



**Federal Trade Commission
Privacy Impact Assessment**

Twitter

April 2016

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

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

The Federal Trade Commission (FTC or Commission) uses Twitter, a microblogging website (i.e., a blog consisting of short posts or messages limited to 140 characters), to disseminate information to the public. See Appendix for a list of official FTC Twitter accounts.

Twitter allows the FTC to promote information, tips, and resources to consumers and other people who may not be regular visitors to FTC websites. Information (“tweets”) posted to FTC Twitter accounts is generally content that already exists on FTC.gov and FTC.gov/espanol or is relevant information from the Bureaus of Consumer Protection, Competition, and Economics, as well as other offices and staff of the FTC.

Typical tweets may include, but are not limited to, consumer and business tips and information as well as photos, news articles and short videos. The Office of Public Affairs (OPA) approves the content of all @FTC, @laFTC, and @MilConsumer tweets, including, but not limited to, press releases, speeches, and information from the Bureaus of Consumer Protection, Competition, and Economics, as well as other offices of the FTC.

Tweets from agency accounts (@FTC, @LaFTC, and @MilConsumer) that reflect the opinions of individual Commissioners, the Chair or other FTC staff members are attributed appropriately. Tweets from the Chair, Commissioners, and Chief Technologist may not necessarily represent the views of the Commission or other individual Commissioners.

All official FTC Twitter accounts are verified by Twitter (as indicated by the blue checkmark on account profiles), documented in the federal government’s [Social Media Registry](#), and also linked from the agency’s [Social Media](#) webpage.

All FTC Twitter profiles are public, so anyone, including visitors who are not registered Twitter users, can visit the accounts and read the agency’s tweets. In contrast, only registered users can post tweets on Twitter. Tweets from other users do not show up in the FTC’s home streams unless retweeted by an FTC account.

Tweets/Retweets

The Commission promotes FTC resources to the public. These tweets will all appear in reverse chronological order in the FTC’s profile pages. Additionally, any Twitter users who “follow” an FTC account will receive agency tweets in their Twitter “stream” also known as the “timeline.” In turn, users may share the FTC’s resources with their network of Twitter followers (generally done by sending out the same tweet and giving credit to the FTC’s original tweet, called a “retweet” and abbreviated as RT) and others can do the same, providing a viral marketing component to the Commission’s outreach and education efforts. A retweet of a non-government account posting by an FTC account does not equal an endorsement.

Follows/Following

Anyone can follow FTC Twitter accounts as they are not private and do not require permission to follow. The @FTC and @LaFTC accounts will only follow other government agencies and leadership. The @MilConsumer account may follow other government accounts and partners of the [Military Consumer Protection campaign](#). Commissioners and the Chief Technologist may follow other users, such as reporters, but any such following does not equal an endorsement by the Commission or any individual Commissioner.

Mentions

If a registered user posts a tweet that includes an FTC's account handle, this is called a mention. The tweet will appear in the user's profile and home stream as well as the timelines of all followers of that user. Additionally, that tweet will show up in the notifications/mentions stream of the FTC account.

If a user posts a tweet that starts with a mention of a specific FTC Twitter account (e.g., @FTC), it will only show up in the home streams of users who follow both that user and the FTC account. However, all public tweets (meaning the account is not locked or protected) are searchable by the public on Twitter's website (or other third party sites linked to Twitter), thus anyone can search for mentions of FTC Twitter accounts.

Public tweets may also be picked up by other search engines (e.g., Bing, Google, Yahoo!), aggregator sites, or applications outside of Twitter. The FTC cannot delete tweets sent by other users even if they mention an FTC account, but the FTC can block Twitter users or other messages (see below) that are deemed as harassing toward the FTC. Additionally, "spam" style Twitter accounts can be reported, and Twitter can investigate and delete the account if necessary.

Direct Messages

Private messages between registered Twitter users are called "Direct Messages." These messages are stored in a "Direct Message stream" accessible only to the registered Twitter user. Only another registered user whom you follow can send you a direct message (and you must follow them to send them one back). The @FTC, @LaFTC, and @MilConsumer accounts may engage in Direct Messages with other government accounts that are mutual followers of these FTC accounts. Similarly, Direct Message activity may result between Commissioners or the Chief Technologist and other Twitter accounts that are mutual followers. In all cases, account users shall be required to manage such communications, if any, to ensure that the FTC is able to comply with potentially applicable legal obligations (e.g., Freedom of Information Act requests, e-discovery litigation holds, duty to preserve, copy, retain or destroy under Federal records law).

Interactive Twitter Events

The FTC may use Twitter to promote events or answer questions in real-time. See the [FTC's Twitter Chats](#) and [Interactive Twitter workshops](#) for more information about how these events work.

1.2 – Is the agency’s use of Twitter 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. Twitter has over 250 million active users. Using tools like Twitter helps the FTC to communicate with consumers on platforms where they’re active, which in turns helps the FTC 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 Twitter 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, consumers who visit Twitter or other third-party websites by clicking on a link on the FTC website receive an exit script or similar notice advising them that the FTC’s privacy policy does not apply on that third-party website. Additionally, notices are placed as appropriate on each FTC account informing visitors that [Twitter’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 TWITTER?

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

Twitter requires users to provide their first name, last name, a valid email address, and a password, with the option to provide additional information in their biography when they register an account. Even though some of this information may be accessible to the FTC, depending on a Twitter user’s privacy settings (users can protect their tweets by using a private account setting), the FTC does not intend to collect, disseminate, or maintain any of the information provided to Twitter.

The FTC may, however, read, review, or rely upon information that individuals make available to the public or to the FTC on Twitter, as authorized or required by law (e.g., if there is evidence of a law violation).

The FTC routinely monitors FTC-related keywords on Twitter and other third-party applications in an effort to determine what kind of public attention the FTC is generating online. Generally, comments that the FTC may collect or maintain as part of such review would be collected and/or maintained without the individual Twitter handle that identifies them. The Office of Public Affairs may elect to include Twitter handles in the following instances:

- Twitter handles of news organizations, journalists, and influential blogs and bloggers may be collected and distributed for use in media clips to lend credibility to tweets;

- Use of Twitter handles may be collected and maintained as an official record during interactive Twitter chats or other live events hosted by the FTC; and
- When answering questions directed to official FTC accounts (which are verified by Twitter and denoted in the appendix of this PIA), the FTC may collect and maintain comments, including the Twitter handles of those users who posted the questions.

In the instances listed above, the FTC intends to keep a record of the information (generally a screen shot of the comment saved as a PDF electronically and on paper), but does not intend to collect or maintain the records in any type of database from which the records will be retrieved specifically by a Twitter handle, or any other personal identifier. The FTC does not strive to collect every tweet about the agency – only tweets of significance to the Commission’s missions.

Although the FTC does not collect information other than comments with their corresponding Twitter handles from users who discuss the FTC online, users should be aware that the United States Library of Congress, through separate arrangement with Twitter, is maintaining an electronic archive of all public tweets, and intends to make them publicly available within a six-month window from the date of the tweet. The FTC understands that private account information (private profiles or direct messages) will not be part of the Library of Congress archive nor will links or photos associated with those tweets. In addition, as noted earlier, a user’s public tweets will also be accessible to the public through Twitter itself and through other, non-Governmental search engines, aggregators, and applications. In addition, PII may be collected through Twitter in the form of Direct Messages, if any, between an FTC account and another Twitter account, where the accounts are mutual followers (e.g., DMs between a Commissioner or the Chief Technologist and the individual user of a Twitter account that is a mutual follower).

Users interested in more information about [Twitter’s privacy policy](#) can review it online.

Finally, the FTC may collect general analytics from Twitter on a regular basis including the numbers of followers, number of retweets, etc. The Twitter analytics tool automatically makes other information available to the FTC, including sex, location, interests, and other handles the FTC’s followers follow; however, the FTC does not plan to collect or track any of this additional information.

2.2 – What are the sources of PII?

The FTC does not have access to the information that Twitter collects to register for the site. The FTC does have access to information that users post to their public profiles. This includes name (real or pseudonym), Twitter handle, location, and any additional information they post in their biography. The sources of PII in any Direct Messages between an FTC and non-FTC account that is a mutual follower, as described above, would be the author of the DM.

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 Twitter as outlined in Section 1.1 is not a web-based interactive technology that would 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 collects Twitter handles and comments in the examples outlined in Section 2.1. This includes tweets mentioning or directed at the FTC, regardless of whether they use an FTC account handle or not. Twitter handles or tweets relevant to the agency may be collected as part of the agency’s daily clips to highlight the FTC in the news or in blogs. Additionally, interactions with the FTC through interactive chats and events or general comments on Twitter may generate new records, for which the FTC may choose to collect comments and Twitter handles. DMs, if any, would be generally used only for informal communications, as FTC account users would normally re-direct and conduct any necessary formal communications through more official channels (e.g., FTC e-mail or correspondence).

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

When answering questions from consumers that generate new agency records or hosting interactive Twitter chats or other live events, the FTC may collect comments and Twitter handles as agency records. The FTC routinely searches Twitter for agency mentions (including those who do and do not use FTC Twitter handles in their tweets) as part of its media research. If these tweets meet the criteria outlined in Section 2.1, the FTC may collect a Twitter handle.

In accordance with OMB memorandum M-10-22, *Guidance for Online Use of Web Measurement and Customization Technologies*, the FTC uses some analytical data from Twitter to measure the overall number of followers, number of retweets, and similar statistical information to evaluate the effectiveness of the FTC’s Twitter accounts. The Twitter analytics tool automatically makes other information available to the FTC, including sex, location, interests, and what other handles the FTC’s followers follow; however, the FTC does not plan to collect or track any of this additional information. The FTC will not collect any PII will not collect any PII that is unnecessary (*see* Sec. 2.1).

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?

Twitter requires a minimum amount of PII collection in order for users to register profiles on the site. This information is outlined in Section 2.0. The FTC does not collect or maintain PII that

Twitter collects from registered users, particularly those who engage with the FTC via mentioning, following or unfollowing of FTC accounts, or other Twitter-permitted activities.

Only approved staff members have access to administer FTC Twitter accounts. Generally, all the information available to the FTC through user engagement such as following, unfollowing or mentioning is also publicly available to anyone visiting Twitter.com.

Section 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 Twitter 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 Twitter accounts are registered using official FTC email accounts. Administrators are not permitted to use personal accounts to manage FTC Twitter accounts. Furthermore, FTC staff are directed to use official government devices to manage accounts when possible.

Consumers do not have to be registered users of Twitter to see FTC tweets. Furthermore, Twitter is a third-party site, and FTC Twitter accounts generally contain comparable information that is available on the FTC’s websites and other resources.

Finally, Twitter users can determine what additional information of theirs is made publicly available, beyond the standard information required by Twitter to create an account. Users can also control whether their tweets are public or not. The FTC does not collect tweets or handles of private accounts.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

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

If the FTC collects a Twitter handle and comment as part of its media research or an interactive FTC Twitter event, they are retained and disposed of in accordance with applicable FTC policies and procedures and schedules issued or approved by the National Archives and Records Administration (NARA). If the FTC collects general comments and Twitter handles directed at the agency, they are also retained and disposed of in accordance with applicable schedules issued or approved by NARA.

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

Yes. In addition, per the FTC’s own privacy policy, the FTC does not collect any information including PII that is unnecessary. For engagement purposes on FTC Twitter accounts, the FTC does not collect or maintain any PII beyond a Twitter handle, which minimizes potential privacy risks.

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 since the FTC is only capturing Twitter handles, which is publicly available information. 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?

Twitter is a third-party service that uses persistent tracking technologies. In an effort to help consumers understand how their information is used by Twitter, the FTC posts notices on its Twitter accounts indicating that Twitter’s policy applies on these sites. Per federal guidance, consumers who visit Twitter or other third-party websites by clicking on a link on the FTC website receive an exit script or similar notice advising them that the FTC’s privacy policy does not apply on that third-party website. An example of an FTC exit script for Twitter is available [here](#). Additionally, notices are placed as appropriate on each FTC account informing visitors that [Twitter’s privacy policy](#) governs on the site.

At this time, the Government Services Administration (GSA) does not feel that Twitter’s standard Terms of Services (ToS) agreement requires a specific government ToS. If this changes, the FTC will follow GSA’s lead and execute a government ToS with Twitter.

As much as possible, the FTC uses information that is already publicly available on other FTC websites, thus consumers do not need to visit the agency’s Twitter accounts to find comparable information.

The FTC routinely reviews Twitter’s privacy policies for any changes that may affect the FTC’s use of Twitter 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 or Twitter handles in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.

Appendix – Official FTC Twitter Accounts

Currently, FTC staff manages the following Twitter accounts:

Managed by the Office of Public Affairs:

@FTC: www.twitter.com/FTC

@LaFTC: www.twitter.com/LaFTC

@FTCGov: www.twitter.com/FTCgov (old account)

@MilConsumer: www.twitter.com/MilConsumer

Managed by the Chairwoman or individual Commissioners:

@EdithRamirezFTC: www.twitter.com/EdithRamirezFTC

@MOhlhausenFTC: www.twitter.com/MOhlhausenFTC

@TMcSweenyFTC: www.twitter.com/TMcSweenyFTC

Managed by the FTC’s Chief Technologist:

@TechFTC: www.twitter.com/TechFTC

Prepared for the Business Owners of the System by:

_____ Date: _____
Peter Kaplan
Office of Public Affairs

Review:

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

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

_____ Date: _____
Katherine Race Brin
Chief Privacy Officer

_____ Date: _____
Jeffrey Nakrin
Director, Records and Filings

_____ Date: _____
Jeffrey Smith
Chief Information Security Officer

Approved:

_____ Date: _____
Raghav Vajjhala
Chief Information Officer