



Privacy Risk Assessment

*American Sabor: Latinos in U.S. Popular Music
Educational Interactive Website*

I. Systems Identification

- 1. System Name: American Sabor: Latinos in U.S. Popular Music website
- 2. Sponsor Unit: Smithsonian Institution Traveling Exhibition Service
- 3. System Sponsor: Denise Schelin, Director of Finance, SITES
- 4. IT Manager: Steve Arnold, Director of IT, SITES
- 5. PIA Author: Evelyn Figueroa, Project Director
- 6. SI Unit Director: Anna Cohn, Director, SITES
- 7. Date: March 23, 2011

Administrative:

The Smithsonian Institution conducts Privacy Risk Assessments (PRAs) as a best privacy practice.¹ Smithsonian Institution units are required to conduct PRAs when developing or procuring information technology systems or websites that collect, maintain, or disseminate personally identifiable information. Smithsonian Institution PRAs do not create any rights, substantive or procedural, that are enforceable at law by any party in any matter, civil or criminal.

Overview:

The Smithsonian Institution Traveling Exhibition Services (SITES) shares the wealth of Smithsonian Institution collections and research programs with the public through a wide range of traveling exhibitions and diverse programming about art, science, and history. As part of its mission, SITES collaborated with the Experience Music Project in Seattle, Washington² to develop the *American Sabor: Latinos in U.S. Popular Music* exhibition that focuses on the influence of Latino artists on U.S. popular music tradition. The exhibition is sponsored by Ford Motor Company Fund and Ford’s public relations partner, Communicad, Inc.³ The *American Sabor: Latinos in U.S. Popular Music Exhibition* includes a small scale traveling exhibition, educational materials for teachers, an exhibition brochure, a family guide,⁴ and an educational interactive website. The traveling exhibition will open at the Sacramento Public Library, Sacramento, California in May 25, 2011 and will travel to twelve (12) additional venues such as the San Francisco Public Library, San Francisco, California, the Puerto Rican Art Alliance, Chicago, Illinois; the Charlotte Museum of History, Charlotte, North Carolina; the Latino Cultural Center, Dallas, Texas; the Plaza de Culturas y Artes, Los Angeles, California; and the Museo de las Americas, San Juan, Puerto Rico. SITES contracted with Interactive Knowledge, Inc. to develop host and maintain the *American Sabor*, www.americansabor.org website. The

¹ The Smithsonian Institution is not subject to the E-Government Act of 2002, Pub. L. 107-347, § 208, 116 Stat. 2899, 2921-23.

² The Experience Music Project is a museum in Seattle, Washington dedicated to the exploration of creativity and innovation in popular music.

³ Ford Motor Company Fund is a major donor of the Smithsonian Institution which works with community partners to advance education, American heritage, and community life. Communicad, Inc. is the public relations partner of the Ford Motor Company Fund which organizes, manages, and promotes Latino programs.

⁴ The family guide is a paper brochure created by SITES that contains educational information about the exhibit. The brochure will be distributed at exhibition venues.

American Sabor website complements the traveling exhibition and introduces national and international audiences to the contributions and influences of Latino artists to today's popular music tradition. SITES anticipates that the website will remain operational for ten (10) years. The American Sabor website will contain music, audio, and video files, photographs, interactive and multimedia components concerning Latino artists, and will comprise the following sections: (a) Share Your Story; (b) The Sabor Blog; (c) Exhibition and Musicians; (d) JukeBox; (e) The Sabor Mixer; (f) For the Classroom; (g) About the Exhibition; and (h) Administration.

(a) Share Your Story

Music is a constant for Latino life and Latino communities; they live, work, and celebrate with music and dance. Accordingly, SITES will be inviting the members of the public (via a link on the American Sabor website) to contribute textual stories, photographs (including descriptive captions), video clips, and audio files which reflect the public's experiences with Latin music, performers, and performances.⁵ The Share Your Story section will help SITES keep the *American Sabor* story current by building a community forum of shared stories and experiences concerning Latino music.

The Share Your Story section invites the public to share stories that relate to the following five (5) categories: *Community Events, Dance, History, Music & Song, and Personal Story*. Contributions to the American Sabor website are strictly voluntary; however, contributors will be required to register by selecting a user name and password, and will also be required to provide name and e-mail addresses prior to submitting materials to the website.⁶ Contributors also will be required to accept the American Sabor Terms and Conditions (attached as Attachment A) which detail SITES criteria and requirements for contributions to the website. After submitting materials, Smithsonian employees will review contributions to determine which submissions best capture Latino's contributions to American popular music and will post those selections to the appropriate sections of the website.⁷ To the extent that a contribution violates any of the Terms and Conditions, the contribution will not be posted to the website.

SITES will select contributions (whole or part) to become part of American Sabor website. SITES initially will accept contributions for approximately three (3) years. At the end of the three (3) year period, SITES will assess the level of public interest in the website, and will determine whether it will accept additional contributions for posting. If SITES determines that the project should be discontinued, SITES will notify visitors to the website of that fact by including a specific announcement in the "Share Your Story" section and disabling the login feature. At the conclusion of the project, the materials will be archived or disposed of according to Smithsonian record retention policies and standard archiving practices, however, the e-mail addresses, usernames, and passwords of contributors will not be archived. After determining that there is a privacy risk associated with disclosing the e-mail addresses, user names and passwords of contributors, SITES determined that it would redact this information prior to archiving these

⁵ The Smithsonian Institution's privacy statement applies to information collected for this project. The privacy statement can be found at <http://www.si.edu/Privacy>.

⁶ Registration information such as user name and password and e-mail address will be used by Smithsonian employees and Interactive Knowledge, Inc. to communicate with contributors and to administer the website.

⁷ Depending on the number of contributions received, SITES may seek assistance from Smithsonian Institution fellows/interns to assist with reviewing and selecting submissions for posting.

materials.⁸ If SITES does not select a contribution for posting on the Sabor Blog, the contribution will be kept internally at SITES for five (5) years. All contributions (whether accepted or not) may be shared with third parties in response to law enforcement or congressional requests, in response to public requests for Smithsonian records under Smithsonian Directive 807,⁹ and as the Smithsonian determines is required by applicable law or regulation. In addition to posting contributions to the website, the Smithsonian may use contributions for educational, promotional and standard museum purposes as described in the Terms and Conditions. Furthermore, the Ford Motor Company Fund and Communicad, Inc. may use selected contributions for non-commercial purposes. Lastly, visitors to the website will be able to “share” stories with others via a link to social media websites such as Facebook and Twitter, and applications such as “Add This.”¹⁰

(b) The Sabor Blog:

The website will contain a blog (the “Sabor Blog”). The Sabor Blog will allow the general public to engage in discussions about diverse topics related to Latino music and its influence on American popular music. Unlike the “Share Your Story,” section, users will not be required to register in order to submit content. Sabor Blog participants will, however, be required to accept the American Sabor Terms and Conditions prior to submitting content. To the extent that user generated content violates any of the Terms and Conditions, the entry will not be posted to the website. The Terms and Conditions advise users that they should not submit personally identifiable information which they do not wish to be made public; however, participants may submit this information if they choose to do so. All user generated content will be reviewed by SITES employees and Communicad, Inc. prior to posting to the blog. User generated content that is posted to the Sabor Blog will be retained for approximately ten (10) years. At the conclusion of the project, the materials will be disposed of according to Smithsonian record retention policies and standard archiving practices, however, e-mail addresses will not be archived as detailed above. If SITES does not select the content for posting on the Sabor Blog, the content will be kept internally at SITES for five years.¹¹

⁸ The Terms and Conditions notify contributors that the Smithsonian will take reasonable steps to avoid disclosing this information to the public, but cannot guarantee privacy.

⁹ The Smithsonian responds to public requests for information as provided in Smithsonian Directive 807, available at www.si.edu/ogc. Otherwise, the information will be maintained in an electronic folder until the conclusion of the project (10 years). At that time, the information will be destroyed in accordance with Smithsonian security policies and procedures. Access to the folder will be restricted to individuals within the Smithsonian who have a need to know the information.

¹⁰ “AddThis” helps website publishers and bloggers spread content across the web by making it easy for visitors to bookmark and share content to their favorite social destinations while offering sophisticated analytics to help users understand how and where their content is being shared. The terms and conditions specify that contributions may be used by the public “for personal, educational, or non-commercial uses in any media now known or later developed without compensation to” the contributor.

The Terms and Conditions notify contributors that visitors to the website will have the ability to share information via social networking websites, as well as tool and applications. The Terms and Conditions also notify contributors that the privacy policies and terms and conditions of those websites, tools, and applications govern the use of those services.

¹¹ See footnote 9. In addition, user generated content may be shared with third parties as described above.

(c) Exhibition and Musicians:

The Exhibition and “Musicians” sections will contain content concerning Latino music history, Latino music genres, musician biographies, video and audio files, photographs, a video concerning the exhibition, as well as virtual tour of the exhibition. Materials are not downloadable and no information will be collected in these sections of the website. All of the content in these sections are licensed by SITES.

(d) The Jukebox

The “Jukebox” section will include the master recordings of approximately thirty (30) songs by Latino musicians such as Santana, Tito Puente, Gloria Estefan, Freddy Fender, and Linda Ronstadt.¹² The general public will be able to listen to the music and to “share” playlists of the available recordings through social media (as described above); however, they will not be able to download the files.¹³ The “Jukebox” will also include the master recordings of fifteen (15) songs by Latino artists who are part of Smithsonian Folkways collection, in a subsection of the website titled *Latino Musical Roots*.¹⁴ The Latino Musical Roots section will include a link to the Smithsonian Folkways collection for individuals who wish to purchase or download those recordings. Smithsonian Institution Folkways will administer those purchases.

(e) The Sabor Mixer:

“The Sabor Mixer” is an interactive music tool which will allow the public to select and experiment with Latino music rhythms to create music arrangements. Registration is not required to use this section and musical arrangements cannot be recorded, saved or shared.

(f) For the Classroom:

“For the Classroom” provides the general public with access to a wide range of educational materials concerning Latino music and its influence on U.S. popular culture. The section is geared towards K-12 educators and students. SITES will provide free downloadable, ready-to-use lesson plans and educational materials for classroom use. The materials were produced by the Experience Music Project in collaboration with the University of Washington in Seattle, Washington. Registration is not required to use this section and no personally identifiable information will be collected.

(g) About the Exhibition:

“About the Exhibition,” is a discrete section of the website accessible to venues and vendors. The section will allow SITES to monitor the exhibition and to conduct business with venues hosting the traveling exhibition. SITES will post exhibition-related information such as installation guides, exhibition reports, crating and shipping information, public relations templates, and guidelines for educational programs. The section will be used by designated staff at SITES and exhibition venues. Venues will be required to register (i.e., provide user name and

¹² SITES secured licensing for these recordings by BMI/ASCAP, as well as the artists’ respective music labels.

¹³ These social media websites collect personally identifiable information. The privacy policies of those websites apply to the collection of that information.

¹⁴ Smithsonian Folkways has provided master recording licenses to SITES for this purpose.

password) to use this section of the website, however, their user name and password will not be available to participating venues. Participating vendors will be required to agree to the American Sabor Term and Conditions (via a click-thru) prior to accessing this section. The names, addresses, email addresses, telephone numbers, fax numbers provided by participating vendors will be visible to all venue participants.

In addition, the About the Exhibition section will contain a bulletin board which will allow venues to post and share program ideas, post comments, provide advice to other venues, as well as upload images, documents, videos, and educational materials. The About the Exhibition section will be administered by SITES and Interactive Knowledge, Inc. The following types of personally identifiable information will be collected in this section of the website: name, address, telephone numbers, fax numbers, e-mail address, photographs, videos, and audio files. Other than exhibition information, information from the “About the Exhibition” section will not be archived. SITES will retain the information for five years after which time the information will be destroyed in accordance with Smithsonian procedures.¹⁵

(h) Administration

The Administration section of the website is password protected and will solely be accessed by Smithsonian employees and Interactive Knowledge, Inc. A SITES administrator will use the Administration section to review and publish (or choose not to publish) contributions to the Share Your Story and the Sabor Blog sections. Designated staff at SITES will also use the Administration section to register and monitor programming and other information submitted by venues in the About the Exhibition section.

¹⁵ Ford Motor Company Fund and Communicad, Inc. will communicate with participating vendors, however, they will not have access to this section of the website.

II. Privacy Risk Assessment

A. What information is being (or will be) collected?

Identify the information the project collects, uses, disseminates or maintains.

Identifying Numbers					
Social Security		Alien Registration		Financial account	
Taxpayer ID		Driver's license		Financial transaction	
Employee ID		Passport		Patient ID	
File/case ID		Credit card			
Other identifying numbers (specify):					

General Personal Data					
Name	X	Date of birth		Religion	
Maiden name		Place of birth		Financial info	
Alias		Home address		Medical information	
Gender		Telephone number		Military service	
Age		Email address	X	Physical characteristics	
Race/ethnicity		Education		Mother's maiden name	
Other general personal data (specify):					

Work-Related Data					
Occupation	X	Telephone number	X	Salary	
Job title	X	Email address	X	Work history	
Work address	X	Business associates			
Other work-related data (specify):					

Distinguishing Features/Biometrics					
Fingerprints		Photos	X	DNA profiles	
Palm prints		Scars, marks, tattoos		Retina/iris scans	
Voice recording/signatures	X	Vascular scan		Dental profile	
Other distinguishing features/biometrics (specify): Video files.					

System Admin/Audit Data					
User ID	X	Date/time of access	X	ID files accessed	
IP address	X	Queries run		Contents of files	X
Other system/audit data (specify):					
Other information (specify)					

B. Sources of Information:

Directly from individual about whom the information pertains					
In person		Hard copy: mail/fax		Online	X
Telephone		Email	X		
Other (specify):					

Other sources					
Members of the public	X	Public media, internet		Cooperative Databases	
Commercial data brokers		Museums/Charitable Organizations	X		
Smithsonian Institution Programs/Databases: Venues on the exhibition tour					
Other (specify):					

2. Why the information is being collected?

SITES is collecting personally identifiable information from the general public, as well as venues hosting exhibitions to document the history of Latino music in the United States and to demonstrate how Latino music continues to influence American popular music and culture. By contributing to the American Sabor website, individuals will be able to participate (on an individual basis) in the preservation and presentation of Latino music history.

3. What is the intended use of the information?

SITES will use information submitted during the registration process to communicate with contributors. The Smithsonian will use submitted photographs, audio and video files, and user generated content for educational, promotional and standard museum purposes. The Exhibition and Musicians sections will be used by the public to learn about Latino music, musicians, and the exhibition. The Jukebox and the Sabor Mixer sections will be used by the public to learn about the musical recordings of specific Latino musicians. Materials in the For the Classroom section

will be used by educators to educate children aged K-12 about the contributions of Latino musicians. Vendors and SITES will use information in the “About the Exhibition” to communicate with venues and to manage the exhibition. As mentioned above, the Ford Motor Company Fund and Communicad, Inc. may use contributions for non-commercial purposes such as inclusion in its annual report, inclusion on the Ford Motor Company Fund Facebook page and its website, and other public relations and educational initiatives related to the exhibition.

4. With whom the information will be shared?

With the exception of the About the Exhibition and Administration sections, the American Sabor website will be available to the general public. The public will have access to the textual stories, photographs, video/ audio files, etc. and other user generated content which comprise the Share Your Story and The Sabor Blog sections; however, e-mail addresses, user IDs, and passwords of contributors provided as part of the registration process will not be archived.¹⁶ User generated content in the Sabor Blog section are shared with SITES employees and Communicad who are responsible for selecting and posting information to the website. Further, SITES may share contributions with Smithsonian Institution programs such as Smithsonian Folkways, the Smithsonian Latino Center, and the Jazz Heritage Program may use contributions for research and educational programs related to Latino music.¹⁷ Information collected in the “About the Exhibition” section (including the bulletin board) will be shared with SITES and participating venues, as well as Interactive Knowledge. With respect to information which is not available to the general public, only those SITES employees, fellows, interns, and contractors administering the project who have a “need to know” the information in the performance of their official duties will have access to this information. Visitors to the website will be able to “share” stories via links to social media websites such as Facebook and Twitter, as well as tools such as “Add This.”¹⁸ Lastly, contributions may be shared with third parties in response to law enforcement or congressional requests, public requests for information, and as required by applicable law or regulation as detailed above.

5. What notice or opportunities for consent would be provided to individuals regarding what information is collected and how that information is shared?

Provision of materials to the “Share Your Story,” “The Sabor Blog,” and “About the Exhibition” sections is strictly voluntary. Prior to submitting materials, all contributors are required to review and accept the American Sabor Terms and Conditions. The Terms and Conditions provide contributors with notice that digital media and user generated content selected for posting to the Share your Story and The Sabor Blog sections will be available to the general public, and that the Ford Motor Company Fund and Communicad, Inc. may use some materials for non-commercial purposes. The Terms and Conditions also provide notice that user IDs, passwords, and e-mail addresses are not shared with the public, and that the Smithsonian will take reasonable steps to ensure that the information is not disclosed when the materials are archived at the conclusion of the project. With respect to the About the Exhibition section, participating venues will be required to accept the American Sabor Terms and Conditions which provide notice

¹⁶ E-mail addresses, user IDs, and passwords of contributors will not be published or made available to the public. Only SITES and Interactive Knowledge, Inc. will have access to this information.

¹⁷ Contributions may also be shared within the Smithsonian for educational, promotional and standard museum purposes.

that names, addresses, email addresses, telephone numbers, fax numbers will be shared with participating venues, and that user name and password will not be available to participating venues. The applicable terms and conditions are attached.

6. How the information will be secured?

SITES contracted with Interactive Knowledge to host and provide maintenance service for the website. As of March 22, 2011, the website was approved by the Smithsonian Institution Office of the Chief Information Officer Information Technology Security as compliant with applicable security policies and procedures. Registration information such as user name, password, and e-mail address are secured by SSL. Access to this information is role-based and restricted as described above.

Conclusion:

The American Sabor website will allow SITES to support its mission to share the wealth of Smithsonian Institution collections and research programs with the public through a wide range of traveling exhibitions and diverse programs about art, science, and history. The minor privacy risk associated with the collection is that the contact information of contributors may be mishandled or exposed to unauthorized persons. Requiring proper credentials and passwords, restricting access to this information when the materials are archived, and using secure information technology procedures will minimize the opportunity to mishandle this information. The unauthorized release of personally identifiable information is also mitigated by those security requirements. The privacy concerns associated with the use of this system is mitigated and outweighed by the benefits of enhanced information knowledge that flows from this project.

Terms and Conditions for Interactive Features on the American Sabor Website

You may interact with the Smithsonian Institution's American Sabor website (www.AmericanSabor.org) on the following conditions:

- You are solely responsible for the content that you submit and the consequences of submitting content.
- You retain ownership of your submission. However, by submitting content, you give the Smithsonian and those authorized by the Smithsonian permission to use it for any educational, promotional, or other standard museum purpose, in any media now known or later developed, without compensation to you. You further give the public permission to use the content you submit for personal, educational, or non-commercial uses in any media now known or later developed without compensation to you. Finally, you give the American Sabor sponsor, Ford Motor Company Fund and its public relations firm, Communicad, Inc., permission to use the data for Ford Motor Company Fund's non-commercial purposes in any media now known or later developed, without compensation to you.
- The Smithsonian will not return any submitted material. Material will be kept and archived as described herein.
- You will not submit content that is off-topic, partisan-political, contains personal attacks or expletives, or is otherwise abusive, threatening, unlawful, harassing, discriminatory, libelous, obscene, false, pornographic, or that infringes on the rights of any third party.
- You only will submit content that you own or for which you have received permission from the person or entity that owns the content and intellectual property rights.
- You understand that the Smithsonian monitors submitted content and is under no obligation to use the content you submit.
- By submitting content, you waive any privacy expectations you may have with regard to the submitted content. The Smithsonian may make the content you submit available to the general public online or at its premises. The content you submit also may be shared with third parties in response to law enforcement or congressional requests, in response to public requests for information from the Smithsonian under Smithsonian Directive 807 (available at www.si.edu/ogc), and as the Smithsonian determines is required by applicable law or regulation. Do not submit any content or personally identifiable information that you do not want made public. If you submit material to the "Share Your Story" or "Blog" the Smithsonian will take reasonable steps to avoid disclosing your e-mail address, user name, and password to the public, but cannot guarantee your privacy.
- If your content is selected by the Smithsonian for posting, website visitors may share your content via social media websites such as Facebook, YouTube, Twitter, and applications such as "AddThis." These sites operate independently of the Smithsonian and have their own privacy policies (any data that the Smithsonian collects on these sites is subject to www.si.edu/privacy). In addition, comments with which you disagree may become associated with the content you submit.

- Names, addresses, email addresses, telephone numbers, and fax numbers that you provide in the About the Exhibition section will be shared with participating venues and vendors.
- Smithsonian decisions are final and binding.
- You are at least 13 years of age.
- You agree to indemnify and hold the Smithsonian and its sponsors harmless against any claims asserted by any third parties that allege your submission violates their rights, or from any breaches by you of these terms of use. You shall be responsible for any costs incurred by the Smithsonian or its sponsors for defense or settlement of third-party claims, including but not limited to reasonable attorney's fees.
- You agree to the Smithsonian's website terms of use, available at www.si.edu/Termsofuse, which are incorporated here by reference.
- All submissions are voluntary on your part.