

U.S. Securities and Exchange Commission

**Instagram
PRIVACY IMPACT ASSESSMENT (PIA)**



March 7, 2025

Office of Public Affairs

Publication History

Revision	Date	Changes Made
Initial	10/13/2021	Original Document
1	3/7/2025	Updated for compliance with E.O. 14168

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Section 1: System Overview

1.1 Name of Website or Application

Office of Public Affairs Instagram

1.2 Website or Application Public URL

This PIA is for the Office of Public Affairs (OPA)'s publicly-facing Instagram account: <https://www.instagram.com/secgov>. Link is also present on [SEC's Social Media](#) page.

1.3 Actual or Requested Operational Date

Actual Date 9/21/2021
Requested 10/14/2021
Date

1.4 Reason for completing PIA

- ☒ New third-party website or application
- ☐ Significant modification to an existing 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) will use Instagram, a third-party social networking web application, for public educational purposes. We will be posting photos, videos, and graphics on Instagram. We will also be posting on Instagram using various features including the following: Instagram TV, Instagram Stories, Instagram Live and Instagram Reels. We intend to use Instagram Direct and Instagram Live and other Instagram features, consistent with SECR-18 – Social Media Policy.

Instagram allows users to upload media that can be edited with filters and organized by hashtags and geographical tagging. Users can browse other users' content by tags and locations and view trending content. Users can "like" photos and videos and other posts and follow other users to add their content to a "feed." The SEC will not be commenting on "likes" and other content posted by Instagram users.

We will generally not be using Instagram Direct, a feature that lets users interact through private messaging. However, we will be using Instagram Direct for setting up a "Live" event where Instagram followers can view a "Live" SEC event. In this situation, those Instagram followers watching the "Live" Instagram account will comment and we will respond to select comments, as a speaker would at a live presentation.

The SEC will be using Instagram Stories, which is a feature that allows users to take photos and videos, add effects and layers, and add them to their Instagram story. Images uploaded to a user's story expire after 24 hours on the public site but for records management purposes, the SEC would retain a record of the Instagram story. Though sometimes, one can permanently add some of the Story posts to Instagram Story Highlights, which appears at the top of the account if/once added to a Story Highlight. The SEC would also use Boomerang (similar to a Gif that loops every couple of seconds) and Superzoom (which zooms in on an object) and add polling stickers and "other interactive features" to our "Stories" to share and get feedback. We intend to use this feature consistent with OMB PRA requirements. Videos will be uploaded to Instagram using Instagram TV and Instagram Reels, both are different methods of posting different types of videos. For example, Instagram TV videos are typically over a minute in length and are sized as 16x9 videos, whereas Instagram Reels are short videos and are sized as 9x16 videos.

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The SEC will use Instagram as an additional avenue for providing investors with investor protection information, information about the Agency’s activities, and information about the Chair’s activities, speeches, and regulatory priorities. The vast majority of the SEC’s content on Instagram will be also available on existing SEC websites and other social media platforms.

Instagram content is available to the public, and it does not require the individual to have a registered account. Users must be logged in to Instagram to share SEC images to their own account, or submit comments or “likes” on the SEC’s Instagram page. Users can login by registering with Instagram, or by using login information from certain social networking services such as Facebook. Users who visit the SEC’s Instagram profile from within SEC.gov are informed through exit scripts that they are leaving the SEC website and are subject to third-party policies.

The SEC does not use Instagram to collect, maintain, use, or disseminate information about individuals to include those who visit, like, comment, or otherwise engage with the SEC’s Instagram pages. In accordance with SECR 18-3, sensitive, nonpublic information and personally identifiable information (PII) must not be posted to the SEC’s social media accounts. The SEC may collect viewer analytics available to page administrators through Instagram analytics (such as the number of impressions and click-throughs and likes on the page in a given time period) that does not contain information about individuals. Depending on a user’s Instagram privacy settings, the Primary Account Manager may incidentally have view-only access to information about an individual (such as user name, user ID, location, and profile information, such as email address, gender, and biography) when reviewing an individual’s comments or managing content. The SEC may view generic user data collected by Instagram using an analytics tool, called Insights. This is information Instagram collects to manage their application and none of it is collected, maintained, used, or disseminated by the SEC.

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 SEC 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 Instagram account will be 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.

Identifying Numbers

- | | | |
|---|--|---|
| <input type="checkbox"/> Social Security Number | <input type="checkbox"/> Alien Registration | <input type="checkbox"/> Financial Accounts |
| <input type="checkbox"/> Taxpayer ID | <input type="checkbox"/> Driver’s License Number | <input type="checkbox"/> Financial Transactions |
| <input type="checkbox"/> Employee ID | <input type="checkbox"/> Passport Information | <input type="checkbox"/> Vehicle Identifiers |
| <input type="checkbox"/> File/Case ID | <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Employer ID |
| <input type="checkbox"/> Other: | | |

General Personal Data

- | | | |
|-------------------------------|--|---|
| <input type="checkbox"/> Name | <input type="checkbox"/> Date of Birth | <input type="checkbox"/> Marriage Records |
|-------------------------------|--|---|

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- | | | |
|---|--|--|
| <input type="checkbox"/> Maiden Name | <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Financial Information |
| <input type="checkbox"/> Alias | <input type="checkbox"/> Home Address | <input type="checkbox"/> Medical Information |
| <input type="checkbox"/> Sex | <input type="checkbox"/> Telephone Number | <input type="checkbox"/> Military Service |
| <input type="checkbox"/> Age | <input type="checkbox"/> Email Address | <input type="checkbox"/> Mother's Maiden Name |
| <input type="checkbox"/> Race/Ethnicity | <input type="checkbox"/> Education Records | <input type="checkbox"/> Health Plan Numbers |
| <input type="checkbox"/> Civil or Criminal History | <input type="checkbox"/> Zip Code | |
| <input type="checkbox"/> Other: Click here to enter text. | | |

Work-Related Data

- | | | |
|---|---|--|
| <input type="checkbox"/> Occupation | <input type="checkbox"/> Telephone Number | <input type="checkbox"/> Salary |
| <input type="checkbox"/> Job Title | <input type="checkbox"/> Email Address | <input type="checkbox"/> Work History |
| <input type="checkbox"/> Work Address | <input type="checkbox"/> Certificate/License Number | <input type="checkbox"/> Business Associates |
| <input type="checkbox"/> PIV Card Information | <input type="checkbox"/> Fax Number | |
| <input type="checkbox"/> Other: Click here to enter text. | | |

Distinguishing Features/Biometrics

- | | | |
|---|---|--|
| <input type="checkbox"/> Fingerprints | <input type="checkbox"/> Photographs | <input type="checkbox"/> Genetic Information |
| <input type="checkbox"/> Voice Recording | <input type="checkbox"/> Video Recordings | <input type="checkbox"/> Voice Signature |
| <input type="checkbox"/> Other: Click here to enter text. | | |

System Administration/Audit Data

- | | | |
|---|--|--|
| <input type="checkbox"/> User ID | <input type="checkbox"/> Date/Time of Access | <input type="checkbox"/> ID Files Accessed |
| <input type="checkbox"/> IP Address | <input type="checkbox"/> Queries Ran | <input type="checkbox"/> Contents of Files |
| <input type="checkbox"/> Other: Click here to enter text. | | |

3.2 What are the sources of PII?

- ☐ Members of the Public (*however, Instagram collects any PII inputted by author; SEC does not collect or use PII*).
- ☐ SEC Employees/Contractors
- ☒ No PII is collected.

3.3 Does the website or application use web measurement or customization technologies?

- ☐ No.
- ☒ Yes, but SEC does not have access to any collected (PII) information (any more than any other public users of Instagram).
- ☐ Yes, SEC has access to the collected information from (*check all that apply*):
 - ☐ Single-Session Technologies
 - ☐ Multi-Session Technologies without the collection of PII
 - ☐ Multi-Session Technologies with the collection of PII

3.4 Can you retrieve data used, collect, or maintained data by a personal identifier?

- ☒ No.
- ☐ Yes, a SORN is in progress.
- ☐ Yes, there is an existing SORN.
If a SORN exists please cite to SORN here.

3.5 Do the SEC's activities trigger the Paperwork Reduction Act (PRA)?

- ☐ No.

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- ☒ Yes. We anticipate using Instagram's "polling" feature, in such cases, OPA would coordinate with OGC and OIT to determine if Instagram polls were appropriate for generic clearance for timely feedback on service delivery as outlined in OMB Memorandum, New Fast-Track Process for Collecting Service Delivery Feedback Under the Paperwork Reduction Act (June 15, 2011, M-11-26). The SEC's use of Instagram's "polling" feature would be within this generic PRA clearance process and not for the purpose of informing significant policy or resource allocation decisions, publication, or basic research that does not benefit the Agency's service delivery.
- Otherwise, per OMB memorandum, Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act (April 7, 2010), the SEC's use of Instagram is not a web-based interactive technology that would trigger the PRA.
- https://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/SocialMediaGuidance_04072010.pdf

Section 4: Openness and Transparency

4.1 How do individuals receive notices to how their information will be collected, used, and/or shared?

The SEC does not routinely use Instagram to collect, maintain, use, or disseminate PII about individuals. Instagram may collect PII from individuals but the SEC does not collect PII beyond identifying information, which is shared through Instagram comments and features. If individuals voluntarily share PII when they comment on an SEC Instagram posted photo or video, they have voluntarily provided this information on an Instagram platform subject to Instagram terms, and conditions. The SEC website will clearly convey that the user is leaving the SEC website and subject to Instagram's terms of service and privacy. The SEC, however, will also caution individuals visiting the SEC's Instagram account that they are now on Instagram and should not share their sensitive PII, such as a Social Security number, in Instagram comments and that PII will be moderated in accordance with the SEC's comment and posting policy. However, if SEC OPA decides to use Instagram's polling feature, the SEC would comply with requirements outlined in OMB Memorandum, New Fast-Track Process for Collecting Service Delivery Feedback Under the Paperwork Reduction Act (June 15, 2011, M-11-26).

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?

The SEC does not share Instagram information internally or externally as a result of using its Instagram account. However, if SEC OPA decides to use Instagram's polling feature, the SEC would comply with requirements outlined in OMB Memorandum, New Fast-Track Process for Collecting Service Delivery Feedback Under the Paperwork Reduction Act (June 15, 2011, M-11-26).

4.3 How will the SEC maintain the information, and for how long?

Record retention for the SEC Instagram account follows NARA approved records schedules GRS 6.4 Item 020 and DAA-GRS-2016-0005-0002 (formerly OPA Records Schedule 1c(1)). The majority of the records will be "temporary records" because they will reiterate or highlight information previously or simultaneously released that is federal record and should be deleted/destroyed when one year old. Records that convey unique information (unlikely) are unscheduled and maintained as permanent records.

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In the event OPA chooses to use the Instagram polling feature, OPA will work with the Office of Records Management and NARA to determine the records schedule for records containing information obtained using the Instagram polling.

Section 5: Security

5.1 How will information, including PII, be secured within the SEC?

Given that the SEC is an Instagram user only and does not own Instagram data records, the SEC does not provide security for Instagram information. The SEC OPA may decide to use Instagram's polling feature with incidental collection of PII for service delivery as outlined in OMB Memorandum, New Fast-Track Process for Collecting Service Delivery Feedback Under the Paperwork Reduction Act (June 15, 2011, M-11-26). Polling information is information that the individual voluntarily submits on the Instagram portal and is subject to Instagram's terms of service, privacy policy, and security measures to which the user consents. If SEC OPA decides to download polling information as a result of using the Instagram polling feature, the SEC will store the information in a secure SEC SharePoint site.

5.2 Given the amount and type of data being collected, discuss what privacy risks were identified and how they were mitigated.

There is a risk that individuals might inadvertently post PII on the site that would be viewable to SEC and others. This risk is generally not applicable because the SEC does not routinely use Instagram to collect, maintain, use, or disseminate information about individuals. If individuals voluntarily share PII when they comment on an SEC Instagram posted photo or video, they have voluntarily provided this information on an Instagram platform subject to Instagram terms and conditions. The SEC website will clearly convey that the user is leaving the SEC website and will now be subject to Instagram's terms and conditions. The SEC, however, will also caution individuals visiting the SEC's Instagram account that they are now on Instagram and should not share their sensitive PII, such as a Social Security number, in Instagram comments and that PII will be moderated in accordance with the SEC's comment and posting policy. If the SEC OPA decides to use Instagram's polling feature with incidental collection of PII for service delivery as outlined in OMB Memorandum, New Fast-Track Process for Collecting Service Delivery Feedback Under the Paperwork Reduction Act (June 15, 2011, M-11-26), the risk to the individual would be minimal as the information would be voluntarily contributed.