

1. System Name: Non-WMATA Personnel Records from 2026 to Present (Contractor Lifecycle Management).
2. System Location: Records are maintained in WMATA-owned or contractor-operated information systems, including authorized cloud-based environments (e.g., Software-as-a-Service, Platform-as-a-Service, and Infrastructure-as-a-Service). Data may be stored at WMATA facilities and at approved service provider locations.
3. Categories of Individuals Covered by System: Non-WMATA Personnel (including, but not limited to, contractor/subcontractor personnel, consultants, vendor personnel, Board members, and applicable oversight agency personnel) who, from June 2026 to present, are performing work pursuant to a WMATA contract; requiring access to WMATA systems, facilities, and/or services; and/or undergoing background verification, onboarding, and/or credentialing processes.
4. Categories of Records in the System: Personal identifying information (e.g., name, address, phone number, email address, date of birth, Social Security numbers or other national identifiers); Employment and engagement information (e.g., employer/vendor name, contract identifier(s), assignment, job role, start/end dates, and/or contract/personnel managers); Identity and access management records (e.g., system access credentials, badge identifiers, audit logs); Background investigation verification records, training, certification, and compliance records, if applicable.
5. Principle Purpose: To support WMATA's administration and management of Non-WMATA personnel, including: facilitating onboarding, identity verification, and credentialing; reviewing and approving applicable work hours/invoices; and managing access to WMATA systems, facilities, and services.
6. Routine Uses of Records maintained in the System:
  - General Routine Use A (Disclosure for Law Enforcement Purposes);
  - General Routine Use B (Disclosure Incident to Requesting Information);
  - General Routine Use C (Disclosure to Requesting Agencies);
  - General Routine Use D (Disclosure to Congressional Offices or Offices of Elected Officials in the Transit Zone);
  - General Routine Use E (Disclosure to Courts or Administrative Bodies);
  - General Routine Use F (Disclosure to Contractors, Grantors, Grantees, Federal Government Agencies, and Others);
  - General Routine Use G (Disclosure for Administrative Claims, Complaints, and Appeals);
  - General Routine Use H (Disclosure in Connection with Litigation);
  - General Routine Use I (Disclosure to WMATA Unions); and
  - General Routine Use J (Disclosure to the Government Accountability Office (GAO), Federal Transit Administration (FTA), or Other Government Oversight Agencies).
7. Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system:

- **Retrieved by:** Individual name; WMATA-furnished personnel identification number; Social Security number/other national identifier; Vendor or employer affiliation; and System-generated identifiers.
- **Storage:** Secure electronic databases within WMATA enterprise systems, including Enterprise Resource Planning platforms); and other systems supporting payroll, human capital, vendor management and financial management functions.
- **Safeguards:** Access to records is restricted to authorized personnel based on role and/or job requirements. Systems employ authentication controls (e.g., user ID, password, multi-factor authentication). Data is protected using administrative, technical, and physical safeguards consistent with WMATA policies. Audit logging and monitoring are implemented to track access and usage.
- **Retention and Disposal:** Records are retained and disposed of in accordance with WMATA records retention schedules and applicable legal and regulatory requirements. Records may be retained for a period sufficient to: Satisfy contractual, financial, and tax obligations; Comply with audit and legal requirements; and Support administrative and operational needs.

8. **Systems Manager/Administrator:** Chief Financial Officer (or designee), Office of Finance Administration, 300 7<sup>th</sup> Street SW, Washington, DC 20024.

9. **Procedure for Notice, Access, and Contesting:** Any individual who wants to know whether this system of records contains a record about them, who wants access to their record(s), or who wants to contest the contents of a record, should make a written request to the Privacy Administrator at (1) [PARP@wmata.com](mailto:PARP@wmata.com); or (2) **Office of General Counsel 7E, PO Box 44390, Washington, D.C. 20026-4390**. Requesters will be required to provide adequate identification, such as a driver's license, WMATA personnel identification card, or government-issued identification document. Requests for correction or amendment must identify the information to be changed and the corrective action sought. Additional information is available in WMATA's Policy/Instruction 9.2 (Privacy Policy), which is posted on WMATA's website.

10. **Records source categories:** Contractor personnel and/or their authorized representatives; Contractor, consultant, vendor, and subcontractor entities; and/or WMATA program offices and applicable data collection systems.