TVA

Tennessee Valley Authority
Privacy Impact Assessment (PIA)

Google Analytics

This PIA is a tool used by the TVA Privacy Office to identify system privacy risks at the planning/initiation phase of the system development lifecycle (SDLC). The PIA should be reviewed and updated every three years in conjunction with the anniversary of the Authority to Operate (ATO) or sooner, if the system undergoes a major change. For additional guidance on how to complete this PIA, please refer to the TVA *Privacy Documentation Completion Guide*. Questions regarding this document should be directed to *camarsalis@tva.gov.*

PIA should be submitted to:
Christopher Marsalis
TVA Senior Privacy Program Manager
(865) 632-2467
camarsalis@tva.gov

Version 2.0
February 2016

PRIVACY
PROGRAM

PROGRAM MANAGEMENT

Name of PIA Author	Date of Submission
Chris Marsalis	03/17/2017

Responsible TVA Business Unit	Name of System/Collection
Communications and Marketing	Google Analytics

System Owner Details   **Reason for Completing PIA**

Name Todd Winkler

Title Program Manager, Digital Communications

Phone 865-632-8282

Email tawinkl5@tva.gov

◉ New system

○ Significant modification to an existing system

○ To update existing PIA for a triennial security reauthorization

PRIVACY DETERMINATION
(To be completed by the TVA Privacy Program)

Privacy Office Comments

The signatures below certify that the information in this document has been reviewed and approved:

	Name	Signature	Date
System Owner	Damien Power	*[signature]*	03/17/2017
Senior Privacy Program Manager	Chris Marsalis	*[signature]*	03/17/2017
Senior Agency Official for Privacy			

SYSTEM OVERVIEW

1. Please describe the purpose of the system/collection:

Tennessee Valley Authority (TVA) will use aggregated information provided by Google Analytics for the purpose of improving services online through measurement and analysis of public-facing website traffic. Specifically, TVA will use non-identifiable aggregated information provided by Google to:
- track visits to TVA's public-facing facing website(s);
- monitor the size of the TVA's audience; and
- better understand the interactions of visitors in order to improve the functionality of TVA's public-facing website(s) and the user experience.

However, to use Google Analytics, the product must collect the full IP Address for analytics purposes, which Google will then mask prior to use storage, and proceed with providing TVA non-identifiable aggregated information in the form of custom reports. TVA will not collect, maintain, or retrieve PII including a visitor's IP Address during this analytics process operated by Google. Google Analytics will not provide to TVA, share with Google or any Google product for additional analysis, or use the full or masked IP Address or information to draw any conclusions in the analytics product. Google will receive the data to process and provide aggregate statistics back to TVA. The only information that is available is the non-identifying aggregated information in the Google Analytics interface in the form of custom reports that is only available to TVA Communications and Marketing personnel, and senior leadership. Under no circumstances shall the TVA use Google Analytics to:
- collect or track PII;
- collect or track a visitor's full or masked IP Address;
- track individual user-level activity on the Internet outside of the TVA website;
- cross-reference any data gathered from Google Analytics against PII to determine individual user-level online activity; or
- collect or track employees on internal facing web initiatives or products.

2. What type of information can be collected, maintained, used, and/or disseminated?

Check all that apply:

☐ Name	☐ Home Phone	☐ Home Address
☐ Social Security number (SSN)	☐ Medical or Health Information	☐ Financial Information
☐ Clearance Information	☐ Mother's Maiden Name	☐ Date of Birth
☐ Place of Birth	☐ Employment Information	☐ Criminal History
☐ Biometric Information	☒ Other:	

Other: *TVA does not collect, maintain, or retrieve personally identifiable information (PII) including a visitor's Internet Protocol (IP) Address during the analytics process operated by Google.*

AUTHORITY AND PURPOSE

3. Legal authority to collect, use, maintain, and share data in the system:

No SORN is required because the Google Analytics custom reports are non-identifiable aggregate information, which is all that is provided to TVA. Google Analytics is an external, third-party hosted, website analytics solution.

4. For each box checked above in Question 2, please provide the business need for the collection:

N/A

5. Will the data in the system be retrieved using one or more of the identifiers listed in Question 2? ○ Yes ◉ No

ACCOUNTABILITY, AUDIT, AND RISK MANAGEMENT

6. What TVA employees and business units are responsible for the privacy governance and administration of this system?

TVA's Office of the Chief Information Officer is the responsible program owner for TVA's Information Security and Privacy Programs, ensuring compliance with TVA-SPP-12.02, TVA Information Management Policy. TVA-SPP-12.02 implements the various privacy laws based on the Privacy Act of 1974 (the Privacy Act), the E-Government At of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), Office of Management and Budget (OMB) mandates, and other applicable North American Electric Reliability Corporation (NERC) and TVA Records Management procedures and guidance. In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to protection, retention and destruction of federal records. Federal and contract employees are given clear guidance in their duties as they relate to the collection, use, processing and security of privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, including "TVA Information Security Training". (See: TVA-SPP-12.01 §3.2.10.) The TVA Privacy Office will conduct period privacy compliance reviews of the

N/A - TVA has no ability to audit Google Analytics

in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-130.

7. What privacy orientation or training is provided to authorized users of the system?

> Only pre-approved TVA registered users will have full access to the Google Analytics account and aggregated data. Pre-approved registered users include TVA Communications and Marketing officials who manage the account. Password controls will be set following best practices (mixed case with numbers, special characters, and longer than 10 characters).

DATA QUALITY AND INTEGRITY

8. How is data quality ensured throughout the data lifecycle and business processes associated with the use of the data? Check all that apply.
   Check all that apply:

   ☐ Cross referencing data entries with other systems   ☐ Character limits on text submissions

   ☐ Third party data verification   ☐ Numerical restrictions in text boxes

   If collected via a form, please list form(s) name and   ☐ Other: [   ]
   number here:

   [   ]

   ☒ Data taken directly from individuals

DATA MINIMIZATION AND RETENTION

9. What are the retention periods for the data in the system?

> Records are maintained as long as necessary for operational purposes.

INDIVIDUAL PARTICIPATION AND REDRESS

10. How can an individual access their information and have it corrected, amended, or deleted?

Subject to the limitations of the Privacy Act, individuals may request access to information about themselves contained in a TVA system of records through TVA's Privacy Act/Freedom of Information Act (FOIA) procedures. TVA will review all Privacy Act requests on an individual basis and may as appropriate, waive applicable exemptions if the release of information to the individual would not detrimentally impact the law enforcement or national security purposes for which the information was originally collected or is subsequently being used. Submitting a Privacy Act Request is accomplished by sending a letter to the system manager listed on the cover of this PIA. The request should include the following:

- *Name*
- *Mailing address*
- *Phone number or email address*
- *A description of the records sought, and if possible, the location of the records*

Contesting record procedures: Individuals wanting to contest information that is contained in this system should make their requests in writing, detailing the reasons for why the records should be corrected. Requests should be submitted to the attention of the TVA Privacy Office at the address below:

Tennessee Valley Authority
Privacy Office
400 W. Summit Hill Dr.
Knoxville, TN 37902-1499

Individuals with concerns about privacy may also email the TVA Privacy Officer via the contact information provided in the privacy policy on the TVA's web site (http://www.tva.gov/abouttva/privacy.htm).

This information is provided in the Privacy Policy, posted visibly on the TVA Web site.

SECURITY

11. Has a FIPS 199 determination been made?

☒ Not Applicable   ☐ No   ☐ Under Development   ☐ Yes

       Expected date of completion: [ ]   Date: [ ]

Confidentiality	Integrity	Availability
☐ Low	☐ Low	☐ Low
☐ Moderate	☐ Moderate	☐ Moderate
☐ High	☐ High	☐ High

12. What types of physical safeguards exist to protect the information?

☒ Guards   ☐ Biometrics   ☒ Identification Badges   ☒ Closed Circuit TV (CCTV)

☐ Other: [ ]

13. What types of access controls are in place to protect the information?

☒ User Identification   ☒ Passwords   ☒ Firewall

☐ Encryption   ☐ Virtual Private Network (VPN)   ☐ Public Key Infrastructure (PKI)

☐ Smart Cards   ☒ Other: [ ]

14. What types of administrative safeguards exist to protect the information?

- ☐ Contingency Plan
- ☐ User manuals for the system
- ☐ Regular Back-up of files
- ☒ Rules of Behavior
- ☐ Offsite storage of back up files
- ☒ Least privilege access
- ☒ User training
- ☐ Other: _____

15. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage?

> TVA's Google Analytics account will be maintained by the TVA's Office of Communications and Marketing, with limited access to the Google Analytics account and aggregated data, which is controlled through password protections. There is no automated toolkit to indicate possible misuse. There is no ability to audit Google Analytics. Google Analytics is owned and operated by Google Inc., which is responsible for the effectiveness of the Google Analytics tool.

16. Discuss any other potential privacy vulnerabilities to the system and safeguards that are in place to mitigate those vulnerabilities:

> TVA systems do not share data with the Google Analytics application, and TVA does not collect, maintain or disseminate PII from Google Analytics. TVA only receives reports containing non-identifiable aggregated information on visitor interactions with TVA websites.

TRANSPARENCY

17. How are individuals notified as to how their information will be collected, used, and/or shared within this system?

> Notice regarding TVA's use of website measurement technology will be provided on the privacy policy page - https://www.tva.com/Information/TVA-Privacy-Policy. Also, this PIA will be posted on the external TVA Privacy Program page accessible at TVA.gov/privacy. Privacy policies will be updated to include information on the use of website measurement technology and instruct the user on the use of cookies for this purpose and instructions on how to block them. The Google Analytics privacy policy can be found at the following web site: http://www.google. com/intl/en/analytics/privacyoverview.html.

USE LIMITATION

18. Explain how the information in the system is limited to the uses specified in the notices discussed above.

> The aggregated information collected by Google Analytics is used for the purpose of improving usability, evaluating visitors' usage of the TVA website, and compiling reports on website activity for website operators. Analytics can also be used to determine the "top tasks" on the website (e.g., the most visited pages / items). This information will be used to track visits to the TVA website, monitor the size of the agencies audience, and understand the interactions of TVA website visitors. In addition, this aggregate information will also be used to improve the TVA website, improve the user experience, and provide more user-centric content to better serve those visitors.

19. With which (if any) internal TVA systems/collections is the information shared?

> None

20. With which (if any) organizations external to TVA is information shared?

> None

Please submit completed form to: Christopher Marsalis
TVA Senior Privacy Program Manager
(865) 632-2467
camarsalis@tva.gov