

Department of the Interior Privacy Impact Assessment

October 25, 2011

Name of Project: Slideshare
Bureau: Department of the Interior
Project's Unique ID (Exhibit 300):

A. CONTACT INFORMATION:

Departmental Privacy Office
Office of the Chief Information Officer
U.S. Department of the Interior
202-208-1605
DOI_Privacy@ios.doi.gov

B. SYSTEM APPLICATION/GENERAL INFORMATION:

President Obama's January 21, 2009 memorandum on Transparency and Open Government encourages Federal agencies to use technology to communicate and engage with the public. Social media services and tools (often referred to collectively as "Web 2.0") are powerful and effective means to communicate quickly and broadly, share information, and interact with colleagues and the public. The Department of the Interior (DOI) is taking advantage of these third-party tools and services in order to reach a wider audience, to facilitate and enhance professional communication and collaboration, and provide additional transparency to the public.

These applications facilitate the sharing of information and ideas between the Department of the Interior and the public. The Department may use social media applications to share information with the public, to collect ideas and comments submitted by the public, and to promote participation and collaboration with the public.

Slideshare (Slideshare.net) is a Software-as-a-Service (SaaS) application that provides document-hosting services to users world-wide. Slideshare users can share presentations or other documents, share videos, create limited personal profiles, "follow" or be "followed" by and/or exchange messages with other users. User profiles may include a name, image, street address/city/state/country, phone number, email address, general description of a user, website/blog address, and date of joining Slideshare. Slideshare users can communicate with each other through public and private messages. Users can set their own privacy settings and control who sees their information and what information is shared.

The Department of the Interior has no control over content or personal information posted by Slideshare users. The Department of the Interior established an official presence on Slideshare to post official documents, presentations, and videos in order to disseminate mission-related information to the public and enhance communication, promote public participation, and increase government transparency.

- 1) **Does this system contain any information about individuals** *{this question is applicable to the system and any minor applications covered under this system}?*

Yes, individual users may post their information within the Slideshare application; however, DOI will not capture any such information. Although DOI does not collect, maintain or disseminate PII from users of Slideshare, there may be instances where PII becomes available. For instance, if a member of the public posts comments, requests information or submits feedback, their username, profile image and/or contact information, as well as the content of posts, may become available to DOI. Also, if there is evidence of criminal activity or a threat to the government, user information, including contact information and content, may be turned over to the appropriate authorities for further action.

- a. **Is this information identifiable to the individual**¹ *{this question is applicable to the system and any minor applications covered under this system}*? (If there is NO information collected, maintained, or used that is identifiable to the individual in the system, Sections D through G can be marked not applicable. If YES complete all sections for system and any applicable minor applications).

Yes, information provided or posted by Slideshare users may be identifiable to individuals.

- b. **Is the information about individual members of the public** *{this question is applicable to the system and any minor applications covered under this system}*? (If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

Yes, information provided or posted by Slideshare users may be identifiable to individual members of the public.

- c. **Is the information about employees** *{this question is applicable to the system and any minor applications covered under this system}*? (If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

Yes, DOI employees may use Slideshare in an unofficial capacity and have personal accounts that contain information about themselves. Official DOI accounts may also contain information about the Departmental programs and employees acting in their official capacity.

2) What is the purpose of the system/application?

Slideshare is a U.S. owned web-based application that provides a free and/or paid document-presentation service which is used world-wide. Slideshare users can share presentations or other documents, share videos, create limited personal profiles, "follow" or be "followed" by and/or exchange messages with other users. User profiles may include a name, profile image, street address/city/state/country, phone number, email address, general description of a user, website/blog address, and date of joining Slideshare. Slideshare users can communicate with each other through public and private messages. Users can set their own privacy settings and control who sees their information and what information is shared. However, the Department of the Interior has no control over content or personal information posted by users in Slideshare.

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

The Department of the Interior established an official presence on Slideshare to share official documents, presentations and videos in order to disseminate mission-related information to the public and enhance communication, to foster and share ideas, facilitate feedback on department programs, promote public participation and collaboration, and increase government transparency. The primary account holder is the Department of the Interior Office of Communications, who will be responsible for ensuring information posted on the Department's official Slideshare page is appropriate and approved for public dissemination. Other DOI bureaus and offices will bear similar responsibility for their own pages.

2a) List all minor applications that are hosted on this system and covered under this privacy impact assessment:

MINOR APPLICATION NAME	PURPOSE	PII? (Yes/No; If Yes, Describe)
There are no minor applications/sub-systems associated with Slideshare		

3) What legal authority authorizes the purchase or development of this system/application?

Presidential Memorandum to the Heads of Executive Departments and Agencies 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, June 25, 2010; Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 U.S.C. 1401; OMB Circular A-130; 210 Departmental Manual 18; 110 Departmental Manual 5.

C. DATA IN THE SYSTEM:

1) What categories of individuals are covered in the system?

Slideshare users include members of the general public, Federal, Tribal, State, or local government agencies, private organizations, and Federal employees; however, DOI does not collect, maintain, or disseminate PII from Slideshare users.

2) What are the sources of the information in the system?

Sources of information available in Slideshare are Slideshare users world-wide, including members of the general public, private organizations, Federal employees, and Federal, Tribal, State and Local agencies, who post messages or feedback on DOI's official Slideshare page. The Department of the Interior also posts mission-related information on its official Slideshare page to enhance communication, promote public participation, and increase government transparency. Official documents, presentations, and videos posted by DOI on Slideshare are also available on DOI official websites.

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

Sources of information are Slideshare users, including members of the general public, private organizations and Federal employees; however, DOI does not collect, maintain, or disseminate PII from Slideshare users. DOI official posts of mission-related information are obtained from DOI sources and have been reviewed and approved prior to public dissemination. Official documents, presentations, and videos posted by DOI on Slideshare are also available on DOI official websites.

b. What Federal agencies are providing data for use in the system?

Other Federal agencies may utilize Slideshare to disseminate information, enhance communication and for public outreach, and may indirectly provide information contained in official postings by DOI; however, DOI does not receive PII or other information from Federal agencies through the use of Slideshare.

c. What Tribal, State and local agencies are providing data for use in the system?

Tribal, State and local agencies may utilize Slideshare to enhance communication and for public outreach; however, DOI does not collect PII or other information from these agencies through the use of Slideshare.

d. From what other third party sources will data be collected?

None. DOI does not collect PII or other information from third party sources through the use of Slideshare.

e. What information will be collected from the employee and the public?

DOI does not collect, maintain or disseminate PII from users of Slideshare; however, there may be instances where PII becomes available. For instance, if a member of the public posts a comment, requests information or submits feedback from their use of Slideshare, their username, profile image and/or contact information may become available to DOI. The Department does not collect or share PII from the use of Slideshare, except in circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or when an employee violates DOI policy and is referred for disciplinary action. This information may include username, profile image and content, and the appropriate law enforcement organizations will be notified.

Slideshare users are subject to Slideshare's privacy policy and terms of use, and can set their own privacy settings to protect their personal information. DOI does not control the content or privacy policy on Slideshare. DOI's Privacy Policy informs the public that they are subject to third party social media website privacy and security policies, and DOI also 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.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOI records be verified for accuracy?

DOI does not collect or maintain PII from Slideshare users, thus does not verify any data for accuracy. Official information such as documents, presentations, and videos posted by DOI on Slideshare are reviewed and approved for public dissemination prior to posting.

b. How will data be checked for completeness?

DOI does not check data posted by Slideshare users for completeness. Official mission related information posted on Slideshare by DOI is reviewed and approved for public dissemination prior to posting.

- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).**

DOI does not collect or maintain PII from Slideshare users, thus does not ensure the data posted by Slideshare users is current. Official information posted by DOI on Slideshare is reviewed and approved for public dissemination prior to posting.

- d. Are the data elements described in detail and documented? If yes, what is the name of the document?**

DOI does not collect, maintain or disseminate PII from users of Slideshare, thus data elements related to such information are not described in detail or documented. The policy for official DOI posts to Slideshare and the process for review and approval for public dissemination are documented in the Department of the Interior Social Media Guidebook.

D. ATTRIBUTES OF THE DATA:

- 1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes, DOI uses Slideshare to disseminate information, enhance communication with the public and for public outreach which is relevant to the purpose of the Slideshare application.

- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

No, DOI does not collect, maintain or disseminate PII from Slideshare users, and does not aggregate data on individual Slideshare users.

- 3) Will the new data be placed in the individual's record?**

No, DOI does not collect, maintain or disseminate PII from Slideshare users. However, in circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or a violation of DOI policy user information, including username, profile image and content, may be referred to the appropriate law enforcement organizations.

- 4) Can the system make determinations about employees/public that would not be possible without the new data?**

No, DOI does not collect, maintain or disseminate PII from Slideshare users.

- 5) How will the new data be verified for relevance and accuracy?**

DOI does not collect, maintain or disseminate PII from use of Slideshare, thus data is not verified for relevance and accuracy.

- 6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

DOI does not collect, maintain or disseminate PII from Slideshare users, so data is not being consolidated.

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

DOI is not consolidating processes and does not collect, maintain or disseminate PII from users of Slideshare.

8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

Data will not be retrieved as DOI does not collect, maintain or disseminate data from Slideshare users. However, if a member of the public posts a comment, requests information or submits feedback from their use of Slideshare, their username, profile image and/or contact information, and the contents of any posts may become available and used to provide additional information. Also, there may be cases where there is evidence of criminal activity, a threat to the government or the public, or an employee violates DOI policy and is referred for disciplinary action. This information may include username, profile image and/or content, and will be turned over to the appropriate law enforcement organizations.

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

Reports on individuals will not be generated.

10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)

Using the Slideshare service and posting information is optional for users. Slideshare users have numerous opportunities to decline to provide information, generally via regular system and privacy settings. Posting information or comments, or providing feedback is voluntary for Slideshare users. However, the provision of information and user consent applies only to terms of use for Slideshare. DOI has no control over Slideshare content and privacy settings, and does not request or collect any PII from Slideshare users.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) What are the retention periods of data in this system?

DOI does not collect, maintain or disseminate PII or other data from users of Slideshare. Any information posted on Slideshare, including DOI's official Slideshare pages, are subject to Slideshare's privacy, security and records policies, and DOI has no control over the management of such information. However, as part of its public outreach effort, DOI disseminates official information such as documents, presentations, and videos on Slideshare regarding its mission-related activities, which may be subject to Federal records requirements. A social media records schedule is under development with the National Archives and Records Administration (NARA), but until an approved schedule is created, official records posted to Slideshare are treated as permanent. To ensure no loss of records, an offline copy of information posted to Slideshare must be maintained by DOI.

2) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Disposition of paper records includes shredding, burning and tearing, and electronic records are degaussed in accordance with 384 DM1. However, until a records retention schedule is approved, official records in Slideshare cannot be destroyed. Maintaining an offline copy of information posted to Slideshare satisfies this requirement.

3) How does the use of this technology affect public/employee privacy?

Affect on public/employee privacy is minimal as DOI does not collect, maintain, or disseminate any PII from Slideshare users. However, DOI does disseminate official information such as documents, presentations, and videos on its mission-related activities on Slideshare. The official information posted by DOI has been reviewed and approved for public dissemination so any privacy risks for the unauthorized disclosure of personal data by the Department are mitigated. DOI does not have any control over personal information posted by individual Slideshare users, including members of the general public and Federal employees.

Slideshare users are subject to Slideshare's privacy policy and terms of use, and can set their own privacy settings to protect their personal information. DOI does not control the content or privacy policy on Slideshare. DOI's Privacy Policy informs the public that they are subject to third party social media website privacy and security policies, and DOI also 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.

4) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

DOI-08, Social Networks System of Records Notice was published on July 22, 2011 to allow DOI to maintain records for referrals for criminal activity, threats to the government or the public, and to enable DOI Bureaus or Offices to implement public outreach programs associated with third party social media applications that may contain usernames, profile images and/or contact information and result in the creation of a Privacy Act system of records. DOI does not collect, maintain or disseminate PII obtained from users of Slideshare.

5) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

N/A – DOI published DOI-08 Social Networks System of Records Notice on July 22, 2011.

F. ACCESS TO DATA:

1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Slideshare is a private third party website and is responsible for privacy, security and access to data. Slideshare users set their own privacy settings to allow access to their data. There could potentially be millions of Slideshare users who have access to information posted on Slideshare, including the general public, Federal employees, private organizations, and Federal, State, Tribal and local agencies. DOI has official Slideshare pages and has the same access to data as other Slideshare users. DOI has no control over user settings or content, and does not collect, maintain or disseminate PII from Slideshare users.

2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Slideshare is responsible for privacy, security and access to data. As noted above, access to data is determined by the Slideshare user when establishing their privacy settings. The privacy settings and policy are governed and controlled by Slideshare. DOI has no control over access controls in Slideshare. Official DOI documents, presentations, and videos posted on DOI's official Slideshare page may be accessed by all Slideshare users; however, official postings are reviewed and approved prior to public dissemination.

3) Will users have access to all data on the system or will the user's access be restricted? Explain.

Slideshare is responsible for privacy, security and access to data. Within Slideshare, users control access to their own PII, generally via system settings. DOI has the same access as any other Slideshare user dependent on individual user privacy settings. DOI has no control over user content in Slideshare, except for official DOI postings. DOI does not collect, maintain or disseminate PII from Slideshare. Official DOI documents, presentations, and videos posted on DOI's official Slideshare page may be accessed by all Slideshare users; however, official postings are reviewed and approved prior to public dissemination.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)

Slideshare is responsible for privacy, security settings and use of data. Slideshare users control access to their own PII, generally via system settings. DOI has the same access as any other Slideshare user dependent on individual user privacy settings. DOI has no control over user content in Slideshare, except for official DOI postings which are reviewed and approved prior to public dissemination.

5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Slideshare is a private third party website that is independently operated. DOI does not have a part in the development or maintenance of Slideshare.