

PRIVACY IMPACT ASSESSMENT

Social Media Platforms (Social Media)

April 2014

Non-FDIC External Systems

Table of Contents

[System Overview](#)

[Personally Identifiable Information \(PII\) in Social Media Platforms](#)

[Purpose & Use of Information in Social Media Platforms](#)

[Sources of Information in Social Media Platforms](#)

[Notice & Consent](#)

[Access to Data in Social Media Platforms](#)

[Data Sharing](#)

[Data Accuracy in Social Media Platforms](#)

[Data Security for Social Media Platforms](#)

[System of Records Notice \(SORN\)](#)

[Contact Us](#)

System Overview

In order to encourage greater public participation, collaboration, and transparency, the Federal Deposit Insurance Corporation (FDIC) maintains official Corporation accounts on a variety of commercial social media websites and applications (platforms), including:

- Social Networks, including [Facebook](#) and [LinkedIn](#)
- Video Sharing Platforms, including [YouTube](#)
- Microblogs, including [Twitter](#)

The above-referenced social media platforms are designed, owned, and operated by third-party entities at no cost to the Corporation. The FDIC is one of many users of these platforms. Therefore, the Corporation does not solicit, endorse, or control the comments or opinions provided by visitors to these sites.

The purpose for the Corporation's accounts on these third-party social website is to disseminate mission-related information to the public. The Corporation does not collect, maintain, or disseminates personal information posted by visitors to these sites. The FDIC Privacy Policy does not extend to, or have authority over, the privacy policy of any commercial third-party site.

Personally Identifiable Information (PII) in Social Media Platforms

The third-party social media platforms listed above collect PII (e.g., name, date of birth, email address, etc.) from individuals in order to establish user accounts, build user profiles for registration or for other purposes. The Corporation does not solicit, receive, or have access to this user registration information.

The FDIC does not use the social media platforms listed above to solicit or collect PII from individuals. However, individuals may make information available to the Corporation when they interact with or take certain actions with respect to the FDIC's official pages on these third-party sites. If individual users visit a Corporation page on a third-party site to view content but do not otherwise interact with the page (e.g., post comments, submit messages, "friend" or "follow" the FDIC), no PII about the users will be made available to the FDIC. If users choose to "follow," "friend," or take similar actions with respect to the FDIC's official page on these third-party sites, the fact that the user made that selection will often be publicly available, depending on the policies of the third-party site. If users choose to post PII in a public area, the FDIC may review but does not collect or maintain this information. Where possible, the FDIC does not allow users to post comments on its official pages on third-party sites and reserves the right to purge any postings or comments that contain PII or that do not meet FDIC posting standards, to the extent possible. Further, the FDIC does not record or search for which users "follow," "friend," or take similar actions with respect to its official pages. Whenever possible, the FDIC elects not to have non-public information made available to it.

Individuals without social media accounts may have access to certain functions on these third-party websites and consequently may be able to transmit PII through the system, such as by commenting on images or other site content, or otherwise

submitting information. The fact that the user took this action will often be publicly available, depending on the policies of the site. As such, the Corporation will be able to view user comments posted in public areas and on the Corporation's page.

Purpose & Use of Information in Social Media Platforms

The Corporation does not collect, maintain, or disseminate PII from individuals who interact with the Corporation's pages on the third-party platforms listed above. Rather, the Corporation uses the third-party social media platforms to disseminate mission-related information to the public.

However, information posted by the public on these third-party social websites is information that is the public domain, and to the extent that any content posted indicates a violation or potential violation of law (e.g., a threat of criminal action or harm to financial institutions), the Corporation will take appropriate action, as would be taken with any other such information in the public domain.

Any information that the FDIC places on third-party social media websites or applications will also be made available through FDIC's official website (www.fdic.gov), or other official means, whenever possible. If FDIC uses social media to solicit feedback, FDIC will provide an alternative government email address where users can also submit feedback, whenever possible.

Sources of Information in Social Media Platforms

The third-party social media platforms listed above collect PII from individuals directly. The Corporation does not solicit, receive, or have access to this PII/user registration information.

Notice & Consent

The Corporation does not actively collect, solicit, maintain, or disseminate PII from individuals who interact with the Corporation's pages on third-party social media platforms. Where feasible, the Corporation posts a privacy notice on its official pages on these third-party sites. Such notice explicitly states that these third-party websites are not part of the FDIC's government-operated website (www.fdic.gov).

Additionally, the Corporation has published an Online Privacy Policy at <http://www.fdic.gov/about/privacy/policy/>, which provides notice about FDIC's use of third-party social media sites. The FDIC Privacy Policy does not extend to, or have authority over, the privacy policy of any commercial social networking sites.

Each social media platform on which FDIC currently maintains an official account is wholly owned and operated by a third-party entity. These third parties collect information from the public, such as name, date of birth, email address, etc., for registration and other purposes. The Corporation does not have access to this data.

Individuals who wish to utilize certain services provided by these social media platforms do not have the opportunity to decline to provide their personal information, nor can they consent to only particular uses of their data. Users are required to provide their personal information, such as name, date of birth, email address, etc. when registering with the social media platform to use the website services. The FDIC does not solicit or have access to this user registration information.

Access to Data in Social Media Platforms

The FDIC Chief Web Officer and a limited number of authorized FDIC personnel serve as administrators for FDIC's official social media accounts. These administrators are authorized to have access to FDIC's social media accounts for the purpose of creating/updating the Corporation's official page and for disseminating non-sensitive, mission-related information to the public. In this capacity, FDIC account administrators have the capability to view information that users elect to voluntarily post, provide, or otherwise associate with their user profiles. If users of these sites choose to provide feedback or post comments (if allowed) on the Corporation's page, the Corporation will not collect and share this information with internal parties, unless the feedback or content posted indicates a violation or potential violation of law (e.g., a threat of criminal action or harm to financial institutions). In such instances, the Corporation will take appropriate action and will share this information on a "need to know" basis with appropriate internal parties as required.

Data Sharing

Other Systems that Share or Have Access to Data in the System:

No FDIC systems currently share or have access to data in social media platforms.

System Name	System Description	Type of Information Processed
N/A	N/A	N/A

Data Accuracy in Social Media Platforms

The FDIC does not collect, maintain, or disseminate any personal data that may be posted by users on the social media platforms. As such, the Corporation cannot measure the data for accuracy, timeliness, or completeness.

Data Security for Social Media Platforms

The Corporation's decision to use the social media platforms listed above was part of a risk-based decision making process that involved input from the appropriate FDIC management officials, including the Office of Communications (OCOM), applicable Program Offices, Security, Privacy, Legal Counsel, and was approved by the

Chairman's office. The Corporation evaluated the business case and mission requirements, along with the privacy and security risks associated with utilizing social media.

Additionally, the FDIC addresses guidelines around its use of social networking websites in its Privacy Policy (<http://www.fdic.gov/about/privacy/policy/>). The Corporation does not collect, maintain, or disseminate information posted by visitors to these sites. Any PII that is posted by users to the official FDIC social media webpages will be removed, to the extent possible, by the FDIC Social Media Account Administrator. FDIC also does not endorse or control comments or opinions provided by public users of these sites. Therefore, users are directed to review the privacy policies of the third-party websites in addition to review the FDIC's Online Privacy Policy.

The FDIC consults and adheres to applicable government-wide requirements and recommendations regarding information security and privacy, such as those provided by the National Institute of Science and Technology (NIST), the Office of Management and Budget (OMB), and the Chief Information Officer (CIO) Council. In accordance with NIST and CIO guidance, the FDIC's Privacy, Security, and Legal experts coordinate with the applicable Program Offices to ensure proper interpretation and implementation of requirements for securing PII. In addition, FDIC maintains a comprehensive understanding of its information systems, information security, privacy, and legal requirements.

System of Records Notice (SORN)

The Corporation's use of the social media platforms listed above does not trigger the Privacy Act System of Records Notice requirement.

Contact Us

To learn more about the FDIC's Privacy Program, please visit:
<http://www.fdic.gov/about/privacy/>.

If you have a privacy-related question or request, email Privacy@fdic.gov or one of the [FDIC Privacy Program Contacts](#). You may also mail your privacy question or request to the FDIC Privacy Program at the following address: 3501 Fairfax Drive, Arlington, VA 22226.

