

Media Monitoring Service Privacy Impact Assessment (PIA)



8/18/2025

USITC Privacy Program

The Privacy Impact Assessment (PIA) evaluates the risks to personally identifiable information (PII) of members of the public that is processed, used, maintained, or disseminated by the United States International Trade Commission (USITC).

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USITC PRIVACY PROGRAM

Record of Template Changes

Version	Date	Description	Author
1.0	October 2017	New Template	Mike O'Rourke
2.0	July 2018	Updated the Approval Section	Mike O'Rourke

OVERVIEW

A Privacy Impact Assessment (PIA) must be conducted for USITC systems that collect, use, process, maintain, or disseminate personally identifiable information (PII) about members of the public. A PIA is conducted to meet the requirements in the Office of Management and Budget (OMB) Memorandum M-03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, September 2003, and to assess the risks to PII collected, used, processed, maintained, or disseminated by USITC.

This document includes guidance to help complete the PIA. Upon completion of this form, please submit it to privacy@usitc.gov for review by the USITC Privacy Program. Once the PIA has been reviewed and approved, USITC will publish it on the USITC website, unless doing so would raise security concerns.

1 SYSTEM, PROJECT, OR PROGRAM INFORMATION

1.1 What is the specific purpose of the Commission's use of the system and how does that fit with the USITC's mission?

The Office of External Relations (ER) uses Meltwater, a third-party cloud service, to track media coverage in online news, print, and social media on key topics such as international trade, economic conditions, and significant U.S. and international policies. ER uses Meltwater to effectively manage the reputation of the USITC, identify potential crises, and stay informed about developments within partner agencies such as the Department of Commerce and the U.S. Trade Representative (USTR). This service facilitates the review of daily and topic-specific newsletters and reports with summaries of media mentions of USITC and highlights coverage trends for Commission leadership and staff. Daily and topic-specific newsletters and reports will summarize media mentions of USITC and highlight coverage trends for Commission leadership and staff.

PII received or stored by Meltwater may include name and contact information of members of the media and social media contact information for individuals posting information about USITC on social media.

2 INFORMATION COLLECTION

2.1 What types of personally identifiable information (PII) is collected? Please select all applicable items and provide a general description of the types of information collected.

Personally Identifiable Information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Tax ID Number | <input type="checkbox"/> Personal Cell Number |
| <input type="checkbox"/> Mother's Maiden Name | <input type="checkbox"/> Credit Card or Financial Account Number | <input type="checkbox"/> Personal Email Address |
| <input type="checkbox"/> Social Security Number (SSN) | <input type="checkbox"/> Patient ID Number | <input checked="" type="checkbox"/> Work Address |
| <input type="checkbox"/> Date of Birth | <input type="checkbox"/> Employment or Salary Record | <input type="checkbox"/> Physical Characteristics (eye or hair color, height, etc.) |
| <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Medical Record | <input type="checkbox"/> Sexual Orientation |
| <input type="checkbox"/> Home Address | <input type="checkbox"/> Criminal Record | <input type="checkbox"/> Marital Status or Family Information |
| <input type="checkbox"/> Work Phone Number | <input type="checkbox"/> Military Record | <input type="checkbox"/> Race or Ethnicity |
| <input checked="" type="checkbox"/> Work Email Address | <input type="checkbox"/> Financial Record | <input type="checkbox"/> Religion |
| <input checked="" type="checkbox"/> Logon Credentials (e.g. username, password) | <input type="checkbox"/> Education Record | <input type="checkbox"/> Citizenship |
| <input type="checkbox"/> Driver's License Number | <input type="checkbox"/> Biometric Records (e.g. fingerprints, photograph, etc.) | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Passport or Green Card Number | <input type="checkbox"/> Sex | <div></div> |
| <input type="checkbox"/> Employee No. or other Identifier | <input type="checkbox"/> Age | <input type="checkbox"/> None |
| | <input type="checkbox"/> Home Phone Number | |

Explanation: Data collected and stored by Meltwater may include social media user names for individuals posting about USITC or related topics on social media and names of individuals who have written news articles. Meltwater collects login credentials and email addresses for USITC staff who have Meltwater accounts.

2.2 About what types of people do you collect, use, maintain, or disseminate personal information? Please describe the groups of individuals.

The Meltwater media monitoring service collects information on USITC staff in the Office of External Relations (ER) who create and maintain user accounts with the Meltwater service. In addition, the Office of ER manages a distribution list within Meltwater of email addresses of USITC staff so that staff can receive email newsletters through Meltwater. In addition, Meltwater collects information on members of the media whose names and contact information appear in Meltwater.

2.3 Who owns and/or controls the PII?

USITC and Meltwater. PII on individuals is stored in Meltwater, and the ER accesses this data to review media and social media references to USITC.

As the third-party cloud servicer, Meltwater collects, owns and controls the PII. USITC and ER may access and review data that contains PII from Meltwater. As a user of Meltwater, USITC has control over the data that is reviewed, stored, or disseminated to and from Meltwater, as well as through newsletter links.

2.4 What specific laws, regulations, or policies authorize the collection of the PII? If the system collects Social Security Numbers (SSNs), please provide the authorities for this collection.

Statutory authority includes the following: 19 U.S.C. §§ 1330–1335, 1337, 1671 et seq., 2151, 2213, 2251–2254, 2436, 2482, 2704, 3204, 3804; 4571-4574; and 7 U.S.C. § 624. Meltwater does not collect SSNs for this service.

2.5 Does Meltwater derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected?

No. Meltwater does not generate unique identifiers for USITC users; a user's USITC email address is used as the username for logging into the system.

2.6 Given the amount and type of information collected, as well as the purpose, discuss what privacy risks were identified and how they were mitigated.

Possible risks to the privacy of individuals' data include unauthorized access by both internal and external users, breaches of the system data, and the retention of records beyond the retention period. Risks are mitigated through the use of access controls and other security controls based on guidance in the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53. Records are retained and disposed of in accordance with retention requirements, as discussed in section 3.4.

3 USES OF THE SYSTEM AND THE INFORMATION

3.1 Describe all uses of the information. Describe how the information supports the USITC mission or a Commission business function.

The ER reviews and assesses data collected through Meltwater to identify media references to USITC and provide summaries of media reports to senior USITC staff.

3.2 How can it be ensured that the PII is accurate, relevant, timely, and complete at the time of collection?

The Office of ER relies on Meltwater to provide accurate, relevant, timely, and complete information.

Meltwater ensures that the PII that it gathers is accurate, relevant, timely, and complete information. For user accounts (i.e. Meltwater accounts of USITC staff), Meltwater relies on USITC users to verify the accuracy of their data at the time that they create a new user account to access the system. Users may also access their Meltwater accounts, when necessary, after account creation, to correct or update inaccurate, outdated, or incomplete information.

3.3 How can it be ensured that only the minimum PII elements are collected?

The Meltwater system provides only information relevant to providing information on media and social media references to USITC. This includes information such as the name or social media username of individuals reporting or posting on USITC or related topics.

3.4 What is the retention period for the system data? Has the applicable records disposition schedule been approved by the National Archives and Records Administration (NARA)?

The retention is temporary, followed by instructions to destroy when no longer needed. See [NARA General Records Schedule 6.4: Public Affairs Records, Item 030](#).

3.5 What methods are used to archive and/or dispose of the PII in the system?

The USITC does not archive or dispose of the daily newsletter. However, it is maintained in the Meltwater system for up to one year.

The system also maintains a database of news articles and social media posts. News data, including reporter details linked to the articles, is retained dating back to 2010. Social media posts are stored for a rolling 15-month period. USITC-related information is retained for six months beyond the expiration of a contract, with the option for earlier deletion upon request by USITC.

3.6 Will the data in the system be retrieved by a personal identifier?

No

3.7 If the answer is “yes” to the previous question, is the system covered by an existing Privacy Act System of Records Notice (SORN)?

Not Applicable.

4 INTERNAL SHARING AND DISCLOSURE OF INFORMATION

4.1 With which internal components of the Commission is the information shared?

All USITC staff may receive the daily newsletter with the media clips, including the Commissioners' offices. The clips include the titles of the articles, where they are published, and a short summary of the articles. PII is not included in the daily newsletters.

4.2 For each recipient component or office, what information is shared and for what purpose?

All USITC staff may receive the daily newsletter with the media clips, including staff in the Commissioners' offices. The clips include the titles of the articles, where they are published, and a short summary of the articles. PII is not included in the daily newsletters.

The Office of ER can access the Meltwater database and articles that may contain PII on reporters (e.g., their email addresses, work phone numbers, and work addresses). This information is accessible to ER users once the users log into Meltwater. This is done principally to enable ER staff to contact reporters, potentially to provide them with additional information, new story ideas, or possibly seek a correction for something already printed.

4.3 How is the information transmitted or disclosed?

USITC provides newsletters, which do not contain PII, via email to staff. However, the newsletters may include hyperlinks to news outlets and articles that contain PII. USITC does not share OER user account information in the daily newsletter. The PII of reporters or USITC staff who have Meltwater accounts is not shared with USITC staff in the daily newsletter.

4.4 Given the internal sharing, discuss what privacy risks were identified and how they were mitigated.

Meltwater newsletters are accessible to all USITC employees. As a result, employees may see PII shared via the newsletters or in web sites that are linked via the newsletters. All USITC staff are required to complete privacy awareness training, which provides information on protecting any PII that staff access. Such training limits the risk of misuse of PII. ER does not intend to use or download any additional PII from Meltwater. By keeping PII in the system, ER limits the risk of exposure or misuse of PII. USITC plans to include notice in the newsletters that the newsletters should be used only for official USITC purposes.

5 EXTERNAL SHARING AND DISCLOSURE

5.1 With which external (non-USITC) recipient(s) is the information shared?

Not applicable. The USITC does not share information collected via the media monitoring service with third parties.

5.2 What information is shared and for what purpose?

Not applicable. The USITC does not share information collected via the media monitoring service with third parties.

5.3 How is the information transmitted or disclosed?

Not applicable. The USITC does not share information collected via the media monitoring service with any third parties.

5.4 Are there any agreements with external entities concerning the security and privacy of the data once it is shared, such as a Memorandum of Understanding (MOU)?

Not applicable. The USITC does not share information collected via the media monitoring service with any third parties.

5.5 Are privacy requirements included in contracts and other acquisition-related documents? If yes, please describe these requirements.

Not applicable. The USITC does not share information collected via the media monitoring service with third parties.

5.6 What type of training is required for users from agencies outside USITC prior to receiving access to the information?

Not applicable. The USITC does not share information collected via the media monitoring service with third parties.

5.7 Are there any provisions in place for auditing the recipients' use of the information?

Not applicable. The USITC does not share information collected via the media monitoring service with third parties.

5.8 Given the external sharing, please discuss any privacy risks that were identified and describe how they were mitigated.

Not applicable. The USITC does not share information collected via the media monitoring service with third parties.

6 NOTICE

6.1 Was notice provided to the individual prior to collection of information? If notice was not provided, why not?

This PIA provides public notice to individuals whose information may be collected through the Meltwater media monitoring service.

6.2 Do individuals have an opportunity and/or right to decline to provide information?

For USITC employees with Meltwater accounts, the Meltwater system allows users to update their profile information on the Profile page. The minimum required information includes:

- First name
- Last name
- Preferred language
- Time zone
- Default account – U.S. International Trade Commission

All other fields such as Department, Phone Number, and Role are optional.

Meltwater aggregates postings from media platforms and social media sites. Individuals whose information is shared through Meltwater via a media platform or social media site would need to contact the primary platform through which their information is posted (e.g., a media or social media platform) if they want their information to be removed from such platforms. Additionally, individuals subscribed to newsletters from Meltwater have the opportunity to unsubscribe from such newsletters.

6.3 Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?

Meltwater aggregates postings from media platforms and social media sites. Individuals would need to contact the primary platform through which their information is posted (e.g., a media or social media platform) if they would like their information to be removed from such platforms. Additionally, individuals subscribed to newsletters from Meltwater can unsubscribe from such newsletters.

6.3 Given the notice provided to individuals above, describe what privacy risks were identified and how they were mitigated.

Potential risks with respect to notice include insufficient notice to users. Some users may not understand what types of information are collected by the media monitoring system and how this information is used by Meltwater or the USITC. This risk is mitigated through the publication of this PIA on the USITC website.

7 INDIVIDUAL ACCESS AND REDRESS

7.1 What are the procedures which allow individuals the opportunity to seek access to or redress of their information?

Users can update their information on the Profile page of the Meltwater system. However, if a user's login information needs to change for whatever reason, the user would need to contact Meltwater directly in order to update the information. Only users from ER will have access to the Meltwater system. Please refer to the USITC Rules, 19 CFR 201.22-32 for information on the redress process.

7.2 How are individuals notified of the procedures for seeking access to or amendment of their information?

This PIA provides notice to individuals.

7.3 If no opportunity to seek amendment is provided, are any other redress alternatives available to the individual?

Not applicable. As noted, users can update their information on the Profile page of the Meltwater system.

7.4 Discuss any opportunities or procedures by which individuals can contest the accuracy of their information in the system or actions taken as a result of USITC reliance on information in the system.

USITC does not rely on the PII collected via Meltwater in order to provide media updates to USITC senior staff. Rather, the agency relies on the accuracy of the media or social media postings about the agency.

8 TECHNICAL ACCESS AND SECURITY

8.1 Who has access to the PII in the system?

Authorized USITC staff in the Office of ER who create user accounts can access PII in the Meltwater media monitoring system.

8.2 Does the system use roles to assign privileges to users of the system?

Meltwater provides the ability for USITC to assign roles. The Office of ER assigns super user access to its staff so that all ER staff can administer the system.

8.3 What procedures are in place to determine which users may access the system and are they documented?

Only USITC staff in ER are permitted to access the system. The Office of ER maintains internal procedures regarding access and usage of ER accessible systems.

8.4 What auditing measures and technical safeguards are in place to prevent misuse of data?

Since only ER staff are permitted to access the system, ER periodically reviews the list of users with Meltwater accounts to ensure no unauthorized users have access to Meltwater. As USITC staff begin to work in ER or leave the office or agency, ER manages their access to the system within Meltwater (e.g., adding new users or removing access for individuals who no longer need it).

8.5 How is the PII secured? What administrative, technical, and physical security safeguards are being used to guard against privacy risks?

USITC implements security controls in accordance with NIST SP 800-53 guidance. These controls are designed to minimize unauthorized access, use, and dissemination of PII.

8.6 Describe what privacy training is provided to users. How often do users complete the training?

All USITC personnel are required to complete annual privacy awareness training to understand their roles and responsibilities for protecting PII.

8.7 Are all IT security requirements and procedures required by federal law being followed to ensure that information is appropriately secured? If yes, does the system have a current authority to operate (ATO)?

USITC has reviewed the IT security requirements relevant to Meltwater. Based on ER's use of the system and its data, the agency has granted the system an exemption from the ATO requirement.

8.8 Given access and security controls, describe what privacy risks were identified and describe how they were mitigated.

Privacy risks include unauthorized access to data and possible breaches of data. These risks are mitigated through the implementation of a data loss prevention (DLP) tool and security controls in accordance with NIST SP 800-53 guidance.
