



**Federal Trade Commission
Privacy Impact Assessment**

for:

DCBE Websites and Blogs – OnGuardOnline, AlertaenLinea, and BCP Business Center

March 2012

1 SYSTEM OVERVIEW

The Federal Trade Commission's Division of Consumer and Business Education (DCBE) developed the websites **OnGuardOnline** (OnGuardOnline.gov) and **AlertaenLínea** (AlertaenLínea.gov) to help consumers be on guard against internet fraud, secure their computers, and protect their personal information; and the **BCP Business Center** (business.ftc.gov) to provide information to help companies comply with the law. The sites include: articles; downloadable video, audio and game files; tutorials; blogs; and RSS feeds. (No data is collected from users who download audio or video files or subscribe to an RSS feed.)

These sites and blogs were developed using the content management system (CMS) Drupal. The CMS enables authorized FTC staff to electronically administer (e.g., upload, revise, delete) the content of these sites (e.g., articles, video, blog comments). This Privacy Impact Assessment (PIA) is an analysis of how information is handled by the CMS: (i) to ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy, (ii) to determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system, and (iii) to examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

In addition to viewing, downloading, or blogging, visitors to the CMS-managed sites can sign up for email alerts, through a commercial e-mail subscription service (GovDelivery) or share information from these sites with others using an application (app) (AddThis). AddThis is covered by this PIA, while the GovDelivery is covered by its own Privacy Impact Assessment. See [GovDelivery Communications Management System Privacy Impact Assessment](#).

2 INFORMATION COLLECTED AND STORED WITHIN THE SYSTEM

2.1 What information is to be collected, used, disseminated, or maintained by the system?

Blog users who submit a comment will provide their comment and a self-selected username. The blog commenting policy advises users not to share personal information.

The CMS collects usernames and passwords from FTC administrators who login to manage content.

The web hosting provider's servers collect the following information: IP address, date and time of visit, referrer, entry page, exit page, browser, and operating system.

2.2 What are the sources of the information in the system?

Users voluntarily submit comments to the blogs.

FTC administrator login credentials are submitted by staff who post blog entries, moderate blog comments, or manage website content.

The web servers automatically collect log information from visitors to the sites as described in Section 2.1.

2.3 Why is the information being collected, used, disseminated, or maintained?

Blog comments will allow FTC employees and our federal partners to interact with consumers, answer questions and share ideas, and help develop an online community that promotes online safety and security and fraud prevention.

A username is required to verify that a real person is submitting the comment. This reduces the amount of comment spam received.

FTC moderators' usernames and passwords are collected to ensure that only authorized staff are able to post blog entries, moderate blog comments, or manage website content.

Web log files are collected to analyze overall traffic to the sites and better serve visitors.

2.4 How is the information collected?

Users who want to leave a comment can do so through an online comment form available at the bottom of each blog post. Users do not register at the blog site and will complete the form each time they submit a comment.

FTC administrators' usernames and passwords are collected through a secure login screen.

Web log files are collected automatically.

2.5 How will the information be checked for accuracy and timeliness?

Blog comments are not checked for accuracy or timeliness but will be reviewed by FTC moderators before they are posted. Any comments that are off-topic or include misinformation, use offensive language, or promote a commercial product or non-Federal website will not be posted. Users who discover errors in their comments after they are posted may contact FTC moderators and request their comments be removed.

FTC administrator login credentials are verified by the CMS software. Administrators are required to change their password every 60 days.

2.6 Is the system using technologies in ways that the FTC has not previously employed (e.g., monitoring software, Smart Cards, etc.)? If so, how does the use of this technology affect individuals' privacy?

No. The Drupal content management system and AddThis share function both have been used in the BCP Business site (business.ftc.gov) since 2010. OnGuardOnline.gov and AlertaEnLinea.gov also use AddThis.

AddThis is an online sharing service. To share a link or information, visitors to the FTC site clicks on the AddThis icon. AddThis displays a menu of third-party sites or services that the user can select and use for sharing FTC content with others (e.g., Facebook, MySpace, LinkedIn, Twitter, etc.). After the user makes a selection, a new browser window will open up and the user will log in to the selected site or service with his or her user name and password for that site or service. Once logged in, the FTC content that the user wants to share or save will be "pre-populated" (e.g., in a draft email message screen) on the selected site or service and the user can share or save the link there. After sharing or saving the FTC content, the new browser window will close, the user will exit the sharing site or service, and the user will go back to browsing the FTC's site.

If visitors choose to share FTC site content through the AddThis email functionality, the service(s) or site(s) they are using will require them to provide their email address and the email address(es) of the recipient(s), so the email can be delivered through those services or sites. They also will have the option to include a message to recipients, with the shared content. AddThis does not maintain, merge, or otherwise combine email addresses or messages with any non-personally identifiable information they may collect. The FTC does not have access to log in credentials, email addresses, or any messages provided AddThis users who use that app share FTC content through other sites or services. AddThis does not use this information to deliver targeted advertising in connection with any FTC website or blog.

AddThis provides the FTC with aggregate level data about how visitors use the service. These reports tell us:

- how many times our content is shared,
- what content is shared,
- what services are being used to share our content, and
- usage by country.

The General Services Administration negotiated an [amendment](#) to the AddThis terms of service applicable to U.S. government agencies. Per this agreement, AddThis agrees not to use cookies, web beacons, or other persistent tracking technology that could collect user information at the Business Center, OnGuard Online, and Alerta en Linea websites because they reside on a .gov domain.

Though AddThis will not use cookies on the FTC's sites, the third-party services available through AddThis (e.g., Facebook, Twitter, MySpace, etc.) often use both session and persistent

cookies. Site visitors who choose to share content through these third-party services may be providing such services or other non-government parties access to their personal information and may have cookies placed on their computers.

2.7 What law or regulation permits the collection of this information?

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.

2.8 Considering the type of information collected and sources of collection, what privacy risks were identified and how were these risks mitigated?

The privacy risks identified are the risk that users will include personally identifiable information about themselves or others in their comments and the risk that those without authorization will access the website content or blog comments.

The former is mitigated through the commenting policy as well as by DCBE's internal guidelines for posting comments so that comments that contain PII will not be posted. If there is any question about whether the individual intended to post contact information, the FTC administrator will contact the individual before posting the comment.

The risk of unauthorized access is mitigated by having only a small number of FTC employees with login credentials and password protected access to the CMS, and by requiring users to change their password every 60 days.

3 USE AND ACCESS TO DATA IN THE SYSTEM

3.1 Describe how information in the system will or may be used.

Comments that are posted will enhance DCBE's ability to have a dialogue with people interested in learning about cyber security and fraud prevention news and tips. Comments also will allow communication between readers who choose to comment.

FTC administrators' usernames and passwords are collected to provide access to the CMS to post blog entries, moderate blog comments, or manage website content.

Web log files are collected to analyze overall traffic to the site and better serve visitors.

3.2 Which internal entities will have access to the information?

If user comments are approved by FTC moderators, they will be publicly viewable on the blog.

A limited number of FTC administrators selected by DCBE management will have access to the CMS to post blog entries, moderate blog comments, or manage website content.

A limited number of DCBE staff who provide internal reports on visits to DCBE-managed websites will have access to the web log information.

3.3 Which external entities will have access to the information?

A limited number of staff from Fleishman Hillard, a communications firm contracted by the FTC to help develop and maintain these websites and blogs, will have access to the database and the information stored there. All contract staff who have access to this information have signed a non-disclosure agreement.

4 NOTICE AND ACCESS FOR INDIVIDUALS

4.1 How will individuals be informed about what information is collected, and how is this information used and disclosed?

The blog links to the FTC's privacy policy and contains an appropriate Privacy Act statement on the blog comment form explaining the authority, purpose, and uses of the information collected by the blog. The commenting policy clearly informs users that the comments will be made public and that comments should not include personally identifiable information.

4.2 Do individuals have the opportunity and/or right to decline to provide information?

Posting a comment in response to an article is voluntary. If a user posts a comment, they are required to provide a self-selected username.

All site visitors agree to the automatic collection of weblog information, as described in the FTC privacy policy.

4.3 Do individuals have the right to consent to particular uses of the information? If so, how would an individual exercise this right?

Users who submit a comment are agreeing to make that comment public upon approval.

All site visitors agree to the automatic collection of weblog information, as described in the FTC privacy policy.

4.4 What are the procedures that allow individuals to gain access to their own information?

Users can see their comments once they are approved and posted to the blog. Users also can contact FTC site administrators by using the contact information on the site.

Individuals who seek access to nonpublic records, if any, collected by the blog about themselves must submit such a request in writing to the FTC's Office of General Counsel, under the agency's Privacy Act access procedures.

4.5 Discuss the privacy risks associated with the process of providing individuals access to their own records and how those risks are mitigated.

There are no identifiable risks in providing individuals with access to their blog comments, since individuals are informed that their comments will be made publicly available on the blog and will not be treated as confidential. The blogs are not configured to allow external users or other members of the public to gain access to any nonpublic information collected by the blog on individuals, and any requests by individuals for access to such information about themselves requires a formal written Privacy Act request, as noted in Section 4.4. See Section 6 for information regarding security measures.

5 WEB SITE PRIVACY ISSUES

5.1 Describe any tracking technology used by the Web site and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, Web beacon). Currently, persistent tracking technology is not approved for use by the FTC (see 5.2).

The sites use session cookies to enable visitors to post comments and to enable advanced features to load faster. OnGuardOnline.gov also uses session cookies to enable a customer satisfaction survey.

The FTC administrator login screen uses a persistent cookie to encrypt and secure the information transmitted and to remember FTC administrators' passwords.

5.2 If a persistent tracking technology is used, ensure that the proper issues are addressed.

The FTC will not use persistent cookies or other persistent tracking technology (persistent cookies) for visitors.

The persistent cookies for administrators will use the same technologies that were used for the BCP Business Center. FTC administrators understand that persistent cookies are implemented to make it easier for them to gain access to the CMS. The risk is minimal because

persistent cookies will only be placed on the computers of a limited number of FTC administrators, with their knowledge. The risk that the login information stored by these cookies on the administrators' computers could be used by unauthorized individuals is minimal because their computers are also secured by other physical, administrative, and technical controls (e.g., password protection). The risk for site administrators will be additionally mitigated by encrypting all of their communications over the site, as described in 5.3.

5.3 If personal information is collected through a Web site, page, or online form accessible through the Internet, is appropriate encryption used? If not, explain.

Encryption will not be used for the public facing website and blog. The information in the system is submitted voluntarily and is closely moderated before being made public. It therefore poses a low risk to privacy and encryption is not necessary. Other security controls have been put in place, however, to minimize the risk of unauthorized alteration or deletion. See Section 6.

The FTC administrator login page is encrypted using https or Secure Sockets Layer (SSL) technology. The only personal information that will be collected from this part of the website (not including the names of authors of articles and blog posts) will be the site administrator's username and password at login.

5.4 Explain how the public will be notified of the Privacy Policy.

The websites and blogs include a link to the FTC's Privacy Policy in the footer and in other relevant places – when users are signing up for email updates or submitting blog comments. The blog comment form and email sign-up form also include a Privacy Act statement.

5.5 Considering any Web site or Internet issues, please describe any privacy risks identified and how they have been mitigated.

See Section 2.8.

5.6 If the Web site will collect personal information from children under 13, or be directed at such children, explain how it will comply with the Children's Online Privacy Protection Act (COPPA).

The websites and blogs are not intended to collect any information from children under 13 years of age. If it becomes clear that a user under 13 has posted a comment, the FTC administrator will delete the post. The FTC does not ask the age of users who sign up to receive email updates. These email addresses are never made public. For more information on the FTC's email updates service, see the [GovDelivery Communications Management System Privacy Impact Assessment](#).

6 Security of Information in the System

6.1 Are all IT security requirements and procedures required by federal law being followed to ensure that information is appropriately secured?

The FTC follows all applicable Federal Information Security Management Act (FISMA) requirements, ensuring that OnGuardOnline.gov and business.ftc.gov are appropriately secured. These sites are hosted in the Data Center GSS which is categorized as moderate using Federal Information Processing Standard (FIPS) 199, Standards for Security Categorization of Federal Information and Information Systems.

In addition, as mandated by [Office of Management and Budget \(OMB\) Memorandum M-08-23, Securing the Federal Government's Domain Name System \(DNS\) Infrastructure](#), the FTC has deployed Domain Name System Security (DNSSEC). This provides cryptographic protections to DNS communication exchanges, removing threats of DNS-based attacks and improving integrity and authenticity of information processed over the Internet.

6.2 Has a Certification & Accreditation (security control assessment and authorization) been completed for the system or systems supporting the program?

These sites are maintained as part of the Data Center General Support System (GSS), which is certified and accredited.

6.3 Has a risk assessment been conducted on the system?

Yes.

6.4 Does the project employ technology that may raise privacy concerns? If so, please discuss its implementation.

Yes, and the FTC has addressed risks and vulnerabilities as described elsewhere in this document. *See, e.g.*, Section 2.8.

6.5 What procedures are in place to determine which users may access the system and are they documented?

These sites are public and accessible via the internet. Documented procedures limit access to nonpublic portions (i.e., log, site administration, forms data, etc.) to authorized FTC and contractor personnel only.

6.6 Describe what privacy training is provided to users either generally or specifically relevant to the program or system.

All FTC employees and designated contractor personnel are required to complete computer security training and privacy awareness training annually. Interactive online training covers topics such as how to properly handle sensitive PII and other data, online threats, social engineering, and the physical security of documents.

Individuals with significant security responsibilities are required to undergo additional, specialized training, tailored to their respective responsibilities.

6.7 What auditing measures and technical safeguards are in place to prevent the misuse of data?

Auditing measures and technical safeguards are in place commensurate with the National Institute of Standards and Technology (NIST) Recommended Security Controls for Federal Information Systems and Organizations Moderate-Impact Baseline Special Publication (SP) 800-53, Rev. 3.

6.8 To whom should questions regarding the security of the system be addressed?

Any questions regarding the security of the system should be directed to the FTC's Information Assurance Manager.

7 DATA RETENTION

7.1 For what period of time will data collected by this system be maintained?

The FTC has submitted to the National Archives and Records Administration (NARA) a new comprehensive records retention schedule. The FTC will begin retaining and disposing documents and data in accordance with the new schedule when NARA has approved it. Pending NARA approval, the FTC will manage the data in a manner consistent with 44 U.S.C. Ch. 31, 44 U.S.C. 3506, 36 CFR Ch. XII, Subchapter B, Records Management, and Office of Management and Budget (OMB) Circular A-130, par. 8a1(j) and (k) and 8a4. In the interim, aggregate data about site visits will be kept indefinitely, but will not contain any personally identifiable information.

7.2 What are the plans for destruction or disposal of the information?

All records and other information that includes inputs, outputs, system documentation, and system content will be disposed in accordance with OMB, NARA and NIST regulations and guidelines.

7.3 Describe any privacy risks identified in the data retention and disposal of the information, and describe how these risks have been mitigated.

The privacy risks are minimal because the information collected by the system is intended for publication. Any PII that is submitted and is not determined to be appropriate for publication is immediately deleted.

8 PRIVACY ACT

8.1 Will the data in the system be retrieved by a personal identifier?

No, unless a user chooses a user ID that is also a personal identifier within the meaning of the Privacy Act. The blogs are not indexed or otherwise configured to allow visitors or users to retrieve comments, usernames or other data by personal identifier.

8.2 Is the system covered by an existing Privacy Act System of Records notice (SORN)?

To the extent, if any, that information is about an individual and retrieved by a personal identifier of such individual, the electronic collection and storage of public comments is covered by existing Privacy Act System of Records notices. System I-6 covers those comments that will be posted publicly and System VII-3 covers user ID and access records. See <http://www.ftc.gov/foia/listofpaysystems.shtm>.

In compliance with the Privacy Act, both blog comment forms used to collect the information will contain the required notice of authority, purpose, routine uses, and that the collection is voluntary (Privacy Act statement).

9 PRIVACY POLICY

9.1 Confirm that the collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC's privacy policy.

The collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC privacy policy.

10. APPROVAL AND SIGNATURE PAGE

Prepared for the Business Owners of the System by:

_____ Date: _____
Nat C. Wood, Assistant Director
Division of Consumer and Business Education

Review:

_____ Date: _____
Alexander C. Tang
Office of the General Counsel

_____ Date: _____
Peter Miller
Acting Chief Privacy Officer

_____ Date: _____
Jeffrey M. Smith
Information Assurance Manager

_____ Date: _____
Jeffrey Nakrin
Records and Filings Office

Approved:

_____ Date: _____
Jeffrey Huskey
Chief Information Officer