

Flickr
PRIVACY IMPACT ASSESSMENT (PIA)



December 21, 2017

Office of Public Affairs

Section 1: System Overview

1.1 Name of Website or Application

Office of Public Affairs Flickr

1.2 Website or Application Public URL

This PIA is for the Office of Public Affairs (OPA)'s publically-facing Flickr account: <https://www.flickr.com/photos/67083337@N02>. Link is also present on [SEC's Social Media](#) page.

1.3 Actual or Requested Operational Date

Actual Date 4/1/2014
Requested Date 6/23/2016

1.4 Reason for completing PIA

New third-party website or application (existing)

Section 2: Overview and Purpose

2.1 Describe the third-party website or application and its purpose or function.

The Securities and Exchange Commission (SEC) Office of Public Affairs (OPA) uses Flickr (a third-party on-line photo and image sharing tool) to disseminate information to the general public on mission-related activities. The Flickr page allows the SEC to post images (such as photographs, videos, and graphics) for public education purposes. The vast majority of the SEC's content on Flickr is also available on existing SEC websites.

The OPA's Flickr page is available to the general public and individuals do not need to have a registered Flickr account to view the content or upload and share images to the SEC Flickr page. The OPA has disabled the ability for individuals to enter comments. Users can log in by registering with Flickr, or by using login information from their Yahoo account. Users who visit the Flickr page from within SEC are informed through exit scripts that they are leaving the SEC website and are subject to third-party policies.

The OPA does not use Flickr to collect, maintain, use, or disseminate information about individuals to include those who visit, comment, or otherwise engage with the SEC's Flickr page. Also, in accordance with the OPA Social Media Tools policy, sensitive, nonpublic information and personally identifiable information (PII) must not be posted to the SEC's social media accounts. The OPA may use Flickr to generate analytics to include, but not limited to, information about the number of subscribers and views on a Flickr page in a given time period (usually for the week). None of this analytics contains information about individuals. Depending on the user's Flickr privacy settings, the Primary Account Manager may incidentally have view only access to information about an individual (such as name, gender, profile photo, free-form biography, location/hometown, website URL and email address). This is information Flickr collects to manage their application and none of it is collected, maintained, used, or disseminated by the OPA.

The OPA Primary Account Manager is responsible for administering all social media accounts with the account provider, providing passwords and technical guidance to individual account holders and ensuring the account is regularly monitored for security issues. The OPA requires the SEC individual accounts holders to agree to abide by social media account security procedures developed in conjunction with Office of Information Technology (OIT) Security and Office of the General Counsel (OGC).

The official SEC Flickr account is documented in the federal government's [U.S. Digital Registry](#), and also linked from the [SEC's Social Media](#) webpage.

Section 3: Data Collection, Minimization, and Retention

- 3.1 What PII is likely to become available to the SEC through the use of the third-party website or application?**
 The system does not collect, maintain, use, or disseminate information about individuals.
- 3.2 What are the sources of PII?**
 No PII is collected.
- 3.3 Does the website or application use web measurement or customization technologies?**
 Yes, but SEC does not have access to any collected (PII) information (*any more than any other public users of Flickr*).
- 3.4 Can you retrieve data used, collect, or maintained data by a personal identifier?**
 No.
- 3.5 Do the SEC's activities trigger the Paperwork Reduction Act (PRA)?**
 No.

Section 4: Openness and Transparency

- 4.1 How do individuals receive notices to how their information will be collected, used, and/or shared?**
Not applicable. As stated, SEC does not collect, maintain, use, or disseminate information about individuals from Flickr.
- 4.2 With what entities or persons inside or outside the agency will the information be shared, what information is shared and for what purpose?**
Not applicable.
- 4.3 How will the SEC maintain the information, and for how long?**
Records from the SEC Flickr page fall within NARA approved records schedules. Because information is not collected, maintained, used or disseminated about individuals, there are no records containing PII.

Section 5: Security

- 5.1 How will information, including PII, be secured within the SEC?**
Not applicable.
- 5.2 Given the amount and type of data being collected, discuss what privacy risks were identified and how they were mitigated.**
Not applicable.