



**Federal Trade Commission
Privacy Impact Assessment**

LinkedIn

Updated May 2019

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?

LinkedIn is a popular professional networking website. The Federal Trade Commission maintains the official [FTC LinkedIn company page](#) using an FTC-approved LinkedIn account administered by authorized FTC staff members. The official FTC LinkedIn page permits the Agency to reach users who may not be regular visitors to FTC websites. It includes links to FTC job postings on government websites and relevant FTC news and resources.

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 LinkedIn helps the FTC to 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 its LinkedIn 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).

In accordance with federal guidance, if the FTC links to LinkedIn 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 also posts a privacy notice on LinkedIn, as feasible.

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?

Users may choose to provide information about themselves on LinkedIn, such as their name, username, contact information, current and previous job experience, education, interests, links to other social media accounts, etc. Users can select additional settings to make their LinkedIn profiles partially or completely private: depending on the users’ privacy settings, some or all of the information they share on LinkedIn may be available to the FTC. While the FTC may post links to job openings at the Agency, the Commission will not collect resumes and applications through LinkedIn.

The FTC may, read, review, or rely upon information that LinkedIn 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 LinkedIn 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 LinkedIn 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.

LinkedIn provides aggregate analytic data to page administrators, called Insights, including date of visit, impressions, clicks, interactions, and new followers acquired. Insights does not reveal the individual identities or profiles of visitors to the page. Additional analytics may include reach (how many times an update is seen), and engagement (clicks, comments, and “likes”). Aggregate analytic data are used to receive feedback and potentially improve consumer experience when visiting the site. Access to Insights is limited to authorized administrators of the official FTC page.

2.2 – What are the sources of PII?

The sources of PII made available to the FTC via LinkedIn are LinkedIn 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 LinkedIn as outlined in Section 1.1 is not a web-based interactive technology involving information collection 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?

Generally, the purpose of the FTC’s company page and administrative account for that page is to disseminate information to other registered and non-registered LinkedIn users or visitors. See also 2.1 above.

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

For example, the FTC uses LinkedIn to post information about available jobs at the agency and to disseminate information about scams. See also 2.1 above.

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?

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

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 have administrative access to manage the FTC's LinkedIn accounts. Each staff member responsible for managing a social media account must sign and comply with the Commission's internal Rules of Behavior, prior to beginning account administration.

The FTC's LinkedIn Company Page is registered using an official FTC email account. Administrators are not permitted to use personal accounts to manage the FTC page. Furthermore, FTC administrators are directed to use FTC-authorized devices to manage their accounts.

The FTC also provides ethical guidance to its staff on best practices when using LinkedIn, personally and professionally, to ensure against the inadvertent collection or disclosure of nonpublic information, including personal information about themselves or other individuals.

SECTION 5.0 - MAINTENANCE AND RETENTION OF PII

Section 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 LinkedIn 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 [Data Center Privacy Impact Assessment](#).

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

In general, this does not apply, as the FTC does not routinely use LinkedIn 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.

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?

In general, this does not apply, as the FTC does not routinely use LinkedIn 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

Section 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 LinkedIn to solicit, collect, maintain, or disseminate PII from members of the public.

LinkedIn, itself, is a third-party service that may use cookies or other tracking technology. In an effort to help consumers understand how their information is used by LinkedIn, the FTC posts a privacy notice on its LinkedIn page indicating that LinkedIn’s policy rather than FTC policy applies on the site. Furthermore, if the FTC links to LinkedIn 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 [LinkedIn’s privacy policy](#) to understand what information LinkedIn may be collecting from them, and to read the [federal-compatible terms of service \(TOS\) with LinkedIn](#).

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 from LinkedIn in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.