LinkedIn Privacy Impact Assessment

| 2/17/2026 | USITC Privacy Program |

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

LinkedIn Privacy Impact Assessment

OVERVIEW

Under the E-Government Act of 2002, the U.S. International Trade Commission (USITC or Commission) must conduct a Privacy Impact Assessment (PIA) for USITC systems that collect, use, process, maintain, or disseminate personally identifiable information (PII) about members of the public. 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) provides implementation guidance on how agencies should assess the risks to PII that they collect, use, process, maintain, or disseminate.

1   SYSTEM, PROJECT, OR PROGRAM INFORMATION

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

LinkedIn is a professional networking platform where individuals connect, share, and advance their careers. Users can create detailed profiles to highlight their work experience, education, and skills, while employers use the platform to recruit talent and promote their brand. LinkedIn also provides tools for job searching, accessing industry news, and supporting professional development.

The USITC Office of External Relations (OER) uses LinkedIn to share and amplify business information about the USITC. This includes USITC job postings, published reports, and other content already available on the USITC website.

Typical interactions on the official USITC LinkedIn page include the posting of comments by LinkedIn users. Information shared within these comments is done voluntarily and at the user's discretion. PII may include first and last names, personal/business email addresses, and photos, if provided to LinkedIn by the user.

2   INFORMATION COLLECTION

2.1 What types of PII are collected? Please select all applicable items and provide a general description of the types of information collected.

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.

☒ Name   ☐ Mother's Maiden Name   ☐ Social Security Number (SSN)

☒ Date of Birth

☐ Place of Birth

☐ Home Address

☐ Work Phone Number

☒ Work Email Address

☒ Logon Credentials (e.g. username, password)

☐ Driver's License Number

☐ Passport or Green Card Number

☐ Employee No. or other Identifier

☐ Tax ID Number

☐ Credit Card or Financial Account Number

☐ Patient ID Number

☒ Employment or Salary Record

☐ Medical Record

☐ Criminal Record

☐ Military Record

☐ Financial Record

☒ Education Record

☐ Biometric Records (e.g. fingerprints, photograph, etc.)

☐ Sex

☐ Age

☐ Home Phone Number

☐ Personal Cell Number

☒ Personal Email Address

☒ Work Address

☐ Physical Characteristics (eye or hair color, height, etc.)

☐ Sexual Orientation

☐ Marital Status or Family Information

☐ Race or Ethnicity

☐ Religion

☐ Citizenship

☒ Other: Photo

☐ None

Explanation: Data collected and stored by LinkedIn may include names and/or social media user names for individuals posting in response to USITC content or related topics on social media and names of individuals who publish relevant articles, reports, etc. on behalf of the USITC. LinkedIn collects email addresses and passwords for USITC staff designated as administrators of the official USITC LinkedIn page.

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

There are three categories of individuals whose data may be associated with the USITC LinkedIn account: 1) Staff in OER who serve as administrators of the USITC LinkedIn page; 2) Individuals who list the USITC as their employer and are connected to the LinkedIn page; and 3) Other LinkedIn members who interact with the USITC LinkedIn page.

LinkedIn collects information on USITC staff in OER who create and maintain administrator accounts for designated employees who manage the USITC LinkedIn page and posts made by USITC. In addition, the OER shares updates via LinkedIn with the public on USITC business. The USITC LinkedIn page may also include names of individuals who comment on or react to posts made by the USITC.

The USITC does not itself collect, maintain, or disseminate PII from members of the public who interact with the USITC LinkedIn page.

2.3 Who owns and/or controls the PII?

Users upload their PII (e.g., name and email address) to LinkedIn. The USITC controls only the PII that is associated with the USITC LinkedIn account. PII on individuals is stored in LinkedIn, and OER accesses this data to

review how other LinkedIn users are commenting about the USITC and to post updates about the USITC's business activities. There are three categories of individuals whose data may be associated with the USITC LinkedIn account: 1) Staff in OER who serve as administrators of the USITC LinkedIn account; 2) Individuals who list the USITC as their employer and are connected to the USITC LinkedIn page; and 3) Other LinkedIn users who interact with the USITC LinkedIn page.

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. LinkedIn does not collect SSNs from its users.

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

LinkedIn may generate unique user identifiers or aggregate or derive data for internal LinkedIn purposes. This data generation or aggregation is done outside of control of the USITC administrators. An administrator's USITC email address is used as the username for logging onto the platform. In addition, when LinkedIn users interact with the USITC's posts, their names, titles, and current company would potentially be visible in any interaction with the USITC and with other USITC employees. The USITC does not derive or create any new PII on individuals who interact with the USITC LinkedIn page.

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

Possible risks to the privacy of LinkedIn users' 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 by 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.

LinkedIn's visibility and privacy settings let users control how their profiles appear and how their activity is shared. Users can manage public visibility by choosing what non-members and search engines see, such as name, photo, headline, and connections. Profile viewing options allow users to browse in private mode and to decide whether others see their identities or limited characteristics of their profiles. Users can also control whether their profile updates—like job changes or work anniversaries—are shared with their networks.

On the data and communication side, LinkedIn lets users manage how their information is used and who can contact them via its direct messaging feature. Individuals can review and limit how LinkedIn uses their data for

advertising, see what data is collected, and adjust job-seeking preferences. Settings also allow users to control who can reach them via invitations or messages, who can see their email addresses, and how often they receive notifications.

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.

OER reviews and assesses data collected through LinkedIn to identify any references to the USITC on the platform, and reports to the Chair of the Commission if any concerns arise about the nature of the references.

The USITC does not itself collect, maintain, or disseminate PII from members of the public who interact with the USITC LinkedIn page. The USITC also does not use any data collected through comments on the USITC LinkedIn page for any reason other than monitoring the account/page (e.g., for references to the USITC) and to pull engagement metrics.

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

LinkedIn requests that the PII that it gathers from users with accounts is accurate, relevant, timely, and complete information. For administrator accounts, the USITC must verify and maintain their information regularly. LinkedIn's privacy policy explains what personal data it collects when individuals use its services, how that data is used and shared, the choices and controls users have over their information, and how it protects and discloses user data in various circumstances. The USITC does not use any data collected through comments on USITC posts or related information.

3.3 How can the USITC ensure that only the minimum PII elements are collected?

Administrator access to the USITC official page is granted only to the designated USITC administrators in OER, who have control over the information they share with LinkedIn. Users that comment on USITC content are potentially sharing PII, but they do so at their own discretion and after accepting LinkedIn's user agreement.

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)?

Social media records are deemed Temporary, to be deleted after 90 days or retained longer if longer retention is required for business use. These records are subject to General Records Schedule (GRS) 6.4: Public Affairs Records, item 020

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

The posts are maintained on the official USITC LinkedIn page. LinkedIn will maintain the posts for as long as the page is operational.

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 USITC is the information shared?

No PII from the USITC LinkedIn account is shared with other internal components of the USITC. OER may share metrics from the LinkedIn account with other offices; however, such metrics would not include PII. All USITC staff and members of the public who have LinkedIn user accounts may see posts on the USITC LinkedIn page, but the posts only contain public information that has been approved by the Commission.

Potential PII on the USITC LinkedIn page or associated with the LinkedIn account may include the posting of comments by LinkedIn users in response to USITC content. Information shared within these comments is done voluntarily and at the user's discretion. PII may include first and last name, personal/business email addresses, and other types of PII specified in this PIA .

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

As noted, no PII is shared with USITC components other than OER. USITC staff with LinkedIn user accounts and members of the public may see posts on the USITC LinkedIn page about Commission business, such as job announcements, the publication of reports, and information about Commission votes.

4.3 How is the information transmitted or disclosed?

The USITC provides updates on Commission business via the posting features on the official USITC LinkedIn page. As noted, no PII is shared with USITC components other than OER.

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

As noted previously, OER shares only metrics from the USITC LinkedIn page with other USITC offices. These metrics do not include PII, reducing privacy risks to individuals.

5 EXTERNAL SHARING AND DISCLOSURE

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

The USITC shares information via its LinkedIn page with the public, with the intention of amplifying business information posted elsewhere on USITC-owned platforms such as usitc.gov and usajobs.gov. PII may be shared if the USITC mentions employees in its posts; in such instances, only the employee's name would be shared. The USITC does not share PII of members of the public through its LinkedIn account.

5.2 What information is shared and for what purpose?

The USITC shares public business information via its LinkedIn page with the public, with the intention of amplifying this information posted elsewhere on USITC-owned platforms such as usitc.gov and usajobs.gov. PII may be shared if the USITC mentions employees in its posts; in such instances, only the employee's name would be shared. The USITC does not directly share PII of members of the public through its LinkedIn account, though USITC's LinkedIn page, as well as posts made by USITC, may include comments from members of the public, as well as links to their LinkedIn profiles.

5.3 How is the information transmitted or disclosed?

The information is shared via the posting function on LinkedIn.

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)?

As stated in LinkedIn's privacy policy to its users: "Any information" that users "share through companies' or other organizations' pages on our services will be viewable by those organizations and others who view those pages' content."

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

The USITC does not share PII of members of the public in its posts on its LinkedIn page. To the extent the USITC shares the PII of employees (i.e., employee names), only authorized USITC administrators in OER (not contractors) will have access to the USITC LinkedIn account to post. Therefore, contract clauses are not applicable.

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

Not applicable. LinkedIn users, including USITC and external users, must accept LinkedIn's user agreement before joining the platform. This agreement serves as the legal contract between LinkedIn and the user, outlining the services LinkedIn provides, permitted user behavior, and the responsibilities and obligations of both parties.

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

LinkedIn does not allow USITC administrators to directly audit how users use information once they have viewed it. However, administrators can track access and engagement signals using the platform's analytics tools. Administrators will periodically review activity on the platform and act accordingly if needed.

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 PII about members of the public with external parties. Employee PII may be shared if the USITC mentions employees in its posts; in such instances, only the employee's name would be shared. Such sharing will be public.

6 NOTICE

6.1 Is notice provided to the individual prior to collection of information? If advance notice is not provided, why not?

LinkedIn provides notice via its user agreement and privacy policy to all users.

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

For USITC staff with administrator rights and therefore access to the USITC LinkedIn page, the minimum required information includes:

- First name
- Last name
- USITC email address
- Birth date (to ensure the user is at least 16 years old, a requirement of the platform)

All other information on a LinkedIn profile such as job title, work history, and photo, are optional.

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?

OER staff that serve as LinkedIn administrators consent to the LinkedIn user agreement; the LinkedIn privacy policy; content responsibility; and compliance regarding applicable laws regarding the accurate representation of company updates by accepting LinkedIn's user agreement.

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 administrators and those visiting the USITC's LinkedIn page. Some users may not understand what types of information are collected by LinkedIn and how it is being used by USITC. These risks are mitigated through the publication of this PIA on the USITC website.

7 INDIVIDUAL ACCESS AND REDRESS

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

The administrators from OER are permitted to adjust information provided in their LinkedIn profiles. However, if a user's login information needs to change for whatever reason, the user would need to contact LinkedIn. Only those designated as administrators from OER will have access to the USITC's official LinkedIn page. 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 their own LinkedIn profile pages.

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

Staff may contact OER to contest information posted on LinkedIn.

8 TECHNICAL ACCESS AND SECURITY

8.1 Who has access to the PII in the system?

The OER Director and Public Affairs Officer in OER are permitted to access the official USITC LinkedIn account and related PII in it.

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

The OER Director and Public Affairs Officer in OER are permitted to access the official USITC LinkedIn account. OER maintains internal procedures regarding access and usage of OER accessible systems.

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

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

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

Since only OER staff are permitted to access the system, OER periodically reviews the list of administrators to prevent unauthorized access to the official USITC LinkedIn page. As USITC staff begin to work in OER or leave the office or agency, OER manages their access to the system within LinkedIn.

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

The USITC implements security controls on its IT network in accordance with NIST SP 800-53 guidance. These controls are designed to minimize unauthorized access, use, and dissemination of PII. LinkedIn also provides the administrators the ability to download a copy of page activity on an ad-hoc basis as needed.

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 Is the USITC following all IT security requirements and procedures required by Federal law to ensure that information is appropriately secured? If yes, does the system have a current authority to operate (ATO)?

The USITC has reviewed the IT security requirements relevant to LinkedIn. Based on OER's use of the system and its data, the USITC 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 on the LinkedIn platform. These risks are mitigated through the implementation of a data loss prevention (DLP) tool and security controls on the ITC IT network in accordance with NIST SP 800-53 guidance. Any data that USITC collects through the LinkedIn page and would be stored by OER in the USITC network would not include PII.