



**Federal Trade Commission
Privacy Impact Assessment**

for the:

OIA Wiki Pilot

April 2010

1 System Overview

The Federal Trade Commission's Office of International Affairs ("OIA") plans to develop an OIA Wiki to maintain and share administrative information and reference materials within the office. The OIA Wiki will reside on a secure website residing on the FTC's Intranet, accessible only by authorized OIA staff. The website will consist of interlinked web pages accessible via a web browser. Each page of the OIA Wiki will be dedicated to a particular topic or subject, and in addition to containing information on that topic or subject, each web page may contain links to documents on OIA's shared network drive, other OIA Wiki pages, other pages on the FTC's Intranet or Internet websites, or external Internet websites. OIA staff will be able to create, edit, or delete pages as necessary to ensure that the content of each page is accurate and current. The Wiki Administrator will be notified of each change to the Wiki, and a log of each modification will be maintained.

The Wiki will serve as a platform for the centralized sharing of information among OIA staff. The information to be shared on the Wiki is the sort of information that OIA staff members already gather and maintain on an individual basis. By aggregating that information in one location, the OIA Wiki will facilitate the efficient sharing of that information among staff members, will permit easier indexing of that information, and will help insure that the information is kept up-to-date.

2 Information Collected and Stored within the System

2.1 What information is to be collected, used, disseminated, or maintained by the system?

The OIA Wiki will centralize information related to the mission of OIA and the work performed by OIA staff. Some of this information includes personally identifiable information ("PII") such as business contact information (e.g., names, work addresses, work telephone numbers, and work e-mail addresses) of:

- Representatives of foreign and domestic law enforcement agencies, nongovernmental organizations, and intergovernmental organizations.
- FTC-sponsored conference and meeting participants.
- Representatives of foreign governments.
- Other U.S. government employees.

2.2 What are the sources of the information in the system?

Information in the OIA Wiki will be gathered or generated by OIA staff during the course of their duties. It will include business contact information of individuals from publicly available sources such as the Internet and legal research databases. It will also contain similar information shared with OIA from other U.S. government agencies such as the Department of Justice, as well as similar information provided by our foreign counterpart agencies. The information may be provided by the individuals themselves, or by organizations or agencies with which they are affiliated.

2.3 Why is the information being collected, used, disseminated, or maintained?

Much of the information has already been collected by individual employees in the performance of their duties, and the OIA Wiki will be used to centralize that information in one location. OIA collects the information because OIA staff frequently need to contact the individuals identified in Section 2.1 above to coordinate law enforcement efforts or to seek other assistance in Commission matters. Centralizing this sort of information in the OIA Wiki will facilitate the work performed by OIA staff, prevent the duplication of work, and help prevent the distribution of office-wide communications seeking information on any particular topic. For example, if an OIA staff member needs to reach out to a consumer protection agency in Country X, instead of sending an e-mail to the entire office asking if anyone has a contact in Country X, or instead of making nontargeted general inquiries to the foreign agency, the staff member can simply access the Wiki entry for Country X to see if someone has previously posted the business contact of an individual at that foreign agency. If the OIA staff member learns that the contact information for the individual at the foreign agency is no longer current, the OIA staff member can update the Wiki entry accordingly.

2.4 How is the information collected?

As explained above, some information will be gathered from publicly accessible sources, such as the Internet and legal research databases. Other information will also be gathered from nonpublic sources, such as other state and federal law enforcement, information provided in confidence by other U.S. government agencies, or from our counterparts in foreign countries. It may be collected in face-to-face meetings, telephone conversations, or via e-mail. OIA staff will input this information directly into the OIA Wiki using a computer software interface.

2.5 How will the information be checked for accuracy and timeliness (currency)?

OIA staff who post or edit information on the OIA Wiki will be responsible for insuring that the information is accurate and timely at the time of posting or editing. If an OIA staff member learns the business contact information of an individual listed in the Wiki is no longer accurate, the OIA staff member can update or delete the information, as appropriate.

2.6 Is the system using technologies in ways that the FTC has not previously employed (e.g., monitoring software, Smart Cards, etc.)? If so, how does the use of this technology affect individuals' privacy?

The OIA Wiki uses the same technology platform that is used for the FTC Intranet, but a new Cold Fusion module will be added and customized to implement the OIA Wiki. The new Wiki modules do not change the privacy issues for the Intranet, because the current Intranet provides similar content update capabilities as the new OIA Wiki.

2.7 What law or regulation permits the collection of this information?

The FTC is authorized to collect and maintain information from businesses, individuals, and

other government agencies under the FTC Act, 15 U.S.C. § 46, and the FTC's Rules of Practice, 16 C.F.R. 4.9, 4.10.

2.8 Considering the type of information collected and sources of collection, what privacy risks were identified and how were these risks mitigated?

The nature of the information that will be included in the OIA Wiki raises minimal privacy concerns. Pursuant to User Agreement and Rules of Behavior governing the use of the OIA Wiki, no sensitive PII or SHI will be posted directly on the OIA Wiki. Documents containing such sensitive information contained in documents shared on the Wiki will be redacted prior to posting.

In addition, the OIA Wiki will be housed on the FTC's secure Intranet, and only OIA staff and a small number of other FTC employees with valid login credentials and passwords will have access to the portion of the Intranet housing the Wiki. Each time a change is made to the Wiki's content, the OIA Wiki administrator will receive an e-mail notifying him or her of the change, for appropriate follow-up by the administrator.

3 Use and Access to Data in the System

3.1 Describe how information in the system will or may be used.

As explained above, the OIA Wiki will serve as a means of centralizing information, including business contact information (e.g., names, work addresses, work telephone numbers, and work e-mail addresses) of individuals identified in Section 2.1. The information contained in the OIA Wiki will be used to further OIA's mission and facilitate work performed by OIA staff. The OIA Wiki will make accessible, in a central location, information used by OIA staff, and the Wiki will permit easy editing and updating of that information, to ensure that it is current and up-to-date.

3.2 Which internal entities will have access to the information?

The following FTC staff will have access to the information contained in the OIA Wiki:

- All OIA staff who undergo training on the proper use of the wiki and who have been granted access by the OIA wiki administrator.
- IT Data Base Administrators will have access to the information, as they currently have access to all databases at the FTC, in order to properly maintain the systems. IT policy and procedures limit access as appropriate for IT staff and contractors.
- IT Web Team will have access to the information as needed to provide support to OIA.

3.3 Which external entities will have access to the information?

None. Like all other agency records, however, OIA Wiki records may need to be disclosed if the FTC receives a subpoena, court order, or other valid legal request (e.g., under the Freedom of Information Act (FOIA)).

4 Notice and Access for Individuals

4.1 How will individuals be informed about what information is collected, and how this information is used and disclosed?

Individuals will receive notices at the time their information is collected, when required by applicable law or policy. Individuals will not be informed, however, when any of their information is posted internally on the OIA Wiki site.

4.2 Do individuals have the opportunity and/or right to decline to provide information?

As explained above, information concerning individuals consists of professional contact information. Some of that information is provided by the individuals themselves, and that provision is entirely voluntary. At other times, the information is provided by the individual's employer or an affiliated person or organization, or gleaned from publicly available sources. In those cases, the individual would not necessarily be aware that her contact information has been gathered, and would therefore not be able to decline to have their information gathered.

4.3 Do individuals have the right to consent to particular uses of the information? If so, how would an individual exercise this right?

When an individual voluntarily provides professional contact information to OIA, that individual consents to OIA's use of that information for the purposes for which it was provided (e.g., to be maintained in a contact list). Such an individual may decline to provide that information for such purposes. When the information is gathered from sources other than the individual (e.g., Internet), while there is no opportunity for the individual to consent, the OIA will use such information only for the purposes discussed earlier. *See* Section 3.1.

4.4 What are the procedures that allow individuals to gain access to their own information?

Since the OIA Wiki will not be externally accessible to non-FTC users, individuals who seek access to agency records, if any, collected in the OIA Wiki about themselves must submit a written request to the FTC's Office of General Counsel, under the agency's FOIA/Privacy Act access procedures. For full details, visit the FTC's FOIA/Privacy Act page at: <http://www.ftc.gov/foia/index.shtm>.

4.5 Discuss the privacy risks associated with the process of providing individuals access to their own records and how those risks are mitigated.

The OIA Wiki is not accessible outside the FTC, including to any individuals who may be the subject of any Wiki records. Therefore individuals will not have direct access to the OIA Wiki. Thus there are no privacy risks associated with the process of providing individuals with such access.

5 Web Site Privacy Issues

Not applicable. The system is not made available for access or disclosure through any public web site.

6 Security of Information in the System

6.1 Are all IT security requirements and procedures required by federal law being followed to ensure that information is appropriately secured?

The FTC follows all applicable Federal Information Security Management Act (FISMA) requirements to ensure that the information found in the OIA Wiki is appropriately secured. The OIA Wiki resides on the Infrastructure General Support System (GSS) which is categorized as a moderate using Federal Information Processing Standard (FIPS) 199.

6.2 Has a Certification & Accreditation been completed for the system or systems supporting the program?

The OIA Wiki resides on the Infrastructure GSS for which a Certification and Accreditation has been completed. A separate C&A is therefore not necessary.

6.3 Has a risk assessment been conducted on the system?

A risk assessment was completed for the Infrastructure GSS.

6.4 Does the project employ technology that may raise privacy concerns? If so, please discuss its implementation.

No.

6.5 What procedures are in place to determine which users may access the system and are they documented?

Access to the OIA Wiki is granted and rescinded by the OIA Wiki Administrator, in consultation with OIA management. Access will be limited to OIA staff who agree to, sign, and submit the OIA Rules of Behavior form to the OIA Wiki Administrator. OIA staff must also complete training on the proper use of the wiki before access will be granted. Access will be granted until such time as it has been rescinded by the Administrator (e.g., upon separation of the staff member from OIA, for failure to abide by the Rules of Behavior, etc.).

6.6 Describe what privacy training is provided to users either generally or specifically relevant to the program or system.

All FTC personnel are subject to FTC agency-wide procedures for safeguarding sensitive personally identifiable information and sensitive health information. All FTC personnel also receive annual computer-based training and other guidance explaining how to safeguard this information.

6.7 What auditing measures and technical safeguards are in place to prevent the misuse of data?

The following auditing, testing, and technical safeguards are in place to prevent misuse of data:

- Access Enforcement — There is active monitoring and testing of access privileges.
- Least Privilege — Only the appropriate folder and file rights are assigned to a user to perform his/her function.

Privacy risks associated with unauthorized disclosure of information are mitigated through implementation of technical controls associated with need-to-know and least privilege, ensuring that users have no more privileges to data than required to complete their official duties.

6.8 State that any questions regarding the security of the system should be directed to the FTC's Chief Information Security Officer.

Any questions regarding the security of the system should be directed to the FTC's Chief Information Security Officer.

7 Data Retention

7.1 For what period of time will data collected by this system be maintained?

The OIA Wiki content conforms to the definition of “nonrecord materials” as identified in 44 U.S.C. § 3301 and 36 C.F.R. § 1220.14. National Archives and Records Administration guidance is to destroy or delete nonrecords when they are no longer needed for reference. Wiki content will be reviewed at least annually and maintained until removed by the Wiki users or administrator. The logs of changes made are purged every 45 days.

7.2 What are the plans for destruction or disposal of the information?

Information contained in the OIA Wiki will be deleted or purged when it is no longer accurate or up-to-date, or when it is no longer needed. Information contained in the OIA Wiki will be deleted or purged when it is found to be no longer useful, accurate, or up-to-date during an annual review or sooner. As with Federal records and nonrecords, OIA Wiki contents are not to be copied and removed for non-Commission use, such as when an employee separates, except with Commission approval.

7.3 Describe any privacy risks identified in the data retention and disposal of the information, and describe how these risks have been mitigated.

See Section 2.8, above.

8 Privacy Act

8.1 Will the data in the system be retrieved by a personal identifier?

Yes.

8.2 Is the system covered by an existing Privacy Act System of Records notice (SORN)?

OIA Wiki records may, from time to time, include information derived from or part of other FTC Privacy Act systems of records. *See, e.g.*, FTC I-1 (Nonpublic Investigational and Other Nonpublic Legal Program Records), FTC I-6 (Public Records), FTC VI-1 (Mailing and Contact Lists), VII-2 (Employee Locator (STAFFID) System), FTC VII-3 (Computer Systems User Identification and Access Records). For more information and the full text of these SORNs, go to <http://www.ftc.gov/foia/listofpaysystems.shtm>.

9 Privacy Policy

9.1 Confirm that the collection, use, and disclosure of the information in this system have been reviewed to ensure consistency with the FTC's Privacy Policy.

The collection, use, and disclosure of the information in the OIA Wiki has been reviewed to ensure consistency with the FTC Privacy Policy.

10 Approval and Signature Page

Prepared for the Business Owners of the System by:

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