



**Federal Trade Commission
Privacy Impact Assessment**

**reddit
May 2015**

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

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

Reddit is a website that is a source for information that is new and popular on the web (it refers to itself as “the front page of the internet”). Users post content – links to materials, comments, etc. – and other users respond by voting (up or down) on that content. The most popular content floats to the top of reddit’s rankings and receives additional attention from reddit users because of its popularity.

The Federal Trade Commission (FTC or Commission) may use reddit to interact with consumers and to post relevant FTC business and consumer education links, press releases, blog posts, videos, graphics, and other resources to the site. Links to Commission content are generally available through FTC.gov, Consumer.ftc.gov, Consumer.gov, Business.ftc.gov, OnGuardOnline.gov, NCPW.gov and other FTC resources.

In addition, the FTC may create or participate in topic-specific communications – “subreddits” – regarding FTC rules, regulations, and other activities and initiatives. The Chairwoman, Commissioners, and other authorized FTC users host interactive Qs and As called “ask me anything” (in reddit terms, “IAmA” or “AMA”) to trigger discussions about relevant Commission news and events. Authorized FTC users may also participate in or respond to communications with other reddit users regarding the FTC.

All FTC posts on reddit are public. To ensure transparency, official FTC reddit accounts will identify the account owner/poster. At the start of an AMA session, FTC officials will provide proof of identity through photographs or links to verified social media accounts as required by reddit. All official FTC reddit accounts will represent the individual opinion of the authorized FTC user, not the opinion of the Commission.

Reddit allows the FTC to provide information, tips, and resources to users who may be not be regular visitors to FTC websites. Posts may link to existing FTC content or develop online discussions or “Q and As,” similar to what would happen if an FTC staff member was giving a speech or participating in a panel discussion.

Reddit users accumulate “karma,” a number placed next to usernames and generated by others liking and voting on a specific user’s posts. The FTC will periodically review its own account karma and may adjust its postings to focus on topics of most interest to reddit users.

The FTC will not use private messaging services available on reddit, friend users on the site, or engage in reddit activities other than those specified in this PIA. Authorized FTC users on official FTC accounts will respond only to posts relevant to the Commission, and will not vote content up or down, like, dislike, or hide comments. The FTC will not use reddit’s share function send relevant posts via email.

Reddit also creates “trophy cases” for registered users with various trophies and awards given daily by reddit online. The FTC’s goal is to provide useful and factual information to reddit users about the agency; the FTC will not consider trophies and awards when posting or engaging with users on the site.

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

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 reddit helps the FTC communicate with consumers on popular 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 through reddit, 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).

In accordance with federal guidance, including OMB Memorandum M-10-23, the FTC provides exit scripts to consumers who click on links on official FTC websites such as www.ftc.gov to go to official FTC accounts on third-party websites such as reddit.

Privacy Notice

When a Federal agency has an account on a social media site, we are required, where feasible, to post a privacy notice on the social media site itself to explain our privacy policy. See OMB M-10-23. It is not feasible for FTC to post such a notice on reddit, which does not provide any location for account holders to post biographical or other information about themselves other than their reddit postings. Users interested in learning more about the FTC’s privacy policy can read it online: <http://www.ftc.gov/ftc/privacy.shtm>. The privacy policy for reddit is posted online here: <http://www.reddit.com/help/privacypolicy>.

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

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

The FTC may read, review, or rely upon information that individuals post publicly on reddit, including comments that may appear in FTC subreddits and other reddit posts about the agency. The FTC may prepare reports or summaries of FTC-related reddit activities, including comments on FTC posts, for agency use, but the FTC does not intend to retain records of such comments or other reddit content in identifiable form except as required for Federal records retention purposes. See Section 5 below.

Although reddit content is generally available to the public without registration (excluding restricted subreddits), reddit users who wish to post links, comment, contact each other by reddit's messaging service, share links, or participate in other reddit activities must sign up for a reddit account. To register, users must provide a unique username and password; providing an email address is optional. Active usernames are publicly available, as are links to the posts that each reddit user has posted or commented on.

Reddit collects the IP address from which the account was initially created, but this information is not available to, or collected or maintained by, the FTC. Reddit also indefinitely retains email addresses used to "share" reddit links, but this is a functionality the FTC will not use.

Reddit provides an option to add friends in order to follow users' comments and subreddits on the site. Friending is unilateral (i.e., if a user "friends" the FTC, the FTC does not need to approve that action). Users release no additional information by friending someone (including the FTC) on reddit. In any event, the FTC itself will not friend other users on reddit, nor collect any information about other users who may choose to "friend" the FTC.

Reddit also offers an internal message service between reddit users and their designated reddit "friends," which could be used to collect or maintain messages, including PII of other users. The FTC will only use reddit for public conversations (i.e., public postings), and will not use the internal message service.

2.2 – What are the sources of PII?

Sources of PII potentially include information that users post about themselves to their public profiles, including username, as well as content that users post in identifiable form, such as comments on the FTC's posts. The FTC does not intend to collect or copy user profiles, and as noted above, the FTC does not intend to retain records of user comments or other content in identifiable form except as required for Federal records retention purposes.

In addition, to the extent that the FTC maintains a record of reddit posts or comments that includes PII, the FTC will redact the PII prior to saving the comment.

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 reddit 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 may collect reddit comments and associated usernames related to FTC reddit posts for reports or summaries of the FTC's reddit activity, as noted in Section 2.1, but the FTC does not

intend to use or retain records of usernames or other content in identifiable form, except as required for Federal records retention purposes and will redact PII prior to saving any comments, as noted in Section 2.2. See also Section 5, below.

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

The FTC may routinely search reddit.com for agency mentions within FTC posts on reddit and may collect comments (with usernames) for reports and summaries for agency use, as noted in Section 2.1. Authorized FTC users will not incorporate non-FTC-related links into official agency reddit account(s), or use reddit functions other than sharing links via email to ftc.gov addresses.

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?

In order to post content, users must register for a reddit account and provide a minimal amount of PII including a unique username. Usernames and posts are generally publicly available, including to unregistered visitors to reddit.com. As noted in Section 3.1, the FTC may view or collect comments and usernames about the Commission under FTC posts, but will not retain them as except as required for records retention purposes and will redact PII before saving any comments, as noted in Section 2.2. See also Section 5, below.

Official reddit accounts are available to the Chairwoman, each of the Commissioners, and the Office of Public Affairs. Only authorized staff members may administer official FTC reddit accounts.

Section 4.2 – What safeguards are in place to prevent expansion of use beyond those authorized under law and described in this PIA?

Only authorized FTC staff members will manage official FTC reddit accounts. Each FTC staff member responsible for managing a social media account must sign and comply with the Commission's internal Social Media Rules of Behavior prior to beginning account administration. This form is mandatory and compliance is monitored through the FTC's Social Media Task Force.

The FTC's reddit accounts are registered using official FTC email accounts. Administrators are not permitted to use personal accounts to manage FTC reddit accounts. Furthermore, FTC staff are directed to use FTC-authorized devices to manage their accounts, and exceptions will be considered only on a case-by-case basis.

The FTC provides best practices to staff on using reddit and requires staff to adhere to the [redditiquette](#) outlined by reddit on their site.

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 comments and/or usernames, they will be retained and disposed of in accordance with applicable schedules issued or approved by the National Archives and Records Administration (NARA). If the FTC collects general comments and usernames directed at the agency, they will also be 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 unnecessary information, including PII. On reddit, the FTC does not collect or maintain any PII beyond public usernames and content that another user might provide in FTC-specific comments to minimize possible privacy risks. In addition, to the extent that the FTC maintains an official record of reddit posts or comments on ftc.gov that include a username, the FTC will redact the username(s) or other content in identifiable form prior to saving the comment.

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 will only capture reddit usernames when necessary, in association with content that is publicly available, and will redact any PII included in comments prior to saving the comment. 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?

The [FTC has negotiated Terms of Service for its official use of reddit](#), in which reddit states that it shall exercise due diligence, using generally accepted IT security practices, to ensure that its systems are maintained and operated in a secure manner.

Users should note, however, that reddit is a third-party service that uses cookies and collects user IP addresses, as outlined in [reddit's privacy policy](#).

Users may adjust their Web browser settings to reject some or all of these cookies to avoid reddit's tracking technology, but some content may not work properly. Furthermore, pursuant to OMB Memorandum M-10-23, the FTC shall periodically review reddit's privacy policy and practices for any changes that may affect whether the FTC's use of reddit remains appropriate. At the time of this PIA, the last official update to reddit's privacy policy was April 2015, and the FTC reviewed it again in May 2015, prior to publishing this PIA.

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 reddit usernames or retrieve such data 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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