



**Federal Trade Commission
Privacy Impact Assessment**

Google Analytics

Through GSA's Digital Analytics Program

June 2014

SECTION 1.0 – SPECIFIC PURPOSE OF THE FTC’S PARTICIPATION IN GSA’S DIGITAL ANALYTICS PROGRAM

– What is the specific purpose of the agency’s participation in GSA’s Digital Analytics Program, and how does that use fit with the agency’s broader mission?

GSA’s [Digital Analytics Program](#) offers advanced Web analytics to federal agencies using Google Analytics Premium to collect and analyze Web traffic data. When this PIA refers to “Google Analytics,” it means Google Analytics Premium as configured by, and acquired through, GSA’s Digital Analytics Program. The Digital Analytics Program is a hosted shared service provided by the [Digital Services Innovation Center](#) in GSA’s [Office of Citizen Services and Innovative Technologies](#), and the protocol and the information collected are the same for all federal agencies participating in GSA’s Digital Analytics Program.

The FTC will use Google Analytics to assess how visitors use FTC.gov, other FTC domains (including OnGuardOnline.gov, NCPW.gov, Consumer.gov, Admongo.gov, donotcall.gov, consumersentinel.gov, and ftccomplaintassistant.gov), and other FTC sub-domains (including consumer.ftc.gov, business.ftc.gov, and military.ncpw.gov) and to provide the FTC with a detailed report for each page of content. This data provides FTC staff with insights such as which pages are most popular; what content attracts the most attention; where visitors spend the least amount of time; and other information that the FTC can then use to improve the website, share FTC information more effectively, and create a more engaging experience for website visitors.

According to U.S. Office of Management & Budget ([OMB Memorandum M-10-22](#) (June 25, 2010), “For government agencies, the potential benefits of web measurement and customization technologies are clear. With the help of such technologies, agencies will be able to allow users to... navigate websites more quickly and in a way that serves their interests and needs. These technologies will also allow agencies to see what is useful to the public and respond accordingly. Services to customers and users can be significantly improved as a result.”

1.1 – Is the agency’s participation in GSA’s Digital Analytics Program consistent with all applicable laws, regulations, and policies?

Yes. [According to the information on GSA’s HowTo.gov site](#), the “[Digital Analytics] Program is designed to help agencies implement Milestone 8.2 of the Digital Government Strategy, which calls for using comprehensive analytics across [each] agency’s Web presence.” Furthermore, in accordance with OMB Memorandum M-10-22, cited above, the FTC will not

- use Google Analytics to track the activity of individual users on the Internet after they leave the FTC websites and applications for which the FTC uses Google Analytics;
- share any individual data that it obtains with other departments or agencies without the user’s explicit consent;
- cross-reference or combine data collected by the FTC with other PII, to determine individual-level online activity without obtaining the user’s explicit consent; or
- collect PII without the user’s explicit consent.

The FTC intends to use GSA’s Digital Analytics Program to analyze traffic on its ftc.gov and other FTC domains at an aggregate level without collecting PII from specific individuals and without exposing site visitors to unnecessary tracking technology, data collection, or data sharing, all of which is consistent with FTC policy and with applicable federal laws, regulations, and policies, including current OMB guidance.

SECTION 2.0 – IS THERE ANY PII THAT IS LIKELY TO BECOME AVAILABLE TO THE AGENCY THROUGH PARTICIPATION IN GSA’S DIGITAL ANALYTICS PROGRAM?

2.1 – What PII will be made available to the FTC?

None. According to the [Q&A about the Digital Analytics Program](#) posted on GSA’s HowTo.gov site, neither Google nor GSA will collect any PII from visitors to FTC.gov and other FTC domains as a result of the FTC’s use of Google Analytics: “Personal information is information that personally identifies you, like name, email address, or other data which can be reasonably

linked to such information. GSA does not track or collect any of this information using the Digital Analytics Program tool.”

Furthermore, GSA’s Digital Analytics Program will not collect device identifiers, IP addresses, or similar information, but instead will anonymize each user: “Every computer and device connected to the Internet is assigned a unique number known as an Internet protocol (IP) address. The code that we are using anonymizes IP addresses.”

The HowTo.gov site provides more information about how IP addresses are anonymized: “IP anonymization/masking takes place as soon as data is received by Google Analytics and before any storage or [sic] takes place. At no time is the full IP address written to disk as all anonymization happens in memory nearly instantaneously after the request has been received. The full IP address is never written to disk when the anonymization flag is turned on as it is with GSA's account. This process was created to meet strict EU [European Union] privacy requirements.”

Google Analytics will collect the following data:

- The date and time of page visits
- The pages visited
- The referring site (if the visitor clicked a link to get to an FTC website)
- The search engine address and search term (if the visitor came from a search engine)
- See also the data described in Section 7.0.

2.2 – What are the sources of PII?

The Digital Analytics Program does not collect PII. In addition, the code strips out and anonymizes the user’s IP address, which identifies the user’s computer, as soon as the visitor arrives at an FTC website. A multi-session cookie, with a unique but anonymous identifier, is then used to capture that visitor’s experience while on the website. According to GSA, and consistent with OMB Memorandum M-10-22, cited above, [the cookie used in the Digital Analytics Program](#) “is considered Tier 2 (multi-session without PII). This tier encompasses any use of multi-session Web measurement and customization technologies when no PII is collected

(including when the agency is unable to identify an individual as a result of its use of such technologies).”¹

2.3 – Do the FTC’s activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No. The FTC’s participation in GSA’s Digital Analytics Program as outlined in Section 1.1 does not trigger the PRA. The program’s use of persistent cookies to collect website traffic data occurs online, is completely automated, and imposes no information collection burden that would require prior OMB clearance under the PRA.

SECTION 3.0 THE FTC’S INTENDED OR EXPECTED USE OF DATA COLLECTED BY THE DIGITAL ANALYTICS PROGRAM

Section 3.1 – Generally, how will the agency use the data described in Section 2.0?

Authorized FTC staff will access the aggregate data generated by Google Analytics through an online dashboard. As described in Section 1.1, the data will be used to analyze visits to FTC sites and improve both the effectiveness with which the FTC provides information and the quality of the user’s experience when visiting [FTC.gov](https://www.ftc.gov) and other FTC domains.

¹ The more detailed explanation of how the cookie works for all federal agencies participating in GSA’s Digital Analytics Program is that

1. A browser requests a web page that contains the tracking code
2. A JavaScript Array named `_gaq` is created and tracking commands are pushed onto the array
3. A `<script>` element is created and enabled for asynchronous loading (loading in the background)
4. The `ga.js` tracking code is fetched; once the code is fetched and loaded the commands on the `_gaq` array are executed and the array is transformed into a tracking object (a cookie)
5. Loads the script element to the DOM
6. After the tracking code collects data, the GIF request is sent to the Analytics database for logging and post-processing

Section 3.2 – Provide specific examples of the types of uses to which the data may be subject.

A limited number of authorized FTC staff and contractors will have user accounts that will allow them to log in to the Google Analytics dashboard and view or run reports regarding visits to FTC sites and the other web metrics available from the Digital Analytics Program.

Aggregate numbers from those reports will be used for internal FTC analysis and shared in reports to the public, the Administration, and Congress about the FTC’s performance.

SECTION 4.0 SHARING OR DISCLOSING OF DATA

Section 4.1 – With what entities or persons inside or outside the agency will the data be shared, and for what purposes will the data be disclosed?

As described above, IP addresses will be stripped out of the data that is retained by Google and GSA, and Google, GSA, and the FTC will not collect or share PII.

According to [GSA](#), the answer to “Are the metrics we collect available to Google’s corporate advertising partners?” is “No. None of the federal government data tracked as part of the Data Analytics Program will be shared with or available to Google’s corporate advertising partners.”

Section 4.2 – What safeguards are in place to prevent expansion of use beyond those authorized under law and described in this PIA?

Only a limited number of authorized FTC staff and contractors will have access to the Google Analytics dashboard, and only a select few will have administrative rights.

In addition, Google Analytics has a Change History feature that logs all dashboard activity, including which FTC user performs activities in the system, what activities, and when. As a

result, if an administrator were to make a change to permissions or other privacy settings, the log would capture the who, what, and when.

According to the Google Analytics terms of service, Google employees can only access the data if the website owner grants permission, and Google conducts periodic audits to ensure that the controls are enforced.

GSA's management of the Digital Analytics Program provides an additional control against future changes in Google Analytics that might undermine consumer privacy. GSA's attorneys worked with Google to develop Terms of Service for federal users of Google Analytics. Those Terms of Service form part of the contract between GSA and Google and would have to be modified and agreed to by both parties prior to significant changes to the privacy practices or other aspects of the Digital Analytics Program.

SECTION 5.0 - MAINTENANCE AND RETENTION OF DATA

Section 5.1 – How will the FTC maintain the data, and for how long?

The data will be maintained in accordance with FTC regulations, policies, and procedures. See Section 7.1 for a discussion of first-party cookies placed by Google Analytics, and how long those cookies remain active. The FTC will retain aggregate data from Google Analytics only as long as is necessary for operational purposes. The FTC currently expects to retain aggregate data for three years to permit the agency to spot trends over time.

Section 5.2 – Was the retention period established to minimize privacy risk?

Yes. The cookies are anonymized at the outset, the data from the Google Analytics dashboard generates aggregate data based on those anonymized cookies, and the data collected and retained by the FTC does not include PII. In addition, the three-year period can be adjusted if the FTC determines that a different retention period is more consistent with the FTC's use of the data.

SECTION 6.0 – HOW THE AGENCY WILL SECURE DATA

Section 6.1 – Will the FTC’s privacy and security officials coordinate to develop methods of securing data?

Yes. The Chief Information Security Officer and Chief Privacy Officer will continue to work together on issues relating to privacy and data security for [FTC.gov](https://www.ftc.gov) and other FTC domains and for the analytic tools used to improve the performance of those sites.

In addition, GSA has conducted its own security analysis of the Digital Analytics Program before recommending its use and making it available to other federal agencies. According to [GSA](https://www.gsa.gov), “GSA has done an IT security review of the federated-analytics.js. We conducted a security scan using WebInspect and also conducted on ‘eyes-on-code’ or a line-by-line analysis to further research potential vulnerabilities. No significant issues were found.” GSA also invited agencies using the Digital Analytics Program to “review our analysis and, in the context of their own infrastructure, follow their processes for securing applications in their infrastructure, adding applications to their Certification and Accreditation analysis, etc.” FTC staff from OCIO reviewed the code and analysis provided by GSA.

Reports generated using the Google Analytics dashboard will only include aggregate data and, because individual data is anonymized at the outset, the aggregate data will not include any PII.

SECTION 7.0 – IDENTIFICATION AND MITIGATION OF OTHER PRIVACY RISKS

Section 7.1 – What other privacy issues exist, and how will the agency mitigate any risks?

Cookies. The privacy risks posed by the FTC’s participation in the Digital Analytics Program for individuals who visit [FTC.gov](https://www.ftc.gov) are low. The cookie placed on users’ computers collect only limited information, and the most sensitive of that – IP addresses – is anonymized.

Google uses both temporary and persistent cookies to track visitors. **Persistent cookies** come with an expiration date set in the future and remain on a computer’s hard drive until they expire or are deleted by the user. **Temporary cookies** are shorter-lived than the persistent cookies and expire as soon as the user closes the browser. Google Analytics uses three primary first-party cookies that perform various functions and have various “shelf lives:”

Cookie Name	Description	Length
_utma	Used to distinguish users (by anonymous identifier) and sessions	2 years from set/update
_utmb	Used to determine new sessions/visits	30 minutes from set/update
_utmz	Stores the traffic source or campaign that explains how the user reached your site	6 months from set/update

The first-party cookies above are used to:

- Determine which domain to measure;
- Distinguish unique users;
- Remember the number and time of previous visits;
- Remember traffic source information; and
- Determine the start and end of a session.

Visitors to FTC pages may delete (or set their browsers to opt-out) of such cookies.

Mobile. The Digital Analytics Program tracks mobile visits in the same way that it tracks desktop and laptop computers that are capable of running JavaScript (older phones will not have this capability). Unique device identifiers will be replaced with anonymous unique identifiers. In addition to the basic Google Analytics metrics for desktop/laptop users, Google Analytics will track the following mobile specific information:

- Mobile device brand (iPhone, Blackberry, Droid, etc.)
- Service provider (Verizon, AT&T, etc.)
- Input selector (touchscreen, joystick, stylus, etc.)
- Operating system (iOS, Android, Blackberry, etc.)
- Screen resolution (768x1024, 320x480, etc.)

Data sharing. GSA staff managing the Digital Analytics Program have confirmed to FTC staff in writing that data generated by the Digital Analytics Program data is for federal government use only, is the property of the federal government, and is not shared with Google or used by Google for Google's own research or marketing purposes.

SECTION 8.0 – CREATION OR MODIFICATION OF A SYSTEM OF RECORDS

Section 8.1 – Will the FTC’s activities create or modify a “system of records” under the Privacy Act of 1974?

No. The FTC does not collect PII through participation in the Digital Analytics Program, and thus it is not creating or modifying a system of records under the Privacy Act of 1974. In addition, as explained above, site visitors’ IP addresses and mobile device identifiers will be stripped out of the data and will not be available to the FTC, GSA, Google, or third parties.

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