



**Federal Trade Commission
Privacy Impact Assessment**

**LinkedIn
April 2014**

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

1.1 – What is the specific purpose of the agency’s use of LinkedIn, and how does that use fit with the agency’s broader mission?

LinkedIn is a popular professional networking website, which claims to connect hundreds of millions of users worldwide. Registered users can create personal profile pages to post resumes, apply for jobs, search other profiles, and post and read other status/news updates. In addition, users can network with other LinkedIn users by “connecting” their LinkedIn profiles, which can be located by using the site’s search function by allowing LinkedIn to search one’s personal email contacts for matching LinkedIn accounts and profiles. Connecting to another user’s profile is a reciprocal relationship, which means that once connected, users can view each other’s LinkedIn profiles. Other features allow users to follow brands, influencers, and create/join groups.

LinkedIn also hosts “company pages” for a variety of businesses, including government agencies. The Federal Trade Commission maintains the official [FTC LinkedIn company page](#) using an FTC-approved LinkedIn account administered by authorized FTC staff members. The official FTC LinkedIn page permits the Agency to reach users who may not be regular visitors to FTC websites and includes links to FTC job postings on government websites, and relevant FTC news and resources. It also contains general information consistent with the LinkedIn company page format, including company type, size, industry, logo, locations, year founded, etc. Company pages have some public information, including a basic company overview, but users must be registered and logged in to LinkedIn to view all company content. All registered users can interact with the FTC company page. To register for a LinkedIn account, users must provide a first and last name, email, and a password. Users may choose to provide additional information about themselves, such as current and previous job experience, education, interests, links to other social media accounts, etc. Users can select additional settings to make their LinkedIn profiles partially or completely private. Some, but not all, LinkedIn content and services may be accessible to viewers who do not register or log onto LinkedIn. Additionally, some services are free while others require fees.

For company pages, LinkedIn offers analytic tools that permit page managers to assess the effectiveness of their page through aggregate data, such as number of page views, page visitor demographics, and number of unique visitors. The FTC will use available LinkedIn analytics, but it will not use InMail, LinkedIn’s private messaging service; will not make personal connections with other LinkedIn users from its official account; and will not use other current or future LinkedIn functionality except as specified in this PIA. The FTC will manage its LinkedIn account through www.Linkedin.com only, not through a mobile app. The FTC will not use “Showcase”¹ pages at this time.

In addition, the FTC may read, review, or rely upon information that individuals post publicly on LinkedIn, including comments that may appear in response to FTC job posts and news. The FTC

¹ Showcase pages are dedicated pages within a LinkedIn page to highlight different aspects of an agency and build relationships in a more specific environment.

may also prepare reports or summaries of FTC-related LinkedIn activities, including comments on FTC posts, for Agency use.

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

Open Government

The President’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. Tools like LinkedIn help the FTC communicate with consumers on popular platforms, which in turn helps the FTC comply with the federal guidance outlined in the directive and memorandum, including the goals of transparency, participation, and collaboration. Furthermore, using a popular networking site to publicize FTC job postings may increase the number of qualified candidates for FTC vacancies.

In accordance with federal guidance, including OMB Memorandum M-10-23, the FTC provides exit scripts to consumers who click on third-party links (e.g., FTC LinkedIn page) that are listed on official FTC websites such as www.ftc.gov; the exit scripts inform viewers that they are visiting an official FTC page on a third-party website.

With respect to the information that the FTC will disseminate through LinkedIn, 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).

Privacy Notice

When a Federal agency has an account on a social media site, we are required, where feasible, to post a privacy notice on the social media site itself to explain our privacy policy. See OMB M-10-23. The FTC will post its privacy notice in the body of the FTC LinkedIn company page.

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

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

While the FTC may post links to job openings at the Agency, the Commission will not collect personal information, including resumes and applications, through LinkedIn. The FTC will not collect comments or names of individuals or other PII from individuals who communicate with the Agency on LinkedIn. The FTC may, however, read, review, and rely upon information that individuals make publicly available on LinkedIn, including their profiles and their comments, as authorized or required by law.

LinkedIn provides aggregate analytic data to page administrators, called Insights, including date of visit, impressions, clicks, interactions, and new followers acquired. Insights does not reveal the individual identities or profiles of visitors to the page. Additional analytics may include reach (how many times an update is seen), and engagement (clicks, comments, and “likes”). Aggregate

analytic data are used to receive feedback and potentially improve consumer experience when visiting the site. Access to Insights is limited to authorized administrators of the official FTC page.

2.2 – What are the sources of PII?

Sources of PII potentially include information that LinkedIn users make publicly available in their profiles, including their full name, personal information, and links to documents or resources, as well as content that users post in identifiable form, such as comments on the FTC’s posts. As noted in 2.1, above, the FTC does not intend to collect or copy user profiles of individuals who communicate with the Agency on LinkedIn and does not intend to retain records of those user communications in identifiable form except to the extent, if any, as required for Federal records retention purposes.

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 LinkedIn as outlined in Section 1.1 is not a web-based interactive technology involving information collection that would trigger the PRA.

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

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

Generally, the purpose of the FTC’s company page and administrative account for that page is to disseminate information to other registered and non-registered LinkedIn users or visitors, and the FTC does not intend to collect or maintain PII from any such user or visitor. In addition, the FTC may read, review, and rely upon information that individuals make publicly available on LinkedIn, including their profiles and their comments, as authorized or required by law.

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

The FTC may routinely read, review, or rely upon content and comments posted or provided by individuals on the Agency’s page, but the FTC does not intend to collect or maintain PII from any such user or visitor. In addition, the FTC may read, review, and rely upon information that individuals make publicly available on LinkedIn, including their profiles and their comments, as authorized or required by law.

SECTION 4.0 SHARING OR DISCLOSING OF PII

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?

Only authorized FTC staff members will administer the FTC company page, and they will not intentionally collect or maintain any PII relating to that page. LinkedIn users who have specific

questions or comments requiring a response will be reminded to contact the FTC through its primary website, www.ftc.gov. Authorized FTC site administrators will promptly delete any PII inadvertently posted on the FTC's page by a LinkedIn user.

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

Only authorized FTC staff members will manage the official FTC LinkedIn account. Each FTC staff member responsible for managing the FTC's LinkedIn account must acknowledge and agree in writing to comply with the Commission's internal Social Media Rules of Behavior (RoB) prior to beginning account administration. The Social Media Rules of Behavior are maintained, reviewed, and revised as needed by the FTC's Social Media Task Force.

The FTC's LinkedIn Company Page is registered using an official FTC email account. Administrators are not permitted to use personal accounts to manage the FTC page. Furthermore, FTC administrators are directed to use FTC-authorized devices to manage their accounts, and exceptions will be considered only on a case-by-case basis.

The FTC also provides ethical guidance to its staff on best practices when using LinkedIn, personally and professionally, to ensure against the inadvertent collection or disclosure of nonpublic information, including personal information about themselves or other individuals.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

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

Not applicable. The FTC does not routinely collect or maintain PII relating to the FTC's official LinkedIn page. To the extent that any individual disregards the instructions on the FTC's official page and posts PII on the FTC's page, authorized FTC site administrators will promptly delete any PII inadvertently posted by a user.

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

Not applicable.

SECTION 6.0 – HOW THE AGENCY WILL SECURE PII

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

Not applicable.

SECTION 7.0 – IDENTIFICATION AND MITIGATION OF OTHER PRIVACY RISKS

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

The General Services Administration negotiated a [federal-compatible terms of service \(TOS\) with LinkedIn](#) on behalf of government agencies that want to use the third-party site. Under these TOS, LinkedIn agrees not to display third-party commercial advertising or solicitations on the Agency’s company page, which may help reduce privacy risks from such ads or solicitations for individuals who visit the Agency’s page. The TOS also describes conditions under which content generated by other users will or will not be made available to the Agency, under LinkedIn’s own privacy policy.

Users should note, however, that LinkedIn is a third-party service that uses session and persistent cookies and collects user information as outlined in their [privacy policy](#) and [cookie policy](#).

According to LinkedIn, it uses cookies for authentication; security; preferences, features, and services; advertising; and performance, analytics, and research. LinkedIn also uses web beacons, ad tags, mobile identifiers, and pixels as part of its advertising technologies. Log files, IP addresses, and other information about user’s computer and mobile device are collected as well. Users should review LinkedIn’s privacy policy to understand its use of these technologies, which is controlled by LinkedIn. The FTC does not have access to any data that LinkedIn may collect using these technologies.

At the time of this PIA, the last official update to LinkedIn’s privacy policy was March 2014, and the FTC reviewed it in April 2014, prior to publishing this PIA.

SECTION 8.0 – CREATION OR MODIFICATION OF A SYSTEM OF RECORDS

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 intend to collect PII or LinkedIn user profiles or retrieve such data in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.

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Prepared for the Business Owners of the System by:

_____ Date: _____
Cheryl Warner
Social Media Strategist

Review:

_____ Date: _____
Sarah Mackey
Chair, Social Media Task Force
Office of the General Counsel

_____ Date: _____
Alexander C. Tang, Attorney
Office of the General Counsel

_____ Date: _____
Peter B. Miller
Chief Privacy Officer

_____ Date: _____
Jeffrey Nakrin
Director, Records and Filings Office

_____ Date: _____
Jeffrey Smith
Chief Information Security Officer

Approved:

_____ Date: _____
Bajinder Paul
Chief Information Officer