



**Federal Trade Commission  
Privacy Impact Assessment**

**Facebook**

**Updated: October 2011**

## 1 SYSTEM OVERVIEW

The Federal Trade Commission (FTC or Commission) uses Facebook, a social networking website, to disseminate information to the public. Currently, the FTC maintains three specific pages: a general FTC page created and administered by the FTC's Office of Public Affairs (OPA) and a second page created and administered by the FTC's Division of Consumer and Business Education featuring the FTC's inter-agency computer and security education campaign OnGuard Online, which is available in both English and Spanish. They are referred to collectively as FTC Facebook pages throughout this document.

The FTC Facebook pages can be accessed online by users and non-users of Facebook at:

<http://www.facebook.com/federaltradecommission>

<http://www.facebook.com/OnGuardOnline>

<http://www.facebook.com/AlertenLinea>

These pages allow the Commission to promote FTC information and resources to users of Facebook who may not be regular visitors to the FTC websites including, OnGuardOnline.gov and other partner websites. Information posted to the FTC Facebook pages will be previously approved by relevant OPA and DCBE staff members (and other FTC staff as necessary) including but not limited to press releases, speeches, videos, tips, games, quizzes, and additional information from the Bureaus of Consumer Protection, Competition, and Economics and agency partners.

FTC Facebook pages are public. However, only Facebook users who have indicated that they like the page are able to post comments and like posts on these pages. Users who like FTC pages may share resources with their network of Facebook friends and others, helping to provide a viral marketing component to the Commission's outreach and education efforts.

### **Friends**

FTC staff will administer the FTC's Facebook pages by establishing and using specially designated FTC user accounts. (FTC staff will not use such administrative accounts for any personal purpose, such as accepting or sending friend requests, sending Facebook emails, or commenting on any Facebook pages.) FTC staff, on behalf of the FTC, may like other government and partner pages. Administrators will use "Facebook as a Page" in lieu of using the Facebook profile account when occasionally commenting on other Facebook pages or in response to comments on its own Facebook page(s).

Any registered user of Facebook is able to like FTC pages. Administrators of Commission pages are able to see everyone who likes the page(s); however, the Commission does not routinely track individuals who like and/or unlike its pages.

### **Commenting Policy**

The FTC does not routinely edit users' comments. Administrators may delete comments that violate the Commission's commenting policy, which is outlined in the FTC Facebook pages

under the comments tab. Additionally, the Commission does not keep a record of deleted comments or users that have posted them.

### **Privacy Policy**

The Commission will ensure all possible efforts are made that visitors to the FTC Facebook pages understand that Facebook's privacy policy governs on that site, not the FTC's. This includes posting a privacy policy on Commission Facebook pages and using exit scripts when linking to Facebook from FTC websites.

### **Analytics and Records**

The Commission may use aggregate information provided by Facebook Insights for internal reporting only. Page administrators will be limited to specific FTC staff members in the Office of Public Affairs and the Division of Consumer and Business Education. All FTC staff members administering social media accounts agree to the terms listed in the Commission's internal Social Media Rules of Behavior.

The FTC does not use its FTC Facebook pages to collect any information about individuals and will not copy information from the comments posted on any Facebook page created by FTC staff members. The FTC may save copies of any new content posted by the agency on its own pages or other non-FTC pages as required by the Commission's Records and Filings Office.

The use of Facebook potentially raises other privacy concerns and therefore we have completed this PIA in an effort to ensure that we have addressed as necessary and appropriate any of those issues.

## **2 INFORMATION COLLECTED AND STORED WITHIN THE SYSTEM**

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

User access is subject to the operational requirements and controls of Facebook. While the FTC may have access to data maintained by Facebook, it is not requesting, storing or otherwise maintaining personally identifiable information from individuals accessing the FTC's Facebook pages. The FTC maintains a weekly internal social mentions report which does highlight the overall number of likes, but this is publicly available information.

Individuals who register with Facebook are required to provide a first name, last name, valid email, password, sex, and date of birth, and have the option to provide additional information. Even though some of this information may be accessible to the FTC, depending on a Facebook user's privacy settings, the FTC will not collect, disseminate, or maintain any personally identifiable information from Facebook of users who visit or like the FTC's pages. The FTC may, however, read, review, or rely upon information that individuals make available to the public or to the FTC on Facebook, including comments on the pages created by the FTC, as authorized or required by law.

Facebook collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the FTC pages and the content those visitors are viewing. These metric reports contain aggregate information but no PII.

The FTC will use Facebook to disseminate information that is currently available on FTC websites including OnGuard Online and its partners. This is publicly available information such as press releases, speeches, tips and information, quizzes, and short videos.

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

While Facebook collects PII from individuals who register with them, the FTC does not, collect, maintain, or disseminate that information. Individuals do not have to register to view information available on FTC Facebook pages.

The FTC uses Facebook to disseminate information that is currently available on the FTC websites including OnGuard Online and relevant information from OnGuard Online partners. This is publicly available information such as press releases, speeches, tips and information, quizzes, and short videos.

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

Individuals who want to become registered users of Facebook must provide Facebook the information outlined in Section 2.1. The FTC does not, collect, maintain, or disseminate that information.

FTC Facebook page administrators will be able to see the names of those individuals who indicate that they like the FTC page(s), as well as any other information those individuals have decided to make available via their Facebook profile. Each user has the ability to set his or her individual privacy settings. The FTC may read, review, or rely upon information that individuals make available to the public or to the FTC on Facebook, including comments on the pages created by the FTC, as authorized or required by law.

Facebook does provide page administrators with user metric reports that include aggregate information such as the number of visitors to the pages and the content they are viewing. These reports, which do not contain any PII, are used by FTC staff to analyze the effectiveness and impact of the pages.

## 2.4 How is the information collected?

The FTC does not collect any PII from individuals who visit FTC Facebook pages.

The web metric reports provided through Facebook Insights, which do not contain PII, are available to page administrators. Administrators may also receive a weekly email with a summary of the numbers of users who have indicated they like each page, comments, and visits

to each page. FTC staff may share some of this aggregate information internally to gauge the effectiveness and impact of the Commission's pages.

## 2.5 How will the information be checked for accuracy and timeliness?

Because the FTC does not collect, disseminate, or maintain PII from individuals who visit and/or like FTC Facebook pages, it does not check the accuracy and timeliness of that information. The information that the FTC disseminates through its Facebook pages, including any PII that may be included in that public information, will be reviewed by relevant DCBE or OPA staff to ensure accuracy and timeliness.

## 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?

Creation of Facebook pages will not require the FTC to use new technologies. Administrators of the pages will be able to access them by using a standard web browser to visit Facebook.com and to login with an email address and a password.

To the extent possible, page administrators will access Facebook from FTC equipment to minimize security risks.

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

The FTC will not collect, maintain, or disseminate any PII from individuals who visit FTC Facebook pages. With respect to the information that the FTC will disseminate through the pages, the FTC Act authorizes the FTC to prevent unfair and deceptive acts and practices in interstate commerce and, in furtherance of this mission, to gather, compile, and make information available in the public interest. See 15 U.S.C. 45, 46(a), (f).

Federal guidance from the Office of Management and Budget (OMB), including the Open Government Directive, OMB M-10-06; Memorandum on Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act (April 7, 2010); and Guidance for Agency Use of Third-Party Websites and Applications, OMB M-10-23, all promote the three principles of transparency, participation, and collaboration. In particular, the FTC provides the public opportunities to participate and engage with our agency to share their expertise and information. Public participation enhances the FTC's effectiveness and improves the qualities of our decisions.

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

The FTC will not collect, maintain, or disseminate any PII from individuals who visit FTC Facebook pages.

Because only a select number of DCBE and OPA staff will have administrative access to the pages, and because the information disseminated will be well-vetted before it is posted, any risk that information, including PII, that is not appropriate for public dissemination will be posted is mitigated.

In addition, the FTC will provide notice to those who visit or indicate that they like FTC pages that Facebook's privacy policy, not the privacy policy for FTC websites, applies to any information an individual provides. This notice will also provide a link to the relevant official FTC websites. If the circumstances warrant, the FTC has the ability to delete individual comments from the page.

There are other privacy risks that are not within the control of the FTC and that the FTC has limited ability to mitigate. Third party advertisements for example may pose privacy risks in the form of cookies or malware to those individuals who click on them. The government's terms of service with Facebook prohibit the appearance of third party advertisements on FTC pages, however, thus eliminating those risks.

There is also a risk that individuals who interact with FTC pages will reveal PII or other sensitive information about themselves or others in comments that they post to the page, or include links that may adversely affect those who click on them (such as links to malicious software or to websites marketing a fraudulent business opportunity). These types of actions are prohibited by the FTC as outlined in the comment policies posted on FTC Facebook pages under the comments tab. Page administrators will periodically review comments and delete any that contain PII or sensitive information as stated in the comment policy.

The FTC will also emphasize to visitors of its Facebook page that they are not on the official FTC websites and that Facebook's privacy policies govern the site.

### 3 USE AND ACCESS TO DATA IN THE SYSTEM

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

The FTC will use the Facebook pages to disseminate information in furtherance of the Commission's consumer protection and competition missions. This will be publicly available information such as press releases, speeches, tips and information, quizzes, and short videos.

The FTC does not collect, disseminate, or maintain PII from individuals who visit or indicate that they like FTC pages on Facebook. The FTC will not use any PII that may be available to it through Facebook, except as described in section 2.1 above.

Any registered Facebook user may choose to like any Commission page. It is not necessary to like a page in order to view its content. Users who like the FTC's pages may receive updates posted those pages in their news feed. Even after indicating they like a page, users may choose to hide FTC postings in their news feeds. FTC page administrators do not seek out individuals to get them to like FTC pages. They do promote the FTC pages as a whole to the public through various communication efforts such as in press releases and links from official FTC websites.

Administrators of Commission pages will be able to see the names of those individuals who indicate that they like the FTC's page(s). From there, FTC staff could click on a user's profile and have access to any additional information that user has made public on their Facebook profile. FTC staff may read, review, or rely upon information that individuals make available to the public or to the FTC on Facebook, particularly comments on the pages created by the FTC, as authorized or required by law.

The FTC will use Facebook Insights to create user metric reports that include aggregate information, such as the number of visitors to the pages and the content they are viewing. These reports, which do not contain any PII, will be used by FTC staff to analyze the effectiveness and impact of the pages.

### 3.2 Which internal entities will have access to the information?

Facebook collects PII from individuals who register with them and who may ultimately visit or indicate that they like the FTC's page(s). The FTC does not collect, disseminate, or maintain this information and no internal FTC entities have access to any information that is not available to the general public through Facebook.

Staff from DCBE and OPA who serves as page administrators will have access to their respective FTC page(s), to post content on behalf of the Commission and its partners. Administrators will be able to see the complete list of users who like the page(s). Facebook Insights, which provides user metric reports, are only available to page administrators. FTC staff may share some of this aggregate information internally to gauge the effectiveness and impact of the Commission's pages.

All FTC page administrators must review and agree to the terms of the FTC's internal Social Media Rules of Behavior before administering social media accounts.

### 3.3 Which external entities will have access to the information?

The information that the FTC makes available on its FTC Facebook pages can be accessed by anyone, whether or not they are registered Facebook users or have indicated that they like the page.

Facebook users determine what information is available about them to other Facebook users and to the general public (i.e., external entities) in accordance with Facebook's policies and terms of use through their individual privacy settings. The FTC does not have access to any more information than any member of the public about other Facebook users and does not control or have the ability to provide access to any user's PII.

## 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?

Because the FTC does not collect any PII from individuals who visit the OnGuard Online and FTC Facebook pages, individuals who seek information about how Facebook uses their PII should review Facebook's [Terms](#) and [Privacy Policy](#).

The FTC does provide a privacy policy on its Facebook pages indicating that Facebook's privacy policy governs on the site. Additionally, any links to Facebook from FTC websites include an exit script indicating that users are leaving an official FTC website.

Finally, the FTC also provides notice to the public about its use of third party services on the official FTC website. That information is available online at: <http://www.ftc.gov/ftc/thirdpartyservices.shtm>.

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

Individuals who want to become registered users of Facebook must provide Facebook the information outlined in Section 2.1. The FTC does not, collect, maintain, or disseminate that information. Visitors to FTC Facebook pages are not required to be registered users of Facebook in order to view that information. Equivalent information is available on official FTC and OnGuard Online websites.

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

Visitors to FTC Facebook pages are not required to be registered users of Facebook in order to view content. Equivalent information is available on official FTC websites including OnGuard Online and its partners as indicated on the Facebook pages.

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

See Section 4.1.

A registered Facebook user must enter her email and password to log in to her page. Once logged in, she can see and edit her profile information by clicking on "Profile" and then "Info."

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

To mitigate the risk of unauthorized access to individual accounts, Facebook requires registered users to log in using their email address and a password.

Visitors to FTC Facebook pages are not required to be registered users of Facebook in order to view content. Equivalent information is available on official FTC websites including OnGuard Online and its partners as indicated on the FTC's Facebook pages.

FTC Facebook pages encourage users in its privacy policies to read and review Facebook privacy policies, which govern the site.

## 5 WEBSITE PRIVACY ISSUES

5.1 Describe any tracking technology used by the website and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, Web beacon). Currently, persistent tracking technology is not approved for use by the FTC (see 5.2).

The FTC will not use any persistent tracking technology on its FTC Facebook pages. Facebook does use session cookies and persistent cookies, as described in its privacy policy. The FTC will post a notice on its pages to ensure that those who visit FTC Facebook pages are notified that Facebook's privacy policy governs on the site. Additionally, any individuals accessing Facebook from the FTC's websites including OnGuard Online will encounter an exit script explaining that they are leaving the official government website and accessing a third-party service where the FTC's privacy policy does not apply.

5.2 If a persistent tracking technology is used, ensure that the proper issues are addressed.

The FTC will not use any persistent tracking technology on its FTC Facebook pages.

5.3 If personal information is collected through a website, page, or online form accessible through the Internet, is appropriate encryption used? If not, explain.

The FTC does not collect any PII through its FTC Facebook pages.

5.4 Explain how the public will be notified of the Privacy Policy.

The FTC will provide notice to those who visit the FTC's Facebook pages that Facebook's privacy policy applies to any information an individual provides. This notice will also provide a link to the official FTC websites including OnGuard Online.

Any individual accessing Facebook from FTC websites will encounter an exit script explaining that they are leaving the official government website and accessing a third-party service where the FTC's privacy policy does not apply.

Finally, the FTC also provides notice to the public about its use of third party services on the official FTC website. That information is available online at:  
<http://www.ftc.gov/ftc/thirdpartyservices.shtm>.

5.5 Considering any website or internet issues, please describe any privacy risks identified and how they have been mitigated.

To ensure that only approved content, including any PII, is disseminated through the FTC's Facebook pages, only a select group of DCBE and OPA staff will have login credentials (email address and password) that allow them to access their respective pages and make content edits.

To the extent possible, page administrators will access Facebook from FTC equipment to minimize security risks.

5.6 If the website will collect personal information from children under 13, or be directed at such children, explain how it will comply with the Children's Online Privacy Protection Act (COPPA).

It is currently against Facebook's terms for users under 13 to register for the site. The FTC does not collect any PII, which would include PII of children under the age of 13, through its Facebook pages.

## 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 does not own or control access to Facebook. Nevertheless, as already described elsewhere in this PIA, the FTC has taken a number of steps to mitigate privacy risks, if any, to individuals who may visit Facebook to view the FTC's pages. See e.g., Sections 2.3, 4.2, 5.1-5.6. Individuals who seek information about Facebook's security controls should review [Facebook's privacy policy](#) and/or direct their inquiries to Facebook.

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

Not applicable.

6.3 Has a risk assessment been conducted on the system?

Not applicable.

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

The FTC does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook's privacy policy and/or direct their inquiries to Facebook.

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

The FTC does not own or control access to Facebook. DCBE and OPA will determine which FTC staff members have access to FTC Facebook pages for the purpose of disseminating FTC information.

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

All DCBE and OPA staff members with responsibility for posting FTC information to a Facebook page participate in annual privacy and data security training. Additionally, all page administrators agree to the terms in the FTC's internal Social Media Rules of Behavior.

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

See Section 6.5.

## 7 DATA RETENTION

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

The FTC does not collect, maintain, or disseminate any PII from individuals who visit its OnGuard Online and FTC Facebook pages. As noted previously, the FTC will disseminate information that is currently available on official FTC websites including OnGuard Online and its partners via the Facebook pages. Facebook stores that information and it will remain on the pages until a page administrator decides to permanently delete the page.

Individual Facebook users have the ability to deactivate their individual accounts. (Facebook's retention, if any, of data from such accounts is subject to their terms of service.) Users may chose at any time to delete comments that they posted to FTC pages. Additionally, page administrators may delete comments that violate the FTC's comment policy.

Any posts by the FTC on its Facebook pages or other Facebook pages that are considered unique content may require the FTC to preserve an official record copy for Federal record purposes, as determined by the Commission's Records and Filings Office.

In the rare instance where the FTC collects the PII that individuals who interact with the OnGuard Online or FTC Facebook pages make available to the public, it will be maintained and disposed of in accordance with the record retention schedules applicable to the relevant system into which the PII has been incorporated. See Section 8 below.

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

If the FTC determines that any information it has disseminated via its Facebook pages should be deleted, staff in DCBE or OPA will take the appropriate steps to ensure that the information is removed or, if appropriate, that the page is deleted in its entirety.

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

The FTC does not collect any PII about individuals who visit its Facebook pages. The information that the FTC disseminates through Facebook is public and there are no identifiable privacy risks associated with its retention and disposal.

## 8 PRIVACY ACT

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

Not applicable. The FTC does not collect any PII about individuals who visit its Facebook pages and, therefore, no PII from Facebook is included in any agency system that is retrieved by a personal identifier. In the rare instance where the FTC collects the PII that individuals who interact with FTC Facebook pages make available to the public, it will be maintained in a relevant agency system and may, depending on the system, be retrieved by a personal identifier.

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

See Section 8.1. In the rare instance where the FTC collects the PII that individuals who interact with FTC Facebook pages make available to the public, and maintains that PII in a system in which it can be retrieved by a personal identifier, it will be covered by the applicable SORN(s). See, e.g., FTC I-1 (nonpublic investigational and other nonpublic legal program records). See generally <http://www.ftc.gov/foia/listofpaysystems.shtml> (FTC Privacy Act SORNs).

## 9 PRIVACY POLICY

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

Because the FTC does not collect any PII from individuals who visit FTC Facebook pages, individuals who seek information about how Facebook uses their PII should review Facebook's [Terms](#) and [Privacy Policy](#).

The FTC does provide a privacy policy on its Facebook pages indicating that Facebook's privacy policy governs on the site. Additionally, any links to Facebook from FTC websites include an exit script indicating that users are leaving the official FTC websites.

Finally, the FTC also provides notice to the public about its use of third party services on the official FTC website. That information is available online at:  
<http://www.ftc.gov/ftc/thirdpartyservices.shtm>.

10. APPROVAL AND SIGNATURE PAGE

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