



Privacy Program U.S. Access Board

Privacy Impact Assessment: Third-Party Social Media/Social Networking Websites and Applications

Section 1: System Information

1.1 Name of Website/Application: LinkedIn

1.2 Agency Account - Public URL/Name: <https://www.linkedin.com/company/us-access-board>

1.3 Agency Account Administrator: Phil Bratta

1.4 Form Completed By: Phil Bratta

1.5 Submission Date:

1.6 Reason for PIA Completion:

☐ New third-party website/application

☐ Changes to use of account by agency that affects data collection/privacy practices

☒ Other (please specify): Existing third-party website account

Section 2: Overview and Purpose

2.1 Describe the website/application:

The Access Board (hereafter as “Board”) uses a LinkedIn “Company Page” to distribute information about the agency’s services and programs. LinkedIn post content may include, but are not limited to, news articles, upcoming webinars and trainings, promotion of Board-hosted events, and announcements of job openings. The Board’s LinkedIn page is public, thus anyone who is not registered with LinkedIn may visit the page.

2.2 Describe how use of the website/application will serve Access Board mission or program (with references to relevant sections of the ABA or Rehabilitation Act, if any)

The Board’s LinkedIn page aligns with its fourth goal in Strategic Plan FY 2022-2026: Promote accessibility throughout society. The LinkedIn page will augment the Board’s public presence and apprise a broader audience about accessibility-related information and resources, aiding in fulfilling its statutory mission to “Promote accessibility throughout all segments of society.” See 29 U.S.C. §792

Section 3: General Requirements

3.1 Third-party privacy policies

- a. The Account Administrator has examined the website/application's privacy policies, evaluated the risks, and determined that the site is appropriate for agency use.

☒ Yes ☐ No

- b. The Account Administrator will periodically monitor the website/application's privacy policies and reassess privacy risks, if needed.

☒ Yes ☐ No

- c. The Account Administrator will ensure that, if a link to the third-party website/application is posted on the agency's website that leads to a web location that is not part of an official government domain, the agency's website will provide an alert to visitors (e.g., statement adjacent to link, "pop-up" notice) that they are being re-directed to a non-governmental, third-party website/application.

☒ Yes ☐ No

3.2 Embedded applications

- a. The Account Administrator will ensure that, if the third-party website/application is embedded or incorporated on the agency's website, visitors will be informed of the third-party's privacy policies.

☒ Yes ☐ No

3.3 Agency branding

- a. The Account Administrator will follow federal guidance suggesting that, when an agency uses a third-party website/application that is not part of a government domain, the agency will apply appropriate branding (e.g., placing agency logo on profile page on a social media site) to distinguish the agency's activities from those of the non-governmental entity.

☒ Yes ☐ No

3.4 Information collection

- a. If information is collected through the Access Board's use of the website/application, the Account Administrator will ensure that only information necessary for the proper performance of agency functions and which has practical utility will be collected.

☒ Yes ☐ No

3.5 Privacy policy notice

- a. The Account Administrator agrees to ensure that a privacy notice/disclosure statement, as approved by the Access Board Privacy Office, is posted on the website/application.

b. ☒ Yes ☐ No

Section 4: Information Collection

4.1 When using the website/application, does the Access Board plan to *collect* personally identifiable information (PII) from individuals? (If yes, please explain.)

☐ Yes ☒ No

The Board does not collect any PII. The Board's LinkedIn posts are viewable by anyone, including those who are not registered at Facebook and searchable on Facebook's website (or other third-party sites linked to Facebook).

4.2 Will individuals be required to provide their name and/or email address to access or use the Access Board's page/account/channel on the website/application?

☐ Yes ☒ No

4.3 By having an account on the website/application, will individuals' PII potentially *be made available* to the Access Board, regardless of whether the agency actively solicits or collects such information? (If yes, please explain.)

☒ Yes ☐ No

LinkedIn requires users to provide their first name, last name, a valid email address, and a password, with the option to provide additional information in their biography when they register an account. The information that the LinkedIn-registered users post to their public profiles may be accessible to the Board. This includes name (real or pseudonym), location, and any additional information they post publicly in their biography.

However, the Board does not have access to all the information that LinkedIn collects to register for the site. The Board does not collect, disseminate, or maintain any of the information provided to LinkedIn.

4.4 Will individuals be permitted to post content on the website/application (e.g., post comments, ask questions, express views on regulatory initiatives)? (If yes, please explain.)

☒ Yes ☐ No

LinkedIn users can post comments on the Board's posts if they choose to do so. If a registered user creates a post that includes/tags the Board's account, the post will appear in the user's profile and home stream, as well as the timelines of all followers of that user. The Board cannot delete posts by other users if they mention the Board's account; but the Board can block users or other messages that are deemed as harassing toward the Board.

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- If you answered yes to any question in Section 4 above, a full PIA for the website/application is required. You must complete the remainder of this form.
 - If you answered no to all questions in Section 4 above, you do not need to complete a full PIA. Proceed to Section for review and approval.
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Section 5: Openness and Transparency

5.1 Will the Access Board provide notice to individuals about how the agency will collect, use, or share their PII? (If yes, please explain.)

☐ Yes ☒ No

Not applicable. The Board does not collect, use, or share any individuals' PII. The home page of the Board's account includes a statement that LinkedIn's privacy policies govern there. Information on where to find the Board's privacy policies is also provided to the public.

5.2 Will the Access Board use or access individuals' PII from the website/application? (If yes, please explain.)

☐ Yes ☒ No

The Board does not use or access any of the information provided to LinkedIn. The Board does not have access to all the information that LinkedIn collects to register for the site. The information that LinkedIn-registered users post to their public profiles is available to the Board. This includes a user's name (real or pseudonym), location, and any information they post publicly in their biography

5.3 Will the Access Board share individuals' PII from the website/application with other governmental agencies, private organizations, or persons (aside from Account Administrators)? (If yes, please explain.)

☐ Yes ☒ No

The Access Board has no plan to share individual users' PII with other agencies, organizations, or persons.

Section 6: Information Retention and Security

6.1 If the Access Board plans to access, collect or store individuals' PII, describe the steps the agency will take to protect this information.

Not applicable. The Board does not access, collect, or store PII that LinkedIn collects from its registered users.

6.2 If the Access Board plans to access, collect, or store individuals' PII, how long with this information be retained? (Please consult with an Access Board records official about applicable record retention schedules.)

Not applicable. The Board does not access, collect, or store PII that LinkedIn collects from its registered users.

6.3 If the Access Board plans to access, collect, or store individuals' PII, describe the identified privacy risks and how such risks will be mitigated.

Not applicable. The Board does not access, collect, or store PII that LinkedIn collects from its registered users. As explained earlier, the Board's LinkedIn account makes it clear that LinkedIn's privacy policies govern there and provides the link to the Board's privacy program.

Section 7: Legal Compliance

7.1 Will the Access Board's use of the website/application trigger the Paperwork Reduction Act (PRA)? (Please consult with USAB/OGC concerning PRA requirements.)

☐ Yes ☒ No

7.2 Will the Access Board's use of the website/application trigger the Privacy Act of 1974 (e.g., creating or modifying a "system of records")? (Please consult with the Privacy Office concerning PRA requirements.)

☐ Yes ☒ No

Section 8: Privacy Office Review

Please submit completed forms to the Access Board Privacy Office (privacy@access-board.gov). An Access Board Privacy Officer will review the form and notify you whether the requested use of the third-party website/application has been approved.

For Access Board Privacy Office Use Only

Reviewed By (Privacy Officer): Wendy Marshall

Date: 10 /25/2021

Requested use of third-party website/application is:

☒ Approved (Use consistent with agency privacy policies and/or applicable federal authorities)

☐ Approved, with conditions (specified below)

☐ Denied (Use inconsistent with agency privacy policies and/or applicable federal authorities)

Signature (Privacy Officer): _____

Comments/Notes: