

Federal Trade Commission
Privacy Impact Assessment

LinkedIn

Updated May 2019

SECTION 1.0 - SPECIFIC PURPOSE OF THE FTC'S USE OF APPLICATION

1.1 – What is the specific purpose of the agency's use of the application, and how does that use fit with the agency's broader mission?

LinkedIn is a popular professional networking website. The Federal Trade Commission maintains the official FTC LinkedIn company page using an FTC-approved LinkedIn account administered by authorized FTC staff members. The official FTC LinkedIn page permits the Agency to reach users who may not be regular visitors to FTC websites. It includes links to FTC job postings on government websites and relevant FTC news and resources.

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

Yes.

Former President 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. Using tools like LinkedIn helps the FTC to 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 LinkedIn account, the FTC Act authorizes the FTC to prevent unfair and deceptive acts and practices in interstatg

disseminate PII from members of the public. In specific circumstances, the FTC may collect limited information (e.g. usernames or handles) about members of the public (e.g., if messages or posts directed to the FTC or its employees on LinkedIn are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). The FTC may also occasionally produce reports or summaries of its use of this social media platform that include PII 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.

LinkedIn provides aggregate analytic data to page administrators, called Insights, including date of visit, impressions, clicks, interactions, and new followers acquired. Insights does not reveal the individual identities or profiles of visitors to the page. Additional analytics may include reach (how many times an update is seen), and engagement (clicks, comments, and "likes"). Aggregate analytic data are used to receive feedback and potentially improve consumer experience when visiting the site. Access to Insights is limited to authorized administrators of the official FTC page.

SECTION 6.0 – HOW THE AGENCY WILL