



**Federal Trade Commission
Privacy Impact Assessment**

for:

YouTube

May 2019

The Federal Trade Commission (FTC or Commission) has prepared this Privacy Impact Assessment (PIA) to analyze and explain how the FTC handles personally identifiable information (PII) about individuals that may be available to the agency through the FTC's use of the video sharing service, YouTube (www.youtube.com).

The purpose of this PIA is: (i) to ensure that the FTC's handling of available PII conforms to applicable legal, regulatory, and policy requirements regarding privacy, (ii) to determine the risks and effects if the FTC were to collect, maintain or disseminate such information, and (iii) to examine and evaluate protections and alternative processes for handling such information to mitigate potential privacy risks. See section 208 of the E-Government Act of 2002 (E-GOV); Office of Management & Budget (OMB) Memoranda 03-22 (2003) & 10-23 (2010); OMB Circular A-130 (2017).

YouTube is a video sharing website that allows users to upload, view, rate, share, report, and comment on videos, as well as subscribe to other users. As explained in this PIA, the privacy impact of the FTC's use of this platform is low, as the FTC does not routinely use YouTube to solicit, collect, maintain, or disseminate PII from members of the public. In specific circumstances, the FTC may collect limited information (e.g. usernames or handles) about members of the public (e.g., if messages or posts directed to the Commission or its employees on the FTC's YouTube pages are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). Individuals who visit or interact with the FTC's YouTube videos should carefully review YouTube's terms of service and its privacy policies to understand how the site may collect or use their personal information, even if the FTC does not.

SECTION 1.0 – SPECIFIC PURPOSE OF THE FTC'S USE OF YOUTUBE

1.1 – What is the specific purpose of the agency's use of YouTube, and how does that use fit with the agency's broader mission?

The Federal Trade Commission's (FTC) Division of Consumer and Business Education (DCBE) manages the Commission's YouTube channel featuring DCBE's educational videos, as a way to reach consumers and organizations through YouTube. As mentioned above, YouTube is a website that allows people to view and share videos across the web by sharing links and embedding the videos on blogs and websites. YouTube also allows registered users to subscribe to channels, rate and comment on videos, and communicate with other users on the site.

The FTC YouTube channel allows DCBE to promote FTC videos to consumers and organizations that may not be regular visitors to the FTC.gov website. Information posted to the YouTube channel consists of videos that already exist on FTC.gov and/or other official FTC web domains

Through the YouTube channel, DCBE promotes FTC videos to users who subscribe to the FTC channel and provide an easy way for bloggers and other news sites to use our videos on their sites. In turn, subscribers and other users share, comment on, and rate our videos for their YouTube network and for the YouTube community at large, providing a viral marketing component to our video outreach/education effort.

Currently, the FTC's YouTube channel is administered by a small number of FTC staff members). Each YouTube administrator signs the agency's Rules of Behavior for Administrators of Social Media and New Media accounts as required by the agency.

1.2 – Is the agency's use of YouTube consistent with all applicable laws, regulations, and policies?

Yes.

The January 21, 2009 Presidential memorandum on *Transparency and Open Government* and the OMB Director's December 8, 2009 *Open Government Directive* call on federal departments and agencies to harness new technologies to engage with the public. Using tools like YouTube, DCBE promotes its videos to users who subscribe to the FTC channel and provide an easy way for bloggers and other news sites to use FTC videos on their sites. In turn, subscribers and other users share, comment on, and rate the videos for their YouTube network and for the YouTube community at large, providing a viral marketing component to the Commission's video outreach/education effort. Such use of social media helps the FTC meet the federal guidance outlined in the directive and memorandum, including the goals of transparency, participation and collaboration.

With respect to the information that the FTC will disseminate, or in limited instances collect, through its YouTube account, the FTC Act authorizes the FTC to prevent unfair and deceptive acts and practices in interstate commerce and, in furtherance of this mission, to gather, compile, and make information available in the public interest. See 15 U.S.C. 45, 46(a), (f).

SECTION 2.0 – IS THERE ANY PII THAT IS LIKELY TO BECOME AVAILABLE TO THE AGENCY THROUGH THE USE OF YOUTUBE?

2.1 – What PII will be made available to the FTC?

YouTube requires users to provide information to YouTube when they register an account. However, individuals are not required to register on YouTube in order to watch FTC videos. Although some user PII may be accessible to the FTC, depending on a YouTube user's privacy settings, the FTC does not routinely collect, use, disseminate, or maintain any of this information. In specific circumstances, the FTC may collect limited information (e.g. usernames or handles) about members of the public (e.g., if messages or posts directed to the FTC or its employees on YouTube are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). The FTC may also occasionally produce reports or summaries of its use of this social media platform that include PII posted publicly (i.e., usernames): for instance, it may do so if needed to comply with social media records retention guidelines from the National Archives and Records Administration (NARA). In such instances, the collection of PII in these summaries will be reduced as much as is feasible.

YouTube collects information to create user metric reports that include aggregate information such as the number of visitors to the YouTube channel and the content they are viewing. These metric

reports, which YouTube provides to the FTC, contain aggregate information but no PII.

2.2 – What are the sources of PII?

YouTube may collect PII from individuals who register with them and who may ultimately visit or subscribe to the FTC YouTube channel. While members of the public may make PII available to the FTC (for instance, in the form of their user names and content of their comments on the Commission’s YouTube videos), the FTC does not collect, maintain, or disseminate that information, except as noted in Section 2.1 above.

2.3 – Do the FTC’s activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

Per the OMB memorandum, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, the FTC’s use of YouTube as outlined in Section 1.1 is not a web-based interactive technology that would trigger the PRA.

SECTION 3.0 – THE FTC’S INTENDED OR EXPECTED USE OF PII

3.1 – Generally, how will the agency use the PII described in Section 2.0?

As mentioned above, the FTC does not collect, disseminate, or maintain PII from individuals who subscribe or otherwise interact with its channel on YouTube, except as noted in Section 2.1 above. The web metric reports, which do not contain PII, are available on the YouTube website via the FTC administrative YouTube account and generally can be viewed only by FTC staff who serve as administrators of the page.

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

The FTC does not collect, disseminate, or maintain PII from individuals who subscribe or otherwise interact with its channel on YouTube, except as noted in Section 2.1 above. The FTC views user metric reports on the YouTube site that include aggregate information such as the number of views a video receives, the top referrers of the videos, and what demographics the viewers fall into. This information, which does not contain any PII, is used by FTC staff to analyze the effectiveness and impact of the FTC YouTube channel.

The FTC may read, review, or rely upon information that users make available to the public or to the FTC on YouTube, including comments on the channel or video pages, as authorized or required by law.

SECTION 4.0 – SHARING OR DISCLOSING OF PII

4.1 – With what entities or persons inside or outside the agency will the PII be shared, and for what purposes will the PII be disclosed?

YouTube collects PII from individuals who register with them and who may ultimately visit or subscribe to the FTC’s channel. The FTC does not collect, disseminate, or maintain this information, except as noted in Section 2.1 of this PIA. FTC staff that serve as page administrators have access to the YouTube channel. They are able to edit content on the page and see the user metric reports YouTube provides as described in 3.2.

The FTC’s YouTube channel is used to disseminate information to the general public in furtherance of the FTC’s consumer education mission. The information that the FTC posts on the page can be accessed by anyone, whether or not they are registered YouTube users or have subscribed to the channel.

4.2 – What safeguards are in place to prevent expansion of use beyond those authorized under law and described in this PIA?

Only approved FTC staff members have access to manage the FTC’s YouTube account. Each staff member responsible for managing any social media account must sign and comply with the Commission’s internal Rules of Behavior, prior to beginning account administration. The FTC’s YouTube accounts are registered using official FTC email accounts. Administrators are not permitted to use personal accounts to manage the FTC YouTube account. Furthermore, FTC staff are directed to use official government devices to manage accounts.

Visitors to YouTube do not have to be registered users of the site to view FTC videos. Furthermore, YouTube is a third-party site, and all FTC content or comparable information is available on the FTC’s websites and other resources.

Finally, YouTube users can determine what additional information of theirs is made publicly available, beyond the standard information required by YouTube to create an account. As mentioned above, the FTC does not collect, disseminate, or maintain this information, except as noted in Section 2.1 above.

SECTION 5.0 – MAINTENANCE AND RETENTION OF PII

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

In general, this does not apply, as the FTC does not routinely use YouTube to solicit, collect, maintain, or disseminate PII from members of the public. In the limited instances in which the FTC does so (see 2.1 above), any PII collected will be securely stored in accordance with FTC policy. See, for instance, the [Data Center Privacy Impact Assessment](#).

Additionally, the FTC may delete individual comments from the page if circumstances warrant.

5.2 – Was the retention period established to minimize privacy risk?

In general, this does not apply, as the FTC does not routinely use Youtube to solicit, collect, maintain, or disseminate PII from members of the public. In the limited instances in which the FTC does so (see 2.1 above), any PII collected will be retained and disposed of in accordance with [NARA's General Records Schedule \(GRS\) 6.4, item 020](#), Public Comments and Communications Not Requiring Formal Action, or other records schedules that may apply.

SECTION 6.0 – HOW THE AGENCY WILL SECURE PII

6.1 – Will the agency's privacy and security officials coordinate to develop methods of securing PII?

In general, this does not apply, as the FTC does not routinely use YouTube to solicit, collect, maintain, or disseminate PII from members of the public. Regarding the limited instances in which the FTC does so (see 2.1 above), privacy and security officials routinely coordinate to develop methods to secure all agency PII.

SECTION 7.0 – IDENTIFICATION AND MITIGATION OF OTHER PRIVACY RISKS

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

The privacy impact of the FTC's use of this platform is low, as the FTC does not routinely use YouTube to solicit, collect, maintain, or disseminate PII from members of the public.

Nonetheless, the FTC limits access to its YouTube accounts to prevent the unauthorized collection of PII through these accounts.

As much as possible, the FTC uses information that is already publicly available on other FTC websites; thus, consumers are not required to visit the agency's YouTube page to access FTC information. Comparable information is posted on the FTC's official website (www.ftc.gov).

SECTION 8.0 – 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 FTC does not collect PI via YouTube in a manner that would require the FTC to create or

modify a system of records under the Privacy Act of 1974. To the extent that any PII collected through YouTube from the FTC's own account and incorporated into agency law enforcement files or other program records, and maintained and retrieved by name or other personal identifier subject to the Privacy Act of 1974, no modification is necessary to the existing system of records or noticed already published for that system. See FTC I-1, available at <https://www.ftc.gov/about-ftc/foia/foia-reading-rooms/privacy-act-systems>.