

PRIVACY IMPACT ASSESSMENT (PIA)

PRESCRIBING AUTHORITY: DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:

U. S. Africa Command YouTube Channel

2. DOD COMPONENT NAME:

United States Africa Command

3. PIA APPROVAL DATE:

10/15/20

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: foreign nationals are included in general public.)

- ☒ From members of the general public ☐ From Federal employees and/or Federal contractors
- ☐ From both members of the general public and Federal employees and/or Federal contractors ☐ Not Collected (if checked proceed to Section 4)

b. The PII is in a: (Check one)

- ☐ New DoD Information System ☐ New Electronic Collection
- ☐ Existing DoD Information System ☐ Existing Electronic Collection
- ☐ Significantly Modified DoD Information System

c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.

YouTube is a third party owned and operated video sharing service that allows users to watch videos posted by other users, and upload their own content. The service is owned and operated by Alphabet, Inc., the parent company of Google. YouTube allows users to upload, view, rate, share, add to playlists, report, comment on videos, and subscribe to other users' channels. It offers a wide variety of user-generated and corporate media videos. Available content includes video clips, TV show clips, music videos, short and documentary films, audio recordings, movie trailers, live streams, and other content such as video blogging, short original videos, and educational videos.

The U.S. Africa Command (AFRICOM) Public Affairs Office (PAO) manages a YouTube channel (a video sharing website) to provide various audiences a deeper understanding of AFRICOM, its missions and the timely release of information. Users can subscribe to YouTube channels and communicate with both AFRICOM PAO, and others on the site.

Information posted to the AFRICOM YouTube channel consists of videos that communicate command and mission information. Public subscribers to the YouTube channel are able to share and use SEC videos on their sites, providing information about AFRICOM initiative and promoting outreach efforts.

YouTube content is available to the public and it does not require the individual to have a registered account. AFRICOM does not use YouTube to collect, maintain, use, or disseminate information about individuals who visit the YouTube page. Also, in accordance with the AFRICOM Social Media Tools policy, sensitive, nonpublic information and personally identifiable information (PII) must not be posted to the AFRICOM's social media accounts.

The AFRICOM YouTube primary account manager has access to the general number of channel views, number of channel subscribers, and number of video views that is publicly available on the YouTube Channel homepage. This information does not contain information about individuals. The command also does not have access to the information that YouTube collects on individuals as detailed in their terms of service.

The OPA primary account manager is responsible for administering all social media accounts with the account provider, providing passwords and technical guidance to individual account holders and ensuring the account is regularly monitored for security issues. The OPA requires the SEC individual accounts holders to agree to abide by social media account security procedures developed in conjunction with Office of Information Technology (OIT) Security and Office of the General Counsel (OGC).

d. Why is the PII collected and/or what is the intended use of the PII? (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

YouTube requires that users register to upload, rate, comment on content; subscribe to users; create playlists; and access premium content. Although some user PII may be accessible to AFRICOM, depending on a YouTube user's privacy settings, the command does not routinely collect, use, disseminate, or maintain any of this information.

e. Do individuals have the opportunity to object to the collection of their PII? ☐ Yes ☒ No

(1) If "Yes," describe the method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object to the collection of PII.

YouTube requires users to submit first name, last name, a valid email address, and a password to register a profile on the site. Individuals may choose to provide additional information in their account biography, but it is not required. AFRICOM does not collect or maintain PII that YouTube collects from registered users, particularly those who engage with AFRICOM via rate, report, comment on AFRICOM videos or by participating in other activities permitted by YouTube.

f. Do individuals have the opportunity to consent to the specific uses of their PII? ☐ Yes ☒ No

(1) If "Yes," describe the method by which individuals can give or withhold their consent.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

AFRICOM does not have access to the information that YouTube collects to register for the site. AFRICOM does have access to information that users post to their public profiles. This includes name (real or pseudonym), username, location, and any additional information they post in their biography. AFRICOM does not routinely use YouTube to solicit, collect, maintain, or disseminate PII from members of the public. In specific circumstances, AFRICOM may collect handles of members of the public (e.g., if messages or posts directed to the AFRICOM or its employees on YouTube are deemed as threatening or violent, or where the content may reveal some other potential law enforcement violation). AFRICOM may also occasionally produce reports or summaries of its use of this social media platform that include PII posted publicly, including handles, to comply with social media records retention guidelines from the National Archives and Records Administration.

g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided. (Check as appropriate and provide the actual wording.)

☐ Privacy Act Statement ☐ Privacy Advisory ☒ Not Applicable

It is important to note that the AFRICOM YouTube channel is not the official AFRICOM website. YouTube is controlled and operated by a third party and is not a government website or application. Therefore, AFRICOM is unable to provide any assurance that the information being collected by YouTube will adhere to the Privacy Act of 1974 or any other Federal requirement. By accessing the AFRICOM's YouTube feed, users may be providing non-government third parties access to their personal information, which can be used to distinguish or trace the individual's identity. Additionally, YouTube may use persistent technology throughout the site. In order to use enhanced features (commenting, rating, reporting, etc.), users must consent to this when they accept the YouTube Terms of Service. AFRICOM may exercise limited control over the sharing of PII on its YouTube account by deleting or reporting comments, consistent with its commenting policy, if an individual posts threatening or violent messages, or unnecessary amounts of PII.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)

☒ Within the DoD Component

Specify.

Comments which include username, that are considered threatening or violent may be shared with agency security officials.

☐ Other DoD Components

Specify.

☒ Other Federal Agencies

Specify.

Comments which include username, may be shared with NARA for records management auditing purposes. Mentions which include username, that are considered threatening or violent may be shared with Federal law enforcement.

☐ State and Local Agencies

Specify.

☐ Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Specify.

☒ Other (e.g., commercial providers, colleges).

Specify.

There is a possibility that other third party applications may access and share user information. For example, links posted by AFRICOM or mentions of AFRICOM may lead to third-party, non-government websites that may have different privacy policies than those of YouTube or AFRICOM. Additionally, YouTube may use persistent cookie technology throughout their sites.

i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)

☒ Individuals

☐ Databases

☐ Existing DoD Information Systems

☐ Commercial Systems

☐ Other Federal Information Systems

Information (username and comment content) is available on the AFRICOM YouTube account from users who interact with the command on YouTube by mentioning AFRICOM. Generally, comments that AFRICOM may collect or maintain as part of such review would be collected and/or maintained without the individual username that identifies them.

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

☐ E-mail

☐ Official Form (Enter Form Number(s) in the box below)

☐ Face-to-Face Contact

☐ Paper

☐ Fax

☐ Telephone Interview

☐ Information Sharing - System to System

☒ Website/E-Form

☐ Other (If Other, enter the information in the box below)

As AFRICOM posts new content on its YouTube channel, individuals sometimes like or comment on it. These comments may include PII from the individual making the comment, such as their username. Users who simply visit the AFRICOM YouTube channel and either 1) do not have a YouTube account or 2) are not logged in and/or do not interact with the page, via liking or commenting do not make any PII available to AFRICOM YouTube administrators.

k. Does this DoD Information system or electronic collection require a Privacy Act System of Records Notice (SORN)?

A Privacy Act SORN is required if the information system or electronic collection contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier. PIA and Privacy Act SORN information must be consistent.

☐ Yes ☒ No

If "Yes," enter SORN System Identifier

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcltd.defense.gov/Privacy/SORNs/>
or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

YouTube is controlled and operated by a third party and is not a US government operated or managed website or application. Therefore, USAFRICOM is unable to provide any assurance that the information being collected by YouTube will adhere to the Privacy Act of 1974 or any other Federal requirement.

I. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?

- (1) NARA Job Number or General Records Schedule Authority. NARA GRS 6.4, Item 020, Public Comments and Communications not
- (2) If pending, provide the date the SF-115 was submitted to NARA.
- (3) Retention Instructions.

Comments received on AFRICOM content are subject to destruction when 90 days old, but longer retention is authorized if required for business use. In addition, per the AFRICOM's own privacy policy, the command does not collect any information including PII that is unnecessary. For engagement purposes on AFRICOM YouTube accounts, the command does not collect or maintain any PII beyond a YouTube username, which minimizes potential privacy risks.

m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.
- (2) If a SORN does not apply, cite the authority for this DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply).
- (a) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.
- (b) If direct statutory authority or an Executive Order does not exist, indirect statutory authority may be cited if the authority requires the operation or administration of a program, the execution of which will require the collection and maintenance of a system of records.
- (c) If direct or indirect authority does not exist, DoD Components can use their general statutory grants of authority ("internal housekeeping") as the primary authority. The requirement, directive, or instruction implementing the statute within the DoD Component must be identified.

10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 161, Combatant commands: establishment ; 10 U.S.C. 164 Commanders of Combatant Commands: assignment; powers and duties. Additionally, the President's January 21, 2009 memorandum on Transparency and Open Government and the OMB Director's December 8, 2009 Open Government Directive call on federal departments and agencies to harness new technologies to engage with the public. Using tools to communicate with the public and USAFRICOM partners on platforms where they are active help to meet the federal guidance outlined in the directive and memorandum including transparency, participation and collaboration.

n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (OMB) Control Number?

Contact the Component Information Management Control Officer or DoD Clearance Officer for this information. This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

☐ Yes ☒ No ☐ Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.
- (2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections."
- (3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

Per the OMB memorandum, Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act (April 7, 2010) and DoD Manual 8910.01, Volume 2, AFRICOM's use of YouTube is not an information collection activity that would trigger the requirements of Act.

SECTION 2: PII RISK REVIEW

a. What PII will be collected (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- | | | |
|---|---|---|
| ☐ Biometrics | ☐ Birth Date | ☐ Child Information |
| ☐ Citizenship | ☐ Disability Information | ☐ DoD ID Number |
| ☐ Driver's License | ☐ Education Information | ☐ Emergency Contact |
| ☐ Employment Information | ☐ Financial Information | ☐ Gender/Gender Identification |
| ☐ Home/Cell Phone | ☐ Law Enforcement Information | ☐ Legal Status |
| ☐ Mailing/Home Address | ☐ Marital Status | ☐ Medical Information |
| ☐ Military Records | ☐ Mother's Middle/Maiden Name | ☒ Name(s) |
| ☐ Official Duty Address | ☐ Official Duty Telephone Phone | ☐ Other ID Number |
| ☐ Passport Information | ☒ Personal E-mail Address | ☐ Photo |
| ☐ Place of Birth | ☐ Position/Title | ☐ Protected Health Information (PHI) ¹ |
| ☐ Race/Ethnicity | ☐ Rank/Grade | ☐ Religious Preference |
| ☐ Records | ☐ Security Information | ☐ Social Security Number (SSN) (Full or in any form) |
| ☐ Work E-mail Address | ☐ If Other, enter the information in the box below | |

YouTube requires users to provide information to YouTube when they register an account. However, individuals are not required to register on YouTube in order to watch AFRICOM videos. YouTube may collect PII from individuals who register with them and who may ultimately visit or subscribe to the AFRICOM YouTube channel. While members of the public may make PII available to AFRICOM (for instance, in the form of their user names and content of their comments on the Command's YouTube videos), the command does not collect, maintain, or disseminate that information, except as noted above.

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

☐ Yes ☒ No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?

If "No," explain.

☐ Yes ☐ No

b. What is the PII confidentiality impact level²?

☒ Low ☐ Moderate ☐ High

¹The definition of PHI involves evaluating conditions listed in the HIPAA. Consult with General Counsel to make this determination.

²Guidance on determining the PII confidentiality impact level, see Section 2.5 "Categorization of PII Using NIST SP 800-122." Use the identified PII confidentiality impact level to apply the appropriate Privacy Overlay low, moderate, or high. This activity may be conducted as part of the categorization exercise that occurs under the Risk Management Framework (RMF). Note that categorization under the RMF is typically conducted using the information types described in NIST Special Publication (SP) 800-60, which are not as granular as the PII data elements listed in the PIA table. Determining the PII confidentiality impact level is most effective when done in collaboration with the Information Owner, Information System Owner, Information System Security Manager, and representatives from the security and privacy organizations, such as the Information System Security Officer (ISSO) and Senior Component Official for Privacy (SCOP) or designees.

c. How will the PII be secured?

(1) Physical Controls. (Check all that apply)

- | | |
|--|---|
| ☐ Cipher Locks | ☐ Closed Circuit TV (CCTV) |
| ☐ Combination Locks | ☐ Identification Badges |
| ☐ Key Cards | ☐ Safes |
| ☐ Security Guards | ☐ If Other, enter the information in the box below |

In general, this does not apply to USAFRICOM's use of YouTube.

(2) Administrative Controls. (Check all that apply)

- ☒ Backups Secured Off-site
- ☒ Encryption of Backups
- ☒ Methods to Ensure Only Authorized Personnel Access to PII
- ☒ Periodic Security Audits
- ☒ Regular Monitoring of Users' Security Practices
- ☐ If Other, enter the information in the box below

AFRICOM does not routinely use YouTube to solicit, collect, maintain, or disseminate PII from members of the public. Regarding the limited instances in which AFRICOM does so, AFRICOM follows the methods laid out in privacy and security policies to secure all agency PII. Any copies of comments or other user interactions on YouTube maintained for law enforcement or record auditing purposes are subject to applicable Federal privacy and information security laws.

YouTube, not AFRICOM, controls the security of likes, comments, or other information posted on that site. AFRICOM users should review YouTube's terms of service and privacy policies for information regarding the security of that site.

(3) Technical Controls. (Check all that apply)

- | | | |
|--|---|--|
| ☐ Biometrics | ☐ Common Access Card (CAC) | ☐ DoD Public Key Infrastructure Certificates |
| ☐ Encryption of Data at Rest | ☐ Encryption of Data in Transit | ☐ External Certificate Authority Certificates |
| ☐ Firewall | ☐ Intrusion Detection System (IDS) | ☐ Least Privilege Access |
| ☐ Role-Based Access Controls | ☐ Used Only for Privileged (Elevated Roles) | ☐ User Identification and Password |
| ☐ Virtual Private Network (VPN) | ☐ If Other, enter the information in the box below | |

YouTube controls the technical security of likes, comments, and any other information posted on the site. YouTube users should review YouTube's terms of service and privacy policies for information regarding the security of that site.

d. What additional measures/safeguards have been put in place to address privacy risks for this information system or electronic collection?