Adapted Privacy Impact Assessment

<u>Sketchfab</u>

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<u>Contact</u>

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One Privacy Impact Assessment (PIA) may be prepared to cover multiple websites or applications that are functionally comparable as long as agency or bureau practices are substantially similar across each website or application. However, any use of a third-party website or application that raises distinct privacy risks requires a complete PIA exclusive to the specific website or application. Department-wide PIAs must be elevated to the Office of the Chief Information Officer (OCIO) for review and approval.

SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application

1.1   What is the specific purpose of the agency's use of the third-party website or application and how does that use fit with the agency's broader mission?

   The mission of the National Park Service (NPS) is to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The NPS cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world. The National Historic Preservation Act (NHPA) of 1966, as amended, is federal legislation developed to ensure that our nation's historical and archaeological properties are not lost through neglect or inadvertently damaged by activities permitted or funded by federal agencies. Section 106 of the NHPA requires NPS to institute procedures to assure that federal plans and programs contribute to the preservation and enhancement of non-federally owned sites and structures, as well as objects of historical, architectural or archaeological significance.

   NPS makes information about its research activities available online through the NPS Web pages and approved third-party applications such as Sketchfab. Sketchfab is a third-party application designed to enable users to publish and find three-dimensional (3D) content online. Sketchfab users can upload and submit 3D models, images, and related content, along with comments and other information. Sketchfab's technology is integrated with every major 3D creation tool and publishing platform and is compatible with every browser and most virtual reality (VR) headsets. Users may embed the service's player anywhere on the Web, thereby enabling them to view and share 3D and VR content on other social media platforms. Sketchfab also offers an online store from which users can review and purchase model files online.

   NPS's use of Sketchfab to share 3D models of paleological specimens, architectural structures, archaeological artifacts and natural or engineered structures, and enables the bureau to be more inclusive, reach new audiences, and better educate the public about NPS's mission. NPS's official use and presence on Sketchfab does not constitute an endorsement or preference for the services, products, or information on Sketchfab.

1.2   Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

   NPS's use of Sketchfab is consistent with all applicable laws, regulations, and policies. Any planned use of Sketchfab that falls outside the scope of this assessment will require a complete PIA exclusive to the Sketchfab use.

Sketchfab has an approved Terms of Service for Department of the Interior (DOI)-wide use.

Legal authorities that authorize the use of Sketchfab include the following: Presidential Memorandum on Building a 21st Century Digital Government, May 23, 2012; Office of Management and Budget (OMB) M-10-06, Open Government Directive, December 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; OMB M-13-13, Open Data Policy—Managing Information as an Asset, May 9, 2013; OMB Memorandum on Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010; and the Paperwork Reduction Act, 44 U.S.C. 3501.

SECTION 2: Any Personally Identifiable Information (PII) that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application

2.1   What PII will be made available to the agency?

Sketchfab does not directly share any user information with NPS, and NPS will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes voluntarily accessible to the Sketchfab community (including NPS) or NPS exclusively. If a Sketchfab user interacts with NPS by liking or commenting on an uploaded NPS model, the user's public profile information and username will become available to NPS and the entire Sketchfab community. If a Sketchfab user or member of the public submits feedback to NPS via the Sketchfab Contact feature, the submitter's SketchFab user name and any other information voluntarily provided in the message will become available to NPS.

The Sketchfab Privacy Policy specifies what PII and non-personal data Sketchfab collects from users and application visitors, as well as how Sketchfab uses the information to manage its services and business. Individuals without a Sketchfab account can view, share, and embed models posted on Sketchfab. However, individuals must be logged into a Sketchfab account to download files, post comments, or "like" posts. Individuals can sign up for a free Sketchfab account by choosing a username, providing an email address, and creating a password. At their discretion, Sketchfab users can expand their profile by adding a profile picture, organization name, location, page description, and website URL. Any information a user adds to their Sketchfab profile may be publicly visible.

2.2   What are the sources of the PII?

Sources of PII are Sketchfab users worldwide, which may include members of the general public; federal, state, local and tribal government representatives; and representatives of industry, non-profit organizations, media outlets, and research and educational institutions.

2.3   Will the PII be collected and maintained by the agency?

NPS does not actively collect, maintain, or disseminate PII while using Sketchfab.

NPS uses Sketchfab to share 3D models of paleological specimens, architectural structures, archaeological artifacts and natural or engineered structures, and increase government transparency. NPS will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including NPS) or NPS exclusively. If a Sketchfab user or member of the public interacts with NPS through Sketchfab, PII and other information may become available to NPS. If applicable, NPS may use the information to provide a response or requested service (through Sketchfab when possible). Users can send a private message or leave a public comment on the specific content hosted at San Francisco. For those private messages, a copy is received via email. To reply, one needs to log into the Privacy Message system on Sketchfab. Users can opt to have a copy BCC'd to an email. Users can also opt out of the PM system and request inquiries be directed to an email or through a web-page.

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI/NPS policy. In these cases, NPS may use information about the user interaction (e.g., username, public profile, contents of postings, and other information available to the bureau through Sketchfab) to notify the appropriate agency officials or law enforcement organizations as required by law.

Any NPS program or office that plans to use Sketchfab in a way that creates a system of records must complete a separate PIA for the specific use and collection of information and must maintain the records in accordance with the DOI-08, DOI Social Networks system of records notice (SORN) or other appropriate SORN.

2.4   Do the agency's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, NPS is not using Sketchfab to survey the public or in any manner that would trigger the requirements of the Paperwork Reduction Act. Any planned use of Sketchfab that falls outside the scope of this assessment will require a complete PIA exclusive to the Sketchfab use and coordination with the NPS Information Collection Clearance Officer.

SECTION 3: The Agency's Intended or Expected Use of the PII

3.1   Generally, how will the agency use the PII described in Section 2.0?

NPS does not actively collect, maintain, or disseminate PII while using Sketchfab. If a Sketchfab user or member of the public interacts with NPS through Sketchfab, NPS will use the minimum required information to provide a response or requested service if applicable (through Sketchfab when possible).

In unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI/NPS policy, NPS may use the information that becomes available to the bureau through Sketchfab (e.g., username, public profile, contents of postings, and other information) to notify the appropriate agency officials or law enforcement organizations.

3.2   Provide specific examples of the types of uses to which PII may be subject.

If a Sketchfab user interacts with NPS by liking or commenting on an uploaded NPS model, the user's public profile information and username will become available to NPS and the entire Sketchfab community. If a Sketchfab user or member of the public submits feedback to NPS via the Sketchfab Contact feature, the submitter's email address and any other information voluntarily provided in the message may become available to NPS. NPS may use the information to provide a response or requested service if applicable (through Sketchfab when possible). NPS will not use any of the information for marketing or other purposes.

In unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI/NPS policy, NPS may use the information that becomes available to the bureau through Sketchfab (e.g., username, public profile, contents of postings, and other information) to notify the appropriate agency officials or law enforcement organizations.

SECTION 4: Sharing or Disclosure of PII

4.1   With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

NPS does not receive, collect or share any of the PII that may become available to the bureau through the use of Sketchfab with any entities or persons outside the agency. However, there may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI/NPS policy. In such instances, NPS may use the information that becomes available to the bureau through Sketchfab (e.g., username, public profile, contents of postings, and other information) to notify the appropriate agency officials or law enforcement organizations.

Sketchfab is a third-party application used by a variety of individuals and organizations worldwide. NPS does not actively collect, maintain, and disseminate PII while using Sketchfab and will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes voluntarily accessible to the Sketchfab community (including NPS) or NPS exclusively. Users understand that they are responsible for their account settings and posted content, and NPS is not responsible for how Sketchfab users or members of the public may access or use data posted on Sketchfab.

4.2   What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

DOI entered into a federal-compatible Terms of Service for the official use of Sketchfab by DOI bureaus and offices. Only approved NPS staff members will have access to manage the official NPS Sketchfab accounts and create official postings. NPS employees are also required to complete annual mandatory security, privacy, and records management training to ensure they understand their responsibility to protect individual privacy and appropriately manage information.

NPS personnel review and approve proposed Sketchfab content prior to posting to prevent the unauthorized disclosure of personal data or internal or proprietary information. Beyond its official postings, NPS has no control over access restrictions or procedures on the Sketchfab platform, or the content posted on Sketchfab. Sketchfab is responsible for protecting its users' privacy and the security of user data within the application. Sketchfab users are subject to the application's Privacy Policy and Terms of Use and must use their own discretion with respect to their account settings and the personal information they provide to enhance their account profiles.

SECTION 5: Maintenance and Retention of PII

5.1   How will the agency maintain the PII, and for how long?

Retention periods vary, as NPS maintains records in accordance with the applicable records schedule for each specific type of record. Records posted on Sketchfab will be assessed on a case-by-case basis depending on the program or office releasing the information and the purpose of the release.

NPS must assess comments and input from the public submitted through Sketchfab by whether they contribute to decisions or actions made by the government. In such cases where input from the public serves a supporting role, NPS must preserve the comments as supporting documentation for the decision made. Approved methods for disposition of records include shredding, burning, pulping, erasing, and degaussing in accordance with National Archives and Records Administration (NARA) guidelines and 384 Departmental Manual 1.

5.2   Was the retention period established to minimize privacy risk?

Retention periods may vary depending on agency requirements and the subject of the records for the NPS program or office maintaining the records. NPS must file data that serves to support agency business with the pertinent records they support and follow the corresponding disposition instructions. Comments used as supporting documentation will follow the disposition instructions of the records they are filed with.

SECTION 6: How the Agency will Secure PII

6.1   Will privacy and security officials coordinate to develop methods of securing PII?

Yes, privacy and security officials will coordinate with NPS programs and offices to develop methods for protecting individual privacy and securing PII that becomes available to the bureau while using Sketchfab. NPS Sketchfab account managers are expected to complete all annual mandatory training requirements and act in accordance with all applicable laws, regulations, and policies.

6.2   How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

In accordance with the DOI Digital Media Policy, official social media accounts must have a primary point of contact who is responsible for managing account security, overseeing employee access and training, and distributing guidance. The contact must be a full-time, permanent federal employee. Before gaining access to an official social media account, employees must complete mandatory social media training and sign DOI's social media user agreement.

Only approved NPS staff members will have access to manage official NPS Sketchfab accounts and create official postings. NPS Sketchfab account managers must create and manage all NPS Sketchfab pages through official NPS accounts while using a protected, official government device. Access to the NPS network is restricted to authorized users with multi-factor authentication controls, servers are located in secured facilities behind restrictive firewalls, and access to databases and files is controlled by the system administrator and restricted to authorized personnel based on an official need-to-know. Other security controls include continuously monitoring threats, rapid response to incidents, and annual mandatory employee security and privacy training.

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI/NPS policy. In these cases, NPS may use information about the user interaction (e.g., username, public profile, contents of postings, and other information available to the bureau through Sketchfab) to notify the appropriate agency officials or law enforcement organizations as required by law. NPS will secure such information in accordance with applicable DOI privacy and security policies.

SECTION 7: Identification and Mitigation of Other Privacy Risks

7.1   What other privacy risks exist, and how will the agency mitigate those risks?

NPS undertakes a number of actions to mitigate other privacy risks posed by Sketchfab use. NPS follows established procedures to identify, evaluate, and address any new additional privacy requirements that may result from new statutes, regulations, and policies. NPS will also evaluate the privacy risks of any new changes to Sketchfab and the Sketchfab Privacy Policy before continuing to use the application.

Sketchfab is an independently owned and operated third-party application. NPS personnel review and approve proposed Sketchfab content prior to posting to prevent the unauthorized disclosure of personal data or internal or proprietary information. However, NPS does not have any control over the actions of other Sketchfab users. Sketchfab users are subject to the Sketchfab Terms of Use and Privacy Policy and control access to their own PII via user profile settings and through discretion with respect to the personal information they provide in posts, comments, or direct communications with other Sketchfab users. Accordingly, users should take care to avoid disclosing sensitive PII, which could be used by unintended persons to commit fraud or identity theft, or for other harmful or unlawful purposes. Sketchfab takes steps to secure user content to prevent piracy and advises users that the service cannot prevent it in all cases. Users may also receive spam or other unsolicited or fraudulent communications as a result of their interactions on Sketchfab. NPS will monitor

interactions on its official postings to the extent practicable to filter spam and abusive comments.

Sketchfab may contain links and features that enable its users to access other third-party websites and services (Third-Party Services). These Third-Party Services are governed by their own terms of use and privacy policies. Sketchfab is not responsible for the contents of any linked site. The Sketchfab Terms of Use advises users to exercise caution before proceeding to any third-party service or entering into any transaction with third parties linked to from the services.

There is a risk that third-party accounts or content may misrepresent agency authority or affiliation. Certain third-party accounts, social media websites, or content may not be officially authorized by, or affiliated with NPS, even where they appear to represent NPS or the Federal Government. Interacting with such unauthorized accounts may expose users to privacy or security risks. NPS will make every reasonable effort to label or identify its official account or page in ways that would help users distinguish it from any unauthorized accounts or pages, such as ensuring that official NPS Sketchfab pages bear the sponsoring units name and a recognizable NPS logo such as the arrowhead, or other NPS brand iconography. NPS will also inform Sketchfab about any official accounts and also notify SketchFab about pages purporting to represent the NPS, and seek their removal.

7.2   Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of the third-party website or application?

NPS provides appropriate notice to individuals informing them of privacy risks associated with the use of Sketchfab:

- This Adapted PIA provides notice to the public on the privacy implications of the use of Sketchfab.

- DOI's linking policy provides notice that website visitors are subject to third-party privacy policies when they leave an official DOI/NPS website to visit linked third-party websites. For the use of embedded elements within NPS pages that show content directly from SketchFab, a notice, associated with each will provide notice that the content is provided externally and show the static web address for the source.

- The NPS Privacy Policy and DOI Digital Media Policy are accessible through a link provided in the NPS Sketchfab profile pages. Both policies describe how NPS handles information that becomes available to the bureau through its official accounts on third-party websites and applications.

SECTION 8: Creation or Modification of a System of Records

8.1   Will the agency's activities create or modify a "system of records" under the Privacy Act of 1974?

No, NPS's use of Sketchfab will not create or modify a system of records under the Privacy Act of 1974. NPS does not actively collect, maintain, or disseminate PII while using Sketchfab. Any NPS program or office that creates a system of records while using Sketchfab will complete a separate PIA for that specific use and collection of information and must maintain the records in accordance with the DOI-08, DOI Social Networks SORN or other appropriate SORN. DOI Privacy Act SORNs may be viewed on the DOI SORN website.

8.2   Provide the name and identifier for the Privacy Act system of records.

NPS does not actively collect, maintain, or disseminate PII while using Sketchfab. Any NPS program or office that creates a system of records while using Sketchfab will complete a separate PIA for that specific use and collection of information and must maintain the records in accordance with the DOI-08, DOI Social Networks SORN or other appropriate SORN. DOI Privacy Act SORNs may be viewed on the on the DOI SORN website.