



**Privacy Impact Assessment
for
Whova Virtual Event Solution**

5/12/2021

System/Business Owner

Office of Data Technology

Reviewing Official

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Chief Privacy Officer
Commodity Futures Trading Commission

I. SYSTEM OVERVIEW

1) Describe the purpose of the system/collection:

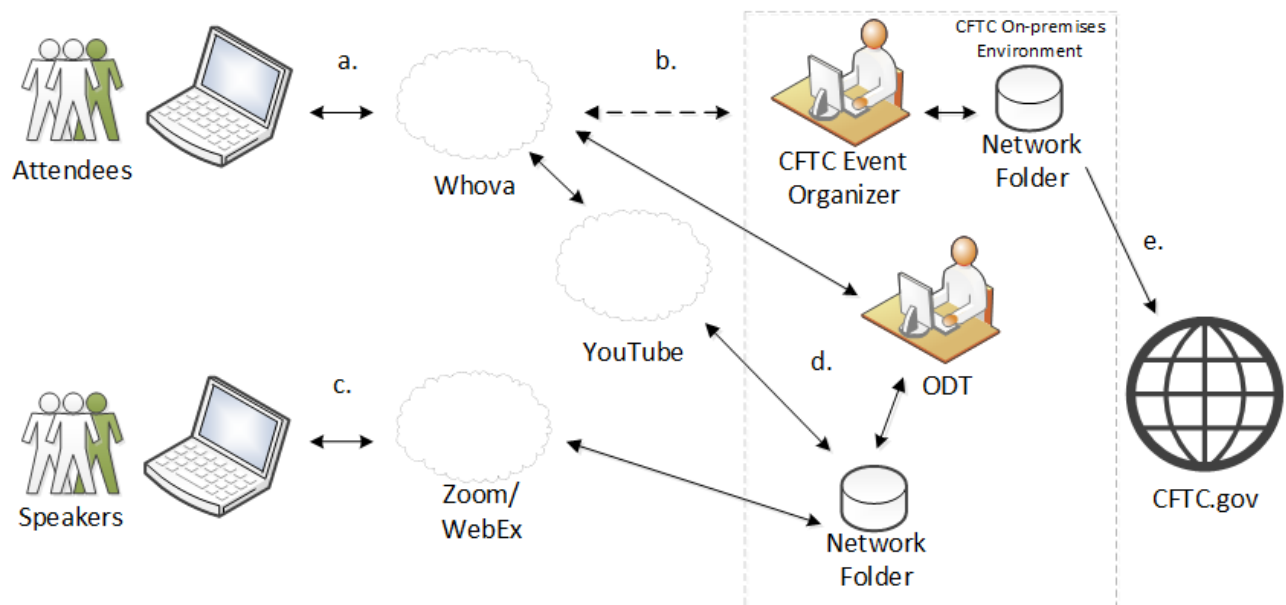
The Commodity Futures Trading Commission (“CFTC” or “Commission”) frequently hosts public training and events that require advanced registration. When these events are not held in person, CFTC staff may use Whova, a third-party event management solution, to host and manage virtual event registration, attendance, and participation.

Whova enables and promotes attendee engagement with features such as live web-streaming, event reminders, anonymous polling and surveys in real-time, and custom branding. It also documents participant registration, allows participants to provide feedback, facilitates question and answers for presenters, shares event documentation such as agendas and speaker biographies, and facilitates attendee networking.

Information collected by Whova may be extracted and saved in the CFTC environment by CFTC staff using Whova to manage virtual events.

Whova is not a CFTC-owned or operated platform. Whova’s [Terms of Use](#) and [Privacy Policy](#) govern Whova’s collection, use, maintenance, and disclosure of personal information. CFTC will provide links or references to the Whova Privacy Policy in its communications relating to virtual events.

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. Attendees create a Whova account and register for CFTC-sponsored virtual events from their personal devices. Attendees log on to Whova to watch the event, communicate with other attendees, answer polling and survey questions, and use other functionalities offered by the Whova platform.
- b. CFTC staff responsible for organizing the event extract registration information and other event metrics from the Whova platform to the relevant network drive or SharePoint site in the CFTC network.
- c. Guest speakers use a video conferencing tool, such as Zoom or WebEx, to deliver their presentations.
- d. The A/V stream is captured by the Division of Administration's webcast vendor and from there routed to YouTube. Attendees watch the presentations in Whova through a YouTube feed embedded in the Whova platform. Recordings of the presentations are stored in a shared drive managed by the Division of Administration and are posted to the CFTC's official YouTube page.
- e. Materials from the event may be posted to CFTC.gov.

II. AUTHORITY AND PURPOSE

- 1) What is the legal authority to collect, use, maintain, and share information in the system?
7 U.S.C. 22(a)(2)-(3).

III. INFORMATION TYPES

- 1) What information 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 type="checkbox"/> Personal Mobile Number	<input 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 type="checkbox"/> Personal or Business Fax Number
<input type="checkbox"/> Home Mailing Address	<input 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 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 checked="" type="checkbox"/> Voice/Audio Recording
<input type="checkbox"/> Hair Color	<input type="checkbox"/> Eye Color
<input checked="" type="checkbox"/> Video Recording	<input type="checkbox"/> Photos
<input type="checkbox"/> Weight	<input type="checkbox"/> Signatures

2) What information relating to users of the Whova platform will be collected, maintained, used, and/or disseminated?

Active Directory/Device Information	
<input checked="" type="checkbox"/> IP Address	<input 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

IV. COLLECTING INFORMATION

1) How is the information in this system collected?

The CFTC publicizes upcoming events on CFTC websites, social media, and by email. Individuals responding to event announcements are directed to register through Whova.

Attendees will need to create a Whova account (or use their existing account) to register for CFTC events. To create a Whova account, users provide their email address, create a password, and provide additional information, as required by Whova. Whova does not provide this account information to the CFTC.

Whova requires users to download its mobile application to use all the Whova platform's features, and may collect additional information that can be linked to a user or user's device(s) including Internet Protocol addresses, Internet browser type, other characteristics

of users' device and software, domain names of users' Internet Service Provider, approximate geographic location, a record of users' actions in the Whova platform, the time of usage and other aggregated information that may help Whova improve its products and services. This information is also not shared with the CFTC, except as described below.

Speakers at CFTC events use a separate video conferencing tool, such as Zoom or WebEx, to present. Speakers will initially join a conference "green room" before their session starts; conversations in these "green rooms" are not broadcast or recorded. Once the session begins, the A/V stream is captured by the Division of Administration's webcast vendor and from there routed to YouTube. Attendees watch the presentations in Whova through a YouTube feed embedded in the Whova platform. Recordings of the presentations are stored in a shared drive managed by the Division of Administration; recordings will not be saved by or shared with Whova or the video conferencing vendor. Speakers may also upload presentation materials to the Whova platform, which are then available to all attendees.

CFTC will receive information generated during each event, including:

- a. Which attendees viewed each session and the duration of the viewing;
- b. Which attendees submitted questions using the Whova platform and the content of the questions and answers;
- c. Which attendees responded to surveys or live polling and the content of their answers; and,
- d. Which attendees posted comments in public forums on the Whova platform and content of their comments.

CFTC will not have access to participants' Whova account profile settings, user device information, location, or other technical information generated by their use of the Whova platform, aside from that mentioned above. CFTC will also not receive information regarding which attendees downloaded presentation materials available in the Whova platform. CFTC will be provided with an aggregate count of how many private messages were exchanged during an event, but will not have access to the parties to these conversations or their content.

- 2) If any forms are used to collect information that resides in the system, please include the name of such form(s) and any applicable control number (i.e. issued by CFTC, OMB, etc.).

No forms are used to collect information that resides in the system.

V. INFORMATION USE

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

Information in Whova can be retrieved by attendee name and email address.

- 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?

Privacy Act records in this system are covered by CFTC-50, *LabCFTC* and CFTC-53, *Mailing, Event, and General Contact Lists*.

VI. 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?

Staff from the Division of Administration and the Logistics Office (LO) providing technical support (i.e., setting up web-streaming, audio and video recordings) and logistical event support, respectively, will have account administrator access to all information across all CFTC events hosted using the Whova platform.

CFTC staff organizing an event will be granted temporary administrator access to the Whova platform, and only for the specific event for which they are responsible. Other staff that assist in organizing a particular event and have a need to know will have access to the information that is extracted from the Whova platform and saved to a CFTC environment, such as a SharePoint site. Temporary administrator access will be revoked after necessary post-event tasks or analyses are complete and any relevant information in the Whova platform has been exported to the CFTC environment.

To the extent Whova is used in conjunction with in-person CFTC events, information may be shared with additional LO staff responsible for event logistics and CFTC security staff.

Information collected by Whova and shared with the CFTC is intended to help CFTC staff understand the number of individuals who registered for and attended the event, how engaged attendees were during the event, as well as feedback provided by attendees on the quality of the event.

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

CFTC staff managing event organization, registration, and providing technical support will have access to Whova. That number of individuals who register and attend an event will vary depending on the specifics of the event.

- 3) How is the information shared internally?

Information extracted from Whova will be shared internally through SharePoint sites and email.

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

Attendees can see limited information about each other (e.g., name, title, organization, posted comments) in the Whova platform, unless they opt out of this option in their Whova profile settings. Recordings of CFTC events and event materials may be made publicly available.

- 5) How is the information shared externally?

Presentation materials can be downloaded from the Whova platform by attendees, and may also be published to CFTC.gov at the close of the event. Audio and video recordings of conferences may be posted to the CFTC's official YouTube account.

VII. TRANSPARENCY

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

Attendees are provided with a Privacy Act statement when registering for a CFTC event. Whova also provides its own Privacy Policy, available [here](#). This assessment serves as additional notice to the public of the Commission's use of Whova.

- 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?

Yes, a SORN is required to maintain information collected and used by Whova. Information pertaining to event participants is only used consistent with CFTC-50, *LabCFTC* and CFTC-53, *Mailing, Event, and General Contact Lists*.

VIII. INDIVIDUAL PARTICIPATION

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

Yes, information is collected directly from individuals who register for and attend CFTC events hosted using the Whova platform.

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

Participation in a CFTC event is voluntary. Individuals who choose not to create a Whova account may not be able to register for and attend certain CFTC-hosted events.

- 5) 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?

Attendees may modify their profiles on the Whova platform and opt out of making their information visible to other event attendees.

IX. DATA MINIMIZATION

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

The system collects the minimum amount of registration and technical information necessary to host and manage virtual CFTC events.

X. 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:

XI. RETENTION

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

Information extracted from Whova by CFTC business units hosting virtual events will be maintained for seven (7) years after the end of the calendar year in which the event takes place, in accordance with CFTC records disposition schedules.

XII. 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?

Internal CFTC systems such as email servers, SharePoint and network drives are continuously monitored to detect unauthorized access as part of CFTC's security program. Access is limited to those with a need to know who understand their responsibilities in handling this information to prevent inappropriate use of the information.

Information about Whova's policies 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? Whova
- b. If yes, has the system obtained a FedRAMP Authorization? No. The Division of Administration has determined that use of the Whova platform does not require FedRAMP authorization.

XIII. TRAINING

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

All CFTC personnel are subject to CFTC agency-wide procedures for safeguarding personally identifiable information and receive annual privacy and security training.