



Adapted Privacy Impact Assessment

PayByPhone Technologies Inc.

March 21, 2024

Contact

Department of Administration
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SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application

- 1.1 What is the specific purpose of the agency's use of the third-party website or application and how does that use fit with the agency's broader mission?

PaybyPhone is a technology company that provides electronic payment solutions for public parking areas. Parkers will have the choice of purchasing parking using the on-site parking pay stations, the PaybyPhone website, or mobile application. These payment options improve the visitor experience and will increase compliance with parking regulations. Providing a secondary payment option will allow the Presidio Trust to reduce the number of physical pay stations in parking areas with multiple pay stations.

- 1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

Title I, Omnibus Parks Public Lands Act of 1996, Public Law 104-333.

The Presidio Trust maintains broad authority over management and use of Area B in the Presidio, in accordance with the Trust Act. These authorities include the collection of parking fees and assessment of additional fees for failure to comply with posted parking fees and time limits. The Trust's management authorities include actions aimed at increasing parking fee compliance.

Parking management using parking fees is identified in both the Presidio Trust Management Plan (2001) and in detail in the Presidio Parking Management Plan (2001). As per the Parking Fee Policy (2018), the Trust "regulate(s) and charge(s) for parking in balance with providing access for visitors of all ages and abilities, and meeting the transportation needs of our residential and commercial tenants". The use of PaybyPhone is consistent with these management plans.

SECTION 2: Any PII that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application

- 2.1 What PII will be made available to the agency?

PayByPhone will store information and data directly relating to drivers' parking sessions through the PayByPhone service at the Parking Locations ("Parking Sessions") and data that may be required for enforcement and the issuance of violations ("Transaction Data"). Transaction Data may include vehicle license plate, parking session date, time, duration, zone number and amount paid, and parking session details obtained through customer service center.

The Presidio Trust is not party to PII including vehicle plate numbers, contact information, or names. The Presidio Trust will not receive transaction information including the billing address and credit card number. This is a separate encrypted payment system.

2.2 What are the sources of the PII?

Information that is provided by the customer when using the PayByPhone mobile application and information that is generated by the PayByPhone mobile application during a parking session.

2.3 Will the PII be collected and maintained by the agency?

No, the Presidio Trust and its contractor, ACE Parking, will not have access to the PII collected and stored by PaybyPhone. The information available to the Presidio Trust and ACE Parking will be limited to transaction identification numbers, times and dates of purchases, durations, amount paid and zone numbers.

2.4 Do the agency's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, the Presidio Trust is not using PaybyPhone to collect information from the public or in any manner that would trigger the requirements of the Paperwork Reduction Act. Any planned use of PaybyPhone that falls outside the scope of this assessment will require a complete PIA exclusive to the PaybyPhone use and coordination with the Presidio Trust Senior Agency Officials for Privacy.

SECTION 3: The Agency's Intended or Expected Use of the PII

3.1 Generally, how will the agency use the PII described in Section 2.0?

The Presidio Trust will not have access to PII collected and maintained by PaybyPhone. PaybyPhone will use license plate numbers recorded with the transaction to identify the vehicle's receipt of payment. This Transaction Data is digitally encrypted and transmitted and then connected with the LPR technology used to scan license plates and issue violations.

3.2 Provide specific examples of the types of uses to which PII may be subject.

Data is digitally encrypted and confirmation of payment is confirmed through an automated process not viewable by the individual conducting enforcement. PII may be used by PaybyPhone when they are processing a customer reimbursement to lookup the transaction. PII is not used by the Presidio Trust or ACE Parking to process violation appeals; the person submitted the appeal is responsible for submitting evidence such as a screenshot or receipt.

SECTION 4: Sharing or Disclosure of PII

4.1 With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

PaybyPhone will maintain the Transaction Data. PaybyPhone maintains records containing PII to expedite the customer's online transaction process. Customers create a user account to store their vehicle and payment information. PayByPhone does not share PII with third-parties.

4.2 What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

Encryption, secure transmission, data privacy policies that comply with applicable data protection laws including GDPR. Confidentiality provisions are in place with all of PaybyPhone's suppliers. PaybyPhone suppliers include data center hosting services and suppliers of first level customer support and tools.

SECTION 5: Maintenance and Retention of PII

5.1 How will the agency maintain the PII, and for how long?

PayByPhone retains data in accordance with Data Protection Laws. PaybyPhone will retain PII (including information related to each parking session) for only so long as is reasonably necessary to fulfill the purposes for which the information was collected or as required by law. If a user creates an Account with PaybyPhone, they will retain the PII as long as they have that Account. If the user closes their Account or if there is no activity on their Account (including no log-ins and no parking sessions) for a period of more than 3 years, PaybyPhone will mark the Account in their database as "Closed," but may have to keep some information for as long as is required to comply with their legal obligations, or 7 years, whichever is shortest. Unless legally required to keep records, PaybyPhone will delete PII latest after 3 years.

5.2 Was the retention period established to minimize privacy risk?

This retention period was established to minimize privacy risk to PaybyPhone users.

SECTION 6: How the Agency will Secure PII

6.1 Will privacy and security officials coordinate to develop methods of securing PII?

N/A. As a result of coordination with privacy officer, project manager, technical security manager and legal counsel, the Presidio Trust will have no access to PII on the PaybyPhone back office and all transaction data will be hidden from the agency's view.

6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

PaybyPhone utilizes virus protection, Encryption, secure transmission, data privacy policies that comply with applicable data protection laws including GDPR. Confidentiality provisions are in place with all PaybyPhone's suppliers. The Presidio Trust will not have access to PII. This is achieved by limiting the user roles of all Presidio Trust log-in accounts and our contractors. The only viewable information for the agency and our contractors will be aggregated reports, parking rates, and locations (geographic zones used to identify specific parking areas).

SECTION 7: Identification and Mitigation of Other Privacy Risks

7.1 What other privacy risks exist, and how will the agency mitigate those risks?

PayByPhone has an Information Security and Compliance team with direct responsibility for designing and implementing security controls for all aspects of the parking payment process.

7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of the third-party website or application?

The Presidio Trust will provide links to the PaybyPhone privacy policy on the parking section of our website. Individuals may choose the mobile payment option, PaybyPhone or to complete their parking transaction using an on-site parking pay station. PayByPhone has links to its privacy policy through the app and online.

SECTION 8: Creation or Modification of a System of Records

8.1 Will the agency's activities create or modify a "system of records" under the Privacy Act of 1974?

The Presidio Trust submitted a system of records (SORN) which can be found on the Federal Register [collection:\(FR\) AND publishdate:range\(,2024-03-19\) AND agency:\(presidio trust\) | Search Results \(govinfo.gov\)](#).

1) Reviewing Official

(Signature) _____

Name: Luke R. Donohue

Title: Director, Department of Administration