



**Federal Trade Commission  
Privacy Impact Assessment**

## **Video Hosting**

**Updated February 2017**

## **SECTION 1.0 PURPOSE**

### **1.1 – What is the specific purpose of the FTC’s use of this third-party video hosting service, and how does that fit with the agency’s broader mission?**

The Federal Trade Commission (FTC or Commission) uses a third-party video hosting service to publish, share and archive educational videos, and to broadcast events live to the public. Through the Brightcove Video Cloud and KnowledgeVision products (referred to herein individually as Brightcove and KnowledgeVision or collectively as FTC’s video hosting service), consumers have the ability to watch FTC videos and live events on a variety of devices including PCs, smartphones, tablets, and connected TVs.

Visitors to the Commission’s website can locate FTC videos from multiple access points including the homepage, news page, and more specifically, the video library available at <https://www.ftc.gov/news-events/audio-video>. Similarly, this information (where applicable) is available in Spanish at [www.ftc.gov/espanol](http://www.ftc.gov/espanol).

These videos allow the Commission to promote FTC information and resources through short and timely educational videos for consumers and businesses. Additionally, the FTC can broadcast live press events and workshops to the public.

The Brightcove video platform enables viewers to watch and share FTC content via emailed links and social networking websites. Users may opt to download these videos and/or grab code to share videos on other websites. These services are free and open to the public.

The Brightcove video platform partners with the following services to provide comprehensive FTC video services to the public:

- Knowledge Vision: Service partner used to create dual screen presentations and streaming live webcasts.
- 3PlayMedia: Service partner used to generate closed captions in English language.
- WGBH: Television service partner used to generate live captions for live events.
- DotSub: Service partner used to generate closed captions in Spanish language.
- Akamai: Content delivery network provider; all video is hosted on their servers.

### **1.2 – Is the FTC’s use of third-party video hosting consistent with all applicable laws, regulations, and policies?**

Yes. 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. In particular, live webcasts make FTC events more accessible and affordable by permitting public participation without the time and expense associated with travel and in-person attendance. Additionally, this service allows the Commission to make events available to consumers on a variety of devices, without regard to a consumer’s location, and thus maximize the Commission’s outreach efforts.

Per the Rehabilitation Act of 1973, Section 508 requirements, Closed-Captions or Transcripts are available with all FTC videos and live webcasts.

While the Brightcove platform is hosted on the cloud, all FTC videos are created and published by FTC staff, and the FTC [privacy policy](#) applies to all FTC video content unless otherwise noted. FTC staff regularly reviews the platform to ensure that any changes and/or updates continue to meet and/or exceed the FTC privacy policy and this privacy impact assessment.

Prior to watching live webcasts, users navigating from [www.ftc.gov](http://www.ftc.gov) will be shown an exit script notifying them that KnowledgeVision's privacy policy, not the FTC's, will apply to live webcasts. Furthermore, users who navigate from the webcast page to social media sites will also be shown an exit script identifying the applicable privacy policy. In both instances, users can decline to proceed to the new site.

## **SECTION 2.0 – ANY PERSONALLY IDENTIFIABLE INFORMATION (PII) AVAILABLE TO THE FTC THROUGH VIDEO SYSTEM**

### **2.1 – What information, including PII, is made available to the FTC?**

The FTC's video hosting system does not generally collect PII from viewers; however, it does use basic analytics tools to obtain viewer counts and to ensure video quality. These tools include a KnowledgeVision persistent cookie set on each browser that views an FTC live webcast. The cookie generates a random number to identify new users or returning visitors that view FTC webcasts. See Section 2.2. The cookie does not collect IP address or any other form of PII. It only functions on the FTC website and cannot be tracked or used by other websites/domains.

In addition, the FTC uses a KnowledgeVision tool, KVTrack, described in more detail in Section 2.2 below, to obtain information about the number of unique viewers who view the FTC live webcasts. This tool collects information about the viewer's interaction with the webcast as well as the viewer's IP address. It combines this information with the cookie ID of the Knowledge Vision persistent cookie described above to generate accurate counts of live webcast viewers. The FTC is not provided any individual, user-level data. The only information the vendor provides to the FTC is the number of total views and unique viewers after each live webcast.

Additionally, the Brightcove platform contains features (e.g., buttons, icons, pop-up screens) that enable consumers to "share" (notify others about) the FTC's videos through other social networking sites (e.g., Facebook). Consumers must ordinarily provide their email addresses or social networking logins as part of this social sharing process. That personal information, however, is collected by the social networking site that the consumer is using to share the FTC's video, and is not made available to or collected or maintained by the FTC or Brightcove. Furthermore, as part of this sharing process, consumers are notified that they are accessing a third-party social networking site that is not covered by the FTC's privacy policy, and that they have the option of continuing to that site, or cancelling the video sharing transaction so that their PII will not be collected by the third-party site.

Certain analytics are conducted on the server level using the Brightcove Analytics Data Collection API. Each time a user visits the FTC webpage and views a video, a user ID is generated and certain information is collected, including the name of the video viewed, the device type, the video player used, viewer engagement metrics, and course geographic information. Brightcove does not collect IP address or other individual consumer information. When the same customer visits [www.ftc.gov](http://www.ftc.gov) again to view a video, a different user ID is generated; multiple visits over time from a single user cannot be associated. Analytic reports can be pulled by the FTC on demand.

## 2.2 – What are the sources of the information?

The FTC’s video hosting service generally does not collect PII from users. The Brightcove Player used on the site to display FTC video content does not use any cookies to collect information about how users interact with the FTC video content.

For live webcasts, the KnowledgeVision Player uses a cookie to identify unique and new viewers of FTC events by assigning a unique, randomly generated number.

Cookie Name	Function	Persistence
kvViewerID	Identifies unique viewers and new viewers	Persistent for one year

In addition, KnowledgeVision uses an internal product, KVTrack, to provide the FTC with a report detailing the number of viewers for each live webcast. The KVTrack tool uses an automated collection process to gather information about a user’s interaction with the webcast, including the number of video tabs a viewer currently has open, the time the browser was last closed, video streams playing in open tabs, slides viewed in a presentation, video start times, and other data about video playtimes. This tool also collects IP address of the viewer and the cookie ID of the kvViewerID cookie to accurately count the number of live webcast viewers. After each live webcast, KnowledgeVision provides the FTC with the number of total views and unique viewers who accessed the live webcast. KnowledgeVision does not include any additional information in its report to the FTC, nor does FTC staff access any viewer-specific data. Within 48 hours after a live webcast has concluded, and once the viewer data has been provided to the FTC, KnowledgeVision will remove from its reporting tool all data collected during the webcast. Once data is removed, it is inaccessible and is no longer available for review by the vendor. The data is moved to a standard archive system that is retained until termination of the FTC’s contract with KnowledgeVision. After the data is archived, it can be recovered only if specified by the FTC. There is no technological option to fully delete the data prior to contract termination without permanently disabling the tool.

**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 Brightcove products is not a web-based interactive technology that would trigger the PRA.

Events that are webcast live may solicit comments and feedback through other FTC channels previously approved by OMB.

**SECTION 3.0 THE FTC’S INTENDED OR EXPECTED USE OF INFORMATION, INCLUDING PII**

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

Cookie and individual viewer information is not available to FTC staff. Only support teams in NeoTech Solutions and KnowledgeVision have access to this data. The data is not shared with any third parties. The data is available and stored with the vendor(s) only as long as the FTC is a customer.

See Section 2.0.

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

Per the OMB memorandum M-10-22, *Guidance for Online Use of Web Measurement and Customization Technologies*, the FTC may use web analytics to measure if the agency’s videos are engaging the public, are an appropriate length for our audiences, if videos are increasing our reach, etc. See Section 2.0 for more information.

**SECTION 4.0 SHARING OR DISCLOSING OF INFORMATION, INCLUDING PII**

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

Only approved FTC staff members from the Office of the Chief Information Officer (OCIO), the Office of Public Affairs (OPA), and the Division of Consumer and Business Education (DCBE) have access to manage videos and run analytic reports. See Section 2.0 for information about the Commission’s use of analytics.

As needed, FTC account administrators may provide Brightcove and KnowledgeVision staff access to the Commission’s video account to support production issues. This access will be limited to the time and staff necessary, and will be promptly be revoked once the issue is resolved.

The vendors are prohibited by contract from sharing any information collected on behalf of the FTC with any other party without prior notice and approval of the FTC.

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

Only approved staff members from OCIO, OPA, and DCBE have access to manage the FTC’s Brightcove and KnowledgeVision products including managing video content and running analytical reports. Each member with access to the FTC’s video platform must sign and comply with the Commission’s internal Rules of Behavior for account management.

In the event that FTC staff needs to provide Brightcove or KnowledgeVision personnel with access to the FTC’s video account for support issues, access will only be granted for the time needed, and will be immediately revoked once the issue is resolved.

### **SECTION 5.0 - MAINTENANCE AND RETENTION OF INFORMATION, INCLUDING PII**

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

The FTC will have access to the aggregate analytic data for as long as it is a customer of Brightcove and KnowledgeVision products.

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

Yes. The data will only be retained as long as the FTC is under contract with the vendor. In the case of the data collected by the KVTrack tool during live webcasts, described in Section 2.2 above, the viewer-level data will be removed from the reporting tool within 48 hours after the live webcast has concluded. Once data is removed, it is inaccessible and is no longer available for review by the vendor. The data is moved to a standard archive system that is retained until termination of the FTC’s contract with KnowledgeVision. After the data is archived, it can be recovered only if specified by the FTC. There is no technological option to fully delete the data prior to contract termination.

### **SECTION 6.0 – HOW THE AGENCY WILL SECURE INFORMATION, INCLUDING PII**

#### **6.1 – Will the FTC’s privacy and security officials coordinate to develop methods of securing information?**

The FTC follows all applicable Federal Information Security Management Act (FISMA) requirements to ensure that the video hosting solution is appropriately secured. The video hosting solution is categorized as Low using Federal Information Processing Standard (FIPS)

199, Standards for Security Categorization of Federal Information and Information Systems. To prevent any misuse of the data, the solution has auditing measures and technical safeguards commensurate with the National Institute of Standards and Technology (NIST) Recommended Security Controls for Federal Information Systems and Organizations, Special Publication (SP) 800-53, Rev. 4. Additionally, an Assessment & Authorization (A&A), including a risk assessment, was conducted and an Authorization to Operate (ATO) was granted by the FTC, prior to implementing the solution.

The FTC has limited access to the video hosting solution to select members of FTC staff from OCIO, OPA, and DCBE. Furthermore, not everyone who can access the system can add or alter materials; those rights are limited to specific users. Each FTC member with access to the system is required to fill out and comply with the FTC's Social Media Rules of Behavior and all FTC staff complete Information Security and Privacy Training annually. Vendors have limited access to the site for updates, repairs, etc.; however, their access is limited to FTC approval.

Any questions regarding the security of the system should be directed to the FTC's Chief Information Security Officer.

## **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 risks posed by this platform for individuals who view the FTC's videos are low. The analytic data collected from viewers ultimately serves to help the FTC and its vendors to deliver better quality video products. In most cases, the data collected by the vendor includes the minimum amount needed to conduct this analysis. Moreover, data is provided to the FTC in aggregate form and includes information about FTC videos such as the start and stop points of videos viewed and whether or not they were viewed in their entirety. The FTC's use of cookies through its video hosting system is outlined in this PIA and in the FTC's privacy policy.

There are two primary components to the FTC's video hosting system, a general video page with FTC videos and archives, and a live-webcast page, accessible only during live events. The general video page will adhere to the FTC's privacy policy. The live webcasts will fall under the privacy policy of the service provider, KnowledgeVision. Users viewing videos from [www.ftc.gov](http://www.ftc.gov) will be shown an exit script when accessing the live-webcast from FTC websites notifying them that a different privacy policy applies. Furthermore, they will be shown an exit script when accessing other third-party sites from the webcast page such as Facebook or Twitter. The applicable privacy policy will be easily accessible from all video-related pages.

The KVTrack tool, managed by Knowledge Vision and described in Section 2.2, collects viewer-level information about viewers of live webcasts. The vendor uses this tool to provide the FTC statistics regarding total views and number of unique views after its live webcasts. Because the KVTrack tool is automated, it collects more information than needed to provide the FTC the requested user statistics. The FTC mitigates this risk in a number of ways. First, the contract with KnowledgeVision prohibits the vendor from sharing or using information collected about



FTC webcasts for any non-FTC purpose or without the explicit consent of the FTC. Second, the FTC requires the vendor to remove all viewer statistics from the reporting tool within 48 hours of the live webcast, after the aggregate viewer numbers are shared with the FTC. Therefore, viewer statistics, which include IP address, are only accessible to the vendor for a short period of time. Third, the vendor implements technical and physical safeguards that comply with NIST 800-53, rev. 4 to protect any FTC data during the period it is retained by the vendor. See Section 6.0.

As previously outlined, consumers interacting with the FTC's videos may share links via email and/or social networking sites. Any disclosure of PII or other information, including name, email address, or logins and passwords is collected by the third-party sites used for sharing, not by the FTC. Email addresses used to send video links are used by third-party sites only for the purpose of that transaction. Consumers opting to share videos through their social networking channels will be notified prior to sharing that they are accessing a third-party service where the FTC's privacy policy does not apply. See Section 2.0 for more information.

The Brightcove Video Cloud does provide third-party advertising, but the FTC has disabled this feature for third-party ads. The FTC may use the advertising feature to provide contextual advertisements for other FTC videos available on the FTC's video platform, but this information is based solely on the current video being viewed, not on any specific information about the consumer viewing the video.

All FTC consumer and business educational videos are also available on the FTC's official YouTube channel at [www.youtube.com/ftcvideos](http://www.youtube.com/ftcvideos). Due to length restrictions, the FTC's live webcasts and press conferences are available only on FTC.gov. YouTube may use persistent tracking technologies when using their services. If a consumer is visiting FTC.gov and chooses to interact with YouTube through a link on the FTC.gov website, they immediately will be taken to an external disclaimer page and notified of the change in privacy policies. The FTC distinguishes its official channel on YouTube with agency branding such as use of an official logo and directly links to the Commission's YouTube channel from the FTC website and vice versa. More information about the FTC's use of YouTube is available in the [YouTube Privacy Impact Assessment](#).

FTC staff will continue to monitor its usage of the Brightcove products for any changes that may require revisions to this PIA and the FTC's privacy policy.

## **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 have access to PII through use of the Brightcove Video Cloud or KnowledgeVision, thus it does not create or modify a system of records under the Privacy Act of 1974.



## **SECTION 9.0 – Privacy Policy**

### **9.1 – Confirm that the collection, use, and disclosure of the information in the system has been reviewed to ensure consistency with the FTC’s privacy policy.**

The collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC privacy policy.

**APPROVAL AND SIGNATURE PAGE**

Prepared for the Business Owners of the System by:

\_\_\_\_\_  
Bruce Jennings  
Office of the Chief Information Officer

Date: \_\_\_\_\_

Review:

\_\_\_\_\_  
Jeffrey Smith  
Chief Information Security Officer

Date: \_\_\_\_\_

\_\_\_\_\_  
Alex Tang  
Office of the General Counsel

Date: \_\_\_\_\_

\_\_\_\_\_  
Katherine Race Brin  
Chief Privacy Officer

Date: \_\_\_\_\_

\_\_\_\_\_  
Jeffrey Nakrin  
Director, Records and Filings Office

Date: \_\_\_\_\_

Approved:

\_\_\_\_\_  
Raghav Vajjhala  
Chief Information Officer

Date: \_\_\_\_\_