



Adapted Privacy Impact Assessment

Instagram

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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?

Instagram is a US-owned application that allows users to take photos, apply digital filters to enhance photos, and share photos using a variety of social networking services, including Instagram's mobile applications for iOS and Android operating systems, Facebook, Tumblr and Twitter. Users also have the option to use Instagram to post a photo and perform a location-based check by using Foursquare.

Users can find other Instagram users to follow by submitting their email contact list to Instagram or logging into Facebook or Twitter through Instagram. Instagram will identify all of the email contacts, Facebook friends, or Twitter followers who are Instagram users and provide the opportunity to follow those users. Instagram also has a search form that facilitates searches for other users, as well as searches for photos based on text tags associated with the photos. Photos posted on Instagram are public by default and can be viewed by all Instagram users. However, users can select to have their photos visible only to their followers. Users can like other user's photos or post comments about photos.

The Department of the Interior (DOI) established an official presence on Instagram to communicate and share photos to promote public participation and collaboration and increase government transparency. The primary account holder is the Department of the Interior Office of Communications, which will be responsible for ensuring information posted using the Department's official Instagram account is appropriate and approved for public dissemination. DOI bureaus and offices which use Instagram are responsible for ensuring information posted using their official Instagram accounts 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?

Presidential Memorandum on Transparency and Open Government, January 21, 2009; Presidential Memorandum on Building a 21st Century Digital Government, May 23, 2012; 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?

If an Instagram user or member of the public interacts with DOI through its official Instagram account, including commenting on a DOI photo, requests information or submits feedback through Instagram, their Instagram username will become available to DOI. Other personally identifiable information (PII) provided by the user, including first and last name, profile photo, images, and contents of postings, may also become available to DOI. The Department does not collect or share PII through its use of Instagram. 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 username, name, images, content of postings, and other personal information available to DOI through Instagram, 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 information are millions of Instagram users 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 through its use of Instagram. However, if an Instagram user or member of the public interacts with DOI through its official Instagram account, including commenting on a DOI photo, requests information or submits feedback through Instagram, their Instagram username will become available to DOI. Other personal information provided by the user, including first and last name, profile photo, images, and contents of postings, may also become available to DOI. The Department does not collect or share PII through its use of Instagram. 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 username, name, profile photo, images, contents of postings, and other personal information available to DOI through Instagram, and may be used to notify the appropriate agency officials or law enforcement organizations.

Any DOI bureau or office that uses Instagram 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 DOI-08, Social Networks system of records 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.

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 Instagram 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?

DOI established an official presence on Instagram to communicate and share photos, to promote public participation and collaboration, and increase government transparency. The Department does not collect or share PII through its use of Instagram. However, if an Instagram user or member of the public interacts with DOI through its official Instagram account, including commenting on a DOI photo, requests information or submits feedback through Instagram, their Instagram username, name, profile photo, images, and contents of postings will become available to DOI and may be used to communicate and interact with the user, or provide information or requested services. There may also 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 username, name, profile photo, images, contents of postings, and other personal information available to DOI through Instagram, and may be used to notify the appropriate agency officials or law enforcement organizations.

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

If an Instagram user or member of the public interacts with DOI through its official Instagram account, including commenting on a DOI photo, requests information or submits feedback through Instagram, their Instagram username, name, profile photo, images, and contents of postings will become available to DOI. Other personal information provided by the user, including first and last name, website, profile photo and bio, may also become available to DOI and may be used to communicate and interact with the user, or provide information or requested services. There may also 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 username, name, profile photo, images, contents of postings, and other personal information available to DOI through Instagram and may be used to notify the appropriate agency officials or law enforcement organizations.

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?

Instagram is a third party web site used by millions of individuals and organizations world-wide, including Federal, Tribal, State and local agencies who may have access to the data posted in Instagram. DOI does not collect PII or share PII with these other agencies and is not responsible for how they may access or use data posted on



Instagram. 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 username, name, profile photo, images, contents of postings, and other personal information available to DOI through Instagram, and may be used to notify the appropriate agency officials or law enforcement organizations.

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

Official mission related information posted on Instagram 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 Instagram. There could potentially be millions of Instagram users who have access to information posted on Instagram, including the general public, Federal employees, private organizations, and Federal, State, Tribal and local agencies.

Instagram requires users to provide a username, email address and password in order to establish an account. Usernames are visible to other Instagram users, but email addresses and passwords are not. Users, at their discretion, may add their name, profile photo, and other information to their Instagram profile. DOI has no control over the personal information provided by users. Instagram is responsible for protecting its users' privacy and the security of users' data. Instagram users are subject to Instagram's Privacy Policy and Terms of Use, and can utilize their own discretion with respect to the personal information they provide to Instagram.

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 Instagram represent public informational releases by the Department, and must be assessed on a case-by-case basis depending on the office releasing the information and the purpose of the release. 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, 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 they support 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.

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 Instagram users, 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 username, name, profile photo, images, contents of postings, and other personal information available to DOI through Instagram, and may be used to notify the appropriate agency officials or law enforcement organizations. In these cases PII is secured in accordance with DOI Privacy Act regulations 43 CFR 2.51 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, and mandatory employee security and privacy training.

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 Instagram 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 Instagram users, including members of the general public and Federal employees. DOI systems do not share data with Instagram.

Instagram is a private third party website that is independently operated and controls access to user data within its system. Instagram users control access to their own PII via system settings and through discretion with respect to the personal information they provide. DOI has the same access as any other user dependent on individual user



information disclosures, and has no control over user content posted in Instagram except for official DOI postings.

Because photos may be uploaded directly to Instagram and shared through Instagram's mobile applications or the integrated social media sites, the use of Instagram may present location-based privacy concerns when uploaded photos can be used to identify a user's location at a given point in time. Location based privacy issues are a particular issue for users who select the option to automatically create a posting in Foursquare when an Instagram photo is uploaded. Location based privacy concerns are endemic to many mobile applications, and users must exercise discretion with mobile applications.

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 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 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.

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 Instagram. Any DOI bureau or office that creates a system of records from use of Instagram will complete a separate PIA for that specific use and collection of information, and must maintain the records in accordance with DOI-08, Social Networks system of records notice, which 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 actively collect, maintain or disseminate PII obtained from the use of Instagram. Any DOI bureau or office that creates a system of records from use of Instagram will complete a separate PIA for that specific use and collection of information, and must maintain the records in accordance with DOI-08, Social Networks system of records notice which may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.