



**Federal Trade Commission
Privacy Impact Assessment**

Hootsuite

August 2018

The Federal Trade Commission (FTC or Commission) has prepared this Privacy Impact Assessment (PIA) to analyze and explain how the FTC handles personally identifiable information (PII) about individuals that may be available to the agency through the FTC's use of the social networking management tool, Hootsuite (www.hootsuite.com).

The purpose of this PIA is: (i) to ensure that the FTC's handling of available PII conforms to applicable legal, regulatory, and policy requirements regarding privacy, (ii) to determine the risks and effects if the FTC were to collect, maintain or disseminate such information, and (iii) to examine and evaluate protections and alternative processes for handling such information to mitigate potential privacy risks. See section 208 of the E-Government Act of 2002 (E-GOV); Office of Management & Budget (OMB) Memoranda 03-22 (2003) & 10-23 (2010); OMB Circular A-130 (2017).

Hootsuite is an online platform that allows the FTC to create a "dashboard" for managing content and monitor activities on its multiple social networking profiles and accounts used to provide consumers with information about the agency's activities and programs. Using Hootsuite, the FTC can schedule and post content to multiple social media accounts and produce internal analytics reports for campaigns. As explained in this PIA, the privacy impact of the FTC's use of this platform is low, as the FTC does not routinely use Hootsuite to solicit, collect, maintain, or disseminate PII from members of the public. In specific circumstances, the FTC may collect limited information (e.g. usernames or handles) about members of the public (e.g., if messages or posts directed to the FTC or its employees on an FTC social media account managed through Hootsuite are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). Individuals who visit or interact with the FTC's Twitter, Facebook or LinkedIn accounts should carefully review each social networking Web site's terms of service and its privacy policies to understand how each social networking site may collect or use their personal information, even if the FTC does not. The FTC also suggests that individuals carefully review the Hootsuite privacy policy to understand what information Hootsuite may collect about them.

SECTION 1.0 – SPECIFIC PURPOSE OF THE FTC'S USE OF HOOTSUITE

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

As noted above, the Federal Trade Commission (FTC or Commission) uses Hootsuite, a social media content management service to create and schedule content for posting on the FTC's social media accounts, to monitor activity on these accounts (e.g., messages or posts by members of the public), and to produce analytics reports for multiple networks and profiles. The social networking accounts that the FTC may manage through Hootsuite include the agency's accounts on Twitter, Facebook and LinkedIn, which are all platforms the FTC uses to promote its information, tips and resources for consumers and others who may not be regular visitors to FTC websites.

Social media content that the FTC may manage and post through Hootsuite is generally information that already exists on FTC.gov and FTC.gov/espanol or features relevant content from the various Bureaus and Offices of the FTC.

Typical FTC social media content on Hootsuite may include, but is 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 posted by the FTC for all of the agency's social media accounts, which include:

- Twitter accounts ([@FTC](#), [@LaFTC](#), and [@MilConsumer](#))
- Facebook accounts ([Federal Trade Commission](#) and [Military Consumer](#))
- LinkedIn account ([Federal Trade Commission](#))
- Press releases, speeches, and information from the Bureau of Consumer Protection, Competition, and Economics, as well as other offices of the FTC.
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In addition, because Hootsuite allows the FTC to create “streams” to view and monitor activity or traffic on its social media accounts, the FTC will also have access to content from users who post or otherwise engage in public discussions on any or all of the social media platforms used by the FTC: Twitter, Facebook, and LinkedIn.¹ The FTC may use Hootsuite to follow discussions through specific hashtags during Twitter chats, Facebook Live events, etc.

1.2 – Is the agency's use of Hootsuite consistent with all applicable laws, regulations, and policies?

The January 21, 2009 Presidential 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 Hootsuite helps the FTC to manage and archive communication with consumers on various social media platforms, which in turn 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, or in limited instances collect, through its Hootsuite account, 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).

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

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

The FTC will have access only to PII that is already available through the FTC social media accounts that it will manage or monitor through Hootsuite. Hootsuite is not a separate social media site for disseminating content, but only allows the FTC to manage and monitor its other existing social media accounts where such content may be disseminated, collected or maintained, as described above (e.g., Facebook, Twitter, LinkedIn). Thus, if a member of the public posts a comment or message on one of the FTC's social media accounts, the FTC may access the content of that comment or message from that social media account or through Hootsuite, including the screen name or other personally identifying information of that individual.

¹ For more information, refer to the [FTC's PIAs](#) for Twitter, Facebook, and LinkedIn.

The FTC will not have access to PII about other users of Hootsuite, other than what may be publicly accessible, depending on the user's Hootsuite account privacy settings (e.g., user name or handle, profile information). (Hootsuite 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. Users interested in more information about [Hootsuite's privacy policy](#) can review it online.) Likewise, the FTC does not have access to PII that social networking sites (e.g., Twitter, Facebook, and LinkedIn) collect from users during the registration process, and as described in the FTC's PIAs for those accounts, the FTC's collection of PII from those accounts would be limited, if any, to comments or other postings to the FTC's accounts on those sites, and/or related personally identifying information (e.g., screen name or user handle).

The FTC routinely monitors FTC-related keywords on Hootsuite and its other social media pages in an effort to determine the type of public attention the FTC is generating online. However, as noted earlier, the FTC does not intend to routinely use Hootsuite to solicit, collect, maintain, or disseminate PII from members of the public. As mentioned above, the FTC may collect limited information in specific circumstances (e.g. usernames or handles) if messages or posts directed to the FTC or its employees are deemed as threatening or violent, or indicates some other potential law violation. Generally, such messages or posts would be collected directly from the specific FTC social media account itself (Twitter, Facebook, LinkedIn) and/or maintained with the individual user name or handle that identifies them, rather than through Hootsuite. Hootsuite will primarily be used to schedule the FTC's social media posts and collect general analytical reports on a regular basis including the numbers of followers, number of retweets, etc. The Hootsuite 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 this additional information.

Although the FTC may not routinely collect personally identifiable information directly from Hootsuite, users should be aware that the United States Library of Congress, through separate arrangement with Twitter, maintains 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 such as HootSuite. See the [Twitter PIA](#) for more information.

2.2 – What are the sources of PII?

As noted earlier, members of the public may be the source of PII available to the FTC, in the form of their screen name and the content of their public or private messages, comments, or other postings on the FTC's social media accounts managed through Hootsuite.² As noted earlier, the Hootsuite analytics tool automatically compiles and 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 this additional information, and to the extent that this analytics

² Although Hootsuite does not have its own internal messaging system, users can still send or receive Twitter or Facebook direct messages through Hootsuite. Messages, 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).

data is not linked or linkable to any user name or other personally identifying information, it would not PII.

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 HootSuite 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?

As mentioned above, the FTC does not intend to use Hootsuite to solicit, collect, maintain, or disseminate PII from members of the public on a routine or regular basis. In specific circumstances, the FTC may collect limited information (such as usernames or handles) if messages or posts directed to or at the FTC or its employees are deemed as threatening or violent, or indicates some other potential law violation. In these infrequent cases, this information may be shared with FTC Security and external law enforcement authorities for investigation, or, where applicable, may be used for investigational purposes within the jurisdiction of the FTC (e.g., FTC Act). Hootsuite will primarily be used by the FTC to schedule its social media posts and collect general analytical reports such as the number of visitors to FTC social media pages, number of likes, retweets, shares, etc., which would not ordinarily involve any use or dissemination of PII.

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

As noted above, the FTC does not intend to use PII made available to it through Hoosuite, except in the limited circumstances described above. As to non-PII, 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 Hootsuite to measure the overall number of followers, number of retweets, and similar statistical information to evaluate the effectiveness of the FTC’s social networking Web sites. Although the Hootsuite analytics tool automatically makes other information available to the FTC (e.g., sex, location, interests, other handles or pages followed or liked by the FTC’s followers), the FTC does not plan to collect or track this additional information, which is normally in aggregated, non-identifiable form, as noted earlier, and thus does not constitute PII.

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?

See above. As noted, in those limited instances where the FTC may collect PII (e.g., user name or handle of a member of the public) from a social media account managed through Hootsuite, that information may be shared with FTC security or other law enforcement agencies or used internally

for law enforcement investigatory purposes, if appropriate. Otherwise, PII will not be routinely collected or shared from Hootsuite.

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 Hootsuite accounts. Prior to beginning account administration, each staff member responsible for managing a social media account must sign and comply with the Commission’s internal Rules of Behavior. This form is required and compliance is monitored through the FTC’s Social Media Task Force.

The FTC’s Hootsuite account is registered using official FTC email accounts. Administrators are not permitted to use personal accounts to manage FTC Hootsuite accounts. Furthermore, FTC staff are directed to use official government devices to manage accounts when possible. OPA staff may also use the agency’s Twitter, Facebook and LinkedIn account credentials to access Hootsuite.

Finally, Hootsuite users can determine what additional personal information is made publicly available, beyond the standard information required by Hootsuite to create an account. Users can control whether their tweets and profiles are public or limited to only those they have previously approved of.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

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

Any PII collected or maintained via Hootsuite will be 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).

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

Yes. Agency records schedules are required to maintain records only for as long as necessary to comply with Federal records preservation laws and guidance to prevent over-retention. In addition, per the FTC’s own privacy policy, the FTC does not collect any unnecessary information, including PII. For engagement purposes on FTC’s social networking Web sites, when required to preserve transcripts or other social media records, the FTC generally does not collect or maintain any PII beyond an account’s handle or user name, which further 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, to the extent that the FTC does not intend to routinely use Hootsuite to solicit, collect, maintain, or disseminate PII from members of the public. Hootsuite will be used by the FTC to schedule its social media posts and collect general analytical reports such as the number of visitors to FTC social media pages, number of likes, retweets, shares, etc.

In those limited instances in which the FTC collects PII from a social media account through that account and/or through Hootsuite and incorporated into agency records and systems, agency privacy and security officials coordinate to ensure that such records and systems are securely maintained and destroyed in accordance with a risk-based approach that takes into account the data's sensitivity and applicable threats and vulnerabilities in determining the appropriate security and privacy controls.

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 noted earlier, the privacy risks are limited, since PII that may be collected by the FTC through Hootsuite from the FTC's social media accounts will ordinarily consist of public posting or comments, or in rare cases, private messages. Nonetheless, as explained earlier, the FTC limits access to the FTC's Hootsuite accounts and its other social media accounts to prevent the unauthorized collection of PII through these accounts.

As much as possible, the FTC uses information that is already publicly available on other FTC websites; thus consumers are not required to visit the agency's page via Hootsuite to access FTC information. Comparable information is posted on the FTC's official website (www.ftc.gov).

The FTC routinely reviews Hootsuite's privacy policies for any changes that may affect the FTC's use of Hootsuite 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 via Hootsuite in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974. To the extent that any PII collected through Hootsuite from the FTC's social media accounts is incorporated into agency law enforcement files or other program records, and maintained and retrieved by name or other personal identifier subject to the Privacy Act of 1974, no modification is necessary to the existing system of records or notice already published for that system. See FTC I-1, available at <https://www.ftc.gov/about-ftc/foia/foia-reading-rooms/privacy-act-systems>.

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