GSA

Social Media

Privacy Impact Assessment (PIA)
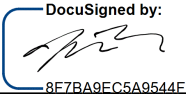
July 2024

POINT of CONTACT

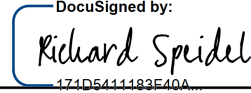privacy.office@gsa.gov

Version 1.4: 5-27-2022

GSA Stakeholders

The GSA representatives listed below have reviewed the information provided by the vendor for completeness.

Name of GSA Program Manager:

X _____
—8F7BA9EC5A9544F...

GSA Program Manager

Name GSA Chief Privacy Officer (CPO):

X *Richard Speidel* _____
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GSA Chief Privacy Officer

Table of Contents

Version 1.4: 5-27-2022

Overview

A. System, Application, or Project Name:

This Privacy Impact Assessment is directed to the use of Social Media by the Office of Strategic Communication.

The General Services Administration (GSA) operates social media profiles on X (formerly known as Twitter)[1], Facebook[2], YouTube[3], LinkedIn[4], Instagram[5], and Threads[6]. There are two types of accounts associated with GSA: flagship and ancillary. Flagship accounts include the main GSA accounts on each platform as well as accounts that represent major GSA functions, such as challenge.gov and the U.S. Technology Modernization Fund. Ancillary accounts are created and managed in order to support individual functions and missions at GSA.

B. GSA Client:

Office of Strategic Communication

C. System, application, or project includes information about:

Individuals who either respond to posts by GSA on Social Media services or who submit direct messages or other communications directly to GSA. These individuals may be members of the public, employees of GSA or other federal agencies, contractors, or non-citizens of the United States. The various platforms that comprise Social Media also include information about the GSA employees who have access to said platforms.

D. System, application, or project includes these data elements:

GSA does not directly solicit PII from members of the public via Social Media. However, individuals may respond to GSA communication or posts by including PII that is not solicited or

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[1] x.com

[2] facebook.com

[3] youtube.com

[4] linkedin.com

[5] instagram.com

[6] threads.net

requested by GSA in their communications. As these communications from members of the public are a free form response, GSA cannot definitely state the types of information that may be submitted.

E. The purpose of the system, application, or project is:

The purpose of Social Media is to provide information to the public regarding the activities and actions of GSA. Users of these platforms may, as noted above, provide PII or other sensitive information in response to such information.

SECTION 1.0 OPENNESS AND TRANSPARENCY

1.1 Are individuals given notice before the collection, maintenance, use or dissemination of personal information about themselves? If not, please explain.

All of the Social Media platforms are governed by Privacy Policies that are outside of the purview of GSA. A user's response to a GSA communication would be governed by said Privacy Policies to the greatest extent possible.

SECTION 2.0 DATA MINIMIZATION

2.1 Why is the collection and use of PII necessary to the system, application, or project?

GSA does not solicit nor request PII on Social Media platforms. If it is necessary for GSA to purposely collect PII about an individual, it would be done through alternative methods or systems, not via Social Media.

2.2 Will the system monitor the public, GSA employees, or contractors?

The intent of the use of Social Media is not to monitor the public, GSA employees, or contractors. However, individuals may choose to self-identify their location or provide other PII using tools available on various Social Media platforms.

2.3 What kinds of report(s) can be produced on individuals?

GSA does not obtain reports on individuals' use of social media.

2.4 Will the data included in any report(s) be de-identified? If so, what process(es) will be used to aggregate or de-identify the data?

Not Applicable.

SECTION 3.0 LIMITS ON USING AND SHARING INFORMATION

3.1 Is the information in the system, application, or project limited to only the information that is needed to carry out the purpose of the collection?

GSA does not request or solicit any information from members of the public in connection with the use of Social Media.

3.2 Will the information be shared with other individuals, federal and/or state agencies, private-sector organizations, foreign governments and/ other entities (e.g., nonprofits, trade associations)? If so, how will the vendor share the information?

GSA responds to valid requests for information such as requests under the Freedom of Information Act (FOIA).

3.3 Is the information collected directly from the individual or is it taken from another source? If so, what is the other source(s)?

As Social Media provides a free-form response, information may be submitted by the individual. An individual may also submit information about a second individual.

SECTION 4.0 DATA QUALITY AND INTEGRITY

4.1 How will the information collected, maintained, used, or disseminated be verified for accuracy and completeness?

GSA does not review unsolicited PII for accuracy or completeness.

SECTION 5.0 SECURITY

5.1 Who or what will have access to the data in the system, application, or project? What is the authorization process to gain access?

A specific subset of employees in the Office of Strategic Communication have access to the direct messages or other account-to-account communications. If individuals relay PII in publicly-available posts, then the other users of said platform may also have access to the publicly-available post. The Social Media Branch Chief manages access to GSA flagship social media accounts, which is restricted to necessary OSC staff. Page administrators oversee ancillary agency social media access according to HSSO or office needs.

5.2 Has a System Security and Privacy Plan (SSPP) been completed for the information system(s) or application?

No SSPP has been completed as the platforms that comprise Social Media are governed by each individual organization's security and privacy plans and policies.

5.3 How will the system or application be secured from a physical, technical, and managerial perspective?

Multi-Factor Authentication (MFA) is required for all accounts, and enabling guidance is provided in the Social Media Navigator policy.

5.4 What mechanisms are in place to identify and respond to suspected or confirmed security incidents and breaches of PII? If so, what are they?

GSA engages with the platforms that comprise Social Media through a web interface, so each individual platform is responsible for ensuring the security of the information under its control.

SECTION 6.0 INDIVIDUAL PARTICIPATION

6.1 What opportunities do individuals have to consent or decline to provide information? Can they opt-in or opt-out? If there are no opportunities to consent, decline, opt in, or opt out, please explain.

Individuals can opt to not comment or send messages to GSA by way of Social Media. Should an individual choose to do so, there are no opportunities to consent, decline, or opt out.

6.2 What procedures allow individuals to access their information?

As GSA does not solicit information from members of the public in connection with its use of Social Media, individuals can access their information directly from the platforms that comprise Social Media.

6.3 Can individuals amend information about themselves? If so, how?

Should individuals provide unsolicited PII to GSA, they can send follow-up communications to correct the unsolicited PII. However, GSA does not record or retain information outside of the platforms that comprise Social Media.

SECTION 7.0 AWARENESS AND TRAINING

7.1 Describe what privacy training is provided to users, either generally or specifically relevant to the system, application, or project.

The GSA users of the various platforms that comprise Social Media undergo annual Security & Privacy awareness training.

SECTION 8.0 ACCOUNTABILITY AND AUDITING

8.1 How does the system owner ensure that the information is only being used according to the stated practices in this PIA?

As GSA does not solicit information from members of the public in connection with its use of Social Media, information forwarded by post or private message from members of the public is generally disregarded. GSA has made other communications channels widely available and encourages their use, including email, web form submission, and telephone.