



## **Adapted Privacy Impact Assessment**

### **Snapchat**

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### **Contact**

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One Privacy Impact Assessment (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 Office of the Chief Information Officer (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?

Snapchat is a third-party image messaging and multimedia mobile application that is open to members of the public. Snapchat is developed, owned and operated by Snap Inc. Over 158 million people use Snapchat every day to share videos or photos (called a snap) with family, watch Stories from friends and publishers, view stories from other users, and see events from around the world on Snap Map or Search. Snapchat is a social media application for younger audiences, with the majority of users under 25 years old. Snaps can only be viewed once when sent privately or last 24 hours in a Story. The exception is users can choose to take a screenshot of the Snap so as to have access to that Snap in the future.

By becoming a member and using the Snapchat application, the Department of the Interior (DOI) can be more inclusive, reach new audiences and better educate the public about the DOI mission. DOI uses Snapchat to share information about DOI and its initiatives, facilitate dialogue, improve customer service, and encourage public participation and collaboration with the Snapchat community.

DOI does not actively seek personally identifiable information (PII) through the use of the Snapchat application, and will only receive minimal amounts of PII in order to fulfill a user's request for more information about DOI's Snap, which might include the username and profile photo of that user. For example, when a Snapchat user sends a snap or a chat to DOI, DOI will be able to view the content of the Snap and has access to the username and profile photo (if they have one) of that individual. DOI is a user of Snapchat and has the same level of access as other users.

DOI's official use and presence on Snapchat does not constitute an endorsement or preference for the services, products or information on Snapchat.

- 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?

Yes. The legal authorities supporting DOI's use of this networking application include:

The President's January 21, 2009 Memorandum on Transparency and Open Government; Presidential Memorandum on Building a 21st Century Digital Government, May 23, 2012; OMB M-10-06, Open Government Directive, December 8, 2009; OMB Memorandum M-10-23, Guidance for Use of Agency Third-Party Websites and Applications, June 25 2010; OMB Memorandum for the Heads of Executive Department Agencies, and Independent Regulatory Agencies, Social Media, Web-Based Interactive Technologies; 44 U.S.C. 350, the Paperwork Reduction Act of April 7, 2010; and 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?

DOI does not actively seek or collect PII from Snapchat users; however, DOI will be able to view any PII that users make available to the official DOI Snapchat account or the larger Snapchat community. DOI uses third-party social media applications to engage the public and provide content in formats that may be useful or interesting, and DOI has the same level of access to Snapchat as other users.

Snapchat users are required to provide a username in order for them to create a Snapchat account. Users may also associate a profile image in their Snapcode, their name, email address or phone number, though these aren't required. When a Snapchat user sends a text, picture or video message to DOI or adds DOI as a friend, the user's username and profile will be visible to DOI, along with content of the snap. When a Snapchat user responds to a DOI story, the user's username and profile (including first and last name, and image if they have opted to include it) will be visible to DOI. When a user submits a snap to Our Story community, their picture or video message could be viewed by the entire Snapchat community, including DOI. Users are reminded that they are using a third-party application and are subject to Snapchat's terms and policies. Users should take care when registering and selecting privacy settings to determine the level of interaction and visibility they want when posting messages, placing comments, and other information for public viewing.

When creating an account, users may provide more than the required information such as profile photo, and first and/or last name. Snapchat users can control or limit their personal information shared with other users by not sharing location with Maps, choosing who can contact them, view their story, or see their location. They can also block users.

Information provided to Snapchat during registration is not collected or used by DOI, and DOI does not ask individuals to provide personal information so as to view DOI stories. Snap Inc. does not share user information with DOI. Any information that individuals voluntarily submit as part of the registration process is not the property of DOI, and Snapchat users are subject to the Snap application owner's privacy policy and terms of service regarding use of their data and how information may be handled and shared.

DOI does not actively solicit, collect, maintain, or disseminate sensitive PII from individuals who interact on Snapchat. In very limited circumstances, DOI may receive and use the minimum amount of PII voluntarily provided by a user when necessary for the proper performance of an agency function. For example, if a user requests information or a service and provides an email address to DOI for communication of that information, DOI may use the email address to communicate for the purpose of providing information or customer service.

DOI receives notifications when a Snapchat user adds DOI as a friend or sends DOI a snap, and would be able to see the username, profile image, and photo or video shared with DOI. If a Snapchat user sends DOI a snap, DOI can view their user profile. If the user opts to use a location-based geofilter on that snap, DOI would be able to tell that user's general location. Users can limit what DOI or others see by not including personal information in their profile, by not interacting with DOI on Snapchat, or by using Snapchat's account settings.

## 2.2 What are the sources of the PII?

Any PII on Snapchat is voluntarily provided by users when they register to create an account, create stories, chat, or otherwise interact with the Snapchat community, and could be publicly available unless the user enables the privacy setting in their account.

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

DOI does not actively solicit, collect or maintain PII from individuals who interact on Snapchat. In very limited circumstances, DOI may receive and use the minimum amount of PII voluntarily provided by a user if it is necessary for the proper performance of an agency function. For example, if a Snapchat user or member of the public interacts with DOI through its official Snapchat account, including responding to a DOI story, requests information, or sends DOI a snap, the user's username as well as other information the user includes in his/her profile will become available to DOI and may be used to provide the requested information or service. In these cases DOI may use PII to provide the requested service through the Snapchat application where possible and will not collect or maintain the PII. The DOI currently uses one central DOI Snapchat account. The Digital Communication Office of the Office of Secretary oversees DOI's use of the Snapchat application and provides training on proper handling of Snapchat information before DOI bureaus or offices are permitted to use the DOI Snapchat account.

DOI requires that any DOI bureau or office that collects PII or uses Snapchat in a way that creates a system of records as defined by the Privacy Act must complete a separate PIA to address the privacy implications for the specific use and collection of information, and must maintain the records in accordance with DOI-08, Social Networks, system of records notice or other applicable system of records notice.

## 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's activities do not trigger the Paperwork Reduction Act (PRA). DOI is not using Snapchat to survey the public in any manner that would trigger the requirements of the Paperwork Reduction Act. The activities of DOI are carried out under the general solicitation exclusion of the PRA. Under the general solicitations exclusion, the PRA does not apply to notices published in the Federal Register or other publications that request public comments on proposed regulations, or any general solicitation for comments "regardless of the form or format thereof." 5 CFR 1320.3 (h)(4).

### **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's official presence on Snapchat is to promote the Department's work and provide better services to the general public, develop community engagement, and increase government transparency. DOI does not collect, maintain or disseminate PII from individuals who interact with DOI on Snapchat. DOI may use a person's username or other information provided by the user to respond to a specific comment or question directed to or about agency activities, or to fulfill a request. In such a situation, only the minimum required information that is needed to appropriately respond is used. See examples in Section 3.2 below.

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 Departmental policy. In these cases information about the user interaction, including username, name, profile photo, images, contents of postings, and other personal information available to DOI through Snapchat may be used to notify the appropriate agency officials or law enforcement organizations as required by law.

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

DOI may respond to Snapchat users' snaps to increase engagement with the Snapchat community. If Snapchat users or member of the public interact with DOI through their official Snapchat account - including commenting on a DOI story, requesting information, or sharing their snap with DOI - their username, name, profile photo, any content in that snap will become available to DOI and may be used by DOI to communicate and interact with the user or to provide information or requested services to the users.

### **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?**

Snapchat is a third-party mobile application. DOI does not collect and maintain PII from Snapchat users, or share PII with other agencies, and is not responsible for how Snapchat may access or use data posted on the platform. Users understand that whenever they share content, the entire content of the snap is available to the account they shared it with. If they share a snap with Our Story, users understand that the content could be publicly displayed and available to all visitors for viewing. Users are encouraged to exercise care when posting information on this application as information shared with the Snapchat community may be viewed by all members of the public.

Information posted on third-party social media websites and applications is considered to be public by its very nature. By choosing to post information on Snapchat's Our Story, users voluntarily choose to share information publicly. DOI does not own or control the third-party site, and accesses it as a user. The public will have access to content posted and published by DOI, and will be able to submit comments or questions about the posted content.

When a Snapchat user or member of the public interacts with DOI through its official Snapchat account by following, sharing snaps, responding to DOI stories, requesting information, or submitting feedback through Snapchat, their username, name, profile photo, and contents of postings will become available to DOI, and may be used by authorized DOI Snapchat account user internally for the purpose of communicating and interacting with the public user, or providing information or requested services to them.

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 Departmental policy. This information may include username, name, profile photo, images, contents of the posting, and other personal information available to the DOI through Snapchat, and may be used to notify the appropriate agency officials or law enforcement organizations as required by law.

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

Only approved DOI staff members will have access to manage the official DOI Snapchat account and create official postings and stories. Except for DOI Snapchat official postings, DOI does not control the content or privacy policy on Snapchat. Snap Inc. is responsible for protecting its users' privacy and the security of user data within the Snapchat application. Snapchat users are subject to the application owner's Privacy Policy and Terms of Use, and can use their own discretion with respect to the personal information they provide to Snapchat or make available to the Snapchat community.

DOI entered into Terms of Service for DOI's official use of the Snapchat application, which was negotiated by DOI's Office of the Solicitor for DOI use.

DOI employees are required to complete annual mandatory security, privacy and records management training to ensure an understanding of their responsibility to protect individual privacy and appropriately manage information.

## **SECTION 5: Maintenance and Retention of PII**

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

DOI does not actively collect or maintain PII from interactions or use of the Snapchat application. Records published through Snapchat represent public informational releases by DOI, and must be assessed on a case-by-case basis depending on the information released and the purpose of the release. Retention periods vary as records are maintained in accordance with the applicable bureau or office records schedule for each specific type of record maintained by DOI. There is no single records schedule that covers all informational releases to the public at this time.

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, pulping, erasing 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 for official postings and informational releases by DOI 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 they support and follow the corresponding disposition instructions. Comments used as supporting documentation will follow 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.

### **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 from Snapchat users, except in 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 username, name, profile photo, contents of the posting, and other personal information available to DOI through Snapchat, and may be used to notify the

appropriate agency officials or law enforcement organizations as required. In these cases PII is secured in accordance with DOI Privacy Act regulations 43 CFR part 2, subpart K, and applicable DOI privacy and security policies. Only authorized users can use the DOI Snapchat account. Access to the DOI network is restricted to authorized users with multi-factor 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, and annual mandatory employee security and privacy training. As the DOI Snapchat account owner, the Office of Communications also provides training to DOI Snapchat users to ensure information is properly handled and safeguarded.

## **SECTION 7: Identification and Mitigation of Other Privacy Risks**

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

Snapchat is a third-party mobile application that is owned and independently operated by Snap Inc. Snap Inc. controls access to user data within its system. Snapchat users are subject to Snapchat's Terms of Service and Privacy Policy. Snapchat users control access to their own PII via system settings and through discretion with respect to the personal information users provide. Accordingly, users should take care to avoid disclosing sensitive PII, which could be used by unintended persons to commit fraud or identity theft, or for other harmful or unlawful purposes. To help reduce these risks, DOI will monitor comments on its official postings to the extent practicable. DOI does not have access to information within the application and has no control over access restrictions, privacy or security procedures, or how Snapchat manages information. Users should also review Snapchat's privacy policy and Terms of Use to ensure an understanding and determine how they wish to use the Snapchat application.

Another privacy risk is third-party advertising. Snapchat displays third-party advertising in accordance with its normal course of business. None of the user data that is available to advertisers is shared with DOI, and DOI does not have access to information within the application, and does not control how Snapchat manages information or its privacy or security procedures. Risks also include spam, unsolicited communications, and other threats. Users may receive spam or other unsolicited or fraudulent communications as a result of their interactions on Snapchat. Users should avoid accepting unknown friend requests.

There is a risk that third-party accounts or content may misrepresent agency authority or affiliation. Certain third-party accounts, social media websites, or content may not be officially authorized by, or affiliated with DOI, even where they appear to represent DOI or the Federal government. Interacting with such unauthorized accounts may expose users to the privacy or security risks described above. DOI has been making every reasonable effort to label or identify its official account or page in ways that would help users distinguish it from any unauthorized accounts or pages. The DOI Snapchat account bears a verification emoji of Snap Inc. DOI will also inform Snapchat about any

unofficial accounts or pages purporting to represent DOI, seek their removal, and warn users about such accounts or pages.

There is a privacy risk associated with the use of location information. If a Snapchat user opts to use a location-based geofilter on a snap, DOI would be able to tell that user's general location. User information including the identification and location of user's mobile device that the Snapchat service provider might have access to is not shared with DOI. DOI does not collect users' location data. Users can limit what DOI or others see by not including personal information in their profile, by not interacting with DOI on Snapchat, or by using Snapchat's account settings. Snapchat users can control or limit their personal information shared with other users by not sharing location with Maps, choosing who can contact them, view their story, or see their location.

If DOI posts an external link that leads to a third-party website or any other location that is not part of an official government domain, DOI will provide notice explaining that visitors are being directed to a non-government website that may have different privacy policies (and risks) from those of DOI's official pages or website.

DOI examines the third-party applications' privacy policy to evaluate the risks and determine that the site is appropriate for DOI's use prior to using the third-party social media application. DOI will monitor any changes to the application's privacy policies and periodically reassess the risks to the extent practicable.

DOI has established procedures to identify, evaluate, and address any new additional privacy requirements that may result from new statutes, regulations, or policies. DOI will evaluate the privacy risks of any new changes to the application before continuing to use it. DOI monitors research or trends in privacy protection technologies or policies that may facilitate new approaches to avoiding or mitigating privacy risks and better protecting PII.

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

This privacy impact assessment provides notice to the public on the privacy implications for use of Snapchat. Additionally, DOI provides notice of privacy practices through its privacy policy, published system of records notice and privacy impact assessments, which are available on the DOI Privacy Program website at <https://www.doi.gov/privacy/privacy-program>.

DOI's Privacy Policy at <https://www.doi.gov/privacy> provides information on the DOI Privacy Program and privacy related policies, notices and activities, and contains information on DOI's social media policy and how DOI handles PII that becomes available through interaction with DOI. The Privacy Policy also informs the public 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 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, the Department does not collect, maintain or disseminate PII from Snapchat users, and is not creating a system of records from use of Snapchat.

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

Not applicable. DOI is not creating a system of records from use of Snapchat.