

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

**July 2016**  
**Program Counsel Division**

**U.S. Office of Government Ethics  
Privacy Impact Assessment (PIA) for the  
Use of Third-Party Websites and Applications**

Provide copies of the signed PIA to OGE's Chief Information Security Officer and Privacy Officer.

**Name of Project/System:** OGE Social Media and Website Analytics Accounts on Third-Party Websites

**Office:** Program Counsel Division, U.S. Office of Government Ethics

**A. CONTACT INFORMATION:**

- 1) **Who is the person completing this document?** (Name, title, organization and contact information).

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- 2) **Who is the system owner?** (Name, title, organization and contact information).

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- 3) **Who is the system manager for this system or application?** (Name, title, organization, and contact information).

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- 4) **Who is the Chief Information Security Officer who reviewed this document?** (Name, organization, and contact information).

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- 5) **Who is the Privacy Officer who reviewed this document?** (Name, organization, and contact information).

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- 6) **Who is the Reviewing Official?** (According to OMB, this is the agency CIO or other agency head designee, someone other than the official procuring the system or the official who conducts the PIA).

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**B. SYSTEM APPLICATION/GENERAL INFORMATION:**

- 1) **Does this system contain any information about individuals?**

No.

- a. **Is this information identifiable to the individual?**

N/A

- b. **Is the information about individual members of the public?**

N/A

- c. **Is the information about employees?**

N/A

## **2) What is the purpose of the system/application?**

OGE maintains social media and website analytics accounts on third-party websites (“third-party accounts”) to promote transparency, raise the visibility of the executive branch ethics program and OGE, and improve the usability of OGE’s website. 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. Lastly, OGE uses third-party accounts to help analyze non-identifiable information about how visitors interact with OGE’s website. This information is vital in continuously improving OGE’s website.

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 social media or website analytics accounts to request, collect, maintain, or record PII.

OGE also uses analytic technology to monitor 1) traffic directed to its website through OGE’s third-party accounts and 2) 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.

## **3) What legal authority authorizes the purchase or development of this system/application?**

5 U.S.C. app. § 402, Authority and Functions, Ethics in Government Act.

### **C. DATA in the SYSTEM:**

#### **1) What categories of individuals are covered in the system?**

People interacting with OGE’s website or third-party social media accounts.

## **2) What are the sources of the information in the system?**

In general, the source of information will depend on the third-party application. For most social media applications, the information provided to OGE when a user voluntarily posts to an OGE third-party social media application is limited to the username. 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. This information, however, is in no way retained or solicited by OGE.

### **a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

If a user does interact with an OGE third-party account, the user's name, username, profile information, and the 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.

### **b. What federal agencies provide data for use in the system?**

None.

### **c. What State and local agencies are providing data for use in the system?**

None.

### **d. From what other third party sources will data be collected?**

The third-party applications, such as Google Analytics.

### **e. What information will be collected from the employee and the public?**

In general, OGE does not collect data through third-party social media applications. Applications used for improving website performance may capture data, but this data is generic to the usage of the website and does not contain PII.

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 or certain international governmental organizations, nongovernmental organizations, or state government entities, within the ethics community. Furthermore, OGE does not use its third-party social media or website analytics accounts to request, collect, maintain, or record PII.

### 3) Accuracy, Timeliness, Reliability, and Completeness

- a. How will data collected from sources other than OGE records be verified for accuracy?

N/A

- b. How will data be checked for completeness?

N/A

- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?

N/A

- d. Are the data elements described in detail and documented?

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.<sup>1</sup>

#### D. ATTRIBUTES OF THE DATA:

- 1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

N/A. Insofar as social media applications are concerned, OGE does not collect data on individual users. Applications used for improving website performance may capture data, but this data is generic to the usage of the website and does not contain PII.

- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No.

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<sup>1</sup> 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](http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-23.pdf).

**3) Will the new data be placed in the individual's record?**

N/A

**4) Can the system make determinations about employees/the public that would not be possible without the new data?**

N/A

**5) How will the new data be verified for relevance and accuracy?**

N/A

**6) If the data is being aggregated, what controls are in place to protect the data from unauthorized access or use?**

N/A

**7) If data is being aggregated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

N/A

**8) How will the data be retrieved? Does a personal identifier retrieve the data?**

N/A

**9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

None.

**10) What opportunities do individuals have to decline/refuse to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

OGE does not request, collect, maintain, or record any PII about users made available to OGE through its third-party social media 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 terms of service agreement of each third-party website.

**E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:**

- 1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

N/A

- 2) Is the data in the system covered by existing records disposition authority? If yes, what are the retention periods of data in this system?**

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 social media or website analytics accounts to request, collect, maintain, or record PII and thus does not create a system of records.

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

N/A

- 4) Is the system using technologies in ways that the OGE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No.

- 5) How does the use of this technology affect public/employee privacy?**

Many of the risks presented by third-party websites depend on how users decide to use these websites.

- 6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

No.

- 7) What kinds of information are collected as a function of the monitoring of individuals?**

N/A

- 8) What controls will be used to prevent unauthorized monitoring?**

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 social media and website analytics 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.

**9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

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 social media or website analytics accounts to request, collect, maintain, or record PII and thus, does not create a system of records.

**10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.**

N/A

**F. ACCESS TO DATA:**

**1) Who will have access to the data in the system?**

OGE restricts access to its third-party social media and website analytics 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.

**2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

OGE restricts access to its third-party social media and website analytics 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.

**3) Will users have access to all data on the system or will the user's access be restricted? Explain.**

OGE restricts access to its third-party social media and website analytics 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.

**4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

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 social media and website analytics 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.

**5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

No.

**6) Do other systems share data or have access to the data in the system? If yes, explain.**

No.

**7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

N/A

**8) Will other agencies share data or have access to the data in this system (Federal, State, or Local)?**

No.

**9) How will the data be used by the other agency?**

N/A

**10) Who is responsible for assuring proper use of the data?**

N/A

**See Attached Approval Page**

The Following Officials Have Approved this Document

1) System Manager

 (Signature) 07/6/16 (Date)

Name: Nelson Cabrera, Jr.

Title: Assistant Director, Internal Operations

2) Chief Information Officer

 (Signature) 07-06-16 (Date)

Name: Ty Cooper

Title: Chief Information Officer

3) Senior Agency Privacy Officer

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