



National Science Foundation

**Privacy Impact Assessment (PIA)
for Social Media Sites**

January 2023

Version 3.0

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REVISION HISTORY

Revision Number	Author	Date	Description
Version 1.0	N. Kaplan	December 2010	Initial Version
Version 2.0	N. Kaplan	March 2011	Incorporated comments
Version 2.0	F. Wenger	August 2011	Review, no changes made
Version 3.0	DIS IT Security Team	January 2023	Updated to include all platforms used by NSF

PRIVACY IMPACT ASSESSMENT FORM

1. CONTACT INFORMATION

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2. GENERAL SYSTEM INFORMATION

1. Name of collection or system:

This PIA covers various social media tools and external sites used by NSF, as follows:

- NSF Facebook Page: <http://www.facebook.com/US.NSF>
- NSF Instagram Page: <https://www.instagram.com/nsf.gov/>
- NSF LinkedIn Page: <https://www.linkedin.com/company/national-science-foundation>
- NSF Pinterest Page: <https://www.pinterest.com/USNSF/>
- NSF Twitter Feed: [Twitter.com/NSF](https://twitter.com/NSF)
- NSF YouTube Channel: <http://www.youtube.com/user/VideosatNSF>

The PIA may be updated in the future as required to reflect NSF's use of new social media tools and sites.

2. Description of System or Electronic Collection of Information:

The sites described in this PIA are external tools used by NSF. They are all linked from the NSF website at: <https://nsf.gov/social/>.

Facebook is a social medium that helps people to communicate more efficiently with their friends, family, and coworkers. Facebook and other social media provide consumer-focused services that can be modified and improved with user feedback. NSF's page encourages the public's engagement with science through posts highlighting NSF-sponsored research and news about scientific discoveries.

Instagram is a social networking application that allows its users to share pictures and videos with their followers. The NSF Instagram features vibrant images and videos of agency news, discoveries, and research.

LinkedIn is a social network for professionals to connect, share, and learn. Unlike other social media platforms, LinkedIn focuses on career development, allowing users to upload their resumes and apply for jobs. NSF uses LinkedIn to discuss current opportunities and NSF work culture.

Pinterest is a visual search engine and social media platform designed to enable the sharing and discovery of information using pinboards, which function as digital bulletin boards. NSF's Pinterest page offers educational resources to parents, students, and teachers.

Twitter is a real-time information network that connects users to information. At the heart of Twitter are small bursts of information called tweets, which often link to additional information, deeper context, and/or embedded media. The NSF Twitter feed highlights the latest news and happenings from NSF-funded research.

WordPress is an open-source content management system that supports Really Simple Syndication (RSS) feeds including blogs, visual and audio podcasts, and learning management systems. NSF publishes RSS feeds pertaining to scientific research and discoveries.¹

YouTube is a popular online video community, allowing people to discover, watch and share originally created videos. NSF's YouTube site offers video that describes NSF and our mission.

3. What is the purpose of the system or electronic collection of information?

All the social media sites and tools listed in Question 2.2 are used by NSF to provide information to, and interact with, NSF stakeholders and members of the public. As stated previously, NSF will share only non-sensitive, mission-related information via these sites.

4. Requested Operational Date?

Not applicable (N/A). NSF is already using these social media tools.

5. Does this collection create a new Privacy Act System of Records Notice (SORN) or is the PII collection covered by one or more existing SORNs? If so, name the SORN.

No.

6. What specific legal authorities, arrangements, and/or agreements require the collection of this information?

N/A.

3. PII IN THE SYSTEM

1. What PII is to be collected, used, disseminated, or maintained in the system or collection?

By NSF: The Foundation does not collect, maintain, or disseminate information from individuals who view, like, comment, or share agency content from external social websites.

¹ Overseen by the Directorate of Biological Sciences

By External Sites: The external sites' practices for collection and use of information from users are described below.

Facebook collects name, email address, gender, and birth date from individuals when they sign up for the service. Individuals may also voluntarily provide photos, educational and employment history, and personal information such as favorite websites, current interests, and contact information. Facebook also collects information on some of the actions that individuals take when using the site, including pages that are visited.

Facebook's Privacy Policy, which describes how information collected from individuals is safeguarded and used, is located at <http://www.facebook.com/policy.php>.

Instagram collects the communications and other information individuals provide when someone uses their products, including when they sign up for an account, create or share content, and message or communicate with others. This includes metadata such as the location of a photo or the date the file was created.

Instagram's Privacy Policy is located at <https://help.instagram.com>.

LinkedIn collects name and email address and/or mobile number when users register for an account. Users may provide information such as education, work experience, certifications, profile photo, city or area and skill endorsements.

LinkedIn's Privacy Policy is located at <https://www.linkedin.com/legal/privacy-policy>.

Pinterest collects name, email address, phone number, photos, Pins, and IP address, which is used to approximate users' location, even if they do not choose to provide their precise location. Users have the option to provide additional information such as gender, age, and preferred language.

Pinterest's Privacy Policy is located at <https://policy.pinterest.com/en/privacy-policy>.

Twitter collects information from individuals when they register to use Twitter, including name and email address. Individuals may also voluntarily provide information for inclusion in their Twitter profile, such as a cell phone number and web site address. Twitter also collects information about site accesses.

Twitter's Privacy Policy is located at: <http://twitter.com/privacy>.

WordPress collects name and email address from individuals when they create an account on their site. Users may provide additional information, such as address or profile photo, but is not required to create an account.

WordPress's Privacy Policy is located at <https://automattic.com/privacy/>.

YouTube collects information from individuals when they create an account on the site. Information collected includes email address, zip code, date of birth, and gender. YouTube also collects access information about site visitors.

YouTube's Privacy Policy is located at http://www.youtube.com/t/privacy_at_youtube.

With all the sites and tools, individuals that have created accounts are able to share additional information via the sites. Each site has account settings and privacy settings that enable an individual to share information, links, photos, videos, etc. broadly or to restrict information to only those they choose to share it with.

2. What are the sources of the PII?

PII collected by these external sites is mostly provided directly, and voluntarily, by individuals. Registration information also is collected by each social media site.

3. What technologies will be used to collect the PII?

By NSF: NSF does not collect, maintain, or disseminate PII from or about individuals who view, like, share, or comment on NSF social media content.

By External Sites: Initial information collected by the sites at account creation uses web forms. The sites use "cookie" technology to collect website usage information.

4. **ATTRIBUTES OF THE DATA (USE AND ACCURACY)**

1. Describe the uses of the PII.

By NSF: NSF does not collect or use PII shared by individuals or organizations on these social media sites.

By External Sites: The PII shared by individuals or organizations on these social media sites is used to establish relationships, share information, and collaborate.

2. Does the system perform any strictly analytical functions on the PII?

By NSF: N/A

By External Sites: All the sites perform some form of analytics at the aggregate (see 5.1 below) or individual user level, including for purposes of targeted advertising, to make suggestions to site users or to provide them with a list of content that may be of interest to them. For example, Facebook may suggest that an individual establish relationships with other individuals on the site based upon common affiliations. YouTube suggests video content that may be of interest to an individual based upon videos that have been previously viewed. Twitter makes suggestions for users to "follow" based upon their other subscriptions.

The suggestions that are offered to individuals based upon their usage of these social media sites are not provided by NSF or made available to NSF.

3. How will the accuracy of the PII collected from individuals or derived by the system be ensured?

By NSF: N/A.

By External Sites: Generally, PII collected from individuals on these sites is not checked for accuracy by the sites themselves. Twitter offers “verified accounts” to prevent impersonation of well-known individuals by others, but the details of this process are not available publicly.

5. SHARING PRACTICES

1. Describe any sharing of the PII with internal or external organizations.

By NSF: N/A

Information shared by users on the NSF-affiliated social media sites is publicly available (e.g., information posted to the NSF Facebook site wall, comments shared in response to an NSF-posted video on YouTube, and responses to NSF postings on Twitter). NSF itself does not make the information available.

NSF may track and share, internally or externally, aggregate statistical data about NSF-affiliated social media sites (e.g., number of NSF Facebook followers, number of NSF Twitter followers, number of YouTube video views).

By External Sites: The social media sites’ privacy policies describe ways in which PII may be disclosed to external organizations (e.g., for purposes of law enforcement)

2. How is the PII transmitted or disclosed to the internal or external organization?

By NSF: N/A.

By External Sites: The social media sites’ privacy policies describe ways in which information may be disclosed to external organizations (e.g., in response to law enforcement or compulsory process).

3. How is the shared PII secured by external recipients?

By NSF: N/A.

By External Sites: The social media sites’ privacy policies describe ways in which PII may be disclosed to external organizations (e.g., for purposes of law enforcement), but they do not disclose how shared PII is secured by external recipients.

6. NOTICE TO INDIVIDUALS TO DECLINE/CONSTENT USE

1. How does the program or collection provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

By NSF: N/A.

NSF provides links from the NSF social media web site (<http://www.nsf.gov/social/>) to the privacy policies of the individual sites.

By External Sites: Individuals must agree with the Terms of Service for each site prior to account creation. The Terms of Service for each site includes references to that site's privacy policy.

2. Do individuals have the opportunity and/or right to decline to provide any or all PII?

By NSF: An individual's use of the social media sites and tools, including affiliation with NSF social media sites, is voluntary.

By External Sites: During account creation, individuals must provide certain PII to have their account established. All these external sites provide examples of PII that is not mandatory to provide.

Each of the external sites allows individuals to view some information without creating an account and providing their PII (i.e., the NSF Facebook page, Twitter account pages, and YouTube channel are all viewable), but certain features of these sites are only available to account holders. For example, an individual can view NSF's social media sites without relevant accounts but could not interact by commenting.

3. Do individuals have the right to consent to particular uses of their PII?

By NSF: N/A.

By External Sites: On all the external sites used by NSF, individuals can use privacy settings to control the PII that is shared beyond the basic information established during account creation. The privacy policies of each site describe exactly how PII will be used.

Facebook and Instagram are currently owned by Meta Platforms, Inc., doing business as Meta and previously known as Facebook, Inc. Meta's privacy policy provides general information on how PII is shared and used within the application. Meta also advises on how individuals can change or remove PII using privacy settings, but individuals do not seem to be able to consent to specific uses of the PII shared on the sites.

LinkedIn collects PII when users provide, post, or upload it to their site. Examples of this include filling out a form (e.g., with demographic data or salary), responding to a survey, submitting a resume, or filling out a job application using their services. Users can opt to import their address book and calendar meeting information, and the site analyzes that data to grow the users' network.

Pinterest, in addition to determining their users' geographic location, collects technical information including log data, cookie data, and device information. This information is shared with advertisers. Individuals do not seem to be able to consent or opt out of specific uses of this information.

Twitter advises that the site will not disclose PII except in limited circumstances; for example, the service may share or disclose an individual's PII when consent is provided, e.g., when an individual uses an external client to access Twitter.

WordPress states that it does not sell or lease your personal information to external parties unless it has the users' permission, or it is required by law to do so.

YouTube advises that when individuals share PII with the site, they are consenting to certain uses of it, e.g., to operate, maintain, and improve the features of the site. YouTube states that the site will not send commercial or marketing messages without opt-in consent.

7. ACCESS TO DATA (ADMINISTRATIVE AND TECHNICAL CONTROLS)

1. What categories of individuals will have lawful access to the system?

By NSF: NSF has access to its own social media accounts on these sites and to any public posted data on these sites. As noted earlier, however, even if NSF has access to PII that may be posted publicly, it does not collect or maintain such PII.

By External Sites: The external sites' privacy policies describe how information is used and secured, and who has access to information that may be posted by or collected from site users.

Meta, currently the parent company of Facebook and Instagram, describes methods they use to secure information, including use of a secured server to hold account information, encryption of sensitive information via secure socket layer technology, and analyzing account activities to detect potentially fraudulent behavior.

LinkedIn uses password protection, data encryption, application security, physical security, and secure networks to protect customers' information residing on the LinkedIn platform.

Pinterest's Privacy Policy states that they work to protect the security of user information but includes no discussion of encryption in the policy or whether users are notified in the event of a data breach.

Twitter does not describe how personal information that it collects is secured.

WordPress provides encryption, firewalls, data backup, and security testing and monitoring to all sites and custom domains hosted on their platform. Their security site provides recommendations on additional steps users can take to protect their information.

YouTube's privacy policy does not describe explicitly how information is secured, but the Google Privacy Policy linked from YouTube (YouTube is a subsidiary of Google) describes how

information is safeguarded. Google restricts access to personal information to “Google employees, contractors, and agents” who need to know. Google also states that they take appropriate security measures, including security reviews, encryption, and physical safeguards, to protect sensitive information from unauthorized disclosure.

2. How is permissible access by a user determined? Are procedures documented?

By NSF: N/A.

By External Sites: The privacy policies of each external site describe how individuals can grant, or restrict, public access to information. (Users’ permissions or rights to access their social media data may also be determined by applicable law.) They do not describe the process for sharing of personal information with authorized users.

3. What auditing measures/controls and technical safeguards are in place to prevent exposure or misuse of PII by authorized users e.g., record browsing, extraction?

By NSF: N/A.

By External Sites: The privacy policies of each external site describe how individuals can grant, or restrict, public access to PII. They do not describe, beyond general terms, the auditing measures and technical safeguards that are in place to prevent unauthorized access to PII.

4. Describe privacy training provided users, general or specific, relevant to the program or system?

By NSF: NSF has included general guidance on use of social media in the annual Security and Privacy training which is mandatory for all staff. NSF employees are expected to follow all NSF directives for social media use.

By External Sites: The privacy policies of each external site describe how individuals can grant, or restrict, public access to PII. They do not describe privacy training provided to authorized users.

5. Describe the extent to which NSF contractors will have access to the system.

See the response to Question 7.4 above.

6. Describe the retention period for the personal records in the system.

By NSF: NSF does not collect, maintain, or disseminate PII from individuals who interact through social media web sites.

By External Sites: The privacy policies of each external site describe how individuals can grant, or restrict, public access to PII. They do not give the actual retention period for the PII they collect, although these sites describe the process that individuals can follow to delete an account.

7. What is the disposition of the personal records at the end of the retention period?

By NSF: N/A, as NSF does not collect personal records (PII) from social media.

By External Sites: The privacy policies of the external sites generally do not describe the process for disposal of data.

8. SECURITY

1. Is the PII secured in accordance with FISMA requirements?

N/A

9. PRIVACY ANALYSIS

Reference to Privacy Policies

Prior to utilizing these external tools, NSF examined each social media site's privacy policy to evaluate the risks of affiliating with the sites and to determine whether each website or application is appropriate for the agency's use. Our initial analysis of these sites indicated that use of the sites to disseminate agency information is appropriate. We continue to monitor these privacy policies to ensure we are aware of any changes and to periodically reassess the risks.

One area of concern for NSF is ensuring that the users of these external sites are aware of the privacy policies that govern the collection, use, and sharing of PII by these sites. NSF links to the social media sites from our agency web site; we provide an exit page to alert visitors that they are being directed to a nongovernment website that has different privacy policies from NSF's.

Use of Disclaimers

The exit page referenced in the section above includes a disclaimer about the information posted on the external social media site: "NSF takes no responsibility for and exercises no control over the views expressed or the accuracy of the information contained on this site." This notice serves to let individuals know that NSF does not control, moderate, or endorse the comments shared on the external sites.

Additional disclaimers:

Risks Associated with Agency Branding

NSF uses the agency's logo to provide "branding" and notify users that the sites represent an official agency presence. However, despite NSF's affiliation with these external sites, the agency does not collect or control the information provided by individuals. One possible risk associated with the agency's use of these sites is that individuals may believe they are interacting directly with, and providing information to, NSF when they are in fact submitting information to the external sites. This misunderstanding may lead to NSF being blamed if a breach or loss of personal information by an external site did occur. In accordance with Office of Management and Budget (OMB) M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, NSF informs individuals on how to obtain information from official agency sources.

Inadvertent Sharing of Sensitive Agency Information

As stated previously, NSF intends to use external social media sites to share only non-sensitive, mission-related information, and not to collect PII from or about individual social media users. In general, the information that NSF shares via these sites is publicly available information, and NSF mitigates the risk of unauthorized information being posted by limiting the number of individuals that can publish to the social media sites. However, as an additional mitigating factor, NSF is prepared to follow existing policies and procedures related to the breach of personal information should sensitive information be inadvertently released by NSF or by an individual using an NSF-branded site.