



**Federal Trade Commission
Privacy Impact Assessment**

GitHub

November 2014

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

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

The Federal Trade Commission (FTC or Commission) uses GitHub, a platform for sharing code and collaborative content, as a repository of open source code from submissions to FTC contests and challenges. Specifically, the FTC uses the GitHub online community built for government: [government.github.com](https://github.com/government). Consumers do not have to be registered users of GitHub to view this content.

Official FTC GitHub accounts will be [denoted in the GitHub and Government community](#), registered in the federal government’s [Social Media Registry](#), linked from the agency’s [Social Media](#) webpage, and otherwise promoted through other official FTC channels. FTC accounts will be created under an “organization” account, which enables the FTC to establish teams with special permissions, host a public profile, and track activity of the FTC account.

FTC GitHub profiles and repositories will be publicly visible. Authorized FTC staff may control access by collaborators (users with the ability to add or edit code), open up opportunities to edit repositories, or approve them on an as needed basis.

GitHub users have multiple options to be social across the site such as friending users and following users. Users can also watch projects (to get updates), submit pull requests (replacing older versions with updates), and identify issues (problems that need to be fixed).

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

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. GitHub has over 200 million active users. Using tools like GitHub helps the FTC to 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 GitHub 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).

In accordance with federal guidance, the FTC includes exit scripts and other notices to consumers who go to GitHub directly from FTC websites to notify them that they are about to access a third-party site where the FTC’s privacy policy does not apply. Additionally, notices are placed to the extent possible on each FTC account informing visitors that [GitHub’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 GITHUB?

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

The FTC will be using GitHub to post content and make information available to the public and does not intend to routinely collect, disseminate, or maintain any personal information from those who choose to view, download, or use the FTC-provided information. To the extent, if any, that GitHub collects or makes available personal information from site visitors, the FTC will generally not collect or receive that information. The FTC may, read, review, or rely upon information that GitHub users make available to the public or to the FTC as authorized or required by law (e.g., if there is evidence of a law violation).

The FTC may post submissions to agency contests on GitHub and identify content creators by name or other moniker, but only after receiving authorization will we identify on GitHub the submission by any direct identifying information.

2.2 – What are the sources of PII?

PII that may be available to the FTC through GitHub consists of information that other GitHub users may post or provide to the site about themselves (e.g., user name). GitHub users determine what information about them is publicly available beyond the standard account registration information required by GitHub. As noted above, the FTC does not intend to routinely collect, disseminate, or maintain any of this information, although the Commission may read, review, or rely upon publicly available information on the site, as described above. See 2.1.

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 GitHub as outlined in Section 1.1 does not 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 will use GitHub to post open source code and other content to collaborate with the public on GitHub. The FTC will not routinely collect PII from GitHub users via the GitHub website. See 2.1.

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

Not applicable, because the FTC is only posting content to GitHub and not routinely collecting PII from GitHub users who interact with FTC accounts on the site. See Sections 2.0 and 5.0.

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?

Not applicable, because the FTC is not using GitHub to routinely collect, maintain, or disseminate PII, as discussed above.

Section 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 have administrative access to manage the FTC's GitHub 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. This form is required and compliance is monitored through the FTC's Social Media Task Force.

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

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

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

Not applicable, because the FTC is only posting content to GitHub and is not routinely collecting PII from GitHub users that interact with FTC accounts on the site. See Sections 2.0 and 5.0.

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

Not applicable, as the FTC is neither routinely collecting nor maintaining PII from GitHub, as discussed above.

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?

Not applicable, because the FTC is only posting content to GitHub and not routinely collecting data from other GitHub users. See Sections 2.0 and 5.0.

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?

GitHub is a third-party service that uses session cookies (which are required to view content on the site). In an effort to help consumers understand how their information is used by GitHub, the FTC posts notices on its GitHub accounts indicating that GitHub's policy rather than FTC policy applies on the site. Furthermore, the FTC informs consumers who connect to FTC GitHub accounts from an FTC website that they are leaving the FTC site and that the Commission's privacy policy no longer applies.

The FTC routinely reviews GitHub's privacy policies for changes that may affect the FTC's use of GitHub and will update its privacy policies as necessary to reflect any changes.

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 from GitHub in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.

Signatures and Approval

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
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