



**Federal Trade Commission
Privacy Impact Assessment**

X (Formerly known as Twitter)

Reviewed and Updated February 2025

SECTION 1.0 – SPECIFIC PURPOSE OF THE FTC’S USE OF X

1.1 – What is the specific purpose of the agency’s use of X (formerly known as Twitter) and how does that use fit with the agency’s broader mission?

The Federal Trade Commission (FTC or Commission) uses X, a microblogging website (i.e., a blog consisting of short posts or messages limited to 280 characters), to disseminate information to the public. See the [social media web page on FTC.gov](#) for a list of active FTC social media accounts, including X accounts.

X allows the FTC to promote information, jobs, tips, and resources to consumers and other people who may not be regular visitors to FTC websites. Information posted to FTC X accounts is generally content that already exists on FTC.gov and FTC.gov/espanol or is relevant information from the Bureaus of Consumer Protection, Competition, and Economics, as well as other offices and staff of the FTC.

Typical posts may include, but are not limited to, consumer and business tips and information as well as photos, news articles and short videos. The Office of Public Affairs (OPA) approves the content of all @FTC, @LaFTC, and @MilConsumer posts, including, but not limited to, press releases, speeches, and information from the Bureaus of Consumer Protection, Competition, and Economics, as well as other offices of the FTC.

Posts from agency accounts (@FTC, @LaFTC, and @MilConsumer) that reflect the opinions of individual Commissioners, the Chair or other FTC staff members are attributed appropriately. Posts from the Chair, Commissioners, and Chief Technologist may not necessarily represent the views of the Commission or other individual Commissioners.

The FTC’s official Twitter account (@FTC) is verified by a gray checkmark, which X views as an official government entity. Most official government accounts are documented in the federal government’s [Social Media Registry](#), and also linked from the agency’s [Social Media](#) webpage.

Members of the public without X accounts are limited to what content they can view without an account on the web and may not be able to use some functions of X.

Posts/Reposts

The Commission promotes FTC resources to the public. These posts will all appear in reverse chronological order in the FTC’s profile pages. Additionally, any X users who “follow” an FTC account will receive agency posts in their X “stream” also known as the “timeline.” In turn, users may share the FTC’s resources with their network of X followers (generally done by sending out the same post and giving credit to the FTC’s original post, called a “repost”)) and others can do the same, providing a viral marketing component to the Commission’s outreach and education efforts. A repost of a non-government account posting by an FTC account does not equal an endorsement.

Follows/Following

People with registered X accounts can follow FTC X accounts as they are not private and do not require permission to follow. The @FTC and @LaFTC accounts will only follow other government agencies, leadership, and official partners. The @MilConsumer account may follow other government accounts and partners of the [Military Consumer Protection campaign](#). Commissioners and the Chief Technologist may follow other users, such as reporters, but any such following does not equal an endorsement by the Commission or any individual Commissioner.

Mentions

If a registered user posts a post that includes an FTC's account handle, this is called a mention. The post will appear in the user's profile and home stream as well as the timelines of all followers of that user. Additionally, that post will show up in the notifications/mentions stream of the FTC account.

If a user posts a post that starts with a mention of a specific FTC X account (e.g., @FTC), it will only show up in the home streams of users who follow both that user and the FTC account. However, all public posts (meaning the account is not locked or protected) are searchable by the public on X's website (or other third party sites linked to X), thus anyone can search for mentions of FTC X accounts.

Public posts may also be picked up by other search engines (e.g., Bing, Google, Yahoo!), aggregator sites, or applications outside of X. The FTC cannot delete posts sent by other users even if they mention an FTC account, but the FTC can block X users or other messages (see below) that are deemed as harassing toward the FTC. Additionally, "spam" style X accounts can be reported, and X can investigate and delete the account if necessary.

Direct Messages

Private messages between registered X users are called "Direct Messages." These messages are stored in a "Direct Message stream" accessible only to the registered X user. Only another registered user whom you follow can send you a direct message (and you must follow them to send them one back). The @FTC, @LaFTC, and @MilConsumer accounts may engage in Direct Messages with other government accounts that are mutual followers of these FTC accounts. Similarly, Direct Message activity may result between Commissioners or the Chief Technologist and other X accounts that are mutual followers, but is generally discouraged. In all cases, account users shall be required to manage such communications, if any, to ensure that the FTC is able to comply with potentially applicable legal obligations (e.g., Freedom of Information Act requests, e-discovery litigation holds, duty to preserve, copy, retain or destroy under Federal records law).

Interactive X Events

The FTC may use X to promote events or answer questions in real-time. See the [FTC's X Chats](#) and [Interactive X workshops](#) for more information about how these events work.

1.2 – Is the agency’s use of X consistent with all applicable laws, regulations, and polices?

Former President Barack Obama’s January 21, 2009 memorandum on *Transparency and Open Government* and the OMB Director’s December 8, 2009 *Open Government Directive* call on federal departments and agencies to harness new technologies to engage with the public. X has over 250 million active users. Using tools like X helps the FTC to communicate with consumers on platforms where they’re active, which in turns helps the FTC meet the federal guidance outlined in the directive and memorandum, including the goals of transparency, participation and collaboration.

With respect to the information that the FTC will disseminate through its X accounts, 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).

Per federal guidance, consumers who visit X or other third-party websites by clicking on a link on the FTC website receive an exit script or similar notice advising them that the FTC’s privacy policy does not apply on that third-party website. Additionally, notices are placed as appropriate on each FTC account informing visitors that [X’s privacy policy](#) governs on the site.

SECTION 2.0 – IS THERE ANY PII THAT IS LIKELY TO BECOME AVAILABLE TO THE AGENCY THROUGH THE USE OF X?

2.1 – What PII will be made available to the FTC?

X requires users to provide their first name, last name, a valid email address, and a password, with the option to provide additional information in their biography when they register an account. Even though some of this information may be accessible to the FTC, depending on a X user’s privacy settings (users can protect their posts by using a private account setting), the FTC does not routinely collect, disseminate, or maintain any of the information provided to X.

The FTC may, however, read, review, or rely upon information that individuals make available to the public or to the FTC on X, as authorized or required by law. The privacy impact of the FTC’s use of this platform is low, as the FTC does not routinely use X to solicit, collect, maintain, or disseminate PII from members of the public. In specific circumstances, the FTC may collect limited information (e.g. usernames or handles) about members of the public (e.g., if messages or posts directed to the FTC or its employees on X are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). The FTC may also occasionally produce reports or summaries of its use of this social media platform that include PII posted publicly (i.e., usernames): for instance, it may do so if needed to comply with social media records retention guidelines from the National Archives and Records Administration (NARA). In such instances, the collection of PII in these summaries will be reduced as much as is feasible.

The FTC does not collect posts from individuals exercising their First Amendment rights unless expressly authorized by statute or by the individual about whom the record is maintained or unless pertinent to and within the scope of an authorized law enforcement activity. The FTC limits access to any such collected posts to only staff and contractors with a legitimate business need to review the materials; the information is not to be used for any other purpose.

The FTC routinely monitors FTC-related keywords on X and other third-party applications in an effort to determine what kind of public attention the FTC is generating online. The FTC does this manually and via automated social media management tools. Generally, comments that the FTC may collect or maintain as part of such review would be collected and/or maintained without the individual X handle that identifies them. The Office of Public Affairs may elect to include X handles in the following instances:

- X handles of news organizations, journalists, and influential blogs and bloggers may be collected and distributed for use in media clips to lend credibility to posts;
- Use of X handles may be collected and maintained as an official record during interactive X chats or other live events hosted by the FTC; and
- When answering questions directed to official FTC accounts (which are verified by X and denoted in the appendix of this PIA), the FTC may collect and maintain comments, including the X handles of those users who posted the questions.

In the instances listed above, the FTC intends to keep a record of the information (generally a screen shot of the comment saved as a PDF electronically and on paper), but does not intend to collect or maintain the records in any type of database from which the records will be retrieved specifically by a X handle, or any other personal identifier. The FTC does not strive to collect every post about the agency – only posts of significance to the Commission’s missions.

Although the FTC does not collect information other than comments with their corresponding X handles from users who discuss the FTC online, users should be aware that the United States Library of Congress, through separate arrangement with X, is maintaining an electronic archive of all public posts, and intends to make them publicly available within a six-month window from the date of the post. The FTC understands that private account information (private profiles or direct messages) will not be part of the Library of Congress archive nor will links or photos associated with those posts. In addition, as noted earlier, a user’s public posts will also be accessible to the public through X itself and through other, non-Governmental search engines, aggregators, and applications. In addition, PII may be collected through X in the form of Direct Messages, if any, between an FTC account and another X account, where the accounts are mutual followers (e.g., DMs between a Commissioner or the Chief Technologist and the individual user of a X account that is a mutual follower).

Users interested in more information about [X’s privacy policy](#) can review it online.

Finally, the FTC may collect general analytics from X on a regular basis including the numbers of followers, number of reposts, etc. The X analytics tool automatically makes other information

available to the FTC, including sex, location, interests, and other handles the FTC's followers follow; however, this information is only available to the FTC in aggregate form.

2.2 – What are the sources of PII?

The FTC does not have access to the information that X collects to register for the site. The FTC does have access to information that users post to their public profiles. This includes name (real or pseudonym), X handle, location, and any additional information they post in their biography. The sources of PII in any Direct Messages between an FTC and non-FTC account that is a mutual follower, as described above, would be the author of the DM.

2.3 – Do the FTC's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

Per the OMB memorandum, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, the FTC's use of X as outlined in Section 1.1 is not a web-based interactive technology that would trigger the PRA.

SECTION 3.0 THE FTC'S INTENDED OR EXPECTED USE OF PII

Section 3.1 – Generally, how will the agency use the PII described in Section 2.0?

The FTC collects X handles and comments in the examples outlined in Section 2.1. This includes posts mentioning or directed at the FTC, regardless of whether they use an FTC account handle or not. X handles or posts relevant to the agency may be collected as part of the agency's daily clips to highlight the FTC in the news or in blogs. Additionally, interactions with the FTC through interactive chats and events or general comments on X may generate new records, for which the FTC may choose to collect comments and X handles. DMs, if any, would be generally used only for informal communications, as FTC account users would normally re-direct and conduct any necessary formal communications through more official channels (e.g., FTC e-mail or correspondence).

Section 3.2 – Provide specific examples of the types of uses to which the PII may be subject.

When answering questions from consumers that generate new agency records or hosting interactive X chats or other live events, the FTC may collect comments and X handles as agency records. The FTC routinely searches X for agency mentions (including those who do and do not use FTC X handles in their posts) as part of its media research. If these posts meet the criteria outlined in Section 2.1, the FTC may collect a X handle.

In accordance with OMB memorandum M-10-22, *Guidance for Online Use of Web Measurement and Customization Technologies*, the FTC uses some analytical data from X to measure the overall number of followers, number of reposts, and similar statistical information to evaluate the effectiveness of the FTC's X accounts. The FTC will not collect any PII that is unnecessary (*see* Sec. 2.1).

SECTION 4.0 SHARING OR DISCLOSING OF PII

Section 4.1 – With what entities or persons inside or outside the agency will the PII be shared, and for what purposes will the PII be disclosed?

PII posted on X is available publicly. See also 2.1 above, since in limited instances, PII posted on X may need to be specifically provided to others at the agency, to other law enforcement agencies, or to NARA.

X requires a minimum amount of PII collection in order for users to register profiles on the site. This information is outlined in Section 2.0. The FTC does not collect or maintain PII that X collects from registered users, particularly those who engage with the FTC via mentioning, following or unfollowing of FTC accounts, or other X-permitted activities.

Only approved staff members have access to administer FTC X accounts. Generally, all the PII available to the FTC through user engagement such as following, unfollowing or mentioning is also publicly available to anyone visiting X.com.

Section 4.2 – What safeguards are in place to prevent expansion of use beyond those authorized under law and described in this PIA?

Only approved FTC staff members have access to manage the FTC's X accounts. Each staff member responsible for managing a social media account must sign and comply with the Commission's internal Rules of Behavior, prior to beginning account administration.

The FTC's X accounts are registered using official FTC email accounts. Administrators are not permitted to use personal accounts to manage FTC X accounts. Furthermore, FTC staff are directed to use official government devices to manage accounts when possible.

Finally, X users can determine what additional information of theirs is made publicly available, beyond the standard information required by X to create an account. Users can also control whether their posts are public or not. The FTC does not collect posts or handles of private accounts.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

Section 5.1 – How will the FTC maintain the PII, and for how long?

If the FTC collects a X handle and comment as part of its media research or an interactive FTC X event, they are retained and disposed of in accordance with applicable FTC policies and procedures and schedules issued or approved by the National Archives and Records Administration (NARA). If the FTC collects general comments and X handles directed at the

agency, they are also retained and disposed of in accordance with applicable schedules issued or approved by NARA.

Section 5.2 – Was the retention period established to minimize privacy risk?

In general, this does not apply, as the FTC does not routinely use X to solicit, collect, maintain, or disseminate PII from members of the public. In the limited instances in which the FTC does so (see 2.1 above), any PII collected will be retained and disposed of in accordance with [NARA's General Records Schedule \(GRS\) 6.4, item 020](#), Public Comments and Communications Not Requiring Formal Action, or other records schedules that may apply. In addition, per the FTC's own privacy policy, the FTC does not collect any information including PII that is unnecessary. For engagement purposes on FTC X accounts, the FTC does not collect or maintain any PII beyond a X handle, which minimizes potential privacy risks.

SECTION 6.0 – HOW THE AGENCY WILL SECURE PII

Section 6.1 – Will the FTC's privacy and security officials coordinate to develop methods of securing PII?

In general, this does not apply: the FTC is only capturing X handles and other post content, which, though it may be PII, is publicly available information. See also Section 2.1. However, privacy and security officials routinely coordinate to develop methods to secure all agency PII.

SECTION 7.0 – IDENTIFICATION AND MITIGATION OF OTHER PRIVACY RISKS

Section 7.1 – What other privacy risks exist, and how will the agency mitigate those risks?

X is a third-party service that uses persistent tracking technologies. In an effort to help consumers understand how their information is used by X, the FTC posts notices on its X accounts indicating that X's policy applies on these sites. Per federal guidance, consumers who visit X or other third-party websites by clicking on a link on the FTC website receive an exit script or similar notice advising them that the FTC's privacy policy does not apply on that third-party website. An example of an FTC exit script for X is available [here](#). Additionally, notices are placed as appropriate on each FTC account informing visitors that [X's privacy policy](#) governs on the site.

X has a Federal Compatible Terms of Service agreement [available via digital.gov](#).

As much as possible, the FTC uses information that is already publicly available on other FTC websites, thus consumers do not need to visit the agency's X accounts to find comparable information.

SECTION 8.0 – CREATION OR MODIFICATION OF A SYSTEM OF RECORDS

Section 8.1 – Will the FTC’s activities create or modify a “system of records” under the Privacy Act of 1974?

No. The FTC does not collect PII or X handles in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.