



**Federal Trade Commission
Privacy Impact Assessment**

Twitter

Reviewed and Updated February 2023

Follows/Following

Anyone can follow FTC Twitter accounts as they are not private and do not require permission to follow. The @FTC and @LaFTC accounts will only follow other government agencies and leadership. The @MilConsumer account may follow other government accounts and partners of the [Military Consumer Protection campaign](#). Commissioners and the Chief Technologist may follow other users, such as reporters, but any such following does not equal an endorsement by the Commission or any individual Commissioner.

Mentions

If a registered user posts a tweet that includes an FTC's account handle, this is called a mention. The tweet will appear in the user's profile and home stream as well as the timelines of all followers of that user. Additionally, that tweet will show up in the notifications/mentions stream of the FTC account.

If a user posts a tweet that starts with a mention of a specific FTC Twitter account (e.g., @FTC), it will only show up in the home streams of users who follow both that user and the FTC account. However, all public tweets (meaning the account is not locked or protected) are searchable by the public on Twitter's website (or other third party sites linked to Twitter), thus anyone can search for mentions of FTC Twitter accounts.

Public tweets may also be picked up by other search engines (e.g., Bing, Google, Yahoo!), aggregator sites, or applications outside of Twitter. The FTC cannot delete tweets sent by other users even if they mention an FTC account, but the FTC can block Twitter users or other messages (see below) that are deemed as harassing toward the FTC. Additionally, "spam" style Twitter accounts can be reported, and Twitter can investigate and delete the account if necessary.

Direct Messages

Private messages between registered Twitter users are called "Direct Messages." These messages are stored in a "Direct Message stream" accessible only to the registered Twitter user. Only another registered user whom you follow can send you a direct message (and you must follow them to send them one back). The @FTC, @LaFTC, and @MilConsumer accounts may engage in Direct Messages with other government accounts that are mutual followers of these FTC accounts. Similarly, Direct Message activity may result between Commissioners or the Chief Technologist and other Twitter accounts that are mutual followers. In all cases, account users shall be required to manage such communications, if any, to ensure that the FTC is able to comply with potentially applicable legal obligations (e.g., Freedom of Information Act requests, e-discovery litigation holds, duty to preserve, copy, retain or destroy under Federal records law).

Interactive Twitter Events

The FTC may use Twitter to promote events or answer questions in real-time. See the [FTC's Twitter Chats](#) and [Interactive Twitter workshops](#) for more information about how these events work.

1.2 – Is the agency’s use of Twitter consistent with all applicable laws, regulations, and polices?

Former President Barack Obama’s January 21, 2009 memorandum on *Transparency and Open Government* and the OMB Director’s December 8, 2009 *Open Government Directive* call on federal departments and agencies to harness new technologies to engage with the public. Twitter has over 250 million active users. Using tools like Twitter helps the FTC to communicate with consumers on platforms where they’re active, which in turns helps the FTC meet the federal guidance outlined in the directive and memorandum, including the goals of transparency, participation and collaboration.

With respect to the information that the FTC will disseminate through its Twitter accounts, the FTC Act authorizes the FTC to prevent unfair and deceptive acts and practices in interstate commerce and, in furtherance of this mission, to gather, compile, and make information available in the public interest. See 15 U.S.C. 45, 46(a), (f).

Per federal guidance, consumers who visit Twitter or other third-party websites by clicking on a link on the FTC website receive an exit script or similar notice advising them that the FTC’s privacy policy does not apply on that third-party website. Additionally, notices are placed as appropriate on each FTC account informing visitors that [Twitter’s privacy policy](#) governs on the

Records Administration (NARA). In such instances, the collection of PII in these summaries will be reduced as much as is feasible.

The FTC does not collect tweets from individuals exercising their First Amendment rights unless expressly authorized by statute or by the individual about whom the record is maintained or unless pertinent to and within the scope of an authorized law enforcement activity. The FTC limits access to any such collected tweets to only staff and contractors with a legitimate business need to review the materials; the information is not to be used for any other purpose.

The FTC routinely monitors FTC-related keywords on Twitter and other third-party applications in an effort to determine what kind of public attention the FTC is generating online. The FTC does this manually and via automated social media management tools. Generally, comments that

In accordance with OMB memorandum M-10-22, *Guidance for Online Use of Web Measurement and Customization Technologies*, the FTC uses some analytical data from Twitter to measure the overall number of followers, number of retweets, and similar statistical information to evaluate the effectiveness of the FTC's Twitter accounts. The FTC will not collect any PII that is unnecessary (*see* Sec. 2.1).

SECTION 4.0 SHARING OR DISCLOSING OF PII

Section 4.1 – With what entities or persons inside or out

Twitter has a Federal Compatible Terms of Service agreement [available via digital.gov](#).

As much as possible, the FTC uses information that is already publicly available on other FTC websites, thus consumers do not need to visit the agency's Twitter accounts to find comparable information.

SECTION 8.0 – CREATION OR MODIFICATION OF A SYSTEM OF RECORDS

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

No. The FTC does not collect PII or Twitter handles in a manner that would require the FTC to create or modify a system of records under the Privacy Act of 1974.

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