



## **Adapted Privacy Impact Assessment**

### **AngelCam**

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### **Contact**

National Park Service Associate Privacy Officer  
U.S. Department of the Interior  
12201 Sunrise Valley Drive  
Reston, VA 20192  
(202) 354-6925  
NPS\_Privacy@nps.gov



One Privacy Impact Assessment (PIA) may be prepared to cover multiple websites or applications that are functionally comparable as long as agency or bureau practices are substantially similar across each website or application. However, any use of a third-party website or application that raises distinct privacy risks requires a complete PIA exclusive to the specific website or application. Department-wide PIAs must be elevated to the Office of the Chief Information Officer (OCIO) for review and approval.

## **SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application**

- 1.1 What is the specific purpose of the agency's use of the third-party website or application and how does that use fit with the agency's broader mission?

This project will provide a 24-hour video feed of the front of Abraham Lincoln's home in Springfield, Illinois using the third-party application AngelCam. The feed will be viewable on the Lincoln's Home National Historic Site website and will allow site visitors to view the home, any events taking place in front of the home, and current weather conditions in the immediate vicinity of the home. This will increase interest and engagement and assist in planning visits to the park. AngelCam was recommended by the Content Management System team and already in use in the National Park Service (NPS).

- 1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, Dec. 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications; the Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 USC 1401; OMB Circular A-130; 110 Departmental Manual 18, 110 Departmental Manual 5.

## **SECTION 2: Any PII that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application**

- 2.1 What PII will be made available to the agency?

The camera is a live feed, and no images/videos will be collected and stored by the park or AngelCam. The cameras may capture video images that may contain facial images, and other individual's personally identifiable information written text or documents on person's belongings.

- 2.2 What are the sources of the PII?



Individuals' facial images or any identifiable information pertaining to individuals captured in the 24-hour live feed of the front of Lincoln's Home. The video feed will be embedded and viewable at the NPS site for Lincoln's Home, <https://www.nps.gov/liho>.

2.3 Will the PII be collected and maintained by the agency?

There will be no data collected or maintained by the National Park Service or AngelCam pertaining to this project. The video will be displayed as a live feed and will not be recorded on- or off-site.

2.4 Do the agency's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, NPS' use of AngelCam does not trigger the PRA.

### SECTION 3: The Agency's Intended or Expected Use of the PII

3.1 Generally, how will the agency use the PII described in Section 2.0?

This project will provide a 24-hour video feed on the Lincoln's Home park website of the front of Abraham Lincoln's home in Springfield, Illinois. This will allow site visitors to view the home, any events taking place in front of the home, and current weather conditions in the immediate vicinity of the home. This will increase interest and engagement and assist in planning visits to the park.

3.2 Provide specific examples of the types of uses to which PII may be subject.

The PII (images) are not used by NPS. NPS only provided a 24-hour live video feed of the front of Abraham Lincoln's home in Springfield, Illinois.

### SECTION 4: Sharing or Disclosure of PII

4.1 With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

AngelCam provides the services needed to provide the 24-hour video feed, but they do not collect or maintain the video pertaining to this project. The video will be displayed as a live feed and will not be recorded on- or off-site.

4.2 What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

AngelCam creates an encrypted cloud tunnel for the cameras. No open ports to the internet are left behind. Access to the NPS network is restricted to authorized users with password authentication controls, servers are in secured facilities behind restrictive firewalls, and access to databases and files is controlled by the system administrator and restricted to authorized personnel based on official need to know. Other security



controls include continuously monitoring threats, rapid response to incidents, and mandatory employee security and privacy training.

## **SECTION 5: Maintenance and Retention of PII**

### **5.1 How will the agency maintain the PII, and for how long?**

There will be no data collected or maintained by the National Park Service or AngelCam pertaining to this project. The video will be displayed as a live feed and will not be recorded on- or off-site.

### **5.2 Was the retention period established to minimize privacy risk?**

NPS does not collect, maintain or disseminate PII from use of AngelCam. There will be no data maintained by the NPS or AngelCam pertaining to this project. The video will be displayed as a live feed and will not be recorded on- or off-site.

## **SECTION 6: How the Agency will Secure PII**

### **6.1 Will privacy and security officials coordinate to develop methods of securing PII?**

Yes. NPS Privacy Officer works with the IT security office to develop methods for protecting individuals' privacy and securing PII that becomes available to NPS.

### **6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.**

NPS does not collect, maintain, or disseminate PII from use of AngelCam.

Access to the NPS network is restricted to authorized users with password authentication controls, servers are in secured facilities behind restrictive firewalls, and access to databases and files is controlled by the system administrator and restricted to authorized personnel based on official need to know. Other security controls include continuously monitoring threats, rapid response to incidents, and mandatory employee security and privacy training.

## **SECTION 7: Identification and Mitigation of Other Privacy Risks**

### **7.1 What other privacy risks exist, and how will the agency mitigate those risks?**

Visitors may not know that cameras are installed at this location. Park visitors will be notified of the camera feed via signs posted in the vicinity of the camera.

### **7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of the third-party website or application?**

DOI's Privacy Policy informs the public on how DOI handles personally identifiable information that becomes available through interaction on the DOI official website. The



Privacy Policy also informs the public that DOI has no control over access restrictions or privacy procedures on third party websites, and those individuals are subject to third party social media website privacy and security policies. DOI's linking policy informs the public that they are subject to third party privacy policies when they leave a DOI official website to link to third party social media web sites.

## **SECTION 8: Creation or Modification of a System of Records**

8.1 Will the agency's activities create or modify a "system of records" under the Privacy Act of 1974?

No, NPS does not collect, maintain or disseminate PII from AngelCam, and is not creating a system of records from the use of AngelCam.

8.2 Provide the name and identifier for the Privacy Act system of records.

N/A. NPS is not creating a system of records from use of AngelCam.