



**Privacy Impact Assessment
for
Cision**

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System/Business Owner

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Reviewing Official

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1. SYSTEM OVERVIEW

1) Describe the purpose of the system/collection:

Cision provides a software-as-a-service communications and public relations platform that enables its customers to identify influencers, craft and distribute meaningful stories, and measure the impact. The Cision platform consists of multiple products that customers may access through the Cision Communications Cloud.

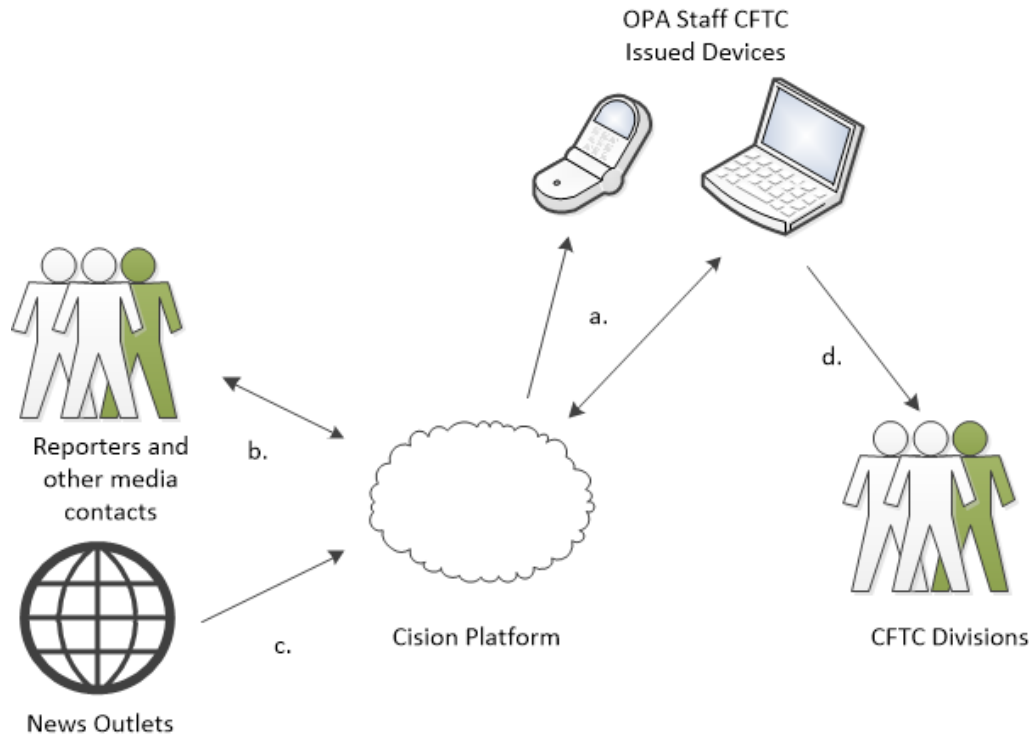
The Commodity Future Trading Commission's ("CFTC" or "Commission") Office of Public Affairs (OPA) uses Cision to tailor communications with press outlets according to need, gauge and create marketing campaigns, and track earned mentions. Specifically, OPA uses the following Cision products:

Media Contact Database: A product that provides access to over 1.4 million contacts and outlets across the globe. OPA uses the database to build media distribution lists. Press contacts can be searched and filtered by multiple criteria, including by name, outlet, bureau, region, and topic.

Media Monitoring: A product that monitors online, social, print, and broadcast channels. OPA uses media monitoring to track mentions of the CFTC in the press and produce daily news clips.

Analytics: A product that provides additional tools to create and track metrics of how effectively the CFTC is communicating its messages to various audiences, such as the American taxpayer and regulated markets.

2) Provide a data map or model illustrating how information is structured or is processed by the system throughout its life cycle. Include a brief description of the data flows.



- a) The Cision platform can be accessed from any web browser or device using a username and password. As a matter of policy, OPA staff will only access the Cision platform using CFTC-issued devices. Once logged in, OPA staff may upload press statements for distribution, export information residing on the Cision cloud, and view analytics information relating to campaign performance. Data exported from Cision may be included in reports and will be saved in a SharePoint site maintained by OPA on the CFTC network.
- b) OPA uses the Media Database and Analytics modules to distribute press releases to reporters and other media contacts and track engagement.
- c) OPA uses the Media Monitoring and Analytics modules to track mentions of the CFTC in media outlets, compile news clips, and generate aggregate reports.
- d) OPA staff circulates information exported from the Cision platform to other CFTC divisions or personnel, as necessary.

2. AUTHORITY AND PURPOSE

- 1) What is the legal authority to collect, use, maintain, and share information in the system?

Commodity Exchange Act, 7 U.S.C. § 12.

3. INFORMATION TYPES

- 1) What information pertaining to members of the press and the public will be collected, maintained, used, and/or disseminated?

Identifying Numbers	
<input type="checkbox"/> Social Security Number	<input type="checkbox"/> Truncated or Partial Social Security Number
<input type="checkbox"/> Driver's License Number	<input type="checkbox"/> License Plate Number
<input type="checkbox"/> Patient ID Number	<input type="checkbox"/> File/Case ID Number
<input type="checkbox"/> Student ID Number	<input type="checkbox"/> Health Plan Beneficiary Number
<input type="checkbox"/> Passport Number	<input type="checkbox"/> Federal Student Aid Number
<input type="checkbox"/> Employee Identification Number	<input type="checkbox"/> Taxpayer Identification Number
<input type="checkbox"/> Professional License Number	<input type="checkbox"/> Legal Entity Identifier
<input type="checkbox"/> Credit/Debit Card Number	<input type="checkbox"/> National Futures Association ID
<input type="checkbox"/> Personal Bank Account Number	<input type="checkbox"/> Other ID if it can be traced back to an individual
<input type="checkbox"/> Personal Device Identifiers or Serial Numbers	
Contact Information	
<input checked="" type="checkbox"/> Personal Mobile Number	<input checked="" type="checkbox"/> Business Phone Number
<input checked="" type="checkbox"/> Personal E-mail Address	<input checked="" type="checkbox"/> Business E-mail Address
<input type="checkbox"/> Home Phone Number	<input checked="" type="checkbox"/> Personal or Business Fax Number
<input type="checkbox"/> Home Mailing Address	<input checked="" type="checkbox"/> Business Mailing Address
Sole Proprietors	
<input type="checkbox"/> Business Taxpayer Identification Number	<input type="checkbox"/> Business Mailing Address
<input type="checkbox"/> Business Credit Card Number	<input type="checkbox"/> Business Phone or Fax Number
<input type="checkbox"/> Business Bank Account Number	<input type="checkbox"/> Business Mobile Numbers
<input type="checkbox"/> Business Device identifiers or Serial Numbers	<input type="checkbox"/> Business Email
Biographical Information	
<input checked="" type="checkbox"/> Name	<input type="checkbox"/> Gender
<input type="checkbox"/> Date of Birth	<input type="checkbox"/> City or County of Birth
<input type="checkbox"/> Country of Birth	<input checked="" type="checkbox"/> Zip Code
<input type="checkbox"/> Citizenship	<input type="checkbox"/> Military Service Information
<input type="checkbox"/> Spouse Information	<input type="checkbox"/> Academic Transcript
<input checked="" type="checkbox"/> Group/Org. Membership	<input type="checkbox"/> Resume or Curriculum Vitae
<input type="checkbox"/> Location Data (e.g., GPS)	<input type="checkbox"/> Nationality
<input checked="" type="checkbox"/> Employment Information	<input type="checkbox"/> Marital Status
<input type="checkbox"/> Mother's Maiden Name	<input type="checkbox"/> Children Information
Biometrics/Distinguishing Features/Characteristics	
<input type="checkbox"/> Fingerprints	<input type="checkbox"/> Height
<input type="checkbox"/> Retina/Iris Scans	<input type="checkbox"/> Voice/Audio Recording
<input type="checkbox"/> Hair Color	<input type="checkbox"/> Eye Color

<input type="checkbox"/> Video Recording	<input type="checkbox"/> Photos
<input type="checkbox"/> Weight	<input type="checkbox"/> Signatures

- 2) What information relating to OPA users of the Cision Platform will be collected, maintained, used, and/or disseminated?

Active Directory/Device Information	
<input checked="" type="checkbox"/> IP Address	<input checked="" type="checkbox"/> MAC Address
<input type="checkbox"/> CFTC Asset Number	<input checked="" type="checkbox"/> Device Identifiers or Serial Numbers
<input checked="" type="checkbox"/> User Name / Password	<input checked="" type="checkbox"/> Log data

4. COLLECTING INFORMATION

- 1) How is the information in this system collected?

Contact information pertaining to members of the press is collected by Cision to facilitate communication with entities of public interest such as the CFTC. To learn more about Cision’s privacy policies, visit: <https://gdpr.cision.com>.

Press releases prepared by OPA are uploaded to the Cision platform for distribution to media contacts and press outlets. CFTC Press Releases may contain personal information pertaining to members of the public (e.g., when announcing an enforcement action) and CFTC staff members (e.g., OPA, Division of Enforcement staff, and the Chairman and Commissioners). OPA maintains an official version of each press release in a SharePoint site maintained by OPA on the CFTC network.

5. INFORMATION USE

- 1) Will information in the system be retrieved using one or more of the data elements listed in Section III?

Information in the Cision platform is searchable by title or content, reporters’ names, pictures, videos, and keyword.

- 2) If the information in the system is retrieved using one or more of the identifiers, what CFTC System of Records Notice (SORN) covers the information?

Retrieval of information pertaining to members of the press is covered by CFTC-53, *Mailing, Event, and General Contact Lists*.

6. ACCESS AND SHARING

- 1) With which internal CFTC Offices or Divisions is the information shared? For each Office or Division, what information is shared and for what purpose?

OPA circulates an organization-wide daily newsletter featuring media coverage of the CFTC and other current events. OPA may also share pertinent articles and mentions of the CFTC with specific CFTC offices and divisions, as necessary.

- 2) Approximately how many users have access to the system?

Between five and ten members of the OPA management team will have credentials to access to the Cision platform.

- 3) How is the information shared internally?

Information derived from Cision, such as articles and metrics, may be used to draft reports and create daily press briefings. Reports and briefings will be saved in a SharePoint site maintained by OPA on the CFTC network and will be emailed to CFTC staff.

- 4) With which external organization(s) is the information shared?

CFTC press releases are shared with Cision for further distribution to other external organizations (e.g., news outlets). News articles and press contacts available in the Cision platform may be shared with other federal agencies on a case-by-case basis.

- 5) How is the information shared externally?

OPA uploads CFTC press releases to the Cision platform, which are then distributed electronically to third parties. In order to share press contact information or news articles residing in the Cision platform with other federal agencies, OPA staff may export such information and transmit it by email.

7. TRANSPARENCY

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

Media outlets and members of the press are in direct contact with Cision and are aware that their personal information is being collected and will be shared with other entities, such as the CFTC. This assessment serves as notice to the Media Outlets and members of the press, as well as industry participants and experts who agree to be interviewed on the record, that their information is collected, used, and disseminated within the CFTC.

CFTC staff members are informed that their personal information may be included in CFTC communication prior to its release.

- 2) Is a SORN required? If so, explain how the use of the information in this system is limited to the use specified in the SORN?

Retrieval of information pertaining to members of the press is covered by CFTC-53, *Mailing, Event, and General Contact Lists*, 84 FR 17814. Additional information about the SORNs maintained by the CFTC is available [here](#).

8. INDIVIDUAL PARTICIPATION

- 1) Is the information collected directly from the individual?

Personal information relating to members of the press and individuals (e.g., industry participants and experts) who agree to be interviewed on the record is collected, maintained, and updated by Cision, and may be collected directly or indirectly.

Personal information relating to members of the public mentioned in CFTC communications is collected by the CFTC in the context of its regulatory activities, such as enforcement actions, and is collected from other CFTC systems or public documents such as court filings.

Personal information relating to CFTC staff members mentioned in CFTC communications is collected from other CFTC IT systems.

- 2) Is the collection mandatory or voluntary? If voluntary, what opportunities do the individuals have to decline to provide information?

The collection of information about individuals whose personal information appears in news articles, such as members of the press and individuals (e.g., industry participants and experts) who agree to be interviewed on the record is involuntary. Members of the press and individuals who agree to be interviewed understand that they may be identified in articles and publications. In certain circumstances, individuals who agree to be interviewed may be interviewed off-the-record or their comments may appear without attribution. The CFTC does not make any attempt to identify or identify unnamed sources.

The collection of personal information relating to members of the public who are mentioned in CFTC communications may be involuntary. For example, in the in the context of enforcement actions certain information may be collected from other CFTC systems or public documents such as court filings.

The collection and use of personal information relating to CFTC staff members in CFTC communications is involuntary. However, the content of CFTC communications is coordinated with multiple stakeholders, including the individuals concerned, heads of CFTC

operating divisions, the Office of General Counsel, and the Office of the Chairman and CFTC staff named in CFTC Communications may request anonymity.

- 3) Do individuals have an opportunity to consent to a particular use of the information? If so, how do they provide consent for a particular use?

CFTC does not determine whether members of the press are presented with an opportunity to consent to the collection of their personal information by Cision.

Members of the public mentioned in CFTC communications in the context of enforcement actions do not have an opportunity to consent to use of their personal information.

CFTC staff members may not have the opportunity to consent to use of their personal information when publication thereof is mandatory (e.g., statements released by the Chairman or Commissioners).

9. DATA MINIMIZATION

- 1) What steps were taken to minimize the collection of PII in the system?

Cision offers products and services that monitor blogs and posts on social media such as Twitter, Facebook, and YouTube. In addition, Cision provides a platform to connect with and build relationships with “new media influencers”. In accordance with Section (e)7 of 5 U.S.C 552a and OMB Memorandum M-10-22 *Guidance for Online Use of Web Measurement and Customization Technologies* (Jun. 25, 2010), OPA will not use these products and services because they could potentially collect information protected by the First Amendment and track user individual-level activity on the Internet outside the Cision platform.

10. DATA QUALITY AND INTEGRITY

- 1) How is data quality ensured throughout the information lifecycle and business processes associated with the use of the information?
 - Cross referencing data entries with other systems
 - Third party data verification
 - Data taken directly from individuals
 - Character limits on text submissions
 - Numerical restrictions in text boxes
 - Other:

11. RETENTION

- 1) What are the retention periods for the information?

Press releases saved to the Cision platform are copies of the Official Press Releases. Copies of press releases are considered Transitory Records. Such records fall under General Records Schedule (GRS) 5.2, item 010, "Transitory Records" and can be destroyed when no longer needed for business use, or according to agency predetermined time period or business rule. Official Press Releases are permanent records and are saved to an internal CFTC repository for eventual transfer to the National Archives and Records Administration.

12. SECURITY

- 1) What types of administrative safeguards protect the information?
 - Contingency Plan
 - User manuals for the system
 - Rules of Behavior
 - Non-Disclosure or other contractual agreement
 - Other:

- 2) What types of physical safeguards protect the information?
 - Guards
 - Identification Badges
 - Biometric
 - Cameras
 - Physically secured space with need to know access
 - Other:

- 3) What types of technical safeguards protect the information?
 - User Identification
 - Firewall
 - Virtual Private Network (VPN)
 - Multi-factor Authentication (MFA)
 - Passwords
 - Encryption
 - De-Identification
 - Anonymization
 - Other:

- 4) What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate use of the information?

Information about what information Cision collects to prevent or detect unauthorized access can be found [here](#).

- 5) Is this system hosted by a Cloud Service Provider (CSP)? Yes.
 - a. If yes, which one? Cision
 - b. If yes, has the system obtained a FedRAMP Authorization? No. The Office of Data and Technology has determined that use of the Cision platform does not require FedRAMP authorization.

13. TRAINING

- 1) What privacy training is provided to users of the system?

OPA staff members receive training before gaining access to Cision for the first time in order to ensure that all information resides in approved locations. In addition, annual privacy and cybersecurity training is mandatory for all CFTC staff.