

U.S. Securities and Exchange Commission

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Performance Fit 2 (PF2)  
**PRIVACY IMPACT ASSESSMENT (PIA)**



May 22, 2025

Office of Human Resources

Publication History

Revision	Date	Changes Made
Initial	5/22/2025	Original Document

# Privacy Impact Assessment

## Performance Fit 2 (PF2)

### Section 1: System Overview

#### 1.1 Name of Project or System

Performance Fit 2 (PF2)

#### 1.2 Is the system internally or externally hosted?

- Internally Hosted (SEC)  
Externally Hosted  
 (Contractor or other agency/organization)

#### 1.3 Reason for completing PIA

- New project or system  
 This is an existing system undergoing an update  
First developed:  
Last updated:  
Description of update:

#### 1.4 Does the system or program employ any of the following technologies?

- Enterprise Data Warehouse (EDW)  
 Social Media  
 Mobile Application (or GPS)  
 Cloud Computing Services  
 [www.sec.gov](http://www.sec.gov) Web Portal  
 Artificial Intelligence (AI)  
 None of the Above

### Section 2: Authority and Purpose of Collection

#### 2.1 Describe the project and its purpose or function in the SEC's IT environment

PF2, is an SEC Office of Human Resources (OHR) system that provides online assessment services to deliver the Leadership Evaluation, Accession and Development (LEAD) program assessments. PF2 uses standardized LEAD assessments to screen leadership candidates for essential leadership competencies in a fair and legally compliant manner.

#### 2.2 What specific legal authorities, arrangements, and/or agreements allow the information to be collected?

- Americans with Disabilities Act of 1990 (ADA)
- Title VII of the Civil Rights Act of 1964
- Age Discrimination in Employment Act of 1967 (ADEA)
- Executive Order 13932 (June 26, 2020)
- Executive Order 14170: Reforming The Federal Hiring Process and Restoring Merit to Government Service (January 20, 2025)

#### 2.3 Does the project use, collect, or maintain Social Security numbers (SSNs)? *This includes truncated SSNs.*

- No  
 Yes

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If yes, provide the purpose of collection:

If yes, provide the legal authority:

### 2.4 Do you retrieve data in the system by using a personal identifier?

- No
- Yes, a SORN is in progress
- Yes, there is an existing SORN  
SEC-10 Personnel Management Employee and Staffing and Training Files (83 FR 6892, February 15, 2018)  
OPM/GOVT-5 Recruiting, Examining and Placement Records (80 FR 74815, November 30, 2015)  
OPM/GOVT-6 Personnel Research and Test Validation Records (80 FR 74815, November 30, 2015)

### 2.5 Is the information covered by the Paperwork Reduction Act of 1995 (PRA)?

- No
- Yes

### 2.6 Considering the purpose of the collection, what privacy risks were identified and how were those risks mitigated?

There is minimal risk to privacy related to the purpose of the collection. Risk is minimized because only minimal PII is collected and associated with an individual response to assessment questions. In addition, assessment questions are designed to not require personal information to adequately respond to questions.

## Section 3: Data Collection, Minimization, and Retention

### 3.1 What information is collected, maintained, used, or disseminated about individuals? *Check all that apply.*

- The system does not collect, maintain, use, or disseminate information about individuals.

#### Identifying Numbers

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Social Security Number | <input type="checkbox"/> Alien Registration      | <input type="checkbox"/> Financial Accounts     |
| <input type="checkbox"/> Taxpayer ID            | <input type="checkbox"/> Driver's License Number | <input type="checkbox"/> Financial Transactions |
| <input type="checkbox"/> Employee ID            | <input type="checkbox"/> Passport Information    | <input type="checkbox"/> Vehicle Identifiers    |
| <input type="checkbox"/> File/Case ID           | <input type="checkbox"/> Credit Card Number      | <input type="checkbox"/> Employer ID            |
| <input type="checkbox"/> Other:                 |  |   |

#### General Personal Data

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Name           | <input type="checkbox"/> Date of Birth            | <input type="checkbox"/> Marriage Records      |
| <input type="checkbox"/> Maiden Name               | <input type="checkbox"/> Place of Birth           | <input type="checkbox"/> Financial Information |
| <input type="checkbox"/> Alias                     | <input type="checkbox"/> Home Address             | <input type="checkbox"/> Medical Information   |
| <input type="checkbox"/> Sex                       | <input type="checkbox"/> Telephone Number         | <input type="checkbox"/> Military Service      |
| <input type="checkbox"/> Age                       | <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Mother's Maiden Name  |
| <input type="checkbox"/> Race/Ethnicity            | <input type="checkbox"/> Education Records        | <input type="checkbox"/> Health Plan Numbers   |
| <input type="checkbox"/> Civil or Criminal History | <input type="checkbox"/> Zip Code                 |  |
| <input type="checkbox"/> Other:                    |   |  |

#### Work-Related Data

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Occupation           | <input type="checkbox"/> Telephone Number           | <input type="checkbox"/> Salary              |
| <input type="checkbox"/> Job Title            | <input type="checkbox"/> Email Address              | <input type="checkbox"/> Work History        |
| <input type="checkbox"/> Work Address         | <input type="checkbox"/> Certificate/License Number | <input type="checkbox"/> Business Associates |
| <input type="checkbox"/> PIV Card Information | <input type="checkbox"/> Fax Number                 |  |

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Other:

### Distinguishing Features/Biometrics

Fingerprints

Photographs

Genetic Information

Voice Recording

Video Recordings

Voice Signature

Other:

### System Administration/Audit Data

User ID

Date/Time of Access

ID Files Accessed

IP Address

Queries Ran

Contents of Files

Other:

### 3.2 Why is the PII listed in Question 3.1 collected, used, shared, or maintained by the system or project?

PF2 sends a personalized link, via the email address on file, to assign assessment to candidates.

### 3.3 Whose information may be collected, used, shared, or maintained by the system?

SEC Employees

Purpose: Names are collected to link to employee leadership test responses and scores.

SEC Federal Contractors

Purpose:

Interns

Purpose:

Members of the Public

Purpose:

Employee Family Members

Purpose:

Former Employees

Purpose:

Job Applicants

Purpose: Names are collected to link to job applicant leadership test responses and scores.

Vendors

Purpose:

Other:

Purpose:

### 3.4 Describe the PII minimizing mechanisms and if the PII from the system is being used for testing, training, and/or research efforts.

PF2 collects only names and email addresses. PII is not used for any testing, training or research efforts.

### 3.5 Has a retention schedule been established by the National Archives and Records Administration (NARA)?

No.

Yes.

DAA-GRS-2017-0007-0002 "Workforce and succession planning records"

### 3.6 What are the procedures for identification and disposition at the end of the retention period?

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When the assessment information has no more business use to test leadership competencies, the system archiving process stores the data for three years before being permanently deleted from the system in accordance with DAA-GRS-2017-0007-0002.

### 3.7 Will the system monitor members of the public, employees, and/or contractors?

- N/A
- Members of the Public  
Purpose:
- Employees  
Purpose:
- Contractors  
Purpose:

### 3.8 Considering the type of information collected, what privacy risks were identified and how were those risks mitigated?

There is minimal risk of inadvertent disclosure of PII. The risk is mitigated by encrypting information and limiting access to PF2 to authorized users only.

## Section 4: Openness and Transparency

### 4.1 What forms of privacy notice were provided to the individuals prior to collection of data? *Check all that apply.*

- Privacy Act Statement
- System of Records Notice  
SEC-10 Personnel Management Employee and Staffing and Training Files (83 FR 6892, February 15, 2018)  
OPM/GOVT-5 Recruiting, Examining and Placement Records (80 FR 74815, November 30, 2015)  
OPM/GOVT-6 Personnel Research and Test Validation Records (80 FR 74815, November 30, 2015)
- Privacy Impact Assessment  
Date of Last Update:
- Web Privacy Policy
- Other notice:
- Notice was not provided.

### 4.2 Considering the method(s) of notice provided, what privacy risks were identified regarding adequate notice and how were those risks mitigated?

Risk to privacy regarding notice is minimal because adequate notice is provided as identified in section 4.1.

## Section 5: Limits on Uses and Sharing of Information

### 5.1 What methods are used to analyze the data?

Manual analysis of the results is performed by the OHR LEAD Program team and is used to average or sum individual response scores to provide an overall assessment score.

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### 5.2 Will internal organizations have access to the data?

- No
- Yes

Organizations:

### 5.3 Describe the risk to privacy from internal sharing and describe how the risks are mitigated.

There is no risk to privacy from internal sharing because data is not shared outside OHR with other SEC divisions and offices.

### 5.4 Will external organizations have access to the data?

- No
- Yes

Organizations: PDRI personnel have access to assessment participant names, email addresses, and responses to assessment questions

### 5.5 Describe the risk to privacy from external sharing and describe how the risks are mitigated.

The primary risk to privacy is inadvertent/unauthorized disclosure. This risk is mitigated by sending information to PDRI via encrypted secure email.

## Section 6: Data Quality and Integrity

### 6.1 Is the information collected directly from the individual or from another source?

- Directly from the individual.
- Other source(s): USAJOBS applications (for name and email)

### 6.2 What methods will be used to collect the data?

SEC OHR provides PDRI the names and email addresses of assessment participants obtained from USAJOBS. PDRI directly enters that information in PF2 for the purposes of emailing a personalized assessment link to individual participants. Participants provide responses to assessment questions using PF2.

### 6.3 How will the data collected from individuals, or derived by the system, be checked for accuracy and completeness?

PF2 does not validate responses for accuracy and completeness. Data obtained from USAJOBS is presumed to be accurate because it is provided by the participant. In addition, assessment responses from participants are presumed to be accurate and complete because they are also provided by the participants.

### 6.4 Does the project or system process, or access, PII in any other SEC system?

- No
- Yes.

System(s):

### 6.5 Consider the sources of the data and methods of collection and discuss the privacy risk for this system related to data quality and integrity? How are these risks mitigated?

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There is minimal risk related to data quality and integrity because information obtained from SEC OHR, USAJOBS is presumed accurate as discussed in section 6.3.

### Section 7: Individual Participation

#### 7.1 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project? If no opportunities are available to consent, decline or opt out, please explain.

Providing information to PF2 is voluntary. Individuals may decline to provide information for use in PF2.

#### 7.2 What procedures are in place to allow individuals to access their information?

Direct access to information stored in PF2 is not permitted for assessment participants. Participants seeking access to their information contained in PF2 may submit a request in writing to the Freedom of Information Act (FOIA)/Privacy Act (PA) Officer, Securities and Exchange Commission, 100 F Street NE., Washington, DC 20549-2736.

#### 7.3 Can individuals amend information about themselves in the system? If so, how?

Individuals cannot directly amend information about themselves in PF2. They may request amendment of their information by submitting a written request to FOIA/Privacy Act Officer, Securities and Exchange Commission, 100 F Street, N.E., Washington, D.C. 20549-2736 or submit a request electronically to [foiapa@sec.gov](mailto:foiapa@sec.gov).

#### 7.4 Discuss the privacy risks related to individual participation and redress? How were these risks mitigated?

Privacy risk related to participation and redress are minimal because individual participation in the PF2 assessment process is voluntary and a means for an individual to amend information provided is in place as discussed in sections 7.1 through 7.3.

### Section 8: Security

#### 8.1 Does the project or system involve an online collection of personal data?

- No
  - Yes
- Public URL:

#### 8.2 Does the site have a posted privacy notice?

- No
- Yes
- N/A

#### 8.3 Does the project or system use web measurement and/or customization technologies?

- No
- Yes, but they do not collect PII
- Yes, and they collect PII

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### Section 9: Accountability and Auditing

#### 9.1 Describe what privacy training is provided to users, either general or specific to the system or project.

All SEC staff and contractors receive initial and annual privacy awareness training, which outlines roles and responsibilities for proper handling and protection of PII. SEC Rules of the Road ensure that employees and contractors are aware of their security responsibilities and how to fulfill them.

#### 9.2 Does the system generate reports that contain information on individuals?

- No
- Yes

#### 9.3 Do contracts for the system include Federal Acquisition Regulation (FAR) and other applicable clauses ensuring adherence to the privacy provisions and practices?

- No
- Yes
- This is not a contractor operated system

#### 9.4 Does the system employ audit logging or event logging?

- No
- Yes

#### 9.5 Given the sensitivity of the PII in the system, manner of use, and established safeguards, describe the expected residual risk related to access.

Although access to PF2 is limited only to authorized SEC staff, the expected residual risk related to access to PII in the system can include the inadvertent handling or misuse of data. To mitigate this risk, user accounts for employees are synched with Active Directory and system privileges are granted based on defined roles.