

SECTION 1.0 – SPECIFIC PURPOSE OF THE FTC’S USE OF SPROUT SOCIAL

1.1 –

SECTION 2.0 – IS THERE ANY PII THAT IS LIKELY TO BECOME AVAILABLE TO THE AGENCY THROUGH THE USE OF SPROUT SOCIAL?

2.1 – What PII will be made available to tFTC?

Sprout Social is a content management platform that allows the FTC to distribute content across multiple social media sites where the FTC maintains a presence (e.g., Facebook, Twitter, LinkedIn, etc.). When registered users log in to their Sprout Social account, they must provide an email address and password to Sprout Social. (This personal user data is not available to the FTC.)

Users who connect their other social media accounts to Sprout Social can disseminate content directly to the other platforms from Sprout Social. Any publicly available information that a consumer may include in their public social media profile will be accessible to the FTC through Sprout Social. It is up to the individual to determine how much personal information they want to make publicly available; typically, however, the person's username (whether it is their actual name or an alias) is public and will be visible to the FTC. If a member of the public posts a comment or message on one of the FTC's social media accounts, the FTC may access the content of that comment or message from that social media account or through Sprout Social, including any personally identifying information that individual has made publicly available about himself/herself.

The FTC usually monitors FTC-related keywords via Sprout Social and its other social media pages to determine the type of public attention the FTC is generating online. However, the FTC does not intend to routinely use Sprout Social to solicit, collect, maintain, or disseminate PII from members of the public. The FTC may collect limited information in specific circumstances (e.g. usernames or handles) if messages or posts directed to the FTC or its employees are deemed as threatening or violent or indicates some other potential law violation. Generally, such messages or posts would be collected directly from the specific FTC social media account itself (Twitter, Facebook, LinkedIn) and/or maintained with the individual user name or handle that identifies them, rather than through Sprout Social.

Sprout Social will primarily be used to schedule the FTC's social media posts and collect general

in aggregate in the form of analytics data, wherein the information is not linked or linkable to a specific individual.

discussed. Nonetheless, as explained earlier, the FTC limits access to the FTC's Sprout Social accounts to prevent the unauthorized collection of PII through these accounts.

As much as possible, the FTC uses Sprout to disseminate information that is already publicly available on the FTC websites; thus, consumers seeking access to FTC information are not required to visit the agency's page via Sprout Social. Any of the other social media platforms where the FTC maintains a presence, if consumers are concerned about the privacy of these third-party platforms. If consumers want to avoid those platforms, comparable information is posted and available to users on the FTC's official website ([ftc.gov](https://www.ftc.gov)).

The FTC routinely reviews Sprout Social's privacy policies for any changes that may affect the FTC's use of Sprout Social and will update its privacy policies as necessary to reflect any changes.