



Federal Trade Commission
Privacy Impact Assessment

FTC Surveys

Reviewed and Updated

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1 System Overview

1.1 Describe the project/system and its purpose.

The Federal Trade Commission (FTC) conducts surveys of consumers and other individuals/entities in support of its regulatory and law enforcement mission in order to promote fair competition and prevent fraud, deception, and other unlawful acts and practices. These surveys help the FTC better understand how consumers perceive statements or representations made to them by businesses; surveys also allow the FTC to collect information about and analyze customers' experiences with various industries. Surveys also allow the FTC to receive feedback and information from its law enforcement partners. Information collected through surveys helps the FTC develop appropriate disclosure guidance for businesses, analyze trends and issues in certain industries, and identify whether certain business practices may be harming consumers, for the purposes of enforcement, education, and other initiatives. The FTC often retains experts, contractors and/or subcontractors to conduct such surveys on the FTC's behalf and deliver the results to staff for analysis and possible regulatory, enforcement or other action.

Surveys may involve the collection or maintenance of personally identifiable information (PII) about individuals using electronic methods (e.g., surveys conducted through the Internet, data stored in electronic databases). Accordingly, the FTC has prepared, and is making publicly available, this Privacy Impact Assessment (PIA), which is legally required when a Federal agency is developing or procuring electronic information technology (IT) to collect, maintain or disseminate information about members of the public in identifiable form.¹

Although the FTC's consumer survey activities do not require the FTC to develop or procure IT, such activities normally involve IT systems used or operated by the FTC, its contractors, or subcontractors. Thus, consistent with the E-GOV Act, the FTC has conducted this PIA to ensure that the use of such IT in conducting surveys on behalf of the FTC conforms to applicable legal, regulatory, and policy requirements regarding privacy.

The FTC will ensure that all applicable surveys adhere to the requirements of the Paperwork Reduction Act (PRA) and follow the appropriate channels for OMB approval. This PIA was also conducted to determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system as well as to examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.²

¹ See Section 208 of the E-Government Act of 2002 (E-GOV Act).

² See Office of Management & Budget (OMB) Memorandum M-03-22 (guidance to Federal agencies on conducting PIAs) and Circular A-130, *Managing Information as a Strategic Resource*.

1.2 What specific legal authority allows for the collection, maintenance, or dissemination of information for this project/system?

See generally the FTC Act, 15 U.S.C. 41 et seq., which authorizes the FTC to gather information in the public interest and for its regulatory and law enforcement mission, and other laws and regulations enforced or administered by the FTC.

2 Data Type, Sources, and Use

2.1 Specify in the table below what types of personally identifiable information (PII)³ may be collected or maintained in the system/project. Check all that apply.

<i>PII Elements: This is not intended to be an exhaustive list. Specify other categories of PII as needed.</i>		
<input checked="" type="checkbox"/> Full Name	<input checked="" type="checkbox"/> Biometric Identifiers (e.g., fingerprint, voiceprint)	<input checked="" type="checkbox"/> User ID
<input checked="" type="checkbox"/> Date of Birth	<input checked="" type="checkbox"/> Audio Recordings	<input checked="" type="checkbox"/> Internet Cookie Containing PII
<input checked="" type="checkbox"/> Home Address	<input checked="" type="checkbox"/> Photographic Identifiers (e.g., image, x-ray, video)	<input checked="" type="checkbox"/> Employment Status, History, or Information
<input checked="" type="checkbox"/> Personal Phone Number(s)	<input checked="" type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.)	<input checked="" type="checkbox"/> Employee Identification Number (EIN)
<input checked="" type="checkbox"/> Work Phone Number(s)	<input checked="" type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.)	<input checked="" type="checkbox"/> Salary
<input checked="" type="checkbox"/> Place of Birth	<input checked="" type="checkbox"/> Vehicle Identifiers (e.g., license plates)	<input checked="" type="checkbox"/> Military Status/Records/ ID Number
<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.)	<input checked="" type="checkbox"/> IP/MAC Address
<input checked="" type="checkbox"/> Race/ethnicity	<input checked="" type="checkbox"/> Geolocation Information	<input checked="" type="checkbox"/> Investigation Report or Database
<input checked="" type="checkbox"/> Alias	<input checked="" type="checkbox"/> Passport Number	<input checked="" type="checkbox"/> Driver's License/State ID Number (or foreign country equivalent)
<input checked="" type="checkbox"/> Sex		<input type="checkbox"/> Other (<i>Please Specify</i>): _____
<input checked="" type="checkbox"/> Email Address		
<input checked="" type="checkbox"/> Work Address		
<input checked="" type="checkbox"/> Taxpayer ID		
<input checked="" type="checkbox"/> Credit Card Number		
<input checked="" type="checkbox"/> Facsimile Number		
<input checked="" type="checkbox"/> Medical Information		
<input checked="" type="checkbox"/> Education Records		
<input checked="" type="checkbox"/> Social Security Number		
<input checked="" type="checkbox"/> Mother's Maiden Name		

A survey may be used to collect any type of information, including PII, that the agency determines is necessary, appropriate, and within its authority to collect in support of the agency's law enforcement and regulatory mission. See 2.7 below. Since surveys are used by FTC staff to perform the Commission's law enforcement and other authorized activities, the PII to be collected and maintained will depend on the survey's specific law enforcement or other purpose.

Information collected from or about survey respondents may include their personal contact information (e.g., name, postal address, e-mail address, phone number). In some cases, surveys may collect contact information for other individuals (e.g., home or e-mail address of

³ Per OMB Circular A-130, personally identifiable information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.

an individual operating a small business or sole proprietorship with whom the consumer being surveyed has dealt). Survey responses may also include any of the following:

- Individual answers to specific survey questions (e.g., multiple choice or narrative response);
- Demographic data about individuals (e.g., age, sex, race, education level);
- Documents collected from individuals (e.g., financing papers, mortgage information, credit reports) obtained with the consumers’ explicit consent;
- Other relevant survey records or data (e.g., survey date or time, location, relevant notes or observations of FTC staff, contractors, or subcontractors).

Information may be collected in written form (e.g., paper or Web-based surveys), or may be solicited through other means (e.g., in-person interviews, telephone calls). Likewise, survey responses may be maintained in written/textual form, and, in some cases, may also be recorded in audio or video format, and then transcribed. See sec. 2.4 below.

When a contractor or subcontractor uses Web-based methods to register participants or collect survey responses, those information collection methods may result in the collection or maintenance of additional user administrative information pertaining to the individual survey respondent (e.g., user ID, passphrase, or other login questions) or information about their experiences or transactions.

2.2 What types of information other than PII will be collected, disseminated, or maintained by the project/system? Provide a general description below and be sure to include all data elements.

Survey records may include aggregate statistical data or other analyses, compilations or summaries (i.e., containing no PII) prepared by the FTC itself or by contractors or subcontractors retained to conduct the survey for the FTC.

2.3 What is the purpose for collection of the information listed above?

Survey information is collected, maintained and used in support of the FTC’s regulatory and law enforcement mission, to provide useful context and insight into views, opinions, experiences, and understanding on specific topics or matters relevant to FTC rules, enforcement cases, education and other initiatives. Surveys also allow the FTC to receive feedback and information from its law enforcement partners.

2.4 What are the sources of the information in the system/project? How is the information collected?

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
Members of the Public	The FTC may obtain consumer contact information for its surveys from consumer complaints previously submitted to

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
	<p>the FTC or to third parties that have shared such complaints with the FTC (e.g., other state or local agencies, consumer advocacy groups). In some cases, consumer contact information may be drawn from customer lists of businesses under investigation by the FTC. On occasion, consumers' contact information may be compiled from public sources; for example, in a mortgage survey, consumers and their addresses may be pulled from county records of mortgage transactions made publicly available online or pulled from hardcopy records at local county offices.</p> <p>Information collection methods may vary depending on the survey design and protocol, as well as the particular contractor or subcontractor (if any) that is retained to conduct the survey. Any or all of the following methods may be used to collect information during a survey: Internet, phone, mail, in-person interviews (e.g., individual interviews, focus groups, mall intercepts), fax, video, audio. In some cases, FTC staff may participate, either with or without disclosure to consumers (e.g., observing a focus group through a one-way mirror in order to prevent inhibiting or potentially skewing the discussion and/or results of the survey).</p>
FTC Employees	Some surveys are conducted anonymously with FTC employees about their views, opinions, experiences, and understanding on specific topics or matters relevant to FTC workplace, education and other initiatives. Other surveys are tailored towards employees that have prior experience or understanding of the subject matter for the questions.
Third-Party (e.g., expert or survey firm)	The FTC may contract with a third party (e.g., expert, survey firm) to conduct the survey. In cases where the FTC itself does not directly administer the survey to consumers, consumer contact information may be provided to a contractor or subcontractor for the purpose of conducting a survey. In some cases, the contractor or subcontractor may (e.g., via online contextual advertising ⁴ or other means) directly solicit consumers to participate in the survey. In other cases, contractors or subcontractors may use their own pre-existing panels of consumers for whom the contractors or subcontractors have already collected and maintained contact information and relevant demographic data. Survey responses reflect the view, opinions, or other information provided by consumers themselves. Certain documentation that may be

⁴ Online contextual advertising refers to advertisements placed based on the context of the webpage. For example, if a user is visiting a car shopping website, they may be presented with advertisements for cars. All visitors to that website receive the same advertisement; placement is not based on previously collected data about the consumer.

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
	stored in the system may come directly from the consumers (with redacted personal information). Survey records may reflect further annotations prepared by FTC staff, contractors, or subcontractors involved in administering the survey or analyzing the consumer responses.
Law Enforcement Partners	Surveys also allow the FTC to receive feedback and information from its law enforcement partners.

3 Data Access and Sharing

3.1 In the table below, specify the systems/applications and groups (both FTC and non-FTC) that will have access to or share data in the system/project.

<i>Data Will Be Accessed By and/or Provided To:</i>	<i>How and Why the Data Will Be Accessed/Shared</i>
FTC staff and contractors/subcontractors	<p>The FTC or its contractors or subcontractors will use contact information to solicit participation in these surveys, and will use survey responses to generate analyses, reports, and summaries. The survey responses and other data delivered to the FTC by its contractors typically will not include identifying information about the respondents, nor will the analyses, reports, and summaries generated from these responses. Reports and analyses may be redacted accordingly to protect consumer information.</p> <p>If the survey is conducted by FTC staff, access to contact information, raw survey data or other related survey records is limited to FTC employees with a need-to-know. If the survey is conducted by a contractor or subcontractor, access to personal information is limited to authorized contractor and subcontractor employees who need such access in the performance of the contract. Survey responses, analyses, and reports that are issued or published as a result of the survey may be made accessible to the public. These final reports or analyses do not include any personal information.</p> <p>The FTC may retain contractors and/or subcontractors to conduct surveys on the FTC's behalf, which may require that such external entities be provided with, or themselves collect and maintain, contact information, demographic data, survey responses, and related survey records. In accordance with their terms of contract with the FTC, such entities are generally prohibited from using, sharing, disclosing or retaining records that are generated as part of</p>

<i>Data Will Be Accessed By and/or Provided To:</i>	<i>How and Why the Data Will Be Accessed/Shared</i>
	<p>an FTC survey for any other purpose. No other external entities will routinely have access to these survey records, except to the extent that disclosure is required or authorized by law (e.g., in response to a Freedom of Information Act, official Congressional request, court discovery or other legal process).</p> <p>The FTC bureau or office initiating the survey determines access roles and privileges based on the user's job requirement. In accordance with FTC's established guidelines and practices, procedures are documented, and administrative access is limited to authorized FTC and contractor/subcontractor personnel who require that level of access in the course of their job duties.</p>

3.2 Do contractors and/or third party service providers have access to data in the project/system? If yes, explain what privacy requirements are in place to ensure that data is properly protected.

All FTC employees and contractors with FTC network access are required to complete computer security training and privacy awareness training on an annual basis. The Federal Acquisitions Regulation (FAR) also requires privacy training for all contractors handling PII. When applicable and necessary, auditing measures and technical safeguards may be enacted to ensure that FTC's contractors/subcontractors comply with all practical rules and regulations set forth by the agency.

3.3 If you answered "yes" to 3.2, describe the privacy incident response plan maintained by the contractor's organization or third party service provider.

In the event of an incident or potential loss of data, all FTC contractors and subcontractors are required to comply with the FTC Breach Notification and Response Policy.

4 Notice and Consent

4.1 How are individuals provided with notice prior to the collection of their PII? If notice is not provided, explain why.

- Notice is provided via (*check all that apply*):
 - Privacy Act Statement (Written Verbal)
 - FTC Website Privacy Policy
 - Privacy Notice (e.g., on Social Media platforms)
 - Login banner
 - Other (*explain*): _____

Notice is not provided (explain): _____

Participants are typically informed about the general nature and purpose of a specific survey when they are contacted to solicit their participation. Participation is always voluntary; if individuals choose to participate, the survey form, questionnaire or other instrument or survey method (e.g., in-person interview) will explain, as applicable and to the extent possible, how their information is to be used and/or disclosed. In some cases the nature or purpose of a survey, including its sponsorship by the FTC, may be disclosed at the end of the survey, because disclosure before the survey is administered may inadvertently create bias in the consumers' responses. This would affect the accuracy and validity of the information collected and effectively nullify the survey. In such cases, participants are given the opportunity to have their survey responses deleted and to withdraw their participation.

Before records are maintained by the FTC or on its behalf in a system of records under the Privacy Act of 1974, notice in accordance with that Act will be provided to survey participants (i.e., Privacy Act statement under 5 U.S.C. 552a(e)). In other cases, the survey contractor or subcontractor may not collect and maintain survey records by name or other personally assigned identifiers. In such cases, a Privacy Act statement is not required, but the FTC will work with the contractor or subcontractor to ensure that consumers receive appropriate notice of the survey's purpose and the use or disclosure of their data.

4.2 Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?

All such surveys administered by the FTC or on behalf of the FTC are completely voluntary. Individuals may not have the right to consent to particular uses of the information they provide except by declining to participate in the survey.

4.3 Are there procedures in place to allow individuals access to their personally identifiable information? Explain.

Individuals may file a request with the FTC under the Freedom of Information Act (FOIA) and the Privacy Act of 1974 for any agency records relating to the survey that may be about them and that are not exempt from disclosure to them under those laws.⁵ As noted earlier, however, the FTC typically does not receive any identifiable participant data when surveys are conducted by a contractor or subcontractor, and thus will not ordinarily have records for disclosure. The FTC typically does not retain or have access to any identifiable participant data that may be collected by survey contractors and subcontractors. As explained above, the FTC normally prohibits any such data from being disclosed, shared or used, and typically requires that data be destroyed after the survey work and analysis are completed in accordance with the FTC's instructions or contract provisions.

⁵ See 16 C.F.R. 4.11(a) (FTC FOIA rules), 4.13(m) (FTC Privacy Act rules).

4.4 Are there procedures in place to allow individuals the ability to correct inaccurate or erroneous information? What is the process for receiving and responding to complaints, concerns, or questions from individuals? Explain.

Individuals may file a request with the FTC under the Freedom of Information Act (FOIA) and the Privacy Act of 1974 for any agency records of the survey that may be about them and that are not exempt from disclosure to them under those laws.⁶ As noted earlier, however, the FTC typically does not receive any identifiable participant data when surveys are conducted by a contractor or subcontractor, and thus will not ordinarily have records for disclosure. The FTC typically does not retain or have access to any identifiable participant data that may be collected by survey contractors and subcontractors. As explained above, the FTC normally prohibits any such data from being disclosed, shared or used, and typically requires that data be destroyed after the survey work and analysis are completed in accord with the FTC's instructions.

5 Data Accuracy and Security

5.1 Are there procedures in place to ensure that the information maintained is accurate, complete, and up-to-date?

Generally, information used to contact survey participants is not independently verified, since the consequences to the individual of such an error are minimal, if any. If contact information for a specific individual is wrong, the FTC or the FTC's contractor or subcontractor may review its respective records to determine if there was a clerical error made when copying the contact information (e.g., from consumer complaints or other sources) or when contacting the consumer (e.g., mistyped e-mail address). Demographic data are normally collected from or reported by the survey recipients (e.g., to the contractor or subcontractor conducting the survey for the FTC), and the FTC relies on the recipients themselves to report their data truthfully, and on its contractors or subcontractors to collect and maintain such data accurately. Likewise, the FTC does not check the accuracy of responses, as survey questions typically solicit personal views or opinions. The accuracy of any analyses or compilations of survey responses and data prepared by the FTC or for it by its contractors or subcontractors may be separately challenged for accuracy (e.g., by public comment if used in a rulemaking, or by cross-examination or challenge in litigation). As is often the case for consumer surveys, there are no "correct" answers; therefore, the FTC does not check these responses for accuracy. For surveys regarding consumer experiences, the FTC and its contractors or subcontractors rely on consumers to truthfully convey their experiences. The FTC and its contractor or subcontractors develop questionnaires and design surveys to ensure that consumer responses are not subject to bias or potentially result in the collection of inaccurate data.

⁶ See 16 C.F.R. 4.11(a) (FTC FOIA rules), 4.13(m) (FTC Privacy Act rules).

In certain situations, it may be possible to have controls in place to minimize inaccurate data depending on how the survey is conducted. For example, a contractor conducting a survey via telephone may be supervised by his/her superior or by a subject matter expert to ensure that the call is being conducted in a fair and unbiased manner. If a survey is being conducted in person (e.g., mall intercept), participants may be asked to verify their responses either in a post-survey interview or by providing their contact information for verification at a later date and time.

5.2 Are there administrative procedures and technical safeguards in place to protect the data in the system/project? What controls are in place to ensure proper use of the data? Please specify.

Each survey conducted by the FTC or its contractors/subcontractors will vary; as such, survey components and any systems or technologies associated with each survey may differ greatly. The FTC bureau or office initiating the survey determines access roles and privileges based on the user's job requirement. In accordance with FTC's established guidelines and practices, procedures are documented, and administrative access is limited to authorized FTC and contractor/subcontractor personnel who require that level of access in the course of their job duties. The FTC and its contractors/subcontractors will coordinate to ensure all applicable federal requirements are met and practical steps are taken to ensure that information is appropriately secured. If web-based means are used to collect survey responses from consumers, certain administrative, technical, and physical controls will be required in order to safeguard consumers' privacy. If PII is collected by Web-based means, the FTC will work with its contractor/subcontractor to ensure secure data transmission methods are in use in accordance with FTC's established guidelines and policies.

5.3 Is PII used in the course of system testing, training, or research? If so, what steps are taken to minimize and protect PII during this process?

Not Applicable

6 Data Retention and Disposal

6.1 Specify the period of time that data is retained in the system/project. What are the specific procedures for disposing of the data at the end of the retention period?

Typically, data is maintained for as long as necessary to conduct the survey and perform analysis of information, subject to applicable agency records disposition schedules. Any survey data retained by the FTC for further analysis will not normally include personal identifiers.

7 Website Privacy Evaluation

7.1 Does the project/system employ the use of a website? If so, describe any tracking technology used by the website and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, web beacon). Describe the purpose of using such tracking technology.

If Web-based methods are used to collect survey responses, the FTC shall require the use of secure data transmission methods and that any third-party tracking technology is avoided or disabled. (There may be instances in which temporary session cookies may be enabled for the purposes of managing the consumer's responses, but such cookies are normally deleted once the user closes his or her browser to end the session.)

The FTC does not permit persistent tracking technology on its websites or allow its contractors/subcontractors to use persistent tracking technology unless previously approved by the agency under applicable OMB policy. Any use of persistent tracking technology, whether by FTC staff or a survey contractor, would require prior express approval by the FTC.

8 Privacy Risks and Evaluation

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

<i>Risk</i>	<i>Mitigation Strategy</i>
FTC sharing of data with contractors and subcontractors	If the FTC provides contractors or subcontractors with consumer contact information, the FTC requires that they agree to treat it as nonpublic and handle it appropriately to safeguard against unauthorized use, loss, or disclosure. For example, the FTC requires written nondisclosure agreements and certain technical security measures (e.g., including encryption, where appropriate). The FTC typically also reviews survey questions to ensure that they do not collect more personal information than needed to fulfill the FTC's survey needs, and that such information may not be used or shared by FTC contractors or subcontractors for another purpose without the FTC's explicit consent. If survey responses are collected by Web-based methods, the FTC seeks to ensure that secure transmission methods (e.g., HTTPS) are used (e.g., for any required user accounts or login activities) and that any third-party tracking technologies are avoided or disabled, to avoid associating the consumers' responses on an FTC survey with any other online profile data.
Potential loss or unauthorized disclosure of data	Survey contractors, consultants, and experts are required to collect, maintain, and transmit PII, if any, in a secure fashion. For example, online collection or transmission of sensitive PII

<i>Risk</i>	<i>Mitigation Strategy</i>
	<p>would normally require the use of encryption, and all data collected must be stored in a manner to prevent unauthorized access, use, and disclosure.</p> <p>Furthermore, to help ensure against possible loss or disclosure, and to avoid any Government collection and maintenance of PII that may be collected or generated by its surveys, FTC survey contracts normally require the redaction of all personal identifiers of participants in any reports, analyses, or other survey contract deliverables. Thus, in most cases, the FTC only receives aggregate or de-identified data regarding participants from its contractors or subcontractors sufficient to conduct the required analysis. Furthermore, the data systems used by contractors and subcontractors usually store this aggregate or de-identified data in separate databases from those that contain any PII. The FTC also typically requires that survey records not be retained except in accordance with FTC instructions, which will normally require their secure destruction after the survey has been administered and analysis has been performed. In the unusual case that the survey design requires or involves the collection or maintenance of particularly sensitive information (e.g., credit records, financing documentation, purchase records, Social Security numbers), the FTC may require additional safeguards (e.g., background checks for personnel handling the information).</p>

8.2 Does the project/system employ the use of automated privacy controls or enhanced capabilities designed to support privacy? Explain.

Each survey conducted by the FTC or contractors/subcontractors on behalf of the FTC varies; as such, survey components and any systems or technologies associated with a survey may differ greatly. When applicable and available, the FTC and its contractors/subcontractors will coordinate to ensure systems used in the course of a survey employ all practical automated privacy controls and any feasible enhanced capabilities to protect and support privacy. Auditing measures and technical safeguards may be enacted to ensure that FTC's contractors/subcontractors comply with all practical rules and regulations set forth by the agency.

8.3 Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register for this system/project? If so, list the applicable SORN(s).

The FTC will typically receive information from its survey contractors in de-identified form, with no records directly identifiable by participant name or other personally assigned

identifier. Thus, the FTC normally will not retrieve any survey records or data by name or other personal identifiers. In some cases, however, if the FTC collects survey data directly from participants, or contractors collect data in identifiable form, the FTC or contractor may maintain and retrieve, or be able to retrieve, survey records or data by name or other personal identifier assigned to the individual survey respondent (e.g., tracking or other code number).

Survey data are covered by an existing FTC SORN only in cases where the FTC or its contractor maintains and retrieves survey records or data by name or other personally assigned identifier.⁷ If the FTC or its contractors or subcontractors use web-based methods to conduct surveys, resulting in the collection of login IDs, passphrases, or responses to challenge questions, that administrative user information would be covered by the FTC SORN that applies to computer user identification and access records.⁸ All of the FTC's SORNs are available on the FTC's public Web site, www.ftc.gov.⁹

8.4 How does the project/system ensure that the information is collected, used, stored, or disseminated in accordance with stated practices in this PIA?

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

⁷ See FTC I-1.

⁸ See FTC VII-3.

⁹ See <https://www.ftc.gov/about-ftc/foia/foia-reading-rooms/privacy-act-systems>.