



Federal Trade Commission

Privacy Impact Assessment

Use of Google Apps for Government for 2015 Robocall Contests

May 2015

Introduction

Google Apps for Government (“Google Apps”) comprises a suite of Google cloud-based products, including e-mail (Gmail) and its document collaboration tool (commonly known as GoogleDocs), licensed for use by Government customers in the United States only. The products in this suite look and operate the same way as the commercial versions available to the general public, but Google Apps for Government is certified to meet Federal information security standards and is governed by terms of service that are compatible with applicable Federal law, regulations, and policy.

SECTION 1.0 – WHAT IS THE SPECIFIC PURPOSE OF THE FTC’S USE OF GOOGLE APPS?

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

The Federal Trade Commission (FTC) is using Google Apps (i.e., Gmail and GoogleDocs only) to execute the FTC’s 2015 Robocall Contests: [DetectaRobo](#) and [Robocalls: Humanity Strikes Back](#) (collectively, the Contests).¹ Such uses include communicating with contestants, receiving contestants’ registration forms and submissions, delivering the submissions to Contest Judges for evaluation, and maintaining appropriate contest documentation. Use of Google Apps is limited to those approved by the Office of General Counsel (OGC) and the Chief Privacy Officer (CPO), i.e., designated FTC staff and contest judges. See Appendix 1. The use of Google Apps, which is intended to be temporary and only for the duration of these contests, will allow these individuals to work together and communicate amongst themselves and contestants securely on-site or remotely, without relying upon or potentially compromising the FTC’s network.

The FTC’s use of Google Apps is managed by the Division of Marketing Practices (DMP), in coordination with information security staff of the Office of the Chief Information Officer (OCIO).

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

Yes. As explained further below, the FTC’s collection, maintenance, use and disposal of information through Google Apps is authorized by and complies with applicable laws, regulations and policies regarding such information collection, maintenance, use and disposal. Further, 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 increase the use of prizes and challenges to promote innovation and engage with the public. Because Google Apps enable the FTC to execute the Contests, using these products helps the FTC meet the federal guidance outlined in the directive and memorandum including the goals of participation and collaboration.

¹ The DetectaRobo contest will be held from June 6-7, 2015, in conjunction with the National Day of Civic Hacking. Submissions for the Robocalls: Humanity Strikes Back contest are due June 15, 2015, and the Final Phase will take place from August 5-9, 2015, at DEFCON 23.

SECTION 2.0 – HOW WILL THE FTC USE PII THAT BECOMES AVAILABLE TO IT FROM GOOGLE APPS, WHO HAS ACCESS TO THE PII, AND WITH WHOM WILL THE PII BE SHARED?

2.1 – What PII will be made available to the FTC?²

In using Google Apps to receive the contestants' registration forms and submissions, the FTC will also receive the contestants' contact information, including names (real or pseudonym), email addresses, and phone numbers.

2.2 – What are the sources of PII?

Any PII made available to the FTC would be from the registration form that contestants are required to submit in order to participate in the Contests or from any identifying information associated with the email address contestants use to submit their registration form and submission.

2.3 – Do the FTC's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No. Per the OMB memorandum, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, the FTC's execution of the Contests does not constitute collection of information that would trigger the PRA.

SECTION 3.0 – HOW WILL THE PII BE MAINTAINED, HOW LONG, AND HOW IS THE PII SECURED?

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

The FTC will use the PII described in Section 2.0 to contact the contestants who participate in the Contests. Registration forms may also be considered an official agency record.

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

The FTC may contact contestants to obtain additional information about their submissions required by the contest judges to review and score those submissions. The FTC may also contact contestants to verify their eligibility to receive a prize.

The FTC does not have access to data that Google itself may collect about contestants or others who may also use Google products. Users interested in more information about the information Google collects should review [Google's privacy policy](#).

² This PIA is limited to information collected in identifiable form from members of the public and excludes usernames, passwords, or other administrative data that may be collected, generated, or maintained by the FTC's Google account about any individual FTC account user (e.g., FTC contest judges or staff).

SECTION 4.0 – WHAT OTHER RISKS ARE ASSOCIATED WITH USE OF GOOGLE APPS, AND HOW ARE THOSE RISKS MITIGATED?

Section 4.1 – With what entities or persons inside or outside the agency will PII be shared, and for what purposes will PII be disclosed?

The PII collected from contestants will be shared only with designated FTC staff members involved in the execution of the Contests. The FTC may share the PII of prize winners with its Contest Participating Organizations (see contest rules on www.ftc.gov/detectarobo or www.ftc.gov/strikeback) in the event that such Participating Organizations issue their own prizes to those contestants.

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 individuals (i.e., contest judges and designated FTC staff members) have access to the FTC's Google Apps account. To gain access, each account user is required to sign and comply with the Commission's internal Rules of Behavior. Compliance with the Rules of Behavior is monitored by OCIO staff and DMP.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

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

Records will be retained in accordance with the length of retention authorized in the FTC records schedule as approved by the National Archives and Records Administration (NARA).

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

Yes. Per the FTC's own privacy policy, the Commission does not collect any information, including PII, that is unnecessary or maintain it for longer than needed.

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?

Yes. Staff will work with multiple offices across the agency, including privacy and security officials, to secure PII collected from official contestants. The FTC's Office of Chief Information Officer (OCIO) is responsible for establishing the account and implementing security controls, such as ensuring that only authorized FTC judges and staff can access their respective accounts or share materials received or maintained in such accounts.

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?

As explained in Section 4.2 above, only approved individuals (i.e., contest judges and designated FTC staff members) have access to the FTC’s Google Apps account. To gain access, each account user is required to sign and comply with the Commission’s internal Rules of Behavior. Compliance with the Rules of Behavior is monitored by OCIO and DMP.

The FTC OCIO staff will create the FTC’s master and individual accounts on Google Apps. The FTC’s master Google Apps account will be established using an official FTC email account, and individual Gmail account addresses will be restricted to an FTC-controlled “vanity domain,” i.e., @robocall.gov, which will also help prevent spoofing that might be possible with an @gmail.com address. FTC staff are directed to use official government devices to access their Google Apps account when possible. See also Appendix 1 for a summary of key rules and controls governing the use of the FTC’s account.

The FTC has signed the special federal-compatible Terms of Service for use of Google Apps.

The FTC routinely reviews Google’s privacy policy for any changes that may affect the FTC’s use of Google products and will update its own privacy policy 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?

The FTC’s use of Google Apps does not require the FTC to create or modify a system of records under the Privacy Act of 1974. Rather, any information collected, maintained and retrieved in individually identifiable form about a contestant will be treated as part of the agency’s existing Privacy Act system of nonpublic program records. *See* FTC I-1; *see also* FTC VI-1 (mailing and contact lists). The Privacy Act system notices for these systems of records, including the routine uses for records in these systems, are linked to the FTC’s privacy policy, at www.ftc.gov.

Appendix 1

The following accounts and/or services constitute the Google Apps, as defined in this PIA, that have been reviewed and approved by the CPO and OGC for limited official purposes in connection with the Contests.

Google product/service	Purpose	Approved Users	Controls
Gmail accounts	Contests	<ul style="list-style-type: none"> • Designated FTC staff • Contest Judges 	<ul style="list-style-type: none"> • the accounts must be used only for Contest purposes; • the accounts must not be intermingled with any personal or non-contest-related e-mails; • passwords must be strong and cannot be shared; • all materials should be treated as confidential even if some may be made public by law or otherwise; • all communications and other contents stored in the accounts shall be preserved as appropriate and shall be securely transferred to the agency at the close of the contest; • in the event staff is notified of electronic discovery in pending or reasonably anticipated litigation, for preservation purposes, no e-mails or other account contents or metadata may be deleted whatsoever until any applicable litigation hold is lifted; • the accounts shall not be deleted until any and all litigation, appeals, etc., if any, have been exhausted; • once all communications and other contents have been properly transferred to the agency at the close of the contest, the accounts must be deactivated; • and users must sign the appropriate Rules of Behavior.
Google Docs	Contests	<ul style="list-style-type: none"> • Designated FTC staff • Contest Judges 	<ul style="list-style-type: none"> • Google Docs must be used only for Contest purposes; • Google Docs must not be intermingled with any personal or non-contest-related content; • passwords must be strong and

			<p>cannot be shared;</p> <ul style="list-style-type: none">• all materials should be treated as confidential even if some may be made public by law or otherwise;• all communications and other contents stored in Google Docs shall be preserved as appropriate and shall be securely transferred to the agency at the close of the contest;• in the event staff is notified of electronic discovery in pending or reasonably anticipated litigation, for preservation purposes, no content or metadata may be deleted whatsoever until any applicable litigation hold is lifted;• the Google Docs shall not be deleted until any and all litigation, appeals, etc., if any, have been exhausted;• once all communications and other contents have been properly transferred to the agency at the close of the contest, the Google Docs must be deactivated;• and users must sign the appropriate Rules of Behavior.
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