Privacy Impact Assessment (PIA) for Third-Party Websites and Applications (Social Media Sites)


Note: In addition to completing a PIA, New Social Media platforms must be approved by the IRS Social Media Governance Council. If your organization has not received approval, complete the New Media Use Authorization Form.

Date (mm/dd/yyyy)
01/28/2014

Section I - Introduction

1. Provide the Full Name the IRS will use for the Third-Party Website or Application or Social Media site (hereinafter, “Social Media site”), and Acronym (“IRS Recruitment”)

Internal Revenue Service Company Overview

2. What type of Social Media site will be used

- Facebook
- You Tube
- Twitter
- iTunes (podcasts)
- Web 2.0 application
- Other LinkedIn

Section II - About the Social Media Site

4. Will personally identifiable information (PII) become available to the IRS through public use of this social media site

- Yes ✗
- No

If yes, list all PII that is likely to become available (i.e., names, avatars, email addresses, photos, etc.)

a. Will the public be able to respond or interact with comments or questions

- Yes ✗
- No

If yes, how

b. Will the public need to identify their email address or other address if they request services

- Yes ✗
- No

If you answered yes to any part of Question 4, a full PIA is required. Please complete the remainder of this questionnaire. If no, stop and explain how no PII is available here, and submit for review.

5. What is the IRS intended or expected use of the PII? Be specific. This answer must map to the mission or goals of the agency

IRS will not collect PII via LinkedIn. We will not be posting content that can be commented on.

a. Will the site be used to solicit feedback? (OMB M-10-23 requires that if an agency uses a third-party service to solicit feedback, the agency should provide an alternative government email address where users can also send feedback)

- Yes ✗
- No

b. If the answer for 2a. above is yes – provide information on the IRS.gov website or email address were users can send feedback
6. With whom will the IRS share the PII
   - a. Within the IRS business owner’s offices
   - b. IRS research/statistical data gathering
   - c. Other IRS offices (list)
   - d. Other federal or state government agencies
   - e. Other outside entities

   **Note:** Follow number 7 retention schedule instructions only if site will interact with public (contact AWSS Records & Information Management Services (RIM) to determine if the interaction constitutes “record keeping”)

7. What are the plans to maintain the PII collected, used or stored

8. How will the IRS secure the PII that is used, maintained or provided? (Be specific to ensure the security controls meet Cybersecurity and other Federal security authorities)

9. List any other privacy risks that may exist, or be inherent in a social networking environment
   - a. What are the IRS plans to mitigate those risks

   IRS does not plan to actively seek PII nor actively seek to connect with users. The IRS does not plan to accept personal users' request to connect or interact on social media sites.
10. Does this social media site use any means to track visitors’ activity on the Internet? (Note: the executive owner must ensure that the website is in full compliance with OMB M-10-22 “Guidance for Online Use of Web Measurement and Customization Technologies including #3, “Appropriate Use and Prohibitions”)

   □ Yes  ✗ No

   a. If yes, indicate means
   LinkedIn uses two types of cookies, persistent and session. Users have the option to disable cookies in their web browser.

   b. Persistent cookies
   □ Yes  ✗ No

   If yes, state authority & provide reason
   As stated in LinkedIn's privacy policy, LinkedIn uses persistent cookies once a user has logged in to his or her LinkedIn account. The next time he or she visits the LinkedIn website using the same device, the persistent cookie will enable LinkedIn to recognize him or her as an existing user, so he or she may not need to log in before using LinkedIn's services.

   c. Web beacons
   □ Yes  ✗ No

   If yes, state authority & provide reason

   d. Session cookies
   ✗ Yes  □ No

   If yes, state authority & provide reason
   As stated in LinkedIn's privacy policy, a session cookie is used to identify a particular visit to the LinkedIn website. Session cookies expire after a short time, or when visitors close their web browser.

   e. Other
   □ Yes  ✗ No

   If yes, describe, state authority & provide reason

11. Specific purpose of the IRS Use of the Social Media Site (Provide a clear, concise description of the social media site and why it’s needed. Explain the benefits to the Mission of the Service)

LinkedIn is a professional networking site with more than 259 million members. The IRS Company Overview will provide static content on the services we provide to taxpayers and tax professionals, including the Return Preparer Office, National Public Liaison, free tax services, etc.

12. Requested operational date

3/1/2014

13. List all System of Records Notices (SORN) that apply (contact to verify SORN listing prior to PIA submission)

Section III - General Requirements

14. Third-Party privacy policies

   a. The IRS business owner has examined the third party’s privacy policy and has evaluated the risks and has determined whether the social media site is appropriate for the IRS use
   ✗ Yes  □ No

   b. The IRS business owner will monitor any changes to the third party’s privacy policy and periodically reassess the risks involved
   ✗ Yes  □ No

15. External links

   a. The IRS business owner will assure that if they posts a link that leads to a third-party website or any other location that is not part of an official government domain, the agency will provide an alert to the visitor, such as a statement adjacent to the link or a “pop-up” explaining that visitors are being directed to another government website that may have different privacy policies from those of the agency’s official website
   ✗ Yes  □ No

16. Embedded applications

   a. If the IRS business owner incorporates or embeds a third-party application on its website or any other official government domain, the IRS business owner will take the necessary steps to disclose the third party’s involvement and describe the IRS privacy requirements in its Privacy Policy notice, as specified by OMB M-10-23
   ✗ Yes  □ No
17. Agency branding
   a. The IRS business owner will follow guidance that suggests that when an agency uses a social media site that is not a part of an official government domain, the IRS will apply appropriate branding to distinguish the agency’s activities from those of nongovernmental actors. For example, to the extent practicable, the IRS business owner will assure that the IRS Seal or emblem will be added to its profile page on a social media site to indicate that it is an official IRS agency presence.

18. Information collection
   a. If information is collected through the IRS use of a social media site, the IRS business owner will assure that they collect only the information “necessary for the proper performance of agency functions and which has practical utility.” If PII is collected, the agency will collect only the minimum necessary to accomplish a purpose required by statute, regulations, or executive order.

19. Privacy policy notice requirements
   a. The Business Owner of this social media site agrees to maintain an IRS approved Privacy Notice plus links to irs.gov and the IRS Privacy Policy on the front page of the website. This Notice will "stand alone" and not be combined into other background information. See guidance below.

Privacy Notice Guidance
Privacy Notice: This service is controlled and operated by a third party and is not an official government website. By interacting with the IRS through this service, you may be providing non-government third parties access to your personal information. The IRS does not keep or share any personally identifiable information that you provide through this service. The IRS strongly discourages you from providing sensitive personally identifiable information (such as your social security number or tax account information) and will delete any comments containing such information without responding.

www.irs.gov
Privacy Policy

Section IV - Other

20. List the names of any other social media sites owned or maintained by the Business Unit, if known. Please provide full names and date of operation.

www.twitter.com/IRSnews (2010 to present)
www.facebook.com/IRS (Jan. 2010 to present)
www.youtube.com/user/irsvideos (April 2009 to present)
www.tumblr.com/internalrevenueservice (July 2012 to present)