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

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Authorities: The Privacy Act of 1974 (*as amended*); the E-Government Act of 2002; OMB M-10-22, "Guidance for Online Use of Web Measurement and Customization Technologies" (6-25-10); and OMB M-10-23, "Guidance for Agency Use of Third-Party Websites and Applications." (6-25-10)

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*)

11/12/2015

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## Section I - Introduction

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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*")

IRS EITC Awareness Thunderclap

2. What type of Social Media site will be used

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

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## Section II - About the Social Media Site

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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.*)

Some PII is potentially available to the IRS through Thunderclap, to the extent that the IRS' Thunderclap supporters choose to make it available (e.g. Facebook user names, Twitter names and profile pictures). Users that support a Thunderclap campaign may show up on the campaign's home page under "recent or current supporter lists." These lists do not include links back to the supporter's social media accounts, so the information is limited to a static photo and user name. Although the IRS may collect or maintain aggregate data about the number of supporters of its campaigns, IRS does not intend to collect identifying usernames, profiles, photos or any other PII about its Thunderclap supporters or individuals in their networks.

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 does not intend to collect or use any PII from Thunderclap.

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 where 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 information collected, used or stored? (Follow approved records retention schedule below if site will interact with public. Contact the IRS Records and Information Management (RIM) Program Office with recordkeeping questions)

Not applicable. IRS does not collect, maintain or use PII that may be made available to it through Thunderclap. Users should review Thunderclap's privacy policy to learn what PII Thunderclap may collect from its users and share with entities or persons inside or outside Thunderclap.

**Records Control Schedule (RCS) 17, item 34 for IRS Interactive Networking Site Use Records (to be published in RCS Document 12990 when next updated):**

Records documenting activity on social networking sites where interaction with site users and IRS occur. Activity capture records include periodic and/or scheduled screen shots detailing content posted by IRS; links to content hosted on IRS-owned web sites; discussion topics posted by IRS; comments to IRS posts/discussions by users subscribed to networking sites/services, and; comments posted by IRS employees. (Job No. DAA-0058-2013-0003)

Disposition: Temporary.

Cut off 6 months after the beginning of the FY.

Delete/Destroy 6 months after cutoff.

Note: Some networking sites are used by IRS strictly for publishing information that is already scheduled and maintained in accordance with previously approved RCS items (including IRS.gov). See RCS Document 12990 for approved disposition instructions for recordkeeping/official copies of those documents. For records that do not have a previously approved schedule, or do not meet the above Networking Site criteria, please contact the RIM Program Office for retention assistance.

a. Site the authority to retain/dispose of the PIA data

- RCS 17, item 34 for IRS Interactive Networking Site Use Records
- Other (explain, and cite authority or provide proposed retention)

No PII data will be collected or maintained.

b. Cite the authority to retain the PII. RCS 17, Item 33, IRS Interactive Networking Site Use Records (DAA-0058-2013-0003, Pending National Archives and Records Administration approval)

No PII data will be collected or maintained.

c. Describe where the PII data will be stored, who will have access to it, and the purpose. (Collection, use, retention, and disclosure of personally identifiable information will be limited to what is minimally necessary for the specific purposes for which it was collected, unless specifically authorized or mandated by law)

No PII data will be collected or stored.

d. How will the PII be eliminated at the end of the retention period? (All records housed in the system will be erased or purged from the system at the conclusion of their retention period(s) as required under IRM 1.15.6 Managing Electronic Records)

No retention period, as no PII data will be collected 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)*

No PII data will be collected, maintained or stored.

9. List any other privacy risks that may exist, or be inherent in a social networking environment

Some PII is potentially available to the IRS through Thunderclap, to the extent that the IRS' Thunderclap supporters choose to make it available (e.g. Facebook user names, Twitter names and profile pictures). Users that support a Thunderclap campaign may show up on the campaign's home page under "recent or current supporter lists." These lists do not include links back to the supporter's social media accounts, so the information is limited to a static photo and user name.

a. What are the IRS plans to mitigate those risks

IRS will not collect or retain any information including PII in order to minimize privacy risks.

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

Thunderclap is a third-party service that uses persistent tracking technologies, which may collect, maintain or share information about individuals who visit or have accounts on Thunderclap. In an effort to help consumers understand how their information is used by Thunderclap, IRS posts notices on its Thunderclap accounts indicating that Thunderclap's policy applies on these sites. IRS routinely reviews Thunderclap's privacy policies for any changes that may affect the IRS's use of Thunderclap and will update its privacy policies as necessary to reflect any changes.

b. Persistent cookies  Yes  No

If yes, state authority & provide reason

c. Web beacons  Yes  No

If yes, state authority & provide reason

d. Session cookies  Yes  No

If yes, state authority & provide reason

Thunderclap's Privacy Policy states: "When you view the Website or use website features, we may collect certain non-personal information from you by using small text files known as "cookies." We use cookies for several purposes, such as to recognize visitors to the Website, to determine the number of unique visitors to the Website, to ascertain which Website pages they visit, and to conduct internal reviews of the Website."

e. Other (i.e. Google Analytics)  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)*

The IRS uses Thunderclap, a third-party (non-government) website, to enlist other Thunderclap users ("supporters") to share IRS messages through their chosen social media accounts. The key feature of Thunderclap is that when a message has attracted enough supporters, it is shared automatically and simultaneously through those supporters' accounts. Thunderclap users login to the site with credentials for their existing social media accounts. The IRS will administer its Thunderclap campaign through the official @IRSnews Twitter account. Users can create a "campaign" that will share their message on the social media accounts or other Thunderclap users if the campaign gets enough users to support it. This feature amplifies the potential impact of IRS content by making it available through networks and individuals to viewers that the IRS might not otherwise reach using its own IRS accounts.

Thunderclap users support each campaign individually, meaning supporting one IRS campaign does not automatically enroll users in supporting future IRS campaigns. For each Thunderclap campaign supported, users grant Thunderclap permission to post only that campaign's message on the users' designated social media accounts. Users can remove their support for a campaign at any time.

IRS Thunderclap campaigns link back to existing content on IRS.gov and other agency and partner websites. All Thunderclap messages from the IRS will contain only public information.

12. Requested operational date

1/1/16

13. List all System of Records Notices (SORN) that apply (*contact Treasury/IRS 00.001 Communications to verify SORN listing prior to PIA submission*)

### Section III - General Requirements

14. Third-Party privacy polices

- 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  Yes  No

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  Yes  No

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  Yes  No

If no, explain the reason why a Privacy Notice is not required

#### 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](http://www.irs.gov)

[Privacy Policy](#)

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**Note:** Office of Privacy Compliance reserves the right to request copies of the following:

- A copy of Terms of Service Agreements
  - A copy of the Privacy Act Notice that will be used
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**Section IV - Other**

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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

Three Twitter accounts in operation since 2012: @IRSnews, @IRStaxpros and @IRSEnEspanol

One Tumblr page (internalrevenueservice.tumblr.com) in operation since 2012

One Facebook page (facebook.com/IRS) in operation since 2012

Three YouTube accounts (IRS Videos, IRS Multilingual and IRS ASL) in operation since 2009

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