



## **Adapted Privacy Impact Assessment**

### **Eventbrite**

**7/14/2021**

### **Contact**

Bureau of Ocean Energy Management  
Associate Privacy Officer  
1849 C Street, NW  
Washington, DC 20240  
202-208-7160  
[boemprivacy@boem.gov](mailto:boemprivacy@boem.gov)



## 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?

The mission of the Bureau of Ocean Energy Management (BOEM) is to manage development of U.S. Outer Continental Shelf energy and mineral resources in an environmentally and economically responsible way. BOEM programs and offices frequently host events (virtual and in-person) for federal employees, members of the public, and other stakeholders that require advanced registration. BOEM programs and offices generally publicize these events through posts on their Web pages, press releases, or direct invitations to stakeholders. BOEM programs and offices seeking means through which they can efficiently manage event registration and provide event-related updates to registrants may use Eventbrite, which is a third-party event management and registration platform that automates certain event registration-related tasks. While Eventbrite provides tools for planning both free and paid events, BOEM will never organize paid events through the service<sup>1</sup>.

- 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?

BOEM programs and offices are responsible for using Eventbrite in accordance with applicable laws, regulations, and policies and will identify specific legal authorities that cover their activities in Privacy Notices, as appropriate. Legal authorities that authorize the use of Eventbrite include the following: Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.); Presidential Memorandum, Building a 21st Century Digital Government, May 23, 2012; Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, December 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; OMB Memorandum on Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010; and OMB Circular A-130, Managing Information as a Strategic Resource, July 28, 2016.

## 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 [Eventbrite Privacy Policy](#) governs the service's collection, use, maintenance, and disclosure of information. The Eventbrite Privacy Policy specifies what PII and non-personal data the platform collects from users and how it uses the information to manage and improve its services. BOEM users (i.e., event organizers) will not have access to any of the data that Eventbrite collects to manage and improve its services

---

<sup>1</sup> For free third-party service accounts, federal-compatible terms of service must be in place before bureau use of the service. For fee-based services, BOEM programs and offices must work with procurement officials to ensure that terms of service are compliant with federal law and DOI policy.



beyond what they collect directly from individuals on behalf of their program or office for the purposes they have specified in an event-specific BOEM Privacy Notice. BOEM programs and offices will solicit from registrants the least amount of information necessary to facilitate and manage official bureau events and are prohibited from using the service to collect sensitive PII from registrants.

Depending on their event management needs, BOEM event organizers will generally request a first and last name, email address, and federal agency/company/organization affiliation (if applicable). BOEM anticipates that most registrants will register to attend events by providing their non-sensitive, business-related contact information. However, registrants may provide their personal contact information at their discretion.

## 2.2 What are the sources of the PII?

BOEM programs and offices will collect information directly from individuals who are voluntarily registering to attend an official bureau event. Registrants may be employees or contractors of BOEM or other DOI bureaus and offices, members of the public, industry representatives, non-governmental organization representatives, members of research or educational institutions, or federal, state, local, or tribal government officials.

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

BOEM programs and offices that use Eventbrite to collect limited PII will export and maintain event-related records that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) in accordance with federal and DOI records management requirements.

Individuals may also contact BOEM via the contact information the bureau has provided on a BOEM Web page or in an event-specific announcement, invitation, or Privacy Notice. In these cases, an individual's name, email address, and any other information they voluntarily provide in their message will become available to BOEM. BOEM will use this information to address their questions, provide a service, or fulfill a request, if applicable. Email messages that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the same disposition schedule as all other federal records. BOEM will preserve such emails and maintain them for varying periods of time if those emails meet the definition of federal records. BOEM programs and offices will delete emails that are not federal records when they no longer need them. The [DOI website Privacy Policy](#) instructs individuals not to send sensitive PII to DOI bureaus and offices via email.

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

Typical BOEM use of Eventbrite will not invoke the Paperwork Reduction Act (PRA). Any Eventbrite use or event-related activity that will invoke the PRA will require a complete PIA exclusive to the Eventbrite use or event-related activity, as well as coordination with the BOEM Information Collection Clearance Officer.



### 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?

To properly consider logistical requirements while planning an event, BOEM programs and offices must have an efficient way to collect and review event registration information. BOEM programs and offices that use Eventbrite are responsible for creating and managing their event pages and specifying what limited information individuals registering to attend BOEM-hosted events must provide to complete registration. BOEM event organizers will use the information only for the purposes stated in the event-specific BOEM Privacy Notice that bureau programs and offices will provide to registrants at the point of collection.

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

The Eventbrite Privacy Policy specifies what PII and non-personal data the service collects from users and how it uses the information to manage and improve its services, as well as to enforce the Eventbrite Terms of Service. By completing a registration form on the Eventbrite platform, individuals are granting Eventbrite permission to collect their information and share it with the responsible BOEM event organizer.

Individuals who complete a registration form on the Eventbrite platform will receive an automated registration confirmation message or a waitlist message through Eventbrite. BOEM event organizers will not have access to any of the data that Eventbrite collects to manage and improve its services beyond what they seek to collect directly from individuals for the purposes specified in an event-specific BOEM Privacy Notice (e.g., sending event-related communications and advance materials to registrants). To the extent that participating in a BOEM event is voluntary, individuals can decline to complete a registration form. However, failure to provide information may delay or prohibit event registration.

BOEM programs and offices may choose to make accommodations for those who wish to provide registration information through other means which they will identify in their event announcements and invitations. Accommodating bureau programs and offices are required to provide an appropriate Privacy Notice to registrants and adequate privacy protections for registration information they collect using alternate means.

If individuals contact BOEM via the contact information the bureau has provided on a BOEM Web page or in an event announcement, invitation, or Privacy Notice, BOEM will use their information to address their questions, provide a service, or fulfill a request, if applicable. Email messages that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the same disposition schedule as all other federal records. BOEM will preserve such emails and maintain them for varying periods of time if those emails meet the definition of federal records. BOEM programs and offices will delete emails that are not federal records when they no longer need them.



## 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?

The Eventbrite Privacy Policy outlines what PII and non-personal data the platform collects from users and how it uses the information to manage and improve its services. The Eventbrite Privacy Policy also details the limited circumstances in which the service will share information with third parties outside Eventbrite. Eventbrite requires authorized BOEM users to provide their email address and select a password to create an account. BOEM users must use their official business email address during the account creation process. BOEM event organizers will have access only to information that registrants provide on a BOEM event page they have created and manage or have permission to access as part of a team. Through paid services such as Eventbrite Professional and Eventbrite Premium, multiple users within a BOEM program or office can use the available collaboration features to manage events. A designated Owner, who is responsible for naming roles and assigning role-based permissions for team management, will have full event and administrator permissions. The Owner may designate other team members to serve as administrators who will have access to all events and permissions.

BOEM may share information with internal and external parties on a need-to-know basis for the purposes stated in event-specific BOEM Privacy Notices. In some cases, BOEM programs and offices may make a full list of event participants publicly available or available to event participants. BOEM will only post or distribute event-related information after the appropriate bureau officials have reviewed and approved the information for dissemination. To the extent that records BOEM creates while using Eventbrite are considered Privacy Act records, BOEM will maintain them consistent with the Privacy Act and will not disclose such records by any means of communication to any person or another agency unless disclosure is pursuant to the prior written request by, or with the prior written consent of, the individual to whom the record pertains, or if the disclosure is otherwise consistent with the Privacy Act.

If individuals contact BOEM via the contact information the bureau has provided on a BOEM Web page or in an event announcement, invitation, or Privacy Notice, BOEM will use their information to address their questions, provide a service, or fulfill a request, if applicable. In doing so, BOEM may share PII with other BOEM programs and offices, DOI bureaus and offices, or external stakeholders, as necessary and permissible by privacy policy.

In unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI policy, BOEM may share information collected through its use of Eventbrite to notify the appropriate agency officials or law enforcement organizations.

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

BOEM programs and offices must adhere to the [Eventbrite Terms of Service](#) while using the service. Eventbrite may unilaterally remove BOEM content or terminate a BOEM



account for a breach of the bureau's obligations under the Terms or the bureau's failure to comply with the instructions and guidelines posted on the Eventbrite site.

BOEM employees and contractors are required to complete security, privacy, and records management training to ensure they understand their responsibilities to protect individual privacy and appropriately manage information before they acquire access to the DOI network and information systems and annually thereafter. BOEM employees and contractors with significant privacy responsibilities are also required to complete role-based privacy training on an annual basis.

BOEM programs and offices planning to use Eventbrite must first review the BOEM Eventbrite Adapted PIA and consult with the BOEM Associate Privacy Officer (APO) to ensure that the planned use of Eventbrite will comply with applicable federal and DOI privacy policies. As applicable, BOEM programs and offices also must coordinate with acquisition officials to ensure that contractors administering Eventbrite activities on their behalf have the proper privacy clauses in their contracts.

BOEM employees and contractors who use Eventbrite are required to use their official business email address while using the service for bureau-sponsored activities. BOEM Eventbrite users must protect their account information to prevent unauthorized access and must use the collected information in accordance with the purposes expressed in the BOEM Privacy Notice. BOEM employees and contractors can employ the available collaboration features to collaborate on event management activities, as permitted by role-based permissions. As applicable, the designated Owner of a team is responsible for ensuring that team members have appropriate access to team activities and data. Designated bureau officials must verify the termination of Eventbrite accounts belonging to departing employees or contractors.

Beyond its official postings, BOEM has no control over access restrictions or procedures on the Eventbrite platform or the content posted on Eventbrite. Official event-related email communications that BOEM programs and offices send using Eventbrite's email tools must be reviewed and approved by appropriate officials for distribution to mitigate any risks for the unauthorized disclosure of personal or privileged data.

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

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

BOEM programs and offices will export and maintain event-related records that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) in accordance with DOI policy and records retention schedules approved by the National Archives and Records Administration (NARA). BOEM programs and offices must coordinate with the BOEM Records Officer to ensure that an appropriate records schedule is in place prior to using Eventbrite. BOEM programs and offices must also be mindful of any active litigation holds. Approved methods for the disposition of records include shredding, burning, tearing, and degaussing in accordance with NARA guidelines and 384 Departmental Manual 1.



5.2 Was the retention period established to minimize privacy risk?

BOEM programs and offices mitigate privacy risk by limiting their collection of PII to what is necessary to facilitate and manage official BOEM events and refraining from collecting sensitive PII. BOEM programs and offices will retain PII that is not part of a federal record subject to NARA retention requirements as needed, then promptly destroy it in accordance with approved destruction methods to minimize privacy risk.

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

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

Prior to using Eventbrite, BOEM programs and offices must coordinate with the BOEM APO to confirm that their proposed use of the service complies with federal and DOI privacy requirements. The BOEM APO will liaison with security officials, as necessary, to analyze acceptable risks, resolve potential issues, and develop methods of securing PII and other information that becomes available to BOEM programs and offices through their use of Eventbrite.

There are mandatory requirements for BOEM employees and contractors to complete security and privacy awareness training and sign the DOI Rules of Behavior form before they acquire access to the DOI network and information systems and annually thereafter. Some BOEM employees and contractors may be required to complete role-based security and privacy training. Privacy and security officials will coordinate with the Bureau DOI Talent Coordinator to ensure that employees and contractors have fulfilled their training obligations, as required.

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.

BOEM programs and offices may use Eventbrite to facilitate and manage official bureau events in accordance with established standards of behavior, which prohibit the collection of sensitive PII that requires strict security. BOEM event organizers must use their official email address to create an Eventbrite account and will have access only to the account they use to create and manage event pages and event-related communications. BOEM users must access their Eventbrite account while using DOI-approved devices, not personal devices.

All BOEM employees and contractors must coordinate with their supervisor and other appropriate officials to ensure that physical, technical, and administrative safeguards are in place protect the records in their custody. BOEM employees and contractors can help protect PII collected through Eventbrite by safeguarding their user credentials and avoiding the storage of records on shared networks or folders accessible to individuals who do not have an official need-to-know. BOEM employees and contractors are responsible for safeguarding all information they remove from their official duty station and information they create at any alternative workplace in accordance with the Federal Records Act, Privacy Act, Freedom of Information Act, and other federal laws, regulations, and DOI policies. BOEM employees and contractors may share Eventbrite and event-related records only with authorized officials using approved sharing methods. All BOEM Eventbrite users must report any compromise of their accounts or related



records to the appropriate Eventbrite and DOI officials in accordance with established procedures.

Access to the DOI network is restricted to authorized users with password authentication controls, servers are located 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 the need-to-know principle. Other security controls include continuously monitoring threats, rapid response to incidents, and mandatory security and privacy training.

Eventbrite employs a full-time legal and security team focused on privacy and security issues. All Eventbrite applications are regularly scanned for common security vulnerabilities. Use of encryption for the storage and transmission of sensitive information is regularly audited by the Eventbrite Security Team. Eventbrite has taken appropriate measures to vet its employees and maintains a stringent information security training program. Eventbrite monitors its security systems and alerts 24 hours a day, 7 days a week. In the event of a breach of an Eventbrite information system, the service has a detailed Incident Response plan in place.

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. In these cases, BOEM may share information collected through its use of Eventbrite to notify the appropriate agency officials or law enforcement organizations as required by law. BOEM will secure such information in accordance with applicable DOI privacy and security policies.

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

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

BOEM will mitigate any potential threats to privacy posed by its use of Eventbrite by enforcing adherence to established service use requirements, ensuring that programs and offices collect the minimum information necessary and use the information they collect only for the purposes stated in their activity-specific BOEM Privacy Notices, ensuring that contractors comply with applicable privacy requirements, enforcing proper maintenance of collected information, moving quickly to remediate privacy breaches, monitoring service policy changes, and reporting misrepresentation by other Eventbrite users.

BOEM programs and offices desiring to use Eventbrite to conduct official bureau activities must review the BOEM Eventbrite Adapted PIA and coordinate with the BOEM APO to complete a Privacy Threshold Analysis to assess the proposed use of the service and demonstrate compliance with privacy laws, regulations, and policy. The proposed use of Eventbrite must be covered under the current Adapted PIA or a complete PIA that documents a specific Eventbrite use, as well as an existing SORN (if applicable). The creation and maintenance of a new system of records not covered by a SORN published in the *Federal Register* is a violation of the Privacy Act. Coordination with the BOEM APO to review proposed events will help ensure that BOEM programs and offices using Eventbrite are collecting the minimum amount of PII necessary to facilitate and manage official bureau events and are providing an adequate Privacy



Notice. BOEM Eventbrite users may collect only the information necessary for the proper performance of official bureau functions and must not collect stand-alone sensitive PII or PII that may become sensitive when viewed in context. The collection of more information than is necessary infringes upon the privacy rights of event attendees and serves no authorized purpose.

There is a risk that BOEM programs and offices may use collected PII for purposes not specified at the time of collection. For example, Eventbrite's email tools make it possible for BOEM event organizers to send event-related communications to registrants. BOEM's use of the email tools must be solely to promote and/or manage a respective event listed on Eventbrite. BOEM event organizers are not permitted to use or export registrants' contact information for other purposes. BOEM must obtain the registrant's consent before using any provided information in any way that differs from the uses described in the Privacy Notice presented to registrants at the point of collection. BOEM employees and contractors are required to complete annual privacy training and are subject to discipline for inappropriately using PII.

An agency that fails to require that systems of records operated on its behalf under contracts be maintained according to the Privacy Act may be civilly liable to individuals injured as a consequence of any failure to maintain records in conformance with the Privacy Act. Officers or employees of the agency may be criminally liable for any violations of the Privacy Act. If the use of Eventbrite and survey-related activities will be handled by a contractor, BOEM programs and offices must coordinate with acquisition officials to ensure that the proper privacy clauses are included in the applicable contracts to hold the contractor accountable for meeting privacy requirements. The contractors and their employees also are subject to civil and criminal sanctions under the Privacy Act for any violation that may occur due to oversight or negligence.

BOEM programs and offices using Eventbrite may maintain PII for longer than necessary either on the service platform or within bureau repositories, thereby creating unnecessary privacy risks. All BOEM records should have an identified owner responsible for their management while in regular use, as well as for appropriate retention and disposal. Agency records are the property of the U.S. Federal Government, not the property of individual employees, and must not be removed from the agency without proper authority to ensure proper safeguarding of the records. All departing or transferring employees must ensure that event-related records have been identified and turned over to the appropriate successor or official to permit continued preservation of the records.

There are risks posed by privacy breaches at the service and bureau levels. In its Privacy Policy, Eventbrite outlines the actions that it takes to protect its customers' data. If Eventbrite learns of a security breach, it will notify affected BOEM users to enable them to take appropriate protective steps. Eventbrite also provides customers with reasonable assistance necessary to respond to a breach. To reduce the risk of bureau-level breaches, BOEM programs and offices using Eventbrite to collect information from individuals are expected to share collected information only with others who have an official need-to-know, must store records in repositories accessible only to others who have a legitimate business need to access the information, must secure their user credentials, and must review and approve proposed Eventbrite/event-related content prior to posting or dissemination to prevent the unauthorized disclosure of personal data



or privileged information. If registrant PII in any medium or format is confirmed or suspected to have become available to individuals who do not have an official need-to-know, BOEM employees and contractors are required to immediately report the compromise of PII to their supervisor and local IT help desk or the BOEM APO. Breaches may also be reported directly to the DOI Computer Incident Response Center (DOI-CIRC). Timely reporting and response enable the agency to take immediate steps in accordance with the DOI Privacy Breach Response Plan to mitigate any harm resulting from the compromise.

Beyond its official postings, BOEM has no control over access restrictions or procedures on the Eventbrite platform or the content posted on Eventbrite. The BOEM APO will reassess the Eventbrite Privacy Policy in response to changes (and annually, at a minimum) to ensure that any policy changes do not adversely impact the bureau's ability to balance service use and the privacy of individuals. Creation of an Eventbrite account is not required to register to attend a BOEM event or view other publicly available BOEM event postings. Individuals who have an Eventbrite account, however, can manage their registration details and share event details via other third-party applications. This integration of other third-party applications may present risks to the privacy of users. Users must be cautiously aware of the information they share with integrated applications. Users must also take care to avoid disclosing sensitive PII, which could be used by unintended persons for harmful or unlawful purposes.

There is a risk that third-party accounts or content may misrepresent agency authority or affiliation. Certain third-party accounts, social media websites, or content may not be officially authorized by or affiliated with BOEM, even where they appear to represent BOEM or the U.S. Federal Government. Interacting with such unauthorized accounts may expose users to privacy or security risks. BOEM will make every reasonable effort to label or identify its official accounts and pages in ways that would help users distinguish them from any unauthorized accounts or pages. BOEM will also inform Eventbrite about any official accounts or pages purporting to represent BOEM, seek their removal, and warn users about such accounts or pages.

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?

BOEM will ensure, to the extent feasible, that registrants are aware that the bureau is sponsoring the event and will provide notice to individuals on the privacy implications of the bureau's use of Eventbrite through this Adapted PIA and access to an event-specific BOEM Privacy Notice as well as the Eventbrite Privacy Policy and Terms of Service.

The event-specific Privacy Notice that BOEM programs and offices will provide to registrants will include a link to the [bureau's official website](#) and the [DOI website Privacy Policy](#), as well as explain:

- That Eventbrite is controlled and operated by a third-party and is not a U.S. Federal Government website;
- That the DOI website Privacy Policy does not apply to Eventbrite;
- The purpose of the event and how BOEM will use PII that becomes available to the bureau; and
- What SORN applies if a system of records is created.



The Eventbrite Privacy Policy specifies what PII and non-personal data the service collects from users and how it uses the information to manage and improve its services. DOI informs the public through its website Privacy Policy of the Department's use of pages on third-party websites and applications.

## **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?

The intended use of Eventbrite by BOEM programs and offices will not create or modify a system of records under the Privacy Act. BOEM programs and offices that will create a system of records through their use of Eventbrite must provide appropriate notice to individuals and maintain the records in accordance with the applicable SORN.

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

The [DOI-08, DOI Social Networks SORN](#) will apply in most cases in which BOEM programs and offices may create a system of records through their use of Eventbrite. BOEM Eventbrite uses not covered by the DOI-08, DOI Social Networks SORN may require the publication of a new or modified SORN to provide appropriate notice to the public.