###### PIA Template

##### THIRD-PARTY WEBSITE AND APPLICATIONS PRIVACY IMPACT ASSESSMENT

## PART I. PIA Contacts and Qualification QUESTIONS

**Contact Information**

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| **System Title**:  *Enter the name of the IT system* |
| **Office of Responsibility**:  *Enter the Service, Staff Office, or Region* |
| **Program Manager Name and Title:**  Phone:  E-mail:  Organization Title and Correspondence Code:  *Enter the information for the Program Manager/System Owner of the system* |
| **System or Project Manager/Project PIA Contact Name and Title:**  Phone:  E-mail:  Organization Title and Correspondence Code:  *Enter the information for the point of contact for the PIA*  *Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_* |
| **Authorizing Official Name and Title:**  Phone:  E-mail:  Organization Title and Correspondence Code:  *Enter the information for the Designated Approving Authority for your Service, Staff Office, or Region* |

**Note on template formatting:**  Responses to questions should replace the Explanations/Instructions in the space provided in column two.

Date PIA completed:   \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Information System Security Officer: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **Use of Third-Party Website or Application**

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| **Question** | **Explanation/Instructions** |
| 1. What is the specific purpose of the agency’s use of the third-party website or application, and how does that use fit with the agency’s broader mission? | *Agency should use plain language to disclose the purpose(s) of its use of the third-party websites or applications. Agency’s description should provide enough detail to allow the reader to gain full understanding of the purpose(s).* |
| 1. Is the agency’s use of the third-party website or application consistent with all applicable laws, regulations, and policies? | *Agency should make clear that it will comply with all applicable laws, regulations, and policies, in particular those pertaining to privacy, accessibility, information security, and records management. Provide examples showing how it will comply with policies. Agency should indicate that it will work with its counsel to ensure that its use of third-party websites and applications remains compliant.*  *The Presidents January 21, 2009 memorandum on Transparency and Open Government and the OMB Director’s December 8, 2009 Open Government Directive may serve as the primary policies underlying the agency’s efforts to use the third-party websites or applications.* |
| ***\*\*If there are no uses of PII, the agency may use a single comprehensive PIA to cover multiple websites and applications.*** | ***An agency with multiple pages on a social media website may use a single PIA to cover ALL the pages if none of the PII made available on those pages is used by the agency.***  ***Multiple applications with similar uses may be covered by a single PIA.*** |

###### PART II. Third-Party Website or Application Assessment

#### B. Use of PII

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| **Question** | **Explanation/Instructions** |
| 1. Is there any PII that is likely to become available to the agency through the use of the Third-Party website or application? | *Answer should be tailored to address the specific websites and applications being used.* |
| 2. What PII will be made available to agency? | *Registration: Many third-party websites or applications request PII at the time of registration.*  *Agencies should make clear whether they will have access to this information and*  *whether users can take steps to limit agencies’ access.*  *Submission: An individual can make information available to agencies when he or she*  *provides, submits, communicates, links, posts, or associates PII while using the third-party website or application. This can include such activities as “friend-ing,” “following,” “liking,” joining a “group,” becoming a “fan,” and comparable functions.*  *Association: Even when individuals do not actively post or submit information, they can*  *potentially make PII available to the agency by “associating” themselves with the*  *websites or applications. Such acts of association may include activities commonly referred to as “friend-ing,” “following,” “liking,” joining a “group,” becoming a “fan,” and comparable functions.*  *Accounts: Even individuals who do not have an account with a third-party website or application may make PII available to agencies if certain functions of the website or application are available to individuals without an account. Agencies should make clear whether they will have access to this information and whether users can take steps to limit agencies’ access.* |
| 2.a. What are the sources of PII? | *Please provide a detailed explanation of sources.*  *It is important to recognize that the agency may gain access to information in ways that are no obvious to users.* |
| 2.b. Do the agencies activities trigger the Paperwork Reduction Act (PRA)? | *Agency should refer to April 7, 2010 OMB memorandum entitled, Social Media, Web-Based Interactive Technologies and the Paperwork Reduction Act to determine whether the PRA will apply.* |
| 2. c. If answer to 2b is YES, please provide detail on how the agency will comply with the statute. | *This determination should be briefly explained using plain language.* |
| 2.d. How will agency use the PII as described in section 2a? | *Both current uses and potential future uses of PII should be addressed and explained using plain language.*  *Once agency has identified the PII that is likely to be made available through the use of a third-party website or application, the agency should determine whether it will use the PII for any purpose.*  *When determination is made, the agency needs to address ALL potential uses of any PII that is likely to become available to the agency. If agency decides to change these uses after the publication of the PIA, the agency will need to revise their assessment.* |
| 2.e. What types of uses will the PII be subjected to? | *Public interaction/open government activities: This could include surveys, contests, or*  *message boards that provide a forum for the public to comment on the agency’s*  *activities.*  *Recruitment and/or employee outreach: In order to recruit and hire from the widest*  *possible pool of candidates, the agency may consider using third-party websites or*  *applications to attract new hires or to inform or receive feedback from current employees.*  *Participation in agency programs or systems: The agency may consider using third-party*  *websites or applications in order to facilitate access to programs or systems. The agency should consider and address whether this use will result in the PII being combined, matched, or otherwise used in concert with PII that is already maintained by the agency.*    *Web measurement and/or customization: The agency may use third-party websites or*  *applications to conduct measurement and analysis of web usage, or to customize the*  *user’s experience.*  *The agency should consult the June 25, 2010 OMB memorandum, Guidance for Online Use of Web Measurement and Customization Technologies.* |

C. Sharing and Disclosure of PII

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| **Question** | **Explanation/Instructions** |
| 1. a. What entities or persons inside or outside the agency will the PII be share, and for what purpose will the PII be disclosed? | *The agency should describe all the entities to which any PII may be disclosed, and explain the specific authority for each type of disclosure. Explain how any disclosure will comply with applicable laws, regulations and policies. Describe any expected dissemination activities and discuss any circumstances in which PII is likely to be disclosed through agency’s activities.* |
| 1.b. What safeguards will be in place to prevent expansion of uses beyond those authorized under law and described in this PIA? | *Describe safeguards that are established to ensure that PII is used only as permitted by law. In addition, the agency should describe the safeguards that are established to ensure that they agency’s uses of PII do not exceed or differ from the precise uses as described in the PIA.* |

D. Maintenance, Retention and Securing

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| **Question** | **Explanation/Instructions** |
| 1. How will agency maintain the PII? | *Description should be detailed while using plain language.* |
| 2.a. How long will agency maintain PII? | *Retention period should be clear and reason for time period should be explained. In addition to conventional retention methods, such as inclusion in a system of records, the agency should explain any less formal methods that it may adopt.* |
| 2.b. Was the retention period established to minimize privacy risks? | *Agency should describe standards and explain why they were adopted.* |
| 3. How will the data be retrieved on third-party website or application? Can it be retrieved by personal identifier? If yes, explain. | *Explain all processes for retrieving the data. If personal identifiers (i.e. name, SSN, employee number, etc.) are used, list the identifiers.*  *Registration process should be considered.* |
| 3a. What are the potential effects on the privacy rights of individuals of:  a. Consolidation and linkage of files and systems;  b. Derivation of data;  c. Accelerated information processing and decision making; and  d. Use of new technologies.  How are the effects to be mitigated? | *Explain how the privacy rights of the individual may be protected or jeopardized based on a, b, c, and d. List all mitigation strategies used to ensure that the rights of the individuals are not compromised.* |

E. Identification and Mitigation of Other Privacy Risks

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| **Question** | **Explanation/Instructions** |
| 1.a. Do any privacy risks exist? | *Answers should be tailored to address specific websites and applications being used.*  *Privacy Risks include:*  *Disclosure of PII by Users-The agency must choose to delete or hide comments or other user interactions when a user’s sensitive information is included. Agency should provide a notice to users on the third-party site, warning individuals to avoid sharing or disclosing sensitive PII.*  *Third-Party advertising and tracking-Advertisements may contain cookies or bugs and PII may be shared by website operator with advertiser.*  *Spam, Unsolicited communications, Spyware and other threats- Users may receive spam or other unsolicited or fraudulent communication from a third party as a result of their interactions with the agency on the website. To avoid harm, users should be wary of responding to such communications.*  *Accounts or pages that misrepresent agency authority or affiliation- Certain accounts or pages on the website may not be officially authorized by or affiliated with, the agency, even if they use official insignia or otherwise appear to represent the agency or the Federal Government.*  *External links and embedded third-party applications- If the agency posts a link that leads to a third-party website or any other location that is not part of an official government domain, agency should provide notice to user to explain that users are being directed to a nongovernment website that may have different privacy policies (and risks) from those agency’s own official website.*  *Monitoring future requirements and future technology- Agency should establish and maintain procedures to identify, evaluate, and address any new additional privacy requirements that may result from new statutes, regulations or policies.*  *Agency should provide warning about these risks in a notice to users on the third-party website itself.* |
| 1. b. If the answer is YES to 1a, how will the agency mitigate those risks? | *Describe technical, managerial, and operational controls in place to ensure that data integrity and protection is maintained across sites. Also describe how data will be kept current and consistent between locations.* |
| 1.c. Have employees and contractors been trained and instructed not to solicit sensitive information when interacting with users on behalf of the agency? | *Describe any potential situation where data could be evaluated differently. List the data elements that may impact disparate treatment (i.e. race, gender, etc)* |
| 2. How does the use of this technology affect individuals’ privacy? | *Is the data more vulnerable to inadvertent or unintentional display? Does it improve the protection of the privacy data?* |
| 2a. Will this third-party website or application provide the capability to identify, locate, and monitor individuals? If yes, explain. | *Describe the rationale and processes for identifying, locating, and monitoring individuals. This can include street address, e-mail, cell phone, as well as GPS data available while using third-party website or application.* |
| 2b. Will this third-party website or application provide the capability to identify, locate, and monitor groups of people? If yes, explain. | *Describe the rationale and processes for identifying, locating, and monitoring groups of individuals. This can include street address, email, cell phone, as well as GPS data.* |
| 2c. What controls will be used to prevent unauthorized monitoring? | *Describe managerial, technical, and operational controls used to manage monitoring activities.* |
| 3. Will agency’s activities create or modify a “system of records” under the Privacy Act of 1974? | *Agency should determine whether the use of the third-party website or application will involve any records that are subject to requirements in the Privacy Act of 1974.*  *Consult OMB guidance, as well as the Department of Justice’s Overview of the Privacy Act of 1974.* |