

**Twitter**  
**PRIVACY IMPACT ASSESSMENT (PIA)**



**December 21, 2017**

**Office of Public Affairs**

## Third Party Website or Application Privacy Impact Assessment

Office of Public Affairs Twitter

### Section 1: System Overview

#### 1.1 Name of Website or Application

Twitter

#### 1.2 Website or Application Public URL

This PIA is for the Office of Public Affairs (OPA)'s publically-facing Twitter accounts: [@SEC News](#); [@SEC Enforcement](#); [@SEC DERA](#), [@SEC Careers](#); [@SEC Investor ed](#); [@FortWorth SEC](#); [@Boston SEC](#); [@Atlanta SEC](#); [@SF SEC](#), and [@SECDiversity](#). These links are also present on [SEC's Social Media](#) page.

#### 1.3 Actual or Requested Operational Date

Actual Date 12/30/2008

Requested 7/5/2016

Date

#### 1.4 Reason for completing PIA

New third-party website or application

### 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 Twitter (a third-party social networking tool) to disseminate information and resources to individuals who may not be regular visitors to the SEC websites. Typical tweets may include, but are not limited to, information about press releases, enforcement actions, job announcements, investor education materials, and diversity initiatives to the general public. See above for the list of official SEC Twitter accounts, which are also listed on [https://www.sec.gov/opa/social\\_media.html](https://www.sec.gov/opa/social_media.html).

The SEC's Twitter profiles are available to the public, so anyone, including visitors who are not registered Twitter users, can visit the accounts and read the agency's tweets. In contrast, only registered users can post tweets on Twitter. Tweets from other users do not show up in the SEC's timeline unless retweeted by an SEC account. Users who visit any of the SEC Twitter profiles from within the 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 Twitter to collect, maintain, use, or disseminate information about individuals. 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 general analytics from Twitter on a regular basis including the numbers of followers, number of retweets, etc. The Twitter analytics tool automatically makes other information available to the SEC, including sex, location, interests, and other handles the SEC's followers follow; however, the OPA does not collect, maintain, use or disseminate this information. Depending on a user's Twitter privacy settings, the Primary Account Manager may incidentally have view-only access to information about an individual (such as name, Twitter handle, location and any additional information users post in their biography) when reposting a Twitter user's tweet on the SEC page; or from viewing users' public profiles. This is information Twitter 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 technical guidance to individual account holders, and ensuring that the account is regularly monitored for security issues. The OPA requires the SEC individual accounts holders to agree to

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abide by social media account security procedures developed in conjunction with Office of Information Technology (OIT) Security and Office of the General Counsel (OGC). Generally, all the information available to the SEC through user engagement such as following, unfollowing or mentioning is also publicly available to anyone visiting Twitter.com.

All official SEC Twitter accounts are verified by Twitter, (as indicated by the blue checkmark on account profiles), 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 information (*any more than any other public users of Twitter*).

#### 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 Twitter.

#### 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 Twitter profiles 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.