

Public Privacy Impact Assessment (PIA)

EXIM HubSpot



Version 1.0

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Introduction

The Export-Import Bank of the United States (EXIM) requires PIAs to be created and maintained on all IT systems that collect, store, process or transfer personally identifiable information (PII).

The system owner has completed this assessment in compliance with Section 208 of the E-Government Act of 2002 (“E-Gov Act”), 44 U.S.C. § 3501, Office of the Management and Budget (OMB) Memorandum 03-22, “OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002.

Name of the system: HubSpot

System Description:

HubSpot is a cloud-based marketing automation SaaS application, hosted on Amazon Web Services (AWS). HubSpot’s AWS product infrastructure resides in the U.S. east region—primary region in Virginia and secondary region in Ohio. HubSpot enables EXIM business development and outreach operations essential to its mission of supporting American jobs by facilitating the export of U.S. goods and services. HubSpot is used by the Office of Small Business (OSB).

OSB uses HubSpot for several outreach related functions including:

- Hosting public-facing webpages on the <https://grow.exim.gov> site including EXIM’s blog, consultation request forms, landing pages for webinars and other events, marketing collateral landing pages, etc.
- Email outreach campaigns to promote EXIM events, publish newsletters, share content, and other outreach and education follow ups.
- Managing EXIM’s Instagram account
- Tracking and reporting on lead generation, website activity, and other key metrics that allows EXIM to track and measure the performance of its outreach activities

HubSpot contains records for companies and their representatives who are potential, current, or former customers or that are also involved in an EXIM financing transaction (e.g., as a sponsor or an advisor). Additionally, EXIM staff use it to manage outreach to partner organizations and agencies and their representatives (registered insurance brokers, commercial lenders, and members of the Regional Export Promotion Program) as well as other organizations and agencies whom EXIM works with in supporting U.S. exporters (e.g., other government agencies and nonprofit business development organizations).

HubSpot’s functionality is enhanced by an integration with another EXIM system, Salesforce. The integration provides a bi-directional dataflow between EXIM’s primary business development applications.

Legal Authority:

Authority of the Export-Import Bank Act of 1945, as amended (12 U.S.C. 635 et seq.), Executive Order 9397 as Amended by Executive Order 13478 signed by President George W. Bush on November 18, 2008, Relating to Federal Agency Use of Social Security Numbers.

Characterization of the Information Collected:

- **Describe all uses of the PII:**

Individual names are used to facilitate and track interactions with them as representatives of companies/organizations. EXIM has limited the PII we collect only to individual names—all other information is business information.

- **From whom will the information be collected?**

The source of the information is originally from the individual—either through the web forms or through one of the channels.

Information is collected in a variety of ways. It is collected through interactions with EXIM staff by phone, email, or in person at trade shows or other events and entered either into HubSpot directly or received through the integration with Salesforce. Also, it is collected through individuals filling out EXIM web forms. It is also collected through partner organizations who refer companies to EXIM (either entered through a web form or entered into HubSpot or Salesforce by an EXIM staff member).

- **What specific data will the system collect?**

The only PII collected is individual name. Additionally, EXIM HubSpot collects job title, business email, and business phone number. HubSpot also collects web tracking information including the number of web page visits, form submissions, and source. The majority of the information in Salesforce is company information including company name, address, and website. We also capture information about a company's potential, current, or former transactions with EXIM including which EXIM product(s), status, amount, and EXIM transaction number. Salesforce also collects notes from EXIM staff about their interaction with the company and copies of emails they sent to or received from the company. A comprehensive list of data fields collected is documented in a HubSpot Objects worksheet which can be made available upon request.

- **With whom will the information be shared, both within EXIM and externally?**

Internal users are only those EXIM employees or contractors who need access to fulfill one or more of their job duties. This includes both regular users and admins/developers. The level of access they are given is based on their position, the documented separation of duties, and in accordance with the principle of “Least Privilege” where the user will be

granted only the access they need and no more. Regular users must work within the Office of Small Business (OSB) and the access request must come from a supervisor/COR or VP/SVP in that office. Any access request from outside OSB, or request for elevated (system admin) access, must be approved by the System Owner or System Owner's designee.

Privacy Risks and Mitigation Strategies:

- **Does the system derive new data or create previously unavailable data about individuals through aggregating or consolidating this data with data from other sources? Yes [] No [X] If so, explain below:**
- **For data that is collected other than directly from the user, how is the integrity and accuracy of the data collection assured?**

N/A - This system has been assessed and authorized in accordance with applicable federal information security requirements. All security controls have been implemented, tested, and evaluated in alignment with the NIST Risk Management Framework (RMF) as defined in NIST Special Publications 800-37, 800-53, and associated guidance. The organization has completed a comprehensive Security Assessment Report (SAR) and Plan of Action and Milestones (POA&M) in accordance with NIST SP 800-53A and maintains continuous monitoring activities consistent with NIST SP 800-137.

The Assessment and Authorization process complies with OMB Circular A-130, OMB Memorandum M-17-25, and all relevant federal policies governing the management of federal information systems. An Authorizing Official (AO) has reviewed the security posture and risk determination and has issued an Authorization to Operate (ATO) contingent upon ongoing adherence to federal cybersecurity requirements. The system is subject to continuous monitoring, annual assessments, and periodic updates, ensuring ongoing compliance with NIST and OMB standards.]

- **Describe the retention periods for data in this system:**

Data in this system falls under records schedule GRS 6.5 Item 020, DAA-GRS2017-0002-0002. These records are temporary, and disposition is 'Delete when superseded, obsolete, or when customer requests the agency to remove the records.

Privacy Act Applicability; System of Records Notice (SORN) Requirement:

- **Is information retrieved from the system by using a name or a "unique identifier", or other PII linked to an individual?**

Yes. Both First Name and Last Name.

- **Is this system operated under a System of Records Notice (SORN) either specific to this system, or part of another SORN? Yes ☒ No ☐ SORN: 86 FR 30933**

**To contact the EXIM Bank Senior Agency Official for Privacy (SAOP) use:
fismasaop@exim.gov**