Adapted Privacy Impact Assessment

Sketchfab

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Contact

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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 (OCS) energy and mineral resources in an environmentally and economically responsible way. This mission also includes BOEM's responsibility to ensure that significant archaeological sites are not adversely affected by oil and gas exploration and development. The National Historic Preservation Act (NHPA) of 1966, as amended, is federal legislation developed to ensure that our nation's historical and archaeological properties are not lost through neglect or inadvertently damaged by activities permitted or funded by federal agencies. Section 106 of the NHPA requires BOEM to institute procedures to assure that federal plans and programs contribute to the preservation and enhancement of non-federally owned sites and structures, as well as objects of historical, architectural, or archaeological significance.

Archaeological sites on the OCS are most likely either prehistoric Native American sites (dating from the time at the end of the last Ice Age when sea levels were about 200 feet lower than they are today) or historic shipwrecks. Historical research indicates that over 2,000 ships have sunk on the federal OCS between 1625 and 1951; thousands more have sunk closer to shore in state waters during the same period. Archaeologists have discovered historic shipwrecks dating from as early as the 16th century A.D. to as recent as World War II in all parts and in all water depths of the Gulf of Mexico. The archaeological research conducted by BOEM and other scientists in the Gulf of Mexico contributes to our understanding of how our nation developed by studying the technology that fostered the growth of the U.S. Part of this research includes imaging shipwreck sites, some of which are discovered through industry surveys.

BOEM makes information about its research activities available online through the Environmental Studies Program Information System, BOEM Web pages, and approved third-party applications such as Sketchfab. Sketchfab is a third-party application designed to enable users to publish and find three-dimensional (3D) content online. Sketchfab users can upload and submit 3D models, images, and related content, along with comments and other information. Sketchfab's technology is integrated with every major 3D creation tool and publishing platform and is compatible with every browser and most virtual reality (VR) headsets. Users may embed the service's player anywhere on the Web, thereby enabling them to view and share 3D and VR content on other social media platforms. Sketchfab also offers an online store from which users can review and purchase model files online.

BOEM's use of Sketchfab to share 3D models of historic archaeological sites on the OCS enables the bureau to be more inclusive, reach new audiences, and better educate the public about BOEM's mission. BOEM's official use and presence on Sketchfab does not constitute an endorsement or preference for the services, products, or information on Sketchfab.

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 Sketchfab in accordance with applicable laws, regulations, and policies and will identify specific legal authorities that cover their activities in Privacy Notices, as appropriate. Any planned use of Sketchfab that falls outside the scope of this assessment will require a complete PIA exclusive to the Sketchfab use.

Legal authorities that authorize the use of Sketchfab include the following: Presidential Memorandum, Building a 21st Century Digital Government, May 23, 2012; Presidential Memorandum on Transparency and Open Government, January 21, 2009; Office of Management and Budget (OMB) M-10-06, Open Government Directive, December 8, 2009; OMB Memorandum on Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; OMB M-13-13, Open Data Policy—Managing Information as an Asset, May 9, 2013; OMB Circular A-130, Managing Information as a Strategic Resource, July 28, 2016; and the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.).

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 Sketchfab Privacy Policy specifies what PII and non-personal data Sketchfab collects from users and application visitors, as well as how Sketchfab uses the information to manage its services and business. Individuals without a Sketchfab account can view, share, and embed models posted on Sketchfab. However, individuals must be logged into a Sketchfab account to download files, post comments, or "like" posts. Individuals can sign up for a Sketchfab account by choosing a username, providing an email address, and creating a password. Individuals may also sign up via third-party accounts such as Twitter, Google, Facebook, or Apple. At their discretion, Sketchfab users can expand their profile by adding a profile picture, organization name, location, page description, website URL, and other categories of information. Any information a user adds to their Sketchfab profile is publicly visible.

Limited personally identifiable information (PII) will be made available to BOEM through its use of Sketchfab. Sketchfab does not directly share any user information with BOEM. BOEM will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including BOEM) or BOEM exclusively. If a Sketchfab user interacts with BOEM by liking or commenting on an uploaded BOEM model, the user's public profile information and username will become available to BOEM and the entire Sketchfab community. If a Sketchfab user or member of the public submits feedback to BOEM via the Sketchfab Contact feature, the submitter's email address and any other information voluntarily provided in the message will become available to BOEM.

2.2   What are the sources of the PII?

Sources of PII are Sketchfab users worldwide, which may include members of the general public; federal, state, local, and tribal government representatives; and representatives of industry, non-profit organizations, media outlets, and research and educational institutions.

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

BOEM uses Sketchfab to disseminate information and increase government transparency. BOEM does not actively collect, maintain, or disseminate PII while using Sketchfab. BOEM will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including BOEM) or BOEM exclusively. If a Sketchfab user or member of the public interacts with BOEM through Sketchfab, PII and other information may become available to BOEM. If applicable, BOEM may use the information to provide a response or requested service (through Sketchfab when possible).

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 about the user interaction (e.g., username, public profile, contents of postings, and other information available to the bureau through Sketchfab) 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.

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, BOEM is not using Sketchfab to survey the public or in any manner that would trigger the requirements of the Paperwork Reduction Act (PRA). Any planned use of Sketchfab or related activity that will invoke the PRA will require a complete PIA exclusive to the collection and 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?

BOEM does not actively collect, maintain, or disseminate PII while using Sketchfab. If a Sketchfab user or member of the public interacts with BOEM through Sketchfab, BOEM will use the available information to provide a response or requested service if applicable (through Sketchfab when possible).

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

The Sketchfab Privacy Policy specifies what PII and non-personal data the service collects from users and application visitors, as well as how Sketchfab uses the information to manage its services and business. If a Sketchfab user interacts with BOEM by liking or commenting on an uploaded BOEM model, the user's public profile

information and username will become available to BOEM and the entire Sketchfab community. If a Sketchfab user or member of the public submits feedback to BOEM via the Sketchfab Contact feature, the submitter's email address and any other information voluntarily provided in the message will become available to BOEM. BOEM may use the information to provide a response or requested service if applicable (through Sketchfab when possible). BOEM will not use any of the information for marketing or other purposes.

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 the information that becomes available to the bureau through Sketchfab (e.g., username, public profile, contents of postings, and other information) to notify the appropriate agency officials or law enforcement organizations.

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?

Sketchfab is a third-party application used by a variety of individuals and organizations worldwide. The Sketchfab Privacy Policy describes the limited circumstances in which Sketchfab will share information with external third parties. BOEM is not responsible for how Sketchfab users or members of the public may access or use data posted on Sketchfab. Users must understand that they are responsible for their account settings and posted content.

Sketchfab requires authorized BOEM users to choose a username, provide their email address, and create a password to create an account. BOEM users must use their official business email address during the account creation process. Authorized BOEM Sketchfab users do not actively collect, maintain, and disseminate PII while using Sketchfab and will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including BOEM) or BOEM exclusively.

If a Sketchfab user or member of the public submits feedback to BOEM via the Sketchfab Contact feature, the submitter's email address and any other information voluntarily provided in the message will become available to BOEM. BOEM may use the information to provide a response or requested service if applicable (through Sketchfab when possible). In doing so, BOEM may share PII with other DOI bureaus and offices or external stakeholders as necessary and permissible by privacy policy.

There may be 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. In such instances, BOEM may share the information that becomes available to the bureau through Sketchfab (e.g., username, public profile, contents of postings, and other information) to notify the appropriate agency officials or law enforcement organizations. To the rare extent that records BOEM creates while using Sketchfab 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.

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

DOI entered into federal-compatible Terms of Service for the official use of Sketchfab by DOI bureaus and offices. BOEM programs and offices planning to use Sketchfab must first review the Sketchfab Adapted PIA and consult with the BOEM Associate Privacy Officer (APO) to ensure that the planned use of Sketchfab will comply with applicable federal and DOI privacy policies. BOEM employees are required to complete security, privacy, and records management training to ensure they understand their responsibility to protect individual privacy and appropriately manage information before they acquire access to the DOI network and information systems and annually thereafter. BOEM employees with significant privacy responsibilities are also required to complete role-based privacy training on an annual basis.

Only approved BOEM employees will have access to manage the official BOEM Sketchfab accounts and create official postings. BOEM employees who use Sketchfab are required to use their official business email address while using the service for bureau-sponsored activities. BOEM personnel review and approve proposed Sketchfab content prior to posting to prevent the unauthorized disclosure of personal data or privileged information. BOEM Sketchfab users must protect their account information to prevent unauthorized access. BOEM Sketchfab users can employ the collaboration features available to Enterprise users to share, manage, and collaborate on 3D assets, as permitted by role-based permissions managed by an Administrator. Designated bureau officials must verify the termination of Sketchfab accounts belonging to departing employees.

Sketchfab is responsible for protecting its users' privacy and the security of user data within the application. Sketchfab users are subject to the application's Privacy Policy and Terms of Use and must use their own discretion with respect to their account settings and the personal information they provide to enhance their account profiles.

SECTION 5: Maintenance and Retention of PII

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

Retention periods may vary, BOEM maintains records in accordance with the applicable records schedule for each specific type of record. BOEM programs and offices must coordinate with the BOEM Records Officer to ensure that an appropriate records schedule is in place prior to using Sketchfab. BOEM programs and offices must also be mindful of any active litigation holds. BOEM must assess comments and input from the public submitted through Sketchfab by whether they contribute to decisions or actions made by the government. In such cases where input from the public serves a supporting role, BOEM must preserve the comments as supporting documentation for the decision made. Approved methods for disposition of records include shredding, burning, pulping, erasing, and degaussing in accordance with National Archives and Records Administration (NARA) guidelines and 384 Departmental Manual 1.

5.2   Was the retention period established to minimize privacy risk?

BOEM programs and offices routinely mitigate privacy risk by limiting their collection of PII to what is necessary to facilitate and manage official BOEM activities and refraining from collecting sensitive PII unless necessary to accomplish a specific function. BOEM does not actively collect, maintain, and disseminate PII while using Sketchfab. However, limited PII is made available to BOEM while using Sketchfab. BOEM must file data that serves to support agency business with the pertinent records they support and follow the corresponding disposition instructions. Comments used as supporting documentation will follow the disposition instructions of the records they are filed with. 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 Sketchfab, BOEM programs and offices must coordinate with the BOEM APO to confirm that their 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 Sketchfab.

There are mandatory requirements for BOEM employees to complete security and privacy awareness training and sign the DOI Rules of Behavior form before acquiring access to the DOI network and information systems, and annually thereafter. Privacy and security officials will coordinate with the Bureau DOI Talent Coordinator to ensure that employees 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.

The [DOI website Privacy Policy](#) does not apply to Sketchfab. The Sketchfab Privacy Policy specifies what PII and non-personal data Sketchfab collects from users and application visitors, as well as how Sketchfab uses the information to manage its services and business. The Sketchfab Help Center contains additional information on how Sketchfab protects user privacy and security.

In accordance with the DOI Digital Media Policy, official social media accounts must have a primary point of contact who is responsible for managing account security, overseeing employee access and training, and distributing guidance. The contact must be a full-time, permanent federal employee. Before gaining access to an official social media account, employees must complete mandatory social media training and sign DOI's social media user agreement. Only approved BOEM employees will have access to manage official BOEM Sketchfab accounts and create official postings. BOEM Sketchfab account managers must create and manage all BOEM Sketchfab pages through official BOEM accounts while using a protected, official government device.

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Access to the DOI network is restricted to authorized users with multi-factor 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 annual mandatory employee security and privacy training.

All BOEM employees 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 does not actively collect, maintain, or disseminate PII while using Sketchfab. 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 about the user interaction (e.g., username, public profile, contents of postings, and other information available to the bureau through Sketchfab) to notify the appropriate agency officials or law enforcement organizations as required by law. BOEM will share and secure such information in accordance with applicable DOI privacy and security policies.

BOEM employees can further help protect PII that becomes available to the bureau through Sketchfab 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 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. All BOEM Sketchfab users must report any compromise of their accounts or related records to the appropriate Sketchfab and DOI officials in accordance with established procedures.

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 undertakes a number of actions to mitigate other privacy risks posed by Sketchfab use. BOEM follows established procedures to identify, evaluate, and address any new additional privacy requirements that may result from new statutes, regulations, and policies. BOEM will also evaluate the privacy risks of any new changes to Sketchfab and the Sketchfab Privacy Policy before continuing to use the application, ensure users have access to an adequate BOEM Privacy Notice, move quickly to remediate privacy breaches, and report misrepresentation by other Sketchfab users.

Sketchfab is an independently owned and operated third-party application. Beyond its official postings, BOEM has no control over access restrictions or procedures on the Sketchfab site or the content posted on Sketchfab. Creation of a Sketchfab account is not required to view content that BOEM has made publicly available on Sketchfab. Sketchfab users are subject to the Sketchfab Terms of Use and Privacy Policy and control access to their own PII via user profile settings and through discretion with respect to the personal information they provide in posts, comments, or direct communications with other Sketchfab users. The BOEM APO will reassess the Sketchfab 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.

Sketchfab contains links and features that enable its users to access other third-party websites and services, which are governed by their own terms of use and privacy policies. Neither DOI nor Sketchfab are responsible for the contents of any linked site. The Sketchfab Terms of Use advise users to exercise caution before proceeding to any third-party service or entering into any transaction with third parties linked to from the services. Users must be cautiously aware of the information they share with integrated applications. Accordingly, users should take care to avoid disclosing sensitive PII, which could be used by unintended persons to commit fraud or identity theft, or for other harmful or unlawful purposes. Users may also receive spam or other unsolicited or fraudulent communications as a result of their interactions on Sketchfab. BOEM will monitor interactions on its official postings to the extent practicable to filter spam and abusive comments. The BOEM APO will coordinate with BOEM programs and offices to ensure that a proper BOEM Privacy Notice is posted on official BOEM Sketchfab profile pages to provide appropriate notice to users.

There are risks posed by privacy breaches at the service and bureau levels. In its Privacy Policy, Sketchfab outlines the actions that it takes to protect its customers' data. If Sketchfab learns of a security breach, it will notify affected BOEM users to enable them to take appropriate protective steps. Sketchfab also provides customers with reasonable assistance necessary to respond to a breach. To reduce the risk of bureau-level breaches, BOEM programs and offices 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 Sketchfab content prior to posting or dissemination to prevent the unauthorized disclosure of personal data or privileged information. Sketchfab takes steps to secure user content to prevent piracy and advises users that the service cannot prevent it in all cases. If 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 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.

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 account pages to help users distinguish them from any unauthorized account pages (such as ensuring that official BOEM Sketchfab pages bear a "PRO" verification icon). BOEM will also inform Sketchfab 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 provides appropriate notice to individuals informing them of privacy risks associated with the use of Sketchfab:

- Sketchfab users and application visitors can review the Sketchfab Privacy Policy and Terms of Use prior to using the application;

- This Adapted PIA provides notice to the public on the privacy implications of the bureau's use of Sketchfab;

- BOEM has posted a Privacy Notice on the bureau's official Sketchfab profile page to provide notice that the DOI website Privacy Policy does not apply to Sketchfab or any third-party sites individuals may encounter links to while using Sketchfab;

- The DOI website Privacy Policy, accessible through a link provided in the BOEM Privacy Notice, describes how DOI bureaus and offices handle information that becomes available to them through their official accounts on third-party websites; and

- DOI's linking policy provides notice that website visitors are subject to third-party privacy policies when they leave an official DOI website to visit linked third-party websites.

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, BOEM's typical use of Sketchfab will not create or modify a system of records under the Privacy Act of 1974 since the bureau does not actively collect, maintain, or disseminate PII while using Sketchfab. Any BOEM program or office that creates a system of records while using Sketchfab must provide appropriate public notice and maintain the records in accordance with the applicable SORN.

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

Any BOEM program or office that creates a system of records while using Sketchfab must maintain the records in accordance with the appropriate SORN to provide notice to the public. BOEM Sketchfab activities 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.