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: Instagram

b. System owner: Pam Wright, Chief Innovation Office

c. Office system is located in: VES

d. PIA author name: Mary Krakowiak Phone: 301.837.1971

e. Date of PIA: July 18, 2013

f. One paragraph description of the system:

Instagram is a photo sharing application that allows users to share photos with filters to transform the image into a memory that connects people through photos. These photos are extremely unique with different perspectives, and are generally location based. The National Archives would create one main US National Archives account, and also open the option to the Presidential Libraries to create their own accounts. Because of the overwhelming popularity of Instagram and its widespread use today, this would increase NARA's online presence and relevance with the public.

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 Instagram. Instagram may collect PII from individuals but this information is not shared with NARA.

NARA does not browse individuals' Instagram accounts to collect PII about them.

Individuals may comment on a NARA Instagram photo. The individual's 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.

When individuals share sensitive PII, such as a Social Security Number, on a Instagram 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 through Instagram comments and similar features.

- c. **How do you intend to use this information?** Information gathered through the management of federal records is used to document the development of federal policies and managed with a federal records schedule.
- d. With whom will the information be shared? All of the information captured through the management of NARA's Instagram accounts is information that is or was publicly accessible. PII that has been removed from an Instagram photo in accordance with our comment and posting policy is retained in the records of the office that manages the Instagram account (Digital Engagement).
- 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 Instagram photos is information voluntarily shared by individuals with NARA on a public web site. On the Instagram accounts maintained by NARA, the privacy policy and comment policy will be linked to from Archives.gov. The comment and posting policy tells visitors: "Do not post personally identifiable information such as social security numbers, addresses, and telephone numbers. Comments containing this information will be removed from the Instagram account."
 - i. If there is a privacy policy in place, please provide the text of it and describe how it is made available to users. The Privacy Notice on Archives.gov will be linked to in the description of NARA on Instagram. The privacy notice says: "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://instagram.com/about/legal/privacy/. 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 http://www.archives.gov, along with archival photos, videos and other documents. The privacy policy for http://www.archives.gov may be found there.

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

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

Click here to enter text.

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 Instagram in accordance with the comment and posting policy is stored electronically in a password protected file. Each office maintains its own file system with information from its Instagram account only. This information is not centralized or regularly shared with other offices in an effort to mitigate security concerns.

III.	Approval of PIA	
	a. System owner	\$/12/12
	James Will	0/13/13
	Name	Date
	b. Senior agency Official for Privacy	9/26/13
	N	Data
	Name	Date
	c. Chief Information Officer	
	Mhild	9.27.16
	Name	Date