

Privacy Office
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Privacy Threshold Analysis Version number: 01-2014 Page 8 of 9

Date submitted to Component Privacy Office:	June 27, 2019	
Date submitted to DHS Privacy Office:	XXX	

Component Privacy Office Recommendation:

Please include recommendation below, including what new privacy compliance documentation is needed.

The HSI Cyber Crimes Center (C3) is submitting this PTA to document Clearview AI, a new facial recognition service C3 will use to identify perpetrators and victims pictured in child exploitation materials. Clearview is a web-based service that acts as a search engine of publicly available images. Clearview pulls and compiles publicly available images from across the internet into a proprietary image database to be used in combination with Clearview's facial recognition technology. Clearview boasts a 98.6% accuracy rate and an image gallery greater than 1 billion images.

ICE's use of Clearview AI is privacy sensitive, requiring PIA coverage. DHS/ICE/PIA-045 Investigative Case Management System (ICM) PIA outlines the risk of utilizing intelligence products from public source databases in reports of investigation and should provide interim coverage for HSI's use of facial recognition technology. All candidate returns from Clearview's facial recognition service will be treated as investigative photographic data within ICM. All information derived from open source URL searches will be treated similarly to standard internet searches in ICM.

ICE Privacy will draft a PIA on its use of facial recognition services for transparency purposes.

Clearview AI requires SORN coverage because it retrieves information by a unique identifier. DHS/ICE-009 External Investigations SORN provides coverage for the use of PII, including photographs, to investigate violations of the law within ICE's jurisdiction. The forthcoming update to DHS/ICE-009 will provide further transparency on HSI's use of facial photographs for biometric purposes and collection of social media.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Click here to enter text.	
PCTS Workflow Number:	Click here to enter text.	
Date approved by DHS Privacy Office:	Click here to enter a date.	
PTA Expiration Date	Click here to enter a date.	

DESIGNATION

Privacy Sensitive System:	Choose an item. If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination: PTA	A sufficient at this time.