

**Pinterest**  
**PRIVACY IMPACT ASSESSMENT (PIA)**



**December 21, 2017**

**Office of Public Affairs**

**Privacy Impact Assessment**  
Office of Public Affairs Pinterest

**Section 1: System Overview**

**1.1 Name of Website or Application**

Office of Public Affairs Pinterest

**1.2 Website or Application Public URL**

This PIA is for the Office of Public Affairs (OPA)'s publically-facing Pinterest account: <https://www.pinterest.com/secgov>. 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 Pinterest (a web application that is a visual bookmarking tool (pinboard)) for public education purposes. Users can post their own images and videos, re-post images from other users' Pinterest collections, or "pin" images found elsewhere on the web. Users can also "follow" other users and comment on and "like" other users' pins.

The OPA uses Pinterest as an additional avenue for providing investors with investor protection information, and job seekers with job posting information, along with providing additional information about the agency's activities. The vast majority of the SEC's content on Pinterest is also available on existing SEC websites.

The OPA's Pinterest content is available to the public, and it does not require the individual to have a registered account. Users must be logged in to Pinterest to post SEC images to their own account, or submit comments or "likes" on the SEC's Pinterest page. Users can login by registering with Pinterest, or by using login information from certain social networking services such as Facebook or Twitter. Users who visit the OPA Pinterest profile 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 Pinterest to collect, maintain, use, or disseminate information about individuals to include those who visit, like, comment, or otherwise engage with the SEC's Pinterest pages. 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 collect viewer analytics available to page administrators through Pinterest analytics (such as the number of impressions and click-throughs and dislikes on the page in a given time period) that does not contain information about individuals. Depending on a user's Pinterest privacy settings, the Primary Account Manager may incidentally have view-only access to information about an individual (such as user name, user ID, and profile information) when reviewing individual's comments or managing content. This is information Pinterest 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)

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Security and Office of the General Counsel (OGC).

The official SEC Pinterest 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

**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 Pinterest.

**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 Pinterest account 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.