



**Federal Trade Commission
Privacy Impact Assessment**

for:

Admongo.gov

September 2012

1 **System Overview**

The Federal Trade Commission's Division of Consumer and Business Education (DCBE) has created a website called Admongo.gov to teach children aged 8-12 how to understand and decode advertising. The website will be hosted on an outside server and exist within the public domain.

The intended audiences are children aged 8-12, their teachers, librarians, and parents. Admongo.gov provides a multi-level game that delivers content; text-based pages that provide the game's content in written form (for use by screen readers and others who prefer to receive written information); text-based pages that contain a glossary, resources for parents and teachers, and a description of the site and the FTC; and a companion curriculum for grades 5-6.

To play the game portion of the site, the player must create an avatar (a character that the player designs from a menu of options, including hair, clothes, and accessories). The player must also enter into a web form an Admongo screen name, password, and an answer to a security question. This information is stored in a database and permits the player to come back later and re-enter the game where it stopped. If the player forgets his or her password, s/he may enter the answer to the security question (e.g., "Who is your favorite movie character?") to re-enter the game. Answering the security question correctly recalls the password the player had previously entered, and allows the player to re-start the game. If the player cannot recall his/her screen name plus either the password or security question, the player may start the game from the beginning by entering new information.

As an optional part of the game, players may, at certain points in the game, send their game results, such as an advertisement that they design, to someone (themselves or someone else). To do this, a player types his or her first name (not their screen name) and the email address of the intended recipient into a web form that will appear on the player's computer screen. This information is sent to the server, which then sends an automatic email to the email address. The email content cannot be altered or supplemented by the player: the content is taken from the game, and the subject line is the player's name as entered into the web form. The names and email addresses provided by players are deleted from the server once the email is sent and are not stored anywhere on the site or server.

Parents and teachers who use the site are given the opportunity to contact DCBE staff. An "Email Us" link appears within the "Spread the Word" page of the Parent/Teacher section. The copy on that page encourages parents and teachers to contact the FTC to share their ideas for spreading the word about Admongo.gov. Users may click that link, which will pop open an email in their own email box with the address admongo@ftc.gov already populated in the To: field to send an email to a DCBE-staffed email box on the FTC email system. The email address is not stored anywhere on the Admongo site or server. The email link provided on the Parents & Teachers pages of Admongo is intended for adult use. In the event that we receive an email from a child, it is our policy

to dispose of that email address immediately; however, we may respond once to a child's question prior to deleting that child's email address.

2 Information Collected and Stored within the System

.1 What information is to be collected, used, disseminated, or maintained by the system?

To play Admongo, the player must create an avatar (a character that the player designs from a menu of options, including hair, clothes, and accessories) and enter into a web form an Admongo screen name, password, and an answer to a security question. The avatar and the information collected via the web form are stored in a database.

Players may, at certain points in the game, enter their first name and an email address to send game results to someone (or themselves). This information is deleted as soon as the email is sent and is not maintained on the site or the server.

On the Parents and Teachers pages of Admongo.gov -- specifically, the "Spread the Word" page -- users may click an "Email Us" link to contact FTC staff to share ideas on spreading the word about the website. Clicking that link will pop open an email in the user's own email client with the address admongo@ftc.gov already populated in the To: field to send an email to a DCBE-staffed email box on the FTC email system. Neither the email address nor any information the user may provide in the email is stored anywhere on the Admongo site or server. The email address and content are, however, received by DCBE staff and used to respond to the email sender on the FTC email system.

In addition, the website server will collect log information, such as IP address, date and time of visit, and referrer sites. This information will be used to analyze traffic to the site and better serve site visitors.

.2 What are the sources of the information in the system?

All personally identifiable information (PII) collected through the site (see 2.1) is obtained directly from visitors to the site (e.g., players of the game and parents or teachers communicating with DCBE via an email link provided by the site).

The website server automatically collects log information of those who visit the website.

.3 Why is the information being collected, used, disseminated, or maintained?

Screen names, passwords, answers to a security question, and an avatar created by the player are required to play the Admongo multi-level game and are collected to save players' progress and allow them to return where they left off to play later.

At certain points in the game, players are given the option to enter their first name and an email address into a web form to share game results, such as an advertisement they created. This information is sent to the site's server, which generates an email message to the intended recipient that identifies the player sending the message. Neither the names nor the email addresses will be maintained.

Users of the parent and teacher pages of Admongo may click a link provided to send an email to a DCBE-staffed email box. The link is on the "Spread the Word" page of the Parent and Teacher section; clicking the link pops up an email from the user's own email client addressed to an FTC email address, admongo@ftc.gov. Neither the email address nor the email content will be maintained on the site or the server; the email box on the FTC system will be staffed by DCBE staff. Allowing users to voluntarily send these emails will help us provide information to users, thereby potentially extending the reach of the website to new users.

Log information is automatically collected in order to analyze traffic to the site and better serve site visitors.

.4 How is the information collected?

Screen names, passwords, and answers to a security question will be collected using a web form, which appears at the beginning of the game, along with the avatar maker.

At certain points in the game, players may enter their first name and an email address (their own or someone else's) into another web form. This allows the player to share game results with a friend or family member.

Adult users in the Parent and Teacher section may click a link to email the FTC. Clicking the link pops up an email from the user's own email client, from which the user can send an email to an address within the FTC system. The email box is staffed by DCBE.

Log information is automatically collected by the website server.

.5 How will the information be checked for accuracy and timeliness (currency)?

The information will not be checked for accuracy and timeliness. The information collected on the site (e.g., screen names, passwords, and answers to a security question) is relied upon solely by players to gain access to the game already in progress. A first name and email address are collected solely to allow the player to share game results, these names and email addresses are not retained. In addition, a link is provided to allow adult users to communicate via email with DCBE staff; these emails are not retained on the servers. Because the information has limited life and purposes, it is not feasible, appropriate, or necessary to verify the timeliness or accuracy of such information. Likewise, it is not feasible, appropriate, or necessary to verify the accuracy or timeliness

of log information, which is automatically generated by the site and used only for security and site management purposes.

.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?

Yes. There is a minimal effect on individuals' privacy, given the type of information collected and the instructions given to individuals. See Section 2.8.

.7 What law or regulation permits the collection of this information?

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). As part of its public education efforts, the FTC will operate this site and answer questions from parents and teachers, activities that involve the collection of a limited amount of personal information from individuals.

Log information is collected and maintained under information security laws, including the Federal Information Security Management Act (FISMA), Pub. L. No. 107-347, t.3.

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

The Admongo.gov site must collect some information to identify those who wish to play the multi-level game in order to ensure that the game operates in a way that best conveys the important messages it is designed to teach. At the outset, the risk to an individual's privacy is mitigated by requesting data elements that do not identify the player by their real name, address, or email address. In collecting the screen name, password, and answer to the security questions, however, there is a risk that those who want to play the Admongo game will choose to use their actual names as screen names. In order to mitigate this risk, players are instructed at the point of collection "Don't use your real name." In addition, the web form is designed to accept only a limited number of characters and does not accept spaces or an @ symbol in an effort to minimize the risk that players will use their actual names or email addresses in any of the web form fields.

There is also a risk that players might send sensitive information when sharing game results. This risk is mitigated by limiting the customization of those emails: players may enter only a first name (and the instruction "First name only, please" accompanies that field of the web form) and an email address. The content of the email sent to the address provided is fixed and cannot be altered or supplemented by the player; the only personal component is the first name provided by the player. In addition, the risk that the email and first name will be compromised within the system is mitigated by their being deleted from the site and server as soon as the email is sent.

The risk that email addresses and content from those using the “Email Us” link on the “Spread the Word” page will be compromised is mitigated by limiting access to the mailbox where the emails will arrive to a small number of FTC employees.

The above risks are also mitigated by prominently featuring the site’s privacy policy on each page of the site (including all pages of the game), and by not storing any email addresses on the site.

3 Use and Access to Data in the System

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

As explained more fully in Section 2.3, avatars, screen names, passwords, and an answer to the security question will be used to allow players to return to their game already in progress. The player must remember their screen name plus either the password or their answer to the security question to return to their game; otherwise the player must start over by creating a new avatar and providing a new screen name, password, and answer to a security question.

A player’s first name and any email address that they enter into the web form are used solely to allow the players to share their game results, such as an advertisement they created, with others. When that information is entered into the web form, it is sent to the site’s server so that an email can be generated. Once the email is sent, the email address and the first name are deleted and are not retained or used for any other purpose.

Emails from parents and teachers that are sent through the link on the Admongo.gov site are collected and maintained on the FTC’s email system to respond to comments and questions from parents and teachers. These emails are not stored on the Admongo.gov site and are not used for any purpose other than to communicate with those who sent them.

The aggregate log information that is automatically collected will be used to evaluate website traffic and better serve visitors.

.2 Which internal entities will have access to the information?

Staff members in DCBE who manage the website on the server will have access to the database containing screen names, passwords, and answers to security questions. Since email addresses and first names that are provided to send game play results to a friend are not stored, no internal entities will have access to that information. Limited DCBE staff, charged with responding to questions emailed via the parent and teacher pages, will have access to those email addresses and the content of those emails.

In addition, DCBE employees who are site administrators will have password-protected access to the server's log files.

.3 Which external entities will have access to the information?

The contractor that posts the website to the server will have access to the database containing user name, passwords, and hints. The contractor will also have access to the server's log information. The contractor will not have access to any of the email addresses voluntarily provided by users.

In addition, those who register to play the Admongo.gov multi-level game will have access to their own game accounts in order to pick up the game where they left off.

4 Notice and Access for Individuals

.1 How will individuals be informed about what information is collected, and how this information is used and disclosed?

The website will provide a privacy policy link on each page of the website - both the multi-level game and all text pages - and will also contain an appropriate Privacy Act statement explaining the authority, purpose, and uses of the information collected by the site. The privacy policy link will appear in the footer of each game page, and on the header of each text-based page.

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

Participation in the website is voluntary. However, those who choose to play the game must create an avatar and enter a screen name, password, and an answer to a security question before they can begin. Sharing game results is also voluntary, but should players wish to share their results at certain points in the game, they will be required to enter their first name and the email address of the intended recipient. Players who choose not to share their results with others will still enjoy full use of the website.

The text-based sections of the site do not require the provision of any information at all. However, users of the Parent and Teacher section of the website may choose to click a link to send an email to the FTC, for the purposes of sharing ideas on how to spread the word about the website. This is voluntary, and users who chose not to provide ideas will still enjoy full use of the website.

Other information, such as the user's IP address and the date and time of the visit, is collected automatically by the website server. Because this information is collected

automatically by the server, and is needed for administrative and security purposes, users do not have the opportunity to decline to provide that information.

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

No. User who choose to play the game must provide the information requested at the outset of the game (screen name, password, and answer to a security questions), and users who choose to send a result email or a comment to staff must provide a first name and email address later in the game or an email address to communicate with DCBE staff. All such users are agreeing to the use of the information for the limited purposes explained on the website, and to the automatic collection of web log information.

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

Players gain access to the game by entering their own username plus their password; if they forget their password, they can correctly answer their security question to retrieve their password and enter the game. This information is stored on a database on the system.

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

See Section 2.8.

5 Web Site Privacy Issues

.1 Describe any tracking technology used by the Web site 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 site does not use any persistent or temporary tracking technology.

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

No persistent tracking is used on the Web site.

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

The information in the system is submitted voluntarily and is not sensitive. The user names and passwords aren't associated with any PII; they just allow players to leave the game and pick up where they left off. It therefore poses a low risk to privacy and encryption is not necessary. In addition, increasing the level of security – for example, by making it a secure site – runs the risk of limiting use of the site by the intended users (teachers and students in schools, where access to secure sites is sometimes restricted).

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

The website will provide a link to its privacy policy on the home page, as well as in the footer of each game page and on the header of each text-based page.

.5 Considering any Web site or Internet issues, please describe any privacy risks identified and how they have been mitigated.

See Section 2.8.

.6 If the Web site 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).

Admongo complies with COPPA in the following manner. For players to participate in the game, Admongo collects only a user's screen name (children are reminded not to use their full name, and the website takes steps to avoid the capture of last name), password, the answer to a security question, and other game account data, including the avatar selected, creation date, start/stop times, failed log-in attempts, and the video created by the user. None of this is considered personal information under COPPA. Admongo also provides the opportunity for players to send game results via email by supplying only the user's first name and the recipient's email address, which is automatically deleted when the email is sent. This falls within the COPPA one-time use exception and does not require parental notice and consent.

Admongo also provides a web area intended for, and designed to appeal to, parents and teachers. Through this web area, parents and teachers can click a link to send an email to contact FTC staff about the site or site materials. In the event that we receive an email indicating that the sender is a child under 13, Admongo will dispose of that email address immediately; however, we may respond once to a child's question prior to deleting that child's email address.

6. Security of Information in the System

.1 Are all IT security requirements and procedures required by federal law being followed to ensure that information is appropriately secured?

The FTC follows all applicable Federal Information Security Management Act (FISMA) requirements to ensure that information on Admongo.gov is appropriately secured.

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

The system is part of the FTC's Public WEB Hosting General Support System (GSS), which has been authorized to process at the moderate level using National Institute of Standards and Technology (NIST), Office of Management and Budget (OMB), and Department of Homeland Security (DHS) guidance.

.3 Has a risk assessment been conducted on the system?

A risk assessment was completed on the Public WEB Hosting GSS as part of the authorization. Appropriate security controls have been identified to minimize the risk associated with the system and such control have been implemented.

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

The privacy risks associated with this web site are discussed in Section 2.8.

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

- **Admongo User Accounts:** Players can access their previously-created game by using a combination of their username plus password or the answer to their security question.
- **Admongo Game Files:** Only a small number of DCBE contractors and staff have access to the Flash game and files. This is accessible via secure file transfer protocol (SFTP) or secure shell host (SSH), with specific login credentials.
 - DCBE contractors or staff will make any necessary updates to the game or website files through SFTP/SSH with a secure virtual private network (VPN) connection.
 - So, in order to make changes to the Admongo game files, DCBE contractors or staff need the secure VPN login information and SFTP/SSH login credentials for the Admongo site files.

- **Web Hosting:** If a server-side change needs to be made, including taking the site down, a support ticket from the FTC’s web hosting vendor is required. A small number of DCBE staff and DCBE contractors have credentials through the FTC’s web hosting vendor which allow them to create and view support tickets.
 - Support tickets also can be created by OCIO and the web hosting vendor.
 - When a support ticket is created it has to pass through two tiers of approvers from OCIO. The first level approvers are OCIO operations staff (a DCBE assistant director also has this approval authority) and the second level approvers are the OCIO network security team.
 - Support tickets are only created for server-side issues and updates in the web hosting vendor’s system – this does not allow changes to the Admongo files themselves.

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

All FTC staff and all contractors with network access are required to complete computer security training and privacy awareness training annually.

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

The following in-place auditing measures and technical safeguards are applied to prevent misuse of data. These controls include:

- Authenticator/Password Management – Application and monitoring of initial distribution, composition, history, compromise, and change of default authenticators.
- Account Management – Application and monitoring of account establishment, activation, modification, disabling, removal (including unnecessary/defunct accounts) and review.
- Access Enforcement – Application and monitoring of access privileges.
- Least Privilege – Access to data is limited to data necessary for specific user to perform his/her specific function..
- Unsuccessful Login Attempts – System automatically locks administrator accounts when the maximum number of unsuccessful attempts is exceeded.
- Audit logs are reviewed for technical and administrative errors.

Privacy risks associated with unauthorized disclosure of information are mitigated through implementation of technical controls associated with need-to-know and least privilege, ensuring that users have no more privileges to data than required to affect their official duties. In addition, deterrent controls in the form of warning banners, rules of

behavior, confidentiality agreements and auditing are in place. Procedures are in place to disable and delete user accounts at the end of use. Access to the server is password protected and access is granted on a very limited basis.

.8 To whom should questions regarding the security of the system be directed to?

Any questions regarding the security of the system should be directed to the FTC's Information Assurance Manager.

7. Data Retention

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

Information in the site's database will be maintained as long as the website is active and available online. Once inactive, the website will be archived as an agency record and will be kept per FTC record retention policies.

Web log files will be kept by DCBE up to one year after the website becomes inactive. Aggregate data about site visits will be kept indefinitely but will not contain any personally identifiable information.

.2 What are the plans for destruction or disposal of the information?

The website will be kept as an agency record per FTC record retention policies.

Web log files will be destroyed by DCBE within one year of the site becoming inactive.

Emails that parents and teachers send to the DCBE-staffed FTC email box will generally be destroyed after FTC responds to the email.

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

See Section 2.8 on privacy risks identified in retention of the data. FTC will dispose of information in a manner that makes it impossible to recover

8. Privacy Act

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

Player account information is retrieved by entry of the individual's username and password. Should the player lose his or her password, the player may enter the answer to the security question, as previously entered into the web form. This retrieves the player's

password, shows it in the web form, and allows the player to enter the game where s/he previously left off.

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

To the extent, if any, that information is about an individual and retrieved by a personal identifier of such individual, the electronic collection and storage of public comments is covered by existing Privacy Act System of Records notices. System I-1 covers nonpublic program records including email communication with consumers such as parents and teachers and System VII-3 covers user ID and access records. See <http://www.ftc.gov/foia/listofpaysystems.shtm>.

9. Privacy Policy

.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.

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

10. Approval and Signature Page

Prepared for the Business Owners of the System by:

_____ Date: _____

Nat Wood, Assistant Director
Division of Consumer and Business Education

Review:

_____ Date: _____

Alexander C. Tang, Attorney
Office of the General Counsel

_____ Date: _____

Peter Miller
Acting Chief Privacy Officer

_____ Date: _____

Jeffrey Smith
Information Assurance Manager

_____ Date: _____

Jeff Nakrin
Director, Office of Records and Filings

Approved:

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Jeff Huskey

Chief Information Officer