

Enabling Mission by Preserving Values



Office of Privacy and Civil Liberties

Protection ◇ **Transparency** ◇ **Trust**

2025

Annual Section 803 Report to Congress

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April 8, 2026

I am pleased to present the Section 803 Report of the Central Intelligence Agency's (CIA) Office of Privacy and Civil Liberties (OPCL), covering the period of January 1, 2025 to December 31, 2025.

As detailed in this report, OPCL advises components and senior agency officials regarding the protection of privacy and civil liberties in the conduct of the Agency's authorized intelligence mission and to conduct reviews to ensure CIA fulfills its obligation to appropriately protect the privacy rights and civil liberties of every American.

A handwritten signature in black ink, appearing to read "Mark J. Mouser". The signature is fluid and cursive, with a long horizontal line extending to the right.

Mark J. Mouser
Privacy and Civil Liberties Officer
Central Intelligence Agency

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I. Purpose and Scope

The Central Intelligence Agency (“CIA” or “Agency”) submits this Annual Report of CIA’s Office of Privacy and Civil Liberties (OPCL) summarizing the activities of CIA Privacy and Civil Liberties Officer (PCLO) for calendar year 2025, in accordance with Section 803 of the Implementing Recommendations of the 9/11 Commission Act of 2007, as amended (hereinafter, the Implementing Recommendations of the 9/11 Commission Act).¹This Annual Report provides an overview of the activities of the PCLO and a summary of notable initiatives undertaken during 2025.

The Annual Report also provides representative descriptions of the kinds of activities pursued by OPCL throughout the reporting period. These activities included advice to the Agency’s various organizational components on privacy and civil liberties related issues, reviews of Agency programs and activities, as well as documenting and responding to Privacy and Civil Liberty complaints from both the general public and the Agency’s workforce. As required by statute, this report has been prepared to the greatest extent possible in unclassified form.² As such, there is no classified annex to this report.

II. Overview of the Office of Privacy and Civil Liberties

CIA’s OPCL is led by the PCLO, a senior Agency official who carries out statutory authorities to safeguard privacy and civil liberties in CIA intelligence operations, policies, programs, and technologies. In accordance with the Implementing Recommendations of the 9/11 Commission Act,³ CIA PCLO serves as the principal advisor to the Director of CIA (DCIA) with the following responsibilities:

- Assist the DCIA and other Agency officials in appropriately considering privacy and civil liberties concerns when such officials are proposing, developing, or implementing laws, regulations, policies, procedures, or guidelines related to efforts to protect the Nation against terrorism;
- Periodically review CIA actions, policies, procedures, guidelines, and related laws and their implementation to ensure CIA is adequately considering privacy and civil liberties in its actions;
- Ensure CIA has adequate procedures to receive, investigate, respond to, and redress complaints from individuals who allege that CIA has violated their privacy or civil liberties; and
- In providing advice on proposals to retain or enhance a particular governmental power available to CIA, include consideration of whether the Agency has established that (i) the need for the power is balanced with the need to protect

¹ 42 U.S.C. § 2000ee-1(f).

² *Id.* § 2000ee-1(g).

³ *Id.* § 2000ee-1(a).

privacy and civil liberties; (ii) that there is adequate supervision of the use by CIA of the power to ensure protection of privacy and civil liberties; and (iii) that there are adequate guidelines and oversight to properly confine its use.

The PCLO also serves as CIA's designated Senior Agency Official for Privacy (SAOP) and CIA Information Sharing Environment (ISE) Privacy Official. As the SAOP, the PCLO represents CIA on the [Federal Privacy Council](#) (FPC), the principal interagency forum established by Executive Order 13719⁴ to improve privacy practices at agencies across the Federal Government. As CIA's ISE Privacy Official, the PCLO provides privacy and civil liberties oversight in CIA's sharing of terrorism-related information between government agencies. The PCLO also serves as CIA's liaison to the Privacy and Civil Liberties Oversight Board (PCLOB).

The PCLO has the additional duty and responsibility of serving as CIA's Transparency Officer, in support of the [Principles of Intelligence Transparency for the Intelligence Community](#). In this role, the PCLO proactively engages in various initiatives to enhance public understanding of intelligence activities needed to accomplish the national security mission.

A team of dedicated privacy and civil liberties officers supports the PCLO in working closely with the Office of the Director of CIA, other Agency Directorates, Mission Centers, and components to ensure privacy and civil liberties safeguards are fully considered in the day-to-day conduct of the Agency's complex and varied intelligence mission. OPCL officers have diverse experience from across CIA, executive branch agencies, and other Intelligence Community (IC) elements. OPCL officers receive specialized training in privacy and civil liberties and have backgrounds in law, information management, policy, and intelligence collection and analysis. In addition, the PCLO and OPCL receive dedicated legal advice from a specialized data privacy attorney from CIA's Office of General Counsel.

III. Notable Initiatives

The following sections provide a brief summary of several notable initiatives undertaken during the reporting period.

CIA's Executive Order 12333 Attorney General Guidelines

Executive Order 12333 (EO 12333), United States Intelligence Activities, requires CIA to collect, retain, and disseminate intelligence information concerning US persons in accordance with procedures established by the Director of CIA and approved by the Attorney General⁵, after consultation with the Director of National Intelligence.

Consistent with OPCL's statutory role to conduct reviews, OPCL advises and assists senior CIA officials on privacy and civil liberties concerns related to implementing the Attorney General Guidelines. During this reporting period, OPCL continued to support implementation of

⁴ Executive Order 13719, 81 Fed. Reg. 30 (Feb. 9, 2016)

⁵ See Attorney General Guidelines and a comprehensive explanation of CIA Attorney General Guidelines.

these guidelines by ensuring that components maintain processes to preempt threats and further US national security objectives through lawful and appropriate collection of foreign intelligence and counterintelligence, with full consideration of US persons' rights, including freedoms, privacy rights, and civil liberties.

Specifically, OPCL assessed the collection of USP data under EO 12333 and provided guidance on CIA's use of Commercially Available Information (CAI), a vital resource for foreign intelligence that also poses risks to revealing sensitive information about individuals. OPCL coordinated with the Office of the Director of National Intelligence by providing commentary on ODNI's policy framework for CAI and worked with Agency components to implement the policy once it was finalized.

EU-US Data Privacy Framework

OPCL continued to provide guidance to CIA components on the implementation of Executive Order 14086 (EO 14086), *Enhancing Safeguards for United States Signals Intelligence*,⁶ and review qualified⁷ requests for redress in accordance with European Union-US Data Privacy Framework.

Artificial Intelligence

Artificial Intelligence (AI)⁸ continued to emerge as a transformative technology, with significant influence on the Agency's internal business processes and its national security mission. During this reporting cycle, OPCL prioritized AI governance and risk management initiatives. In addition to delivering guidance on privacy and civil liberties implications to CIA components regarding the Agency's AI utilization, OPCL consulted on efforts to align with the Office of Management and Budget memorandum M-25-21 and the Framework to Advance AI Governance and Risk Management in National Security.

Privacy and Civil Liberties Oversight Board (PCLOB) Engagement

The PCLOB is an independent, bipartisan agency within the Executive Branch established by the Implementing Recommendations of the 9/11 Commission Act.⁹ The

⁶ Executive Order 14086, 87 Fed. Reg. 62283 (Oct. 7, 2022). EO 14086 directs implementation of commitments made as part of the European Union-US Data Privacy Framework and established safeguards that enhance privacy and civil liberties throughout the course of the United States' signals intelligence activities.

⁷ Under EO 14086, a complaint is treated as "qualifying" only if it is submitted by an individual in a qualifying state or qualifying regional economic integration organization as determined by the US Attorney General.

⁸ The term "Artificial Intelligence" refers to a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations or decisions influencing real or virtual environments. Artificial Intelligence systems use machine and human-based inputs to (A) perceive real and virtual environments; (B) abstract such perceptions into models through analysis in an automated manner, and (C) use model inference to formulate options for information or action. National Artificial Intelligence Act, Pub. L. No. 116-283 § 5001(e).

⁹ 42 U.S.C. § 2000ee-1(a).

PCLOB’s enabling statute vests it with two fundamental authorities: to review and analyze actions the Executive Branch takes to protect the Nation from terrorism, ensuring that the need for such actions is balanced with the need to protect privacy and civil liberties, and to ensure that liberty concerns are appropriately considered in the development and implementation of laws, regulations, and policies related to efforts to protect the Nation from terrorism. Throughout 2025, OPCL served as CIA’s primary point of contact for the PCLOB.

During this reporting period OPCL assisted the PCLOB with its review and analysis of CIA programs by responding to PCLOB requests for information. For example, OPCL coordinated the Agency’s response to the PCLOB’s report on the implementation of Executive Order 14086, *Enhancing Safeguards for United States Signals Intelligence Activities*, and PCLOB’s updated report on surveillance conducted pursuant to Section 702 of the Foreign Intelligence Surveillance Act¹⁰

Workforce Engagement

During this reporting period OPCL continued to maintain an internal website providing the Agency’s workforce with a user-friendly web-based repository of privacy and civil liberties related resources. The website includes an updated library of frequently asked questions, a convenient portal to report breaches of personally identifiable information and privacy and civil liberties complaints, and access to the searchable text of CIA’s System of Records Notices (SORNs)¹¹.

This year, OPCL initiated a workforce engagement campaign with a series of written articles and posters with the central theme of “Privacy Matters”. This ongoing series seeks to educate the workforce on privacy and civil liberties related responsibilities, resources, and information. In addition to this communications campaign OPCL also provided interested members of the workforce opportunities to shadow OPCL officers for a day and experience firsthand the daily activities of OPCL.

OPCL continued its tradition of co-sponsoring a Constitution Day celebration with CIA’s Office of General Counsel and Office of Public Affairs. This year’s events included staffing an information kiosk where members of the Agency’s workforce could test their knowledge of the Constitution and engage with OPCL staff, as well as an original video that included officers’ personal reflections on what it means to support and defend the Constitution. OPCL handed out copies of the Constitution and maintained a webpage dedicated to Constitution Day resources and information.

¹⁰ The PCLOB’s Section 702 Report provides a comprehensive, unclassified account and analysis of the Section 702 surveillance program. This effort supported an update to PCLOB’s 2023 report.

¹¹ SORNs are public-facing documents published in the Federal Register which inform the public of the existence of records and provides notice to the public of their rights and procedures under the Privacy Act of 1974, as amended.

Interagency Engagement

OPCL serves as CIA's focal point for interactions with counterpart privacy and civil liberties organizations within the IC, particularly the Civil Liberties, Privacy, and Transparency (CLPT) Office at ODNI. OPCL also frequently coordinates with other IC counterparts, and occasionally with other departments and agencies within the Executive Branch, regarding privacy and civil liberties matters.

Representative examples of interagency engagement include the following:

- Met with counterpart privacy and civil liberties offices from the US Department of Justice and ODNI to exchange best practices and discuss common issues;
- Coordinated with IC partners on the implementation of EO 14086 to include review and investigation of qualifying complaints alleging unlawful signals intelligence activities and coordinated responses to PCLOB recommendations on implementing stronger privacy and civil-liberties protections while still meeting national security goals;
- Participated in numerous Interagency Policy Committee and subordinate level committee meetings on topics such as privacy and civil liberties, AI, Committee on National Security Systems (CNSS) Privacy Overlay, and refugee vetting;
- Participated in interagency groups and meetings, such as events and conferences sponsored by the Federal Privacy Council and the Intelligence Community's Civil Liberties Privacy and Transparency Council;
- Coordinated with the national vetting enterprise in an interagency effort to ensure that the use of intelligence information in vetting determinations conforms to appropriate privacy, civil rights, and civil liberties protections;
- Coordinated with ODNI on Requests for Identities of US Persons in Disseminated Intelligence Reports (ICPG 107.1) requirements for inclusion in ODNI's Annual Statistical Transparency Report (ASTR);

Public Engagement

Consistent with the [*Principles of Intelligence Transparency for the Intelligence Community*](#), OPCL conducts activities to inform the public about the laws, directives, authorities, and policies governing intelligence activities and the compliance and oversight frameworks in place that ensure such activities are conducted in a manner that respects privacy and civil liberties.

SORNs are required under the Privacy Act to be updated and made publicly available in order to be transparent about how CIA collects, uses, shares, and disposes of records about U.S. citizens and Lawful Permanent Residents. This year, OPCL added a new SORN that covers how the Agency collects and maintains data related to the resolution of certain workforce complaints

and disputes. This new Resolution Office Records SORN, and an update to CIA's general routine use exceptions, were published in the *Federal Register*, where they are available to the public along with CIA's 44 other SORNs.

OPCL also manages content on the Privacy section of CIA's public website, CIA.gov. The information posted on this site explains the role of OPCL, provides instructions on how members of the public can file a privacy or civil liberties complaint, provides access to oversight reports, and provides additional access to CIA's SORNs.

IV. Representative Examples and Metrics

In addition to the notable initiatives discussed above, this section describes representative examples and metrics regarding the activities of OPCL in carrying out the PCLO statutory responsibilities during the period covered in this report in each of the areas enumerated in Section 803 of the Implementing Recommendations of the 9/11 Commission Act.

Advice

OPCL provides advice to CIA components to ensure Agency programs and activities incorporate appropriate privacy and civil liberties protections. Advice includes providing information, guidance or assistance to Agency components. Advisory activities are generally forward-looking and may involve a proposed course of action or providing comments on a proposed rule, policy, or guidance. During this reporting period, OPCL provided advice to various Agency Directorates and components, ODNI, other IC elements, and Executive Branch agencies on matters ranging from interagency initiatives to requests for advice regarding Privacy Act compliance, the proper handling of PII, administration of information technology systems, implementing guidelines, and other matters.

Representative examples include the following:

- Provided advice in support of CIA's AI governance policy;
- Advised CIA components on how to identify and respond to breaches, incidents, Privacy Act violations, and Privacy Act disclosures;
- Provided input, guidance, and advice to CIA components on the implementation of CIA Attorney General Guidelines;
- Contributed to CIA's enterprise plan of action for Federal Information Security Act (FISMA) compliance reporting;
- Conducted meetings with Agency offices and components, including system developers, to advise on Privacy Act mandates and the applicability of System of Records requirements, and drafting new SORNs when necessary;
- Continued to provide substantive input and comments on proposed policy initiatives or frameworks on matters involving security, data access, and training

requirements to ensure the appropriate consideration of privacy and civil liberties in Agency activities;

- Provided advice regarding business processes and systems that provide administrative support to CIA; and
- Provided advice regarding privacy and civil liberties protections in CIA's workforce implementation of OPM requirements;

Reviews

OPCL reviews CIA systems, processes, programs, and activities to ensure adherence to applicable laws, regulations, and policies, such as the Privacy Act and the Attorney General Guidelines.

For the purposes of this report, reviews are distinguished from the provision of advice insofar as a review consists of an assessment regarding whether an existing system, process, program, or activity complies with law, regulation, or policy. In contrast, providing advice consists of assessing a proposed system, action, or procedure. A review may be formal and responsive to a complaint, or responsive to OPCL's periodic investigation and review of Agency systems, processes, programs, or activities. Often, several separate actions may take place to complete a review. When there is one output, such as a report, these actions will be counted as one review.

Throughout 2025 OPCL reviewed CIA processes, procedures, systems, and activities throughout 2025. These reviews included Privacy Overviews, which are conducted at the request of information system owners to help them identify potential privacy issues and provide guidance to mitigate privacy risks. OPCL also reviewed new and updated CIA operating regulations and guidelines, participated in the accreditation process for information systems and reviewed reports on data breaches.

An example of OPCL reviews includes reviewing the Agency's Business Analytics Office use of personal information in its analysis of workforce metrics.

Complaints

Complaints include any concerns raised by members of the public, CIA staff or contractors, or any other government officials to the PCLO indicating a possible violation of privacy protections or civil liberties in the administration of the programs and operations of CIA. Information on the complaints received from CIA personnel and the public are indicated below. The PCLO conducted both internal reviews and inquiries to assess the nature of the complaints and their dispositions. The PCLO reviews and approves final response to each complaint, whether internal or external. During this reporting period, OPCL worked closely with internal stakeholders on frequently asked questions, developed internal tracking systems consistent with the Fair Information Practice Principles (FIPPs), and met individually with CIA employees on how to balance ensuring workforce safety while protecting the privacy of individuals.

I. Internal Complaints:

Nature	Number	Disposition
Allegation that CIA violated a privacy or civil liberties right.	14	In each case, OPCL conducted a review, and as appropriate, provided or will provide advice and/or recommendations.

II. Complaints from the Public:

Nature	Number	Disposition
Allegation that CIA violated a privacy or civil liberties right.	3	In each case, OPCL determined there was an insufficient factual basis to support the complaint.

Members of the public may continue to contact CIA PCLO to make a complaint that indicates a possible violation of privacy protections or civil liberties in the administration of CIA programs and operations. The public can find instructions for submitting complaints at <https://www.cia.gov/privacy>. A complaint may be sent via U.S. postal mail to the following address:

Central Intelligence Agency
Privacy and Civil Liberties Officer
Washington, D.C. 20505

OPCL will review all complaints directed to the PCLO. A complaint must state the possible violation of privacy protections or civil liberties with sufficient detail to allow the PCLO to assess the nature of the complaint and whether a remedy may be appropriate. A response by the PCLO will neither confirm nor deny the accuracy of the complaint and/or whether the individual has been subject to CIA action, but will confirm that the complaint has been properly investigated and indicate, when appropriate, that the matter has been remedied or found to be in compliance with applicable law or policy. OPCL also may refer a complaint to CIA Office of Inspector General or to another Federal Government agency, as appropriate.

V. Conclusion

This annual report summarizes CIA OPCL’s activities for the period from January 1, 2025 to December 31, 2025. OPCL is committed to ensuring that CIA’s activities align with our enduring commitment to protecting privacy and civil liberties.



Office of Privacy and Civil Liberties
Central Intelligence Agency