory. The information contained in Active Directory is synced with ServiceNow, therefore information such as PBGC distinguished name (SAM Account Name / User ID), first and last name, PBGC-phone number(s) (desk and agency-issued mobile device), work location (if at a PBGC-controlled facility), and PBGC email address will be displayed.

4. Discuss any privacy controls that PBGC inherits from an external provider (cloud provider, third party provider, another government agency, etc.) If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of that document.

PBGC does not inherit privacy controls from any external providers.

5. For the user roles in the system (*as of 8/21/2023):

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
APPS_ServiceNow_HiPortal_Admin	4	Joshua Kossoy (primary); Brittanie Thom; Anh Nguyen	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow	Annually; 5/4/2023 – 5/9/2023
APPS_ServiceNow_HiPortal_User	7	Joshua Kossoy (primary); Brittanie Thom; Anh Nguyen	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow	Annually; 5/4/2023 – 5/9/2023
APPS_ServiceNow_AgileDev_Access	9	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to the ServiceNow Agile Development project management features.	Annually; 5/5/2023 – 6/1/2023
APPS_ServiceNow_ITSM_Approver	10	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Allows a Designated Approver to Approve Requests in ServiceNow	Annually; 5/2/2023 – 5/23/2023
APPS_ServiceNow_ITSM_Asset_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Group to be used with ServiceNow is necessary to support access and separation of duties for Asset Management.	Annually; 5/1/2023 – 5/16/2023
APPS_ServiceNow_ITSM_Asset_Tech	17	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Group to be used with ServiceNow is necessary to	Annually; 5/1/2023 – 5/16/2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
			support access and separation of duties for Asset Management.	
APPS_ServiceNow_ITSM_Azure_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Azure Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_BusinessService_Manager	0	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants the ability to add, edit, modify and administer the FISMA & Business Services table data in ServiceNow	Annually; N/A in 2023
APPS_ServiceNow_ITSM_CAB_Analyst	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to CAB Analyst functions in ServiceNow	Annually; 5/5/2023 – 5/26/2023
APPS_ServiceNow_ITSM_Catalog_Admin	10	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Provides Admin access to Service Now / Service Catalog functions	Annually; 5/5/2023 – 5/10/2023
APPS_ServiceNow_ITSM_Change_Manager	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants manager access to ServiceNow request for change (RFC) tickets	Annually

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
			including approve, deny request.	
APPS_ServiceNow_ITSM_Chat_Admin	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control features of the ServiceNow service desk chat service.	Annually; 5/4/2023 – 5/5/2023
APPS_ServiceNow_ITSM_CMDB_Admin	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control the ServiceNow Configuration Management Database (CMDB) and Asset functions.	Annually; 5/5/2023 – 6/1/2023
APPS_ServiceNow_ITSM_EquipmentRelocation_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Equipment Relocation Step 2 Approver Role in SNOW	Annually; 5/25/2023 – 5/31/2023
APPS_ServiceNow_ITSM_GetITAIL_Admin	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control the ServiceNow service portal.	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_Incident_Manager	11	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow;	Annually; 5/4/2023 – 5/5/2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
			Grants Manager access to declare Major Incident, exclude tickets from reporting, mark a ticket as a test ticket.	
APPS_ServiceNow_ITSM_ITCOSMgr_ITIODLead	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to ITCOS Manager ITIOD Lead Role in SNOW	Annually; 5/1/2023 – 5/12/2023
APPS_ServiceNow_ITSM_ITDirector_ITSpecialist	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to IT Director IT Specialist Role in SNOW	Annually; 5/1/2023 – 5/9/2023
APPS_ServiceNow_ITSM_ITIOD-EIM-Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to EIMApprover Role in SNOW	Annually; 5/16/2023 – 6/1/2023
APPS_ServiceNow_ITSM_ITIOSS_SLA_Access	25	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to view survey results and service desk performance metrics.	Annually; 5/4/2023 – 6/1/2023
APPS_ServiceNow_ITSM_Knowledge_Admin	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permission to allow editing of all KB articles in the knowledge library	Annually; 5/4/2023 – 5/5/2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
APPS_ServiceNow_ITSM_Knowledge_Edit	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants edit access to create, edit, and review knowledge base articles in ServiceNow.	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_List_Updater	10	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to Bulk Update/Close Tickets.	Annually; 5/4/2023 – 6/1/2023
APPS_ServiceNow_ITSM_Location_Manager	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants the ability to add, edit, modify and administer the Location table data in ServiceNow	Annually; 5/1/2023 – 5/11/2023
APPS_ServiceNow_ITSM_NewUNIXLINUXServiceAccount Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New UnixLinux Service Account Step 2 Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_NewMicrosoft TeamsPlanner Approver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Step 3 Teams Approver Role in SNOW	Annually; 5/1/2023 – 5/31/2023
APPS_ServiceNow_ITSM_NewMobileDevice Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow;	Annually; 5/16/2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
			Access to New Mobile Device Step 2 Approver Role in SNOW	
APPS_ServiceNow_ITSM_NewOracleServiceAccount_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Oracle Service Account Step 2 Approver Role in SNOW	Annually; 5/4/2023
APPS_ServiceNow_ITSM_NewWindowsServiceAccount_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Windows Account Step 2 Approver Role in SNOW	Annually; 5/4/2023
APPS_ServiceNow_ITSM_ODBC_Access	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants members the ODBC role which allows for read only ODBC connections to ServiceNow.	Annually; 5/5/2023 – 5/26/2023
APPS_ServiceNow_ITSM_Oracle_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Oracle DBA's the ability to add, edit and create Database, Schema, Role and Approver records in ServiceNow/Service Catalog	Annually; 5/5/2023
APPS_ServiceNow_ITSM_Oracledatabase_Approver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow;	Annually; 5/4/2023 – 5/31/2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
			Access to Oracle Database Approver Role in SNOW	
APPS_ServiceNow_ITSM_PERSEC_Approver	10	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to PERSEC Approver Role in SNOW	Annually; 5/9/2023 – 6/1/2023
APPS_ServiceNow_ITSM_Problem_Manager	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants manager access to resolve, close, and analyze problem tickets.	Annually; 5/1/2023 – 5/31/2023
APPS_ServiceNow_ITSM_Reporting_Access	24	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to share reports to groups and to schedule reports for automated generation and delivery	Annually; 5/1/2023 – 5/31/2023
APPS_ServiceNow_ITSM_Reporting_Admin	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to ServiceNow reporting. Permits viewing, adding, deleting reports.	Annually; 5/5/2023
APPS_ServiceNow_ITSM_ServiceCatalogNewCatalogItemApprover	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Service Catalog New Catalog Item Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
APPS_ServiceNow_ITSM_SoftwarePackaging_Approver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Software Packaging Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_SQLServerNewDatabase_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to SQL Server, New Database Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_StorageAllocation_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Storage Allocation Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_UnixNewServerAdditionalMemory_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to UNIX Newserver, Additional Memory Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_WindowsNewServerAdditionalMemory_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Windows NewServer, Additional Memory Approver Role in SNOW	Annually; 5/4/2023 – 5/31/2023
APPS_ServiceNow_ITSM_WSDOfficeMove_Approver	0	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow;	Annually; N/A in 2023

Role Name	Number of Users Role *	Approver	Access Level (Read, Write, etc.)	Recertification Date
			Access to WSD Office Move Approver Role in SNow	
APPS_ServiceNow_ServiceNow_App_Admin	11	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based in ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants full administrative access to control ServiceNow.	Annually; 5/4/2023 – 6/1/2023
APPS_ServiceNow_ITSM_ITIL_Process User	2,600	None (Default entitlement)	Access is default entitlement. Grants edit access to create and update interaction, incident and, problem and change tickets within ServiceNow. Grants access to send Significant Occurrence Reports (SOR).	N/A

6. Does the System leverage the Enterprise Access Controls?

- Yes
- No

7. Discuss the Physical, Technical, and administrative controls that are employed to secure the PII in the system.

- *Physical Controls* - Physical security controls employed to secure the PII in the system include:*
 - *Visitor Access Records*
 - *Physical Access Controls*
 - *Emergency Shutoff*
 - *Emergency Power*
 - *Emergency Lightening*
 - *Fire Protection*
 - *Temperature and humidity control*
 - *Water damage protection*
 - *Delivery and removal*
 - *Alternate Workstation*
 - *Location of information system components*

**Physical controls are provided by Cloud Service Provider (CSP)*

- *Technical Controls** - Technical controls employed to secure the PII in the system include:*
 - *Password protection*
 - *Virtual Private Network (VPN)*
 - *Firewalls*
 - *Unique user identification names*
 - *Encryption*
 - *Intrusion Detection and Prevention Systems (IDPS)*
 - *Personal Identity Verification (PIV) card access*
 - *Public Key Infrastructure (PKI) Certificates*
 - *Time Stamps*
 - *Audit Events*
 - *Remote Access*
 - *Wireless Access*
 - *Audit Storage capacity*
 - *Authentication Management*
 - *Cryptographic Key establishment and management*

***Technical Controls are provided by both PBGC and Cloud Service Provider (CSP)*

- *Administrative Controls - All PBGC users are required to complete privacy training annually. Administrative controls employed to secure the PII in the system include:*
 - *Periodic Security Audits*
 - *Regular Monitoring of User's Activities*
 - *Annual Security, Privacy, and Records Management Refresher Training*
 - *Backups Secured Offsite*
 - *Encryption of Backups containing sensitive data*
 - *Role-Based Training*
 - *Least Privilege Access*
 - *Mandatory on-boarding training for security, privacy, and Records management personnel*

8. For the PII in the system, discuss the actual/intended uses of the PII; the steps taken to limit the PII collected to the minimum needed; and the reasons the PII is necessary and relevant.

PBGC technical support teams use PII to provide support for PBGC IT systems, assets, and facilities. Service-oriented activities include managing facilities and IT service request tickets, retrieving incident information and troubleshooting issues. PII made available to ServiceNow is limited to PBGC distinguished name (SAM Account Name / User ID), names, PBGC email address, and PBGC phone number(s) (desk and agency-issued mobile device) of employees and contractors; however, attachments to a service ticket may include the PII of other individuals. When PII of other individuals is attached to a ticket, it is removed from the system as soon as possible after detection. Limiting collection of PII is controlled through personnel system data feeds to only provide limited information. When conducting training, the Privacy Office instructs individuals to not include PII of others (e.g., participants) when they open a

service ticket. Personally Identifiable Information (PII) captured will be secured in compliance with the Federal Information Security Modernization Act (FISMA) and is not subject to unauthorized distribution. The limited use of PII that is in SNow is necessary for system performance, service tracking, and auditing purposes.

9. Discuss the data flows within the system (include sources of data for data flowing into the system, destinations for data flowing out of the system, and any routine uses applicable to the system). For any information that is shared internally, be sure to discuss whether these data interconnections are noted in CSAM. Be sure to include any MOU, ISA, or Interagency Agreements.

1. *ServiceNow creates a request for data from ARS/LDAP.*
2. *The request is queued in the External Communication Channel (ECC) Queue.*
3. *A MID Server sends out a request to the ServiceNow instance over a designated port checking for any work in the ECC Queue.*
4. *Based on the configuration of the MID Server's capabilities in the SN instance, the SN instance replies with a request that the MID Server can perform.*
5. *In the case of an LDAP request, the MID Server connects to the PBGC LDAP instance within the PBGC network and collects the data.*
6. *Once the MID Server has completed the request, it contacts the ServiceNow instance over the designated port, stating the task is finished. The data is sent to the ServiceNow instance, and the data is stored in an Import table.*
7. *Once imported, the data in the Import Table is processed using a Transform Map. User records are either inserted or updated records in the User (sys_user) table as appropriate. Group tables are also imported in a similar manner.*
8. *Records imported in the Import Tables are cleared after one week.*

10. Does the system leverage the commonly offered control for Accounting of Disclosures

- Yes
 No

11. If your system collects, Social Security Numbers:

- a. Please provide a justification for the collection, use, maintenance, and disposal of PII in the form of SSN?

ServiceNow does not collect SSN's but attachments to stored records may contain PII collected elsewhere and inadvertently uploaded as supporting artifacts. If such a situation were to occur, once identified, the PII would be removed and the incident reported.

- b. Under which authorized uses, as described in the "Reduction of Use of Social Security Numbers (SSN) in PBGC" policy document?

Not Applicable

- c. If the answer to b., above is “Compelling Business Need,” please provide a plan to reduce the use of SSNs, highlighting activities that can be completed in the next 12 months.

Not Applicable

2.3 Privacy Office Review

Name of Reviewer	Margaret Drake
Date Reviewed	9/7/23
Expiration Date	9/7/24
Result	<input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> Denied

(For Privacy Office Use Only)

Discuss analysis of risks and compensating controls (or other mitigation steps).

Enter description here.

Discuss any conditions on Approval

Enter description here.