



**Federal Trade Commission
Privacy Impact Assessment**

Thunderclap™

January 2014

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

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

The Federal Trade Commission (FTC or Commission) uses [Thunderclap](#), a third-party (non-government) website, to enlist other Thunderclap users (“supporters”) to share FTC messages through their chosen social media accounts. The key feature of Thunderclap is that, when a message has attracted enough supporters, it is shared automatically and simultaneously through those supporters’ accounts.

Thunderclap users login to the site with credentials for their existing Twitter, Facebook, or Tumblr accounts (users do not create new login accounts for Thunderclap). The FTC will administer its Thunderclap campaigns through the Agency’s official @FTC Twitter accounts. Users can create a “campaign” that will share their message on the social media accounts of other Thunderclap users if the campaign gets enough users to support the Thunderclap, as described below. This Thunderclap feature amplifies the potential impact of FTC content by making it available through networks and individuals to viewers that the FTC might not otherwise reach using its own FTC social media accounts. A Thunderclap campaign includes a title, category, specific message text for sharing (limited number of characters), background, and links for more information (referred to as “the story”). Creators of campaigns may also include additional information about themselves or their agency/organization/cause and links to other social channels (similar to a biography or “about me” section). Additionally, Thunderclap creators must identify a goal (i.e., number of required supporters) and date to complete their Thunderclap. (Goals include garnering at least 100 unique supporters, and generally should occur in a 7- to-14-day window.) If the goal is not met, the Thunderclap does not become active. If the goal is met or exceeded, then the message is shared simultaneously to supporters’ designated social media accounts (e.g., their Facebook profiles or Twitter feeds), where it may be viewed by the supporters’ friends or followers. (Thunderclap and the FTC do not post or send any messages directly to any supporters’ friends’ or followers’ accounts.)

Thunderclap users support each campaign individually, meaning supporting one FTC campaign does not automatically enroll users in supporting future FTC campaigns. For each Thunderclap campaign supported, users grant Thunderclap permission to post only that campaign’s message on the users’ designated social media accounts. Users can remove their support for a campaign at any time.

FTC Thunderclap messages link back to existing content on FTC.gov and other agency and partner websites. All Thunderclap messages from the FTC will contain only public information. Thunderclap allows the FTC to promote information, tips, and resources to citizens who may not be regular visitors to FTC websites or its social media sites. The Commission’s goal in utilizing Thunderclap is to raise awareness on important issues affecting consumers and businesses.

1.2 – Is the agency’s use of Thunderclap 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. Using tools like Thunderclap helps the FTC to communicate with consumers on platforms where they are active, which in turn helps the FTC meet the federal guidance outlined in the directive and memorandum including the goals of transparency, participation, and collaboration.

The Government Services Administration (GSA) has negotiated a [federal-compatible Terms of Service \(TOS\) with Thunderclap](#). The TOS, among other things, prohibits Thunderclap from placing third-party advertisements on any Federal agency pages, which avoids the potential privacy risk to consumers who may view or click on such ads.

With respect to the information that the FTC will disseminate through its Thunderclap 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, the FTC includes exit scripts/and other notices to consumers who opt to visit a third-party site (Thunderclap) via links from FTC websites; the exit scripts notify consumers that the FTC's privacy policy does not apply to third-party websites. Additionally, notices are placed, as appropriate, on each FTC account informing visitors that [Thunderclap's privacy policy](#) governs the third-party site.

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

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

Some PII is potentially available to the FTC through Thunderclap, to the extent that the FTC's Thunderclap supporters choose to make it available, e.g., Facebook usernames and profiles, or Twitter name and profile pictures (whether real or a pseudonym for either account of the FTC's Thunderclap supporters). Users that support a Thunderclap campaign may show up on the campaign homepage under limited "recent or current supporter lists." Lists of current or recent Thunderclap supporters do not include links back to the supporter's social media accounts. This information is limited to a static photo and username. Although the FTC may collect or maintain aggregate data about the number of supporters of its campaigns, the FTC does not intend to collect identifying usernames, profiles, photos, or any other PII about its Thunderclap supporters or individuals in their networks.

In addition, individuals who establish a Thunderclap account may be making certain PII available to Thunderclap. Users interested in more information about how Thunderclap handles or uses their information should review [Thunderclap's privacy policy](#) online.

2.2 – What are the sources of PII?

Any PII that may be available to the FTC through Thunderclap is provided directly by users who have granted Thunderclap access to their social media account and have further chosen to

support a specific FTC Thunderclap campaign. The FTC does not have access to supporters' social media accounts or networks when users login to Thunderclap. As noted above, the FTC may have access to information (e.g., name, photo) that users post to their public profiles, which is visible to the FTC (and others) when they support an FTC Thunderclap. The FTC, as explained above, will not collect or maintain information about its individual Thunderclap supporters but will only collect aggregate data on the number of users who may support the FTC's messages.

At the time of this Privacy Impact Assessment, there is no way to search individually for Thunderclap supporters, regardless of whether or not users support an FTC campaign. Because Thunderclap users login with their existing external social media accounts, Thunderclap does not curate new Thunderclap friends/subscribers/followers lists available to the public. Users who are logged in can see a history of the Thunderclaps that they have individually created and supported.

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 Thunderclap as outlined in Section 1.1 is not a web-based interactive information collection technology 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?

As explained above, the FTC does not intend to collect or use PII from Thunderclap.

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

The FTC does not collect, maintain, or use PII that may be made available to it through Thunderclap. Thunderclap explains in its [privacy policy](#) how it collects and uses non-PII and PII. For example, Thunderclap uses personal information to provide the services and customer support requested; resolve disputes, respond to emails or other inquiries, and troubleshoot problems; prevent potentially prohibited or illegal activities, and enforce Thunderclap website policies; customize, measure, and improve Thunderclap services and content; and compare supporters' information for accuracy, and verify it with third parties. Users should review Thunderclap's privacy policy for more details.

Users can also subscribe to Thunderclap campaign updates via e-mail. The FTC does not have access to these e-mail addresses nor will the FTC be collecting any individual e-mail addresses through Thunderclap.

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?

Not applicable. The FTC does not collect, maintain, or use PII that may be made available to it through Thunderclap. Users should review Thunderclap's privacy policy to learn what PII Thunderclap may collect from its users and share with entities or persons inside or outside Thunderclap.

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 Thunderclap accounts. Each FTC staff member responsible for managing a social media account must sign and comply with the Commission's internal Rules of Behavior (ROB), prior to beginning account administration. This form is required and compliance is monitored through the FTC's Social Media Task Force. These ROB prohibit, for example, any unauthorized collection or dissemination of PII about other users or other individuals through Thunderclap.

The FTC's Thunderclap account shall be administered through its official @FTC Twitter account. Administrators are not permitted to use personal accounts to manage FTC Thunderclap accounts. Furthermore, authorized FTC staff members are required to use FTC-authorized devices to manage and access Thunderclap and other social media accounts, and exceptions will only be considered on a case-by-case basis.

Finally, Thunderclap users may delete their support of an FTC Thunderclap message. If Thunderclap users do so, any PII that they may have made available to the FTC and other Thunderclap users will no longer be displayed in connection with that message (e.g., the supporter's Facebook photo and username or Twitter photo and name). In any event, the FTC does not collect, maintain, or use PII that may be made available to it through Thunderclap.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

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

The FTC does not intend to collect or maintain PII that may be available to it through Thunderclap, as discussed earlier. If the FTC collects anonymous, aggregate data from Thunderclap, such non-PII data is retained and disposed of in accordance with FTC policies and procedures and with FTC records retention schedule [N1-122-09-1](#) approved by the National Archives and Records Administration (NARA).

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

Not applicable. The FTC does not collect, maintain, or use PII that may be made available to it through Thunderclap. Per the FTC's own privacy policy, the FTC does not collect or retain any information including PII, that is unnecessary, in order to minimize privacy risks, if any.

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. The FTC does not intend to use Thunderclap to collect or maintain any PII. See Sections 2.0 and 5.0.

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?

Thunderclap is a third-party service that uses persistent tracking technologies, which may collect, maintain, or share information about individuals who visit or have accounts on Thunderclap. In an effort to help consumers understand how their information is used by Thunderclap, the FTC posts notices on its Thunderclap accounts indicating that Thunderclap’s policy applies on these sites. Furthermore, the FTC informs consumers who link to the FTC’s Thunderclap account from official Agency websites, that they are leaving FTC sites, and that the Commission’s privacy policy no longer applies once they are on Thunderclap’s site.

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

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?

The FTC does not intend to collect PII (e.g., Thunderclap or other social media user “handles,” names, profiles, photos) 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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Approval and Signature Page

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