#### EZ PIA

This form should only be used for systems that do not qualify as a major information system. It is designed for small projects, databases, Web 2.0 applications, etc. For questions about the form you should contact NGC

## I. System identification

a. System name: Flickr

b. System owner: Pamela Wright, Social media team

c. Office system is located in: NPOL

d. PIA author name: Kelly Osborn and Hannah Bergman Phone: 301-837-0870

e. Date of PIA: September 17, 2010

f. One paragraph description of the system:

NARA's Flickr photos are managed by program offices in locations at NARA's Washington, D.C. offices, its regional archives, and the presidential libraries. NARA's participation in Flickr and the Creative Commons group increases NARA's online presence and is another way for the public to interact with NARA. Each image allows viewers to comment with a screen.

## II. Privacy Assessment

a. What information is being (or will be collected)? For databases, list fields NARA does not collect, maintain or disseminate PII from individuals who interact with NARA on our Flickr Photostream. Flickr may collect PII from individuals but this information is not shared with NARA.

NARA does not browse individuals' Flickr pages to collect PII about them.

Individuals may comment on images in NARA's photostream. The individual's screen name and profile picture, which are visible to the public and have been voluntarily shared with NARA, are captured and saved through NARA's records management processes.

If individuals share sensitive PII, such as a Social Security Number, through a comment, the PII is moderated in accordance with NARA's comment and posting policy.

### b. Why is the information being collected?

Any PII that is collected is done so through the management of federal records. NARA does not collect PII beyond that identifying information which is shared by Flickr users when commenting on photos.

- c. How do you intend to use this information? Any PII collected through comments is not used. The comments themselves often provide additional information about the content of the photo or document. This information may be used to update NARA's records regarding the photo or document to make them more accurate.
- d. With whom will the information be shared? All of the information captured through the management of Flickr photostream is information that is or was publicly accessible. PII that has been removed from a Flickr photostream page in accordance with our comment and posting policy is retained in the records of the office that manages the photostream. These records have not yet been scheduled but when a schedule is approved they will be managed in accordance with it.
- e. How is the information stored? Electronically and in paper form.
  - i. What records schedule applies? The records are unscheduled.
  - ii. For how long will the information be kept? Unscheduled records are retained as permanent until they are scheduled.
- f. What notice or opportunities for consent is provided to individuals when their information is collected? All information collected through the capture of NARA's Flickr photostream is information voluntarily shared by individuals with NARA on a public web site. On NARA's Flickr profile page, there is a privacy notice and comment and posting policy. The comment and posting policy tells visitors: "Please do not share information such as social security numbers, birth dates, or other private information that you do not want to make available to others."
  - i. If there is a privacy policy in place, please provide the text of it and describe how it is made available to users. On NARA's photostream profile, the following privacy notice is posted: This site is not hosted by the National Archives and Records Administration and thus the privacy policies of NARA do NOT apply. The privacy policy for this web site may be found at http://info.yahoo.com/privacy/us/yahoo/flickr/details.html. NARA retains records of the content on the NARA portion of this site, as is provided for in our records retention schedules and mandated by the Federal Records Act. These records include user comments and any personally identifiable information a commenter shares with NARA. Because these records are collected from a public web site, it may be

disclosed to others and used by NARA in the conduct of agency business. Please do not share information such as social security numbers, birth dates, or other private information that you do not want to make available to others. NARA disclaims any liability for any loss or damage resulting from any comments posted on this page. This forum may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy. Information about NARA activities and other methods to communicate with NARA are also available on NARA's official web page at www.archives.gov/, along with archival photos, videos and other documents. The privacy policy for www.archives.gov/ maybe found there.

ii. Is this system a Privacy Act system of records? No

If yes, then what SORN is the system covered by?

N/A

### g. How is the information secured?

All PII is secured in accordance with NARA's internal directive on PII. In particular, sensitive PII removed from a Flickr comment in accordance with the comment and posting policy is stored electronically in a password protected file. NARA's Social media team maintains all information related to the Flickr photostream. This information is not regularly shared with other offices in an effort to mitigate security concerns.

### III. Approval of PIA

a. System owner

b. Senior agency Official for Privacy

Date

# b. Senior Agency Official for Privacy

And to

9/2H/0
Date

Name

c. Chief Information Officer

Name

9/30/2010

Date