Social Media PCLIA Report

Date of Approval: July 7, 2017 Survey PCLIA ID Number: 2736

A. Site Description

1. The full name and acronym for the Social Media site, Third Party Website, or Application. <u>Eventbrite</u>, Eventbrite

Note: the remaining questions will be simplified to Social Media site (vs. Third Party Website or Application)

- 2. Is this a new Social Media site? Yes
 - 2.b.1. If yes, enter the full name, acronym and PCLIA ID of the most recent Social Media PCLIA.
 - 2.b.2. If yes, enter the approval date of the most recent Social Media PCLIA.
 - 2.b.3. If yes, indicate which of the following changes occurred to require this update. (Check all that apply)

No: Addition of PII

No: Conversions

No: Anonymous to Non-Anonymous

No: Significant System Management Changes

No: Significant Merging with Another System

No: New Access by IRS Employees or the Public

No: Addition of Commercial Data or Resources

No: New Interagency Use

No: Internal Flow or Collection

No: Other

- 3. What type of Social Media site will be used? (Facebook, YouTube, Twitter, LinkedIn, Other) Other
 - 3.a. If other, please specify: Eventbrite event management website

A.1 General Business Purpose

4. What is the specific business purpose of the IRS use of this Social Media site? Provide a clear, concise description of the Social Media site, the reason for the site, and the benefits to the IRS mission. IRS Procurement hosts several industry engagement events throughout the year. Attendees of these events are vendors, industry representatives and industry partnerships. We have no automated internal registration method (that we are aware of) and manual methods are administratively burdensome and require bandwidth we currently do not have. We need a mechanism like Eventbrite for outreach and

registration management; automated list and attendance data and the ability to send email updates to all registered attendees.

- 5. Is the Social Media site operational? No
 - 5.b. If no, what is the requested operational date? 7/10/2017

B. PII Details

- 6. Will Personally Identifiable Information (PII) become available to the IRS through public use of this Social Media site? Yes
 - 6.a. If yes, check all the (PII) that is likely to become available

Yes: Name

No: Location

No: Picture

Yes: Contact Information

Yes: Employer

No: Education

No: Other

- 7. Will the public be able to respond or interact with comments or questions? Yes
 - 7.a. If yes, how? Eventbrite allows users to communicate with event organizers through their Simple Mail Transfer Protocol (SMTP) email function.
- 8. Will the public need to identify their email address or other address if they request service? Yes

B.1 About the Social Media Site

- 9. Does the IRS intend or expect to use the PII? Yes
 - 9.a.1. If yes, explain the detailed business needs and uses for the PII, and how the PII is limited only to that which is relevant and necessary to meet the mission and goals of the IRS. The only information that will be used by IRS Procurement is the individual's name, company and email. This information will be used for event communication purposes only. (e.g. reminders, updates, future events and outreach)
 - 9.a.2. If yes, will the site be used to solicit feedback? No
- 10. Will the IRS share the PII? No
 - 10.a. If yes, with whom will the PII be shared? (Check all that apply)
 - No Within the IRS Business Owner's office
 - No IRS research/ statistical data gathering

No Other IRS Offices (if selected, list other IRS offices)

list other IRS offices:

<u>No</u> Other federal or state government agencies (if selected, list other federal or state government agencies).

Yes Other (if selected, list other outside entities)

C. Privacy Act & System of Records Notice

- 11. Is there a System of Records Notice(s) or SORN(s) that addresses the PII records in this site? No
 - 11.b. If no, explain why the Social Media site does not have a SORN?

These are records owned by private company in the application used by federal employees to register for events.

D. Responsible Parties

12. Identify the individuals for the following Social Media site roles: # # Official Use Only

I.1 Records Schedule

- 13. Will your site interact with the public? Yes
 - 13.1. If yes, what are the plans to maintain the PII collected, used, or stored? Name, company/business, email address. Any records we keep will be stored on our Share Point library with permissions limited to only a few IRS employees.
 - 13.2. If yes, cite the authority to retain/dispose of the PII.
 - RCS 17, item 34 for IRS Interactive Networking Site Use Records
 - 13.3. If yes, describe where the PII data will be stored, who will have access to it and the purpose.

Only a few IRS employees will have access to the information stored by Eventbrite.

13.4. If yes, how will the PII be eliminated at the end of the retention period?

The account will be closed and event information deleted.

O. Tracking

- 14. Does this Social Media site use any means to track visitors' activities on the Internet? Yes
 - 14.a. If yes, indicate how.
 - No Persistent Cookies

14.a.1. If selected, state authority & provide reason.

No Web Beacons

14.a.2. If selected, state authority & provide reason.

No Session Cookies

14.a.3. If selected, state authority & provide reason.

In addition to information voluntarily submitted by users, Eventbrite automatically collects certain technical data that is sent from the computer, mobile device and/or browser through which you access the Services (Automatic Data). Automatic Data, includes without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address) characteristics about your access device and/or browser, statistics on your activities on the Services, information about how you came to the Services and data collected through Cookies, Pixel Tags, Local Shared Objects, Web Storage and other similar technologies.

14.a.4. If selected, describe, state authority & provide reason. No

P. Privacy Policy

15. Has the IRS Business Owner examined the Third Party's Privacy Policy and evaluated risks? Yes

15.a If yes, is the Social Media site appropriate for IRS use? Yes

- 16. Will the IRS Business Owner monitor any changes to the Third Party's Privacy Policy and periodically assess the risks involved? Yes
- 17. Can the IRS Business Owner assure that if a link is posted that leads to an external Third Party website or any other external location that is not an official government domain, the agency will provide a pop-up alert to the visitor explaining that they are being directed to another website that may have different Privacy Policies? No
 - 17.b. If no, please explain. We have no jurisdiction or control over Eventbrite's content, nor do we have the ability to add links to their page.
- 18. If the IRS Business Owner incorporates or embeds a third-party application on its website or any other official government domain; will the IRS Business Owner 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? NA

P.1 Data Security

- 19. How will the IRS secure the PII that is used, maintained, or provided? (Be specific to ensure the security controls meet Cyber Security and other federal security authorities.) While we don't envision a need to store participant information on IRS systems, if we were to do so, any information downloaded for event participants would be stored in a Share Point folder, on which permissions are strictly limited to the Program Manager and SME.
- 20. Are there any privacy risks that may exist or be inherent in a social networking environment? Yes

20.a.1. If yes, list the risks. There is ALWAYS a risk of hackers obtaining any online data. Any site or database connected to the internet has vulnerabilities that may be exploited by experienced hackers. Information provided to Eventbrite is done voluntarily with user accepting the Terms of Service upon entering.

20.a.2. If yes, what are the plans to mitigate the risks? From Eventbrite: "We take what we believe to be reasonable steps to protect the Personal Data collected via the Services from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or Internet or e-mail transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us electronically."

Q. General Requirements

- 21. Will the IRS Business Owner follow guidance that suggests 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
- 22. If information is collected through the IRS use of a Social Media site, will the IRS Business Owner assure that they collect only the information "necessary for the proper performance of agency functions and which has practical utility"? Yes
- 23. If PII is collected, will the Business Owner assure that the agency collect only the minimum necessary to accomplish a purpose required by statute, regulations, or executive order? Yes

R. Privacy Notice

- 24. Does the Business Owner of this Social Media site agree to maintain an IRS approved Privacy Notice that will "stand alone" and not be combined into other background information? (Privacy Compliance & Assurance may request copies of the Terms of Service Agreements and/or the Privacy Notice.) Yes
- 25. Can the Business Owner confirm that links to IRS.gov and the IRS.gov Privacy Policy will be placed on the front page of the website? Yes

K. Other Sites

26. Are there any other Social Media sites owned or maintained by the Business Unit? No

M. Civil Liberties

- 27. Does the Social Media site maintain records describing how an individual exercises rights guaranteed by the First Amendment (including, but not limited to information regarding religious and political beliefs, freedom of speech and of the press, and freedom of assembly and petition)? <u>No</u>
- 28. Will this Social Media site have the capability to identify, locate, and monitor individuals or groups of people? <u>No</u>

End of Report