Adapted Privacy Impact Assessment

<u>Google Analytics</u>

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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?

Google Analytics is a free web-based application owned and operated by Google Inc. that generates detailed statistics about the visitors to a website. Google Analytics provides website traffic information through the use of first-party cookie(s) and a snippet of javascript on each webpage which transmits website traffic directly back to Google Analytics. However, DOI does not collect, maintain or retrieve PII, including IP addresses. Google Analytics' customers have some control over the data collected and transmitted by the cookies to Google through Google Analytics' dashboard. DOI has implemented the IP masking feature within Google Analytics to avoid the use and storage of the full IP address, which effectively masks the geographic location.

Google Analytics collects the full IP address which is then masked prior to storage and use, then provides the DOI with reports with non-identifiable aggregated information. This allows DOI to view and analyze a variety of reports about how visitors interact on official websites without identifying individual visitors. DOI uses this aggregated information to improve website management and functionality, and to improve visitor experiences and online services. The improved functionality will increase DOI's ability to disseminate information to the public and enhance communication, facilitate feedback on Department programs, promote public participation and collaboration, and increase government transparency.

The DOI Privacy Policy provides visitors with information on how to opt-out of having cookies dropped in the visitor's browser. The visitor will then be able to visit the DOI websites without information being processed on their visit.

The primary account holder is the Department of the Interior Office of Communications, which will be responsible for ensuring appropriate use of Google Analytics. DOI bureaus and offices are also responsible for ensuring appropriate use of Google Analytics on DOI bureau or office websites in accordance with applicable laws, regulations, and DOI 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 for the use of the third-party website or application?

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; OMB M-10-22, Guidance for Online Use of Web-Measurement and Customization Technologies, 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; 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?

No PII will be made available to DOI. When a visitor accesses a DOI website that has Google Analytics enabled, a tracking cookie will be installed on the visitor's computer by Google. The cookie is used to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. Google Analytics collects a visitor's full IP Address. However, DOI has expressly opted to avoid the use and storage of visitors' full IP addresses by Google Analytics, and visitor's IP addresses are masked prior to use and storage. The masking involves the truncation of the IP address. The truncated IP addresses are used by Google to provide DOI with aggregated reports concerning the general geographic areas of site visitors, but cannot be used to identify individuals. DOI receives only aggregated data reports through Google Analytics, and does not receive full or masked IP addresses.

Google Analytics is governed by Google's universal Terms of Service and Privacy Policy, and information obtained through a Google service or application, including PII, may be combined or integrated into other Google services. However, because DOI has opted to have the IP addresses masked, DOI's use of Google Analytics will not result in the collection of PII that Google can share with other applications.

2.2   What are the sources of the PII?

Sources of information are visitors to DOI websites world-wide, including members of the general public and Federal employees, and may include other government agencies and private organizations.

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

DOI does not collect, maintain or disseminate PII from visitors to DOI websites through the use of Google Analytics. Google Analytics collects a visitor's full IP Address. However, DOI has expressly opted to avoid the use and storage of visitors' full IP addresses by Google Analytics, and visitor's IP addresses are masked prior to use and storage. The masking involves the truncation of the IP address. The truncated IP address can still be used by Google to provide DOI with aggregated reports concerning the general geographic areas of site visitors, but cannot be used to identify individuals.

DOI receives only aggregated data reports through Google Analytics, and does not receive full or masked IP addresses.

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 is not using Google Analytics to survey the public or in any manner that would trigger the requirements of the Paperwork Reduction Act.

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?

No PII will be made available to DOI. Google Analytics collects the full IP address which is then masked prior to storage and use. Google provides the DOI with reports with non-identifiable aggregated information concerning the general geographic areas of site visitors, which cannot be used to identify individuals. DOI uses this aggregated information to measure and analyze website traffic in order to improve the management and functionality of DOI websites, and to improve visitor experiences and online services. The improved functionality will increase DOI's ability to disseminate information to the public, enhance communication, facilitate feedback on Department programs, promote public participation and collaboration, and increase government transparency.

DOI has implemented the IP masking feature within Google Analytics to avoid the use and storage of the full IP address, which effectively masks the geographic location. DOI has expressly chosen to opt-out of sharing information with Google and receives only aggregated data reports through Google Analytics, and does not receive full or masked IP addresses.

The primary account holder is the Department of the Interior Office of Communications, which will be responsible for ensuring the appropriate use of Google Analytics in accordance with applicable laws, regulations, and DOI policies.

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

No PII is being collected, maintained or disseminated by DOI through the use of Google Analytics. DOI obtains anonymous and aggregated web traffic information through the use of Google Analytics in order to measure and analyze website traffic to improve the management and functionality of DOI websites, and to improve visitor experiences and online services.

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?

No PII is being collected, maintained or disseminated by DOI through the use of Google Analytics. Google Analytics is a free web-based application owned and operated by Google Inc. that generates detailed statistics about the visitors to a website. Google Analytics collects information anonymously and reports website trends without identifying individual visitors. DOI obtains anonymous and aggregated web traffic information through the use of Google Analytics in order to improve the management and functionality of DOI websites, and improve visitor experiences and online services. Aggregated data will be shared with the DOI Office of Communications officials and other senior leaders in order to make decisions on how to improve website management, visitor experiences and online services.

Google Analytics is governed by Google's universal Terms of Service and Privacy Policy, and information obtained through a Google service or application, including PII, may be combined or integrated into other Google services. However, because DOI has opted to have the IP addresses masked, DOI's use of Google Analytics will not result in the collection of PII that Google can share with other applications.

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

DOI's Google Analytics account will be maintained by the Office of Communications, and only the Director of New Media and an authorized delegate will have access to the Google Analytics account and aggregated data, which is controlled through password protections.

DOI has implemented the IP masking feature within Google Analytics to avoid the use and storage of the full IP address, which effectively masks the geographic location. DOI has expressly chosen to opt-out of sharing information with Google and receives only aggregated data reports through Google Analytics, and does not receive full or masked IP addresses. Google is responsible for masking IP addresses as requested by DOI.

SECTION 5: Maintenance and Retention of PII

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

Records maintained by the Department through the use of Google Analytics are retained in accordance with Office of the Secretary Records Schedule 1403 Management and Maintenance Files. The disposition for these records is temporary. Retention of records created to test system performance, monitor system usage, update master data files, and any related or supporting documents will be destroyed 2 years after close of the calendar year, or when no longer needed for agency business, whichever is later.

DOI bureaus or offices may maintain records from the use of Google Analytics in accordance with approved bureau or office records retention schedules or General Records Schedule 20-1, Files/Records Relating to the Creation, Use, and Maintenance of Computer Systems, Applications, or Electronic Records. Disposition methods 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 vary depending on agency requirements and specific DOI bureau or office records retention schedules. The records disposition is temporary and records are destroyed when no longer needed for agency business in accordance with the applicable records schedule.

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. However, DOI does not collect, maintain or disseminate PII from Google Analytics and only receives reports containing non-identifiable aggregated information on visitor interactions with DOI websites.

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.

No PII is being collected, maintained or disseminated by DOI through the use of Google Analytics. Google Analytics is a free web-based application owned and operated by Google Inc. that generates detailed statistics about the visitors to a website. Google Analytics collects information anonymously, and reports website trends without identifying individual visitors. DOI has implemented the IP masking feature within Google Analytics to avoid the use and storage of the full IP address, which effectively masks the geographic location. DOI has expressly chosen to opt-out of sharing information with Google and receives only aggregated data reports through Google Analytics, and does not receive full or masked IP addresses. DOI obtains only anonymous and aggregated web traffic information through the use of Google Analytics in order to improve the management and functionality of DOI websites, and improve visitor experiences and online services. DOI's Google Analytics account and aggregated data will be restricted to the Office of Communications Director of New Media and an authorized delegate, and is controlled with password protection.

SECTION 7: Identification and Mitigation of Other Privacy Risks

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

DOI systems do not share data with the Google Analytics application, and DOI does not collect, maintain or disseminate PII from Google Analytics. DOI only receives reports containing non-identifiable aggregated information on visitor interactions with DOI websites. DOI's Google Analytics account will be maintained by the Office of Communications, and only the Director of New Media and an authorized delegate will have access to the Google Analytics account and aggregated data, which is controlled through password protections. Google Analytics is owned and operated by Google Inc.,

which is responsible for the effectiveness of the Google Analytics opt-out browser add-on function.

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's Privacy Policy informs the public how DOI handles information that becomes available through interactions with website visitors, and also instructs individuals how to opt-out of the Google Analytics tracking by using Google's Opt-out Browser Add-on so that information about the website visit will not be sent to Google Analytics. DOI does not endorse and makes no representation about the effectiveness of the Google Analytics Opt-out Browser Add-on. Visitors that opt out of the Google Analytics tracking can still visit the DOI website. The DOI Privacy Policy may be viewed at http://www.doi.gov/privacy.cfm.

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 from its use of Google Analytics, and only receives reports containing non-identifiable aggregated information on visitor interactions with DOI websites.

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

A system of records notice is not required as DOI does not collect, maintain or disseminate PII obtained from the use of Google Analytics. DOI only receives reports containing non-identifiable aggregated information on visitor interactions with DOI websites.