



**Federal Trade Commission  
Privacy Impact Assessment**

**Instagram**

**July 2024**

The Federal Trade Commission (FTC or Commission) has prepared this Privacy Impact Assessment (PIA) to analyze and explain how the FTC handles personally identifiable information (PII)<sup>1</sup> about individuals that may be available to the agency through the FTC's use of the social networking platform, Instagram ([www.instagram.com](http://www.instagram.com)). The purpose of this PIA is: (i) to ensure that the FPIA.24 Tm-0.00mJ-0.004 1



also occasionally produce reports or summaries of its use of this social media platform that include PII that is already posted publicly (i.e., usernames): for instance, it may do so if needed to comply with social media records retention guidelines from the National Archives and Records Administration (NARA). In such instances, the collection of PII in these summaries will be reduced as much as is feasible. FTC Instagram administrators may delete any comments on the Commission's Instagram profile that contain unnecessary amounts of PII, as stated in the FTC's comment policy that will be posted on its Instagram page. The FTC may use generic user data available through its systems.

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## SECTION 4.0-- SHARING OR DISCLOSING OF PII

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

All information provided by users who interact with the FTC on Instagram by liking, commenting on, or sharing FTC news and information is also publicly available on Instagram to anyone visiting the FTC's pages. As noted earlier, the FTC can exercise limited control over the sharing of PII on its Instagram profile by deleting individual comments, consistent with its commenting policy, if an individual posts unnecessary amounts of PII. See also 2.1 above, since in limited instances, PII posted on Instagram may need to be specifically provided to others at the agency, to other law enforcement agencies, or to NARA. As noted in 1.2, the FTC's Instagram page is not the official FTC website. Instagram is controlled and operated by a third party and is not a government website or application. Therefore, by using Instagram and its application providers to access the FTC's Instagram profile, users may be providing non-government third parties access to their personal information, which can be used to distinguish or trace an individual's identity. Additionally, Instagram and its application providers may use persistent technology throughout their sites. There is a possibility that other third party applications may access and share user information. For example, links posted by the FTC may lead to third-party, non-government websites that may have different privacy policies than those of Instagram or the FTC. When visiting the FTC Instagram profile, users should be aware of their privacy settings and the personal information being collected by Instagram and non-FTC related applications.

4.2 – What safeguards are in place to prevent expansion of use beyond those authorized under law and described in this PA?

Only authorized staff members from OPA have access to manage the FTC's Instagram page. Each staff member with access must sign and comply with the Commission's internal Rules of Behavior foraff may us-66 (o)r2 (r)c teca(hos)- my haofl1;(y w)2 3 (n-2 (z)4 (e)(t)-275 Td[o-2 (i)-2 (c)4 (i)-2 ( (

database. Individual users register for Instagram account and maintain their data on Instagram to the extent permitted by Instagram's [terms of use](#). For example, users who choose to interact with the FTC can publicly “unlike” and delete their interactions on the FTC’s pages at any time. FTC Instagram profile

Instagram's privacy policy. These notices will be available through exit scripts or text overlays at all points that connect users to Instagram