

# Office of Management and Budget

# Privacy Impact Assessment for Eventbrite

Agency Chief Information Officer	Date
Senior Agency Official for Privacy	Date

# I. System Overview

1.) Describe the purpose of the system, collection or tool.

The U.S. Digital Service (USDS) works to further integrated, efficient, secure, and effective uses of information technology in the Federal Government. USDS achieves that result by, among other things, transforming critical, public-facing digital services; expanding the use of common information technology (IT) platforms, services, and tools; rethinking how the Government buys digital services; and bringing top tech talent into Federal service.

USDS recruits experts in tech and supporting fields to serve short two- to four-year terms in government service. To draw top talent on continuous basis, USDS engages in a variety of recruiting efforts, including public events.

Eventbrite is a third-party platform that allows users to organize and promote events and enables easy public discovery and attendee registration. Using Eventbrite will facilitate USDS's event planning and communications with attendees. USDS also plans to use the registration information to promote future USDS events for those who opt in to this future contact. Although the Eventbrite platform provides tools for facilitating both free and paid events, USDS will not organize paid events through this service.

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

Eventbrite collects information voluntarily provided by users who create accounts or register for events. USDS will receive the information provided by Eventbrite users who register for USDS events. Registrants will be asked to provide their names, email addresses, and optionally zip code. For registrants that opt in to future communications directly from USDS, distinct from the standard Eventbrite "Keep me updated on more events and news from this event organizer" feature, USDS will export their information from Eventbrite to be stored in a spreadsheet with limited access controls in a USDS/OMB managed system. If the user does not choose to opt in to future communications from USDS, the information they provide to USDS will only be used for that specific event's registration and facilitation.

# II. Authority and Purpose

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

Further Consolidated Appropriations Act, 2024 (Public Law 118-47); section 4010, American Rescue Plan Act of 2021 (Public Law 117-2); E.O. 14110; E.O. 14058.

### III. Information Types

1.) What information will be collected, maintained, used, and/or disseminated? Select all that may apply:

Identifying Numbers		
Social Security Number	Truncated or Partial Social Security Number	
Driver's License Number	Vehicle Identifier	
Patient ID Number	File/Case ID	
Student ID Number	Credit Card	
Passport	Alien Registration	
Employee ID Number	Employer ID Number	
Professional License Number	Financial Account	
Taxpayer ID Number	Credit Card	
Medical Record	Any Other ID (specify)	

Contact Information			
Personal Mobile Number		Business Phone Number	
Personal Email Address	Х	Business Email Address	
Home Phone Number		Business Mailing Address	
Home Mailing Address		Any Other Contact Information (specify)	

Work Related Data (WRD)		
Occupation	Job Title	
Work Email Address	Work Address	
Work Phone Numbers	Salary	
Student ID Number	Procurement or Contracting Records	
Employment Performance Ratings or other Performance Information	Work History	
Other Information (specify)		

Biographical Information			
Name	X	Gender	
Date of Birth		City or County of Birth	
Country of Birth		Zip Code	Х
Citizenship		Military Service Information	
Spouse Information		Academic Transcript	
Marital Status		Resume or Curriculum Vitae	
Mother's Maiden Name		Children or Dependent Information	
Any other (specify):	I		

Biometrics		
Fingerprints	He	eight
Hair Color	Еу	ye Color
Video Recording	Αι	udio Recording
Signatures	Pł	hotos
Weight	Ar	ny Other (specify)

Active Dire	ctory/Device Information
User Name or User ID	IP Address
Device Identifier or Serial Numbers	Any Other (Specify)

# IV. Collecting Information

1.) How is information in this system collected?

Eventbrite collects information voluntarily provided by users who create accounts or register for events. USDS will receive the information provided by Eventbrite users who register for USDS events. Registrants will be asked to provide their names, email addresses, and optionally zip code. USDS will be able to view this information in Eventbrite and export it to an access-controlled spreadsheet in a USDS/OMB managed system.

Additionally, users have the option to create an Eventbrite account, but it is not required to sign up for events. When creating an account, users provide their email address, create a password, can link their social media accounts, and provide additional information as required by Eventbrite. Eventbrite does not provide this account information to USDS. Eventbrite may also collect other information that can be linked to a user or user's device including Internet Protocol (IP) addresses, Internet browser type, other characteristics of users' device and software, and other aggregated information that may help Eventbrite improve its products and services.

#### V. Information Use

1.) Will information in the system be retrievable using one or more of the data elements listed in Section III? If yes, will the information be retrieved?

Yes, USDS can retrieve the information in the system by name, email, and zip code, listed above in Section III.

2.) If the information in the system is retrieved using one or more of the identifiers, is this information covered by a government-wide or OMB System of Records Notice (SORN)? If so, please identify the appropriate SORN which covers the information.

The records maintained in this system will be covered by the OMB Human Capital SORN.

# VI. Access and Sharing

1.) With which internal OMB offices is the information shared? For each office, what information is shared and for what purpose?

The information will only be used only by USDS. Within USDS, only site administrators, organizers of the event, the USDS communications team, and the USDS talent management team will have access to the information.

2.) How is the information shared within the requesting office or division?

N/A, the information will remain in USDS.

3.) With which other organizations (including other EOP components) or individuals is the information shared and for what purpose?

USDS will not share information from Eventbrite with other organizations or individuals.

4.) How is the information shared with other organizations or individuals?

USDS will not share information from Eventbrite with other organizations or individuals.

# VII. Transparency

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

Eventbrite's Privacy Policy informs users of the way in which their information may be used in general. USDS will provide a notice on its Events pages informing users of how USDS will use their names, email addresses, and optionally zip code. Upon notification, users will have the option to opt in to future communications directly from USDS. If the user does not choose to opt in to future communications from USDS, the information they provide to USDS will only be used for that specific event's registration and facilitation.

# VIII. Individual Participation

1.) Is the information collected directly from the individual, OMB staff, some other means, or some combination? Please elaborate.

USDS receives the information from Eventbrite, which receives the information from the individual. USDS may on occasion obtain the information from an individual directly and enter it manually into Eventbrite; for example, to facilitate same-day registration.

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

Collection is voluntary. Individuals who decline to provide their information to Eventbrite may be unable to preregister for a USDS event, and therefore may be unable to attend. The option to be contacted by USDS in the future about future events and recruiting-related activities is completely voluntary and does not affect the individual's ability to register for the event.

3.) Do individuals have an opportunity to consent to a particular use of their information? If so, how to they provide consent for a particular use? (Attach proposed consent forms or other documentation).

Potential event attendees will voluntarily be able to sign up for/opt into future communications from USDS directly and provide their zip code information. This is in addition to the option to opt into the Eventbrite feature to be contacted about future events by Eventbrite.

# IX. Data Minimization

1.) What steps will be taken to minimize the collection of PII in the system, collection, or tool?

To register for a USDS event, individuals will only have to provide their names and email addresses—the minimum amount of information required to plan and carry out the event and related communications. Individuals will have the option to provide their zip code to receive information about future events in their area, but may register without doing so.

#### 2.) Data Quality and Integrity

1.) How is data quality ensured throughout the information lifecycle and business processes associated with the use of the information?

Eventbrite is responsible for maintaining the security of information on the platform. Eventbrite provides a description of its security practices at https://www.eventbrite.com/security/. Any information exported from Eventbrite will be exported to USDS/OMB managed systems.

- **3.) Retention** [To be completed in coordination with ARO]
- 1.) Are the records captured by one (or more) legal disposition authorities (also known as record schedule items)?

The records created by this tool would fall under GRS 2.1, Employment Acquisition Records, item 180 (DAA-GRS-2018-0008-0003).

#### **Recruitment Records**

Records documenting agency in-person and on-line recruitment efforts at career fairs, job fairs, visits to colleges, and similar venues. Includes:

- records documenting planning and logistics of individual recruitment events
- record copy of advertisement and materials for distribution (see exclusion 2)
- contact information and interest areas collected from potential job candidates
- recruitment event reports
- correspondence with prospective candidates

The only unique records created and maintained in this system would be the participant info of individuals who have signed up for the event. If that is the case, these records would fall under GRS 5.2, item 010 – Transitory Records.

2.) What are the retention periods for the information?

Destroy when 1 year old, but longer retention is authorized if required for business use.

#### XII. Security

1.)	What types of administrative safeguards protect the information?
□ Con	itingency Plan $\square$ User manuals for the system $\square$ Rules of Behavior $\square$ Non-Disclosure or other
contra	ictual agreement $oxtimes$ Other: Administrative access is limited to only USDS system admins – all other
users	will have restricted access to the platform. These restricted users would be the organizers of the
event,	USDS communications team, and USDS talent management team.
2.)	What types of physical safeguards protect the information? $\Box$ Guards $\Box$ Identification Badges
☐ Bior	metric □ Cameras □ Physically secured space with need-to-know access ☒ Other: Eventbrite
impler	ments perimeter defense, firewall systems, and best practice data center controls.

<sup>\*</sup>Note: Records without a legal disposition are unscheduled and must be treated as permanent until scheduled. The ARO will work with the records creators to schedule such records.

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
4.) What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate use of the information?
Eventbrite provides a description of its security practices, including 24x7 monitoring of security systems and alerts at <a href="https://www.eventbrite.com/security/">https://www.eventbrite.com/security/</a> . Any information exported from Eventbrite will be exported to USDS/OMB managed systems.
5.) Is this system/tool hosted by a Cloud Service Provider (CSP)?
a. If yes, which one?
Hosting Environment
Amazon EC2 hosts Eventbrite's production systems.
PCI-DSS Level 1 Service Provider
ISO 27001 certified
Independently verified and audited
SAS-70 Type II and SSAE16
Amazon AWS PCI Compliance site
b. If yes, has the system obtained a FedRAMP Authorization?  The service of hosted on AWS; however, it is not using the FedRAMP accredited AWS instance.
<ul><li>4.) Training</li><li>1.) What privacy training have users of this system/collection taken?</li></ul>
The users will have taken any required OMB trainings.