



**Federal Trade Commission  
Privacy Impact Assessment**

**Reddit**

**Reviewed & Updated April 2021**

## **SECTION 1.0 – SPECIFIC PURPOSE OF THE FTC’S USE OF APPLICATION**

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

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. In addition, the FTC may create or participate in topic-specific communications—“subreddits”—regarding FTC rules, regulations, and other activities and initiatives. Authorized FTC users may host interactive question and answer sessions called “Ask Me Anything” (in Reddit terms, “AMA” or “IAmA”) 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.

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 the official FTC account will respond only to posts relevant to the Commission, will not vote content up or down, or “like” or “dislike” comments. In rare circumstances—for instance, if a comment is inappropriate—the FTC may hide comments. The FTC will not use Reddit’s “share” function to send relevant posts via email.

### **1.2 – Is the agency’s use of the application consistent with all applicable laws, regulations, and polices?**

Yes. Former President Obama’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).

If the FTC links to Reddit from official FTC websites, the FTC will provide exit scripts to consumers alerting them that they are leaving the official agency website and going to a third-party site. Typically, when a Federal agency has an account on a social media site, the FTC is required, where feasible, to post a privacy notice on the social media site itself to explain the agency’s privacy policy. It is not feasible for the 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.

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

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

The FTC may, read, review, or rely upon information that Reddit users make available to the public or to the FTC as authorized or required by law. The privacy impact of the FTC’s use of this platform is low, as the FTC does not routinely use Reddit 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 Reddit are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). The FTC may also occasionally produce reports or summaries of its use of this social media platform that include PII posted publicly (i.e., usernames): for instance, it may do so if needed to comply with social media records retention guidelines from the National Archives and Records Administration (NARA). In such instances, the collection of PII in these summaries will be reduced as much as is feasible.

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?**

The sources of PII made available to the FTC via Reddit are Reddit users who make PII available to the public and/or to the FTC on the platform. See also 2.1 above.

### **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 does not 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?**

The FTC will use Reddit for the purposes described in 1.1 above. See also 2.1.

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

See Section 1.1 for information on Ask Me Anything (AMA) sessions. See also 2.1.

## **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?**

PII posted on the FTC’s Reddit pages is available publicly. See also 2.1 above, since in limited instances, PII posted on Reddit may need to be specifically provided to others at the agency, to other law enforcement agencies, or to NARA.

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

The FTC only maintains one official Reddit account available to staff only upon the approval of the Office of Public Affairs (OPA). Only authorized staff members, in the presence of an OPA representative, may use the official FTC Reddit account. Each staff member participating in a Reddit session must sign and comply with the Commission’s internal Rules of Behavior, prior to beginning page administration.

The FTC’s Reddit account is registered using an official FTC email account. FTC staff are not permitted to use personal accounts to manage FTC Reddit sessions. Furthermore, FTC staff are directed to use FTC-authorized devices to participate in Reddit sessions. 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**

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

In general, this does not apply, as the FTC does not routinely use Reddit to solicit, collect, maintain, or disseminate PII from members of the public. In the limited instances in which the FTC does so (see 2.1 above), any PII collected will be securely stored in accordance with FTC policy. See, for instance, the General Support System (GSS) Privacy Impact Assessment.<sup>1</sup>

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

In general, this does not apply, as the FTC does not routinely use Reddit to solicit, collect, maintain, or disseminate PII from members of the public. In the limited instances in which the FTC does so (see 2.1 above), any PII collected will be retained and disposed of in accordance with [NARA’s General Records Schedule \(GRS\) 6.4, item 020](#), Public Comments and Communications Not Requiring Formal Action, or other records schedules that may apply.

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<sup>1</sup> All FTC PIAs are available [online](#).

## **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?**

In general, this does not apply, as the FTC does not routinely use Reddit to solicit, collect, maintain, or disseminate PII from members of the public. Regarding the limited instances in which the FTC does so (see 2.1 above), privacy and security officials routinely coordinate to develop methods to secure all agency PII.

## **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?**

The privacy impact of the FTC’s use of this platform is low, as the FTC does not routinely use Reddit to solicit, collect, maintain, or disseminate PII from members of the public.

Reddit is an independent third-party social media platform that may use cookies or other tracking technology. The FTC does not have access to any cookies or tracking technology used by Reddit. If the FTC links to Reddit from an FTC website, the FTC will inform consumers (i.e., via an exit script) that they are leaving the FTC site, and that the Commission’s privacy policy no longer applies. The FTC encourages members of the public to read [Reddit’s privacy policy](#) to understand what information Reddit may be collecting from them, and to review the [Terms of Service](#) that the FTC has negotiated for its official use of Reddit.

## **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?**

No. The FTC does not collect PII from Reddit in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.