



Adapted Privacy Impact Assessment

Tumblr

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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?

Tumblr is a U.S. owned web-based application that provides a free blogging and social networking service which is used by millions of users world-wide. Tumblr users can create blog posts, exchange messages with other users, follow the posts of users of similar interests, share text, photos, videos, audio and web links, post personal profile information, and create blogs for events and for other purposes. User profiles include a username and email address, and may include visual media, lists of interests, contact information, and other personal information at the user's discretion. Tumblr users can communicate with each other and with groups through public posts, messaging and email. Video and audio can be broadcast using an online live streaming video or audio application operated by a third party to facilitate communication and increase government transparency. The Department of the Interior has no control over content in Tumblr except for official DOI postings, including personal information posted by users.

The Department of the Interior established an official presence on Tumblr to disseminate information to the public and enhance communication, to foster and share ideas, facilitate feedback on Department programs, promote public participation and collaboration, and increase government transparency. The primary account holder is the Department of the Interior Office of Communications, who will be responsible for ensuring information posted on the Department's primary official Tumblr page is appropriate and approved for public dissemination. DOI bureaus and offices are responsible for ensuring information posted on their official Tumblr page is appropriate and approved for public dissemination in accordance with applicable 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; 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 a Tumblr user or member of the public interacts with DOI on its official Tumblr website, posts comments, requests information or submits feedback from their use of Tumblr, their name, username, email address, content of messages, blogs or postings, including photos, images, videos, audio, and other personal information provided by the user may become available to DOI. The Department does not collect or share PII from the use of Tumblr, except in unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or when an employee violates DOI policy and is referred for disciplinary action. This information may include name, username, email address, photos, images, videos, audio, content of messages, blogs or postings, or other personal information provided by the user, and the appropriate agency officials or law enforcement organizations may be notified.

2.2 What are the sources of the PII?

Sources of information are Tumblr 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 actively collect, maintain or disseminate PII from users of Tumblr; however, PII may become available to DOI through interactions with Tumblr users. If a member of the public requests information or submits feedback from their use of Tumblr, their name, username, email address, contact information, photo image, video image, or the contents of messages or postings that include personal information may become available to DOI. The Department does not collect or share PII from the use of Tumblr, except in unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or when an employee violates DOI policy and is referred for disciplinary action. This information may include name, username, email address, photos, images, videos, audio, content of messages, blogs or postings, or other personal information provided by the user, and the appropriate agency officials or law enforcement organizations may be notified.

Any DOI bureau or office that uses Tumblr 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/privacy/DOI_notices.htm.

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 Tumblr 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?

The Department of the Interior uses Tumblr to disseminate information to the public and enhance communication, to foster and share ideas, facilitate feedback on Department programs, promote public participation and collaboration, and increase government transparency. Tumblr user interactions with DOI may include name, username, email address, photos, images, videos, audio, content of messages or postings, or other personal information provided by the user. This information may be used to communicate with users or provide requested information. Also, if there is evidence of criminal activity or a threat to the government, the appropriate agency officials or law enforcement organizations may be notified. This information may include name, username, email address, photos, images, videos, audio, content of messages, blogs or postings, or other personal information provided by the user.

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

If a user requests information or submits feedback from their use of Tumblr, their username, email address, image or other user provided personal information may become available and used to communicate with the individual user or provide additional information on DOI programs or mission. Also, there may be cases where there is evidence of criminal activity, a threat to the government or the public, or an employee violates DOI policy and is referred for disciplinary action. This information may include username, email address, images, videos, audio, content of messages or postings, and other user provided personal information, and the appropriate agency officials or law enforcement organizations may be notified.

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?

Tumblr is a third party social networking web application 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 Tumblr. 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 Tumblr. However, there may be cases where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violates DOI policy and is referred for disciplinary action. These incidents may include name, username, email address, photos, images, videos, audio, content of messages, blogs or postings, or other personal information provided by the user, and the appropriate agency officials or law enforcement organizations may be notified.

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 Tumblr 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.

Tumblr requires users to provide a username and an email address. Additional personal information is provided at the user's discretion. However, the provision of information and user consent applies only to terms of use for Tumblr. DOI has no control over access restrictions or procedures in Tumblr, or over content posted on Tumblr and the personal information provided by users. Tumblr is responsible for protecting its users' privacy and the security of the data in the application. Tumblr users are subject to Tumblr's Privacy Policy and Terms of Service, and can control access to their own PII, generally via decisions regarding what personal information they provide. There could potentially be millions of Tumblr users who have access to information posted on Tumblr, including the general public, Federal employees, private organizations, and Federal, State, Tribal and local agencies. DOI does not control the content or privacy policy on Tumblr, except for official DOI postings.

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 Tumblr 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. 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 Tumblr users. In unusual cases where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violates DOI policy and is referred for disciplinary action. This information may include name, username, email address, photos, images, videos, audio, content of messages, blogs or postings, or other personal information provided by the user, and the appropriate agency officials or law enforcement organizations may be notified. 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, the server is 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 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 Tumblr users, including members of general public and Federal employees. DOI systems do not share data with the Tumblr application.

Tumblr is a private third party website that is independently operated and controls access to user data within its system. Tumblr users control access to their own PII, generally via decisions regarding what personal information they provide. DOI has the same access as any other user dependent on individual user personal information disclosures and has no control over user content posted in Tumblr, except for official DOI postings. DOI may edit or remove postings by users that are deemed inappropriate or inconsistent with DOI's message or mission. However, due to the fact that Tumblr is owned and operated by a third party, DOI cannot prevent or ensure that users do not disclose PII on DOI's Tumblr website.

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 of 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.

The Department of the Interior has also posted a Privacy Notice on its official Tumblr website which informs users that Tumblr is a non-government third party application. It also informs users of how DOI handles personally identifiable information that becomes available through user interaction, and directs Tumblr users to the DOI Privacy Policy for information handling practices.

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 Tumblr. Any DOI bureau or office that creates a system of records from use of Tumblr 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/privacy/DOI_notices.htm.

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 Tumblr. Any DOI bureau or office that creates a system of records from use of Tumblr will complete a separate PIA for that specific use 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/privacy/DOI_notices.htm.