

Office of Government Ethics
Privacy Impact Assessment for the
Use of Third-Party Websites and Applications



January 17, 2014

Name of Project/System: OGE Social Media Accounts on Third-Party Websites
Office: Program Counsel Division, U.S. Office of Government Ethics

I. Overview and Purpose

OGE maintains social media accounts on third-party websites (“third-party accounts”) to promote transparency and raise the visibility of the executive branch ethics program and OGE. Raising the visibility of the executive branch ethics program and OGE are critical steps towards building awareness of the systems in place to detect and resolve potential conflicts of interest. Additionally, OGE uses third-party accounts to provide cost-effective online training for ethics officials. This training provides ethics officials with the knowledge and skills needed to carry out the duties of their positions.

All OGE third-party accounts are governed by OGE’s Policy for Official OGE Social Media Accounts on Third-Party Websites. Additionally, OGE provides a privacy statement, either in full text or through a hyperlink, on the profile page of each of its third-party accounts. OGE periodically reviews the use of its third-party accounts to ensure that such use complies with OGE’s policies and all federal privacy, accessibility, information security, records management, and other applicable laws, regulations, and guidance.¹

Consistent with OMB Memorandum Model Privacy Impact Assessment for Agency Use of Third-Party Sites and Applications, dated December 29, 2011, this Privacy Impact Assessment (PIA) analyzes OGE’s use of third-party websites and how such use could result in personally identifiable information (PII) becoming available to OGE.

OGE will revise or update this privacy impact assessment if OGE’s practices change, if new risks to privacy develop, or as OGE develops better ways to keep external audiences informed. OGE will post the updated assessment on its website and change the date on the cover page.

II. PII Made Available to OGE Through Third-Party Websites

Personally identifiable information (PII), as defined by OMB Memorandum M-07-16, “refers to information which can be used to distinguish or trace an individual’s identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.”

Third-party user accounts often contain an individual’s name, a username, and a short bio. Some third-party websites may also collect PII during the registration process. Depending on the user’s privacy settings, any member of the public may be able to view a user’s name, username, and any other PII the user includes in his or her profile information, comments, or posts. If a user visits an OGE page on a third-party account to review the content but does not interact with the page, no PII about the user is made directly available to OGE. If a user does interact with an

¹ Guidance includes, but is not limited to, *Memorandum M-10-23: Guidance for Agency Use of Third-Party Websites and Applications*, Office of Mgmt. & Budget, Exec. Office of the President, June 25, 2010, http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-23.pdf.

OGE third-party account, the user's name, username, profile information, and content of the messages or postings (including photos, images, videos, and other personal information provided by the user) may become available to OGE. Interactions include "following," "friending," "subscribing" to or otherwise associating with an OGE third-party account; posting comments, videos, or other content to an OGE page; exchanging messages; or participating in one of the various services, such as a live video chat.

OGE does not "follow," "friend," "subscribe" to, or take similar actions to connect its account with other user accounts, except for U.S. government entities. Furthermore, OGE does not use its third-party accounts to request, collect, maintain, or record PII.

To the extent that OGE solicits comments and feedback through its third-party accounts, OGE currently only solicits general feedback. Thus, OGE does not use its third-party accounts in any manner that triggers the Paperwork Reduction Act because OGE's use of its third-party accounts does not constitute an information collection activity under the law.²

III. OGE's Intended or Expected Use of PII

OGE uses its third-party accounts to inform its external audiences about the executive branch ethics program and OGE, to provide ethics education and training for agency ethics officials, and to direct users to OGE's official website or to contact OGE for more information. Such use will generally not implicate PII outside of voluntary user interaction with OGE. User interactions with OGE may include name, username, email address, photos, images, videos, content of messages or postings, or other personal information provided by the user. OGE may use this information to respond to comments or messages posted on or directed at OGE's third-party accounts. OGE does not use its third-party accounts to request, collect, maintain, or record PII.

OGE also uses analytic technology to monitor traffic directed to its website through OGE's third-party accounts; engagement activities with OGE third-party pages, such as the number of views, clicks on posted links, "likes," and "retweets;" and the number of "followers," "friends," "subscribers," or similar connections. OGE uses this information to learn about the reach of its external communications by analyzing the number of users who visit OGE's official website through links OGE posts on its third-party sites and to make its website and third-party accounts more useful to its external audiences. No PII is provided to OGE through these measurement technologies.

IV. Sharing or Disclosure of PII

OGE does not request, collect, maintain, or record any PII about users who visit an OGE page on a third-party website or "follow," "friend," "subscribe" to, or otherwise associate their accounts with an OGE third-party account. To the extent that a user posts comments, joins a group, exchanges messages, participates in one of the various services, or otherwise sends PII to OGE through OGE third-party accounts, OGE will use the minimum amount of PII necessary to

² Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, Office of Mgmt. & Budget, Exec. Office of the President, (April 7, 2010).

accomplish a purpose authorized by statute, executive order, or regulation. OGE will not request, collect, record, or maintain PII unless required by law.

Only a limited number of approved OGE employees have access to manage OGE's third-party accounts. Each employee with access must comply with OGE's Policy for Official OGE Social Media Accounts on Third-Party Websites, which prohibits the use of OGE third-party accounts to request, collect, maintain, or record PII.

V. Maintenance and Retention of PII

OGE does not request, collect, maintain, or record any PII about users made available to OGE through its third-party accounts. Content posted on OGE third-party accounts by other users may be retained independently by the third-party website and such retention period is governed by the automatic applications of the third-party website.

VI. Security of Information

OGE takes reasonable precautions to protect its third-party accounts and information voluntarily submitted to OGE on a third-party website. OGE restricts access to its third-party accounts only to employees who have received management approval to access the account to perform their official duties. Access to OGE third-party accounts is limited to employees who administer those accounts. OGE utilizes best practices for creating secure passwords for its third-party accounts, and all such accounts are clearly identified as official OGE accounts. Additionally, policies governing the creation of an OGE third-party account must be reviewed by the agency's Chief Information Officer, Privacy Officer, and Records Officer to ensure compliance with IT security policy and procedures, federal privacy laws, and federal records laws.

VII. Additional Privacy Risks

While OGE takes appropriate steps to protect individual privacy, many of the risks presented by third-party websites depend on how users decide to use these websites.

Consequently, OGE profile pages on third-party websites will include a brief privacy statement, where possible, and a link to OGE's full privacy statement. Such statements will contain (1) OGE's privacy policies, (2) the specific purpose of OGE's use of the account, (3) a link to the privacy policy of the third-party website and a statement that the website is operated by a third party that is not governed by OGE's privacy policies, (4) a statement explaining that all information provided to OGE through its account may be available to operators of the third-party website and other users, and (5) a link to the relevant privacy impact assessment.

VIII. Creation or Modification of a System of Records

Under the Privacy Act, a system of records is a group of records from which information is retrieved by the name of an individual, or by any number, symbol, or other unique identifier assigned to that individual. OGE does not use its third-party accounts to request, collect, maintain, or record PII and thus does not create a system of records.

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