



Adapted Privacy Impact Assessment

LinkedIn

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One PIA may be prepared to cover multiple websites or applications that are functionally comparable as long as agency or bureau practices are substantially similar across each website or application. However, any use of a third-party website or application that raises distinct privacy risks requires a complete PIA exclusive to the specific website or application. Department-wide PIAs must be elevated to the OCIO for review and approval.

SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application

1.1 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?

The Department of the Interior (DOI) will utilize LinkedIn for recruiting purposes, and to enhance visibility of DOI employment opportunities and mission. LinkedIn is a third-party social networking service used primarily for professional networking. It is available on the World Wide Web at www.linkedin.com, or through mobile applications for the iOS and Android mobile operating systems. LinkedIn permits companies, organizations and institutions, including government agencies, to establish pages. The LinkedIn career pages will assist DOI in tailoring its employer brand messaging, showcasing its mission critical occupations, and in some cases facilitating recruitment efforts by engaging users to apply for DOI positions. The Office of Communications will grant access to human resources (HR) and/or communication professionals in bureaus and offices to administer official DOI LinkedIn pages. These administrators will have access to post links to relevant position announcements and add employer branding information. Individuals interested in applying for employment opportunities will be directed to the USAJOBS.gov website to complete the application process. Resumes or other application documents are not collected through the DOI LinkedIn page.

Visitors to LinkedIn's website can view some site content, but registration is required for active participation, including connecting with other users or participating in group discussions. A registered LinkedIn user has a unique page where information can be added concerning current and past work history, professional experience, educational background, professional licenses and certifications, and more. DOI HR and/or communication professionals may have visibility to users' public profiles. For example, if a user comments on a mission critical position posted on DOI's LinkedIn page, DOI HR and/or communication professionals may review a user's public profile to determine their qualifications. Users establish their own LinkedIn network by requesting connections with other users; the connection is established when the user receiving the connection request submits a confirmation. Users can also follow specific organizations in order to receive updates and notices when new content is posted. Users may follow DOI through LinkedIn; however, DOI will not follow users.

The primary account holder is the DOI Office of Communications, which will be responsible for ensuring information posted on the Department's official LinkedIn page is appropriate and approved for public dissemination. DOI HR and/or communication offices which use LinkedIn are responsible for ensuring information posted on their official LinkedIn pages is appropriate and approved for public dissemination in accordance with applicable Federal laws, regulations, and DOI privacy, security and social media policies.



1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

Executive Order 13571, Streamlining Service Delivery and Improving Customer Service, April 11, 2011; Presidential Memorandum, "Building a 21st Century Digital Government", May 23, 2012; Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, December 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; the Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 U.S.C. 1401; OMB Circular A-130; 210 Departmental Manual 18; 110 Departmental Manual 5.

SECTION 2: Any PII that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application

2.1 What PII will be made available to the agency?

In order for users to interact with DOI on its official LinkedIn page, users must establish accounts to utilize most of the interactive features. Registration for a user account requires the submission of a first and last name, email address and password. Each registered user has a unique LinkedIn page that is compiled using a distinct numeric ID assigned to each user. Users can add large amounts of additional information to their LinkedIn page, such as address, phone number, gender, work history and experience, educational history, professional licenses and certifications, birthday, and a profile photo.

LinkedIn offers various privacy settings that permit users to control the amount of information that is displayed, including personally identifiable information (PII) that is shared with other LinkedIn users. The settings provide options for the sharing of most user content. DOI's ability to view information on an individual's LinkedIn page depends on the information the user has submitted to LinkedIn and the privacy settings selected by the user.

DOI will use LinkedIn to tailor its employer brand message, showcase its mission critical occupations, and facilitate recruitment efforts, such as posting available jobs on LinkedIn or searching for qualified candidates to advise them of available jobs at DOI. In the course of searching, PII such as, first and last name, work history, professional experience, and educational background in a user's profile may become available to DOI, if the user permits this information to be displayed based on the user's privacy settings. While potentially qualified candidates may be contacted and encouraged to apply for a job vacancy, DOI will not retain any personal information about a candidate until an application is submitted. Applications are not submitted to DOI through LinkedIn, applicants must submit information directly to USAJOBS.gov, which is a Federal government website operated by the Office of Personnel Management (OPM). Data submitted to and stored in USAJOBS.gov is covered by a separate OPM privacy impact assessment - <http://www.opm.gov/information-management/privacy-policy/privacy-policy/usajobs.pdf>. DOI may receive some personal information from individuals who have been contacted about specific positions if the individual responds



using LinkedIn's internal messaging system by either commenting on a post or sending a private message.

DOI does not collect or share PII through its use of LinkedIn. However, there may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include profile picture, first and last name, email address, address, phone number, gender, birthday, work history, professional experience, educational background, professional licenses and certifications, contents of posts or private messages, and other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

2.2 What are the sources of the PII?

Sources of PII are LinkedIn users, including members of the public and Federal employees, whose PII is made publicly available through their interaction with DOI on the official DOI LinkedIn page. This information may include profile picture, first and last name, email address, address, phone number, gender, birthday, work history, professional experience, educational background, professional licenses and certifications, and contents of posts or private messages.

2.3 Will the PII be collected and maintained by the agency?

DOI does not collect or maintain PII directly through its use of LinkedIn. If a LinkedIn user or member of the public interacts with DOI through its official LinkedIn page to post comments to mission critical occupations or request feedback on job announcements, DOI may use information provided to respond to comments or provide the requested information. DOI may review user profiles to facilitate communication and recruitment efforts, and may contact potentially qualified candidates to encourage them to apply for a job vacancy. However, these communications occur within LinkedIn, and DOI does not collect or maintain this information. Users will be directed to USAJOBS.gov to submit applications or other information.

Also, there may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include profile picture, first and last name, email address, address, phone number, gender, birthday, work history, professional experience, educational background, professional licenses and certifications, contents of posts or private messages, and other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

Any DOI bureau or office that uses LinkedIn outside the scope of this PIA or in a way that creates a system of records must complete a separate PIA for the specific use and collection of information, and must maintain the records in accordance with OPM/GOVT-1, General Personal Records, OPM/GOVT-5 Recruiting, Examining, and Placement Records, DOI-79 Interior Personnel Records, or other system notice as applicable. DOI Privacy Act system of records notices may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.



2.4 Do the agency's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, DOI will not use LinkedIn to survey members of public in any manner that would trigger the requirements of the Paperwork Reduction Act. LinkedIn users may post comments to information on the DOI LinkedIn page, but aren't specifically asked to engage in surveys or polls.

SECTION 3: The Agency's Intended or Expected Use of the PII

3.1 Generally, how will the agency use the PII described in Section 2.0?

DOI will use LinkedIn for recruiting purposes. This will include posting available jobs on LinkedIn or using LinkedIn to search for qualified candidates. In the course of searching, DOI may review user profiles, potentially qualified candidates may be contacted and encouraged to apply for a job vacancy. DOI will not retain any personal information about a candidate until an application is submitted to USAJOBS.gov, which is operated by OPM. Once an application is submitted through USAJOBS.gov for a DOI job vacancy, DOI personnel will use the PII provided in the normal course of HR functions and procedures for job recruitment. Data submitted to and stored in USAJOBS.gov is covered by a separate OPM privacy impact assessment -

<http://www.opm.gov/information-management/privacy-policy/#url=Privacy-Impact-Assessments>.

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

DOI will use LinkedIn for recruiting purposes. Users may interact with DOI through its official LinkedIn page, to include posting comments and sending private messages to DOI. When users post comments or send private messages, users' profile picture, first and last name, email address, address, phone number, gender, birthday, work history, professional experiences, professional licenses and certifications, educational background, contents of posts or private messages, and other personal information provided by the user may become available to DOI. DOI may use this information to communicate with users and provide additional or requested information. However, these communications occur within LinkedIn, and DOI does not collect or maintain this information.

In addition, DOI will post available jobs on LinkedIn or use LinkedIn to search for qualified candidates. In the course of searching, DOI may review user profiles and may have access to specific information made publicly available by the user. While potentially qualified candidates may be contacted and encouraged to apply for an open job, DOI will not retain any personal information about a candidate until an application is submitted. Applications are submitted directly to USAJOBS.gov, which is operated by OPM. Data submitted to and stored in USAJOBS.gov is covered by a separate OPM privacy impact assessment - <http://www.opm.gov/information-management/privacy-policy/privacy-policy/usajobs.pdf>.

In very unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government or the public, or a violation of DOI policy, information



may be sent to the appropriate agency officials or law enforcement organizations. This information may include profile picture, first and last name, email address, address, phone number, gender, birthday, work history, professional experience, educational background, professional licenses and certifications, contents of posts or private messages, and other personal information provided by the user.

SECTION 4: Sharing or Disclosure of PII

4.1 With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

DOI does not share information from LinkedIn interactions with third-party entities. Users that choose to apply for a career posting on LinkedIn will be directed to USAJOBS.gov to complete the application process. However, there may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or a violation of DOI policy. This information may include profile picture, first and last name, email address, address, phone number, gender, birthday, work history, professional experience, educational background, professional licenses and certifications, contents of posts or private messages, and other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

LinkedIn's Privacy Policy, https://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv, outlines how LinkedIn protects personal information.

Hootsuite or other social media application management tools may be used to manage DOI LinkedIn account posts, including reviewing responses to DOI postings or postings containing keywords that are of interest to DOI. The use of Hootsuite or similar applications is outside the scope of this PIA; a separate PIA will be prepared for any social media application management tool that DOI uses.

4.2 What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

Only approved personnel from the DOI Office of Communications, Office of Human Resources, bureaus, and offices are given access to DOI's LinkedIn accounts. Each employee with access must sign and comply with the applicable DOI Rules of Behavior. In addition, all DOI LinkedIn page maintenance is performed through official DOI LinkedIn accounts, and not the personal accounts of DOI employees.

DOI career opportunity and employer branding related information, such as interesting work, programs or initiatives of DOI entities, posted on LinkedIn by DOI is reviewed and approved for public dissemination prior to posting so any privacy risks for the unauthorized disclosure of personal data by the Department is mitigated. However, except for official postings, DOI does not control the content or privacy policy on LinkedIn. LinkedIn's privacy policy, https://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv, outlines information collected for the use of LinkedIn, how it shares information with third parties, and the choices members have regarding privacy when they become a member. There could potentially be millions of LinkedIn users who have



access to information posted on LinkedIn, including members of the general public, Federal employees, private organizations, and Federal, state, tribal and local agencies.

LinkedIn requires users to provide their first and last name, email address, and a password in order to create a LinkedIn account. Additional personal information is provided at the user's discretion. DOI has no control over access restrictions or procedures in LinkedIn, or the personal information voluntarily provided by users. LinkedIn is responsible for protecting its users' privacy and the security of users' data. LinkedIn users are subject to LinkedIn's User Agreement, Privacy Policy and Cookie Policy, and can set their own privacy settings to protect their personal information.

SECTION 5: Maintenance and Retention of PII

5.1 How will the agency maintain the PII, and for how long?

Retention periods vary as records are maintained in accordance with the applicable records schedule for each specific type of record maintained by the Department. Records published through LinkedIn represent public informational releases by the Department, and must be assessed on a case-by-case basis depending on the individual/entity releasing the information and the purpose of the release.

If records are collected as part of the application process, the records should be maintained in accordance with DRS 1.2A Short-Term Human Resources Records (DAA-0048-2013-0001-0004). The records should be retained for 3 years after the decision is made on the position or it is cancelled, and then destroyed.

Comments and input from the public must be assessed by whether they contribute to decisions or actions made by the government. In such cases where input from the public serves a supporting role, the comments must be preserved as supporting documentation for the decision made. Approved methods for disposition of records include shredding, burning, tearing, and degaussing in accordance with National Archives and Records Administration guidelines and 384 Departmental Manual 1.

5.2 Was the retention period established to minimize privacy risk?

Retention periods may vary depending on agency requirements and the subject of the records for the DOI bureau or office maintaining the records. In cases where data serves to support agency business, it must be filed with the pertinent records it supports and follow the corresponding disposition instructions. Comments used as supporting documentation will utilize the disposition instructions of the records they are filed with.

SECTION 6: How the Agency will Secure PII

6.1 Will privacy and security officials coordinate to develop methods of securing PII?

Yes. Privacy and security officials work with the Office of Communications to develop methods for protecting individual privacy and securing PII that becomes available to DOI. All employees who have access to DOI LinkedIn's page are required to take the



Federal Information System Security Awareness + Privacy and Records Management (FISSA+) training annually and sign the DOI Rules of Behavior.

6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

DOI does not collect, maintain or disseminate PII through its use of LinkedIn, except in unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include profile picture, first and last name, email address, address, phone number, gender, birthday, employment history, educational background, professional licenses and certifications, contents of posts or private messages, and other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations. Any individual applying for a position posted on LinkedIn will be directed to the appropriate job announcement on USAJOBS.gov to complete the application process, which may include submitting the application online via electronic submission or fax.

PII received through the application process on USAJOBS.gov is secured in accordance with DOI Privacy Act regulations 43 CFR 2.226 and applicable DOI privacy and security policies. Access to the DOI network is restricted to authorized users with password authentication controls, servers are located in secured facilities behind restrictive firewalls, and access to databases and files is controlled by the system administrator and restricted to authorized personnel based on official need to know. Other security controls include continuously monitoring threats, rapid response to incidents, mandatory employee security and privacy training, and rules of behavior.

SECTION 7: Identification and Mitigation of Other Privacy Risks

7.1 What other privacy risks exist, and how will the agency mitigate those risks?

The official information posted on LinkedIn by DOI has been reviewed and approved for public dissemination so any privacy risk of unauthorized disclosure of personal data by the Department is mitigated. DOI does not have any control over personal information posted by individual LinkedIn users, including members of the general public and Federal employees. DOI systems do not share data with LinkedIn.

DOI posts a privacy notice on each of its LinkedIn pages which informs the public as to how DOI handles PII that becomes available through interaction on the DOI official LinkedIn pages. The privacy notice and the DOI Privacy Policy also informs users that DOI has no control over access restrictions or privacy procedures on third-party websites, and that individuals are subject to third-party social media website privacy and security policies. DOI's linking policy informs the public that they are subject to third-party privacy policies when they leave a DOI official website to link to third party social media web sites.

LinkedIn is a private third-party website that is independently operated and controls access to user data within its system. LinkedIn users control access to their own PII, via system settings and by using discretion in terms of the PII they provide. DOI has limited



control over user content posted on DOI LinkedIn pages, except for official DOI postings. DOI LinkedIn administrators may delete comments on DOI's LinkedIn pages that are considered inappropriate.

LinkedIn uses persistent tracking technologies, including cookies, which permit LinkedIn to collect data on its users, such as information on users' interests and viewing habits. DOI recommends that LinkedIn users carefully review LinkedIn's User Agreement, Privacy Policy and Cookie Policy to understand how LinkedIn may collect or use their personal information. In the event that a user is uncomfortable with LinkedIn's User Agreement, Privacy Policy and Cookie Policy, or otherwise does not wish to use LinkedIn, most of the information posted on DOI's LinkedIn pages is readily available through other sources, including DOI websites and through other social media sites.

The General Services Administration has negotiated specific contractual terms with LinkedIn, which include a provision that third-party advertising will not appear on government agency LinkedIn pages. This limits the placement of third-party content (which has not been reviewed or approved by DOI) on DOI's LinkedIn pages. Nevertheless, DOI recommends that users exercise care and be aware of the risks associated with any third-party solicitations on LinkedIn, as these third parties may collect, use, or share the user's PII or compromise the user's computer security.

Because of the amount of PII present in typical LinkedIn accounts, the vast number of LinkedIn users, and the extent of information sharing and third-party relationships, the use of LinkedIn can pose a heightened degree of risk to users' privacy relative to other social media applications. DOI's use of LinkedIn is not expected to increase this risk, and there is no reason to believe that DOI's use of LinkedIn results in a material increase in the number of LinkedIn users or causes a material change in the behavior of LinkedIn users.

Finally, when DOI receives notice that LinkedIn's User Agreement, Privacy Policy or Cookie Policy have changed, or if there is a material change in the functionality of LinkedIn, DOI will review the changes and adjust DOI's use of LinkedIn or update this Privacy Impact Assessment as necessary.

7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of third-party website or application?

DOI has posted a privacy notice on its official LinkedIn page that informs users that LinkedIn is a non-government third-party application. It also informs users on how DOI handles PII that becomes available through user interaction. LinkedIn users are directed to the DOI Privacy Policy for information handling practices.

DOI's Privacy Policy informs the public on how DOI handles personally identifiable information that becomes available through interaction on the DOI official website. The Privacy Policy also informs the public that DOI has no control over access restrictions or privacy procedures on third-party websites and those individuals are subject to third-party social media website privacy and security policies. DOI's linking policy informs the public that they are subject to third party privacy policies when they leave a DOI official website to link to third party social media websites.



SECTION 8: Creation or Modification of a System of Records

8.1 Will the agency's activities create or modify a "system of records" under the Privacy Act of 1974?

No, DOI does not collect, maintain or disseminate PII through its use of LinkedIn and is not creating a new system of records. Users are directed to USAJOBS.gov, an OPM website to submit applications to job vacancies, and any PII collected through these applications will be maintained in accordance with applicable personnel system of records notices, which may include OPM/GOVT-1, General Personal Records, OPM/GOVT-5 Recruiting, Examining, and Placement Records, DOI-79 Interior Personnel Records, or other system notice. DOI Privacy Act system of records notices may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.

8.2 Provide the name and identifier for the Privacy Act system of records.

DOI does not collect, maintain or disseminate PII through its use of LinkedIn. Any PII collected through applications submitted on USAJOBS.gov will be maintained in accordance with applicable personnel system of records notices, which may include OPM/GOVT-1, General Personal Records, OPM/GOVT-5 Recruiting, Examining, and Placement Records, DOI-79 Interior Personnel Records, or other system notice. DOI Privacy Act system of records notices may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.