

PIA Meeting for Facebook Pixel

Privacy Tracking:

- PIA number: [PIA 2023-015](#)
 - Date of meeting: [via correspondence between Ernest Soares and Elise Mallory](#)
 - Present during meeting: [Ernest Soares and Elise Mallory](#)
 - These notes taken by: [Ernest Soares and Elise Mallory](#)
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Questions for Initiative Lead

- Has an SFU IT security professional determined that this software employs reasonable security arrangements (if so, who?):
 - Yes
- Has a contract been signed with vendor (if yes, send to privacy team for review with these answers):
 - No contract is required. - <https://www.facebook.com/legal/terms/businessstools/update>
- Was SFU's Cloud Privacy Protection Schedule appended to the contract:
 - No contract is required.
- Purpose/Objective of initiative:
 - The Facebook pixel is a piece of website code designed to enable website owners to measure, optimize, and build audiences for their ad campaigns. It is also an analytics tool that allows advertisers to measure the effectiveness of advertising by understanding the actions people take on their websites.
 - A limited amount of information is disclosed to SFU via the Facebook pixel. Specifically, only the number of clicks on a SFU ad displayed on Facebook are reported to SFU. No further information is disclosed to SFU regarding the identity of the user.
 - No personal information of the website user is ever disclosed to SFU by Facebook pixel and any information collected by Facebook remains in the custody and control of Facebook.
 - At no time is any personal information in the custody or control of the University.
 - The purpose of using Facebook Pixel at SFU is to allow the Facebook pixel to be employed on SFU websites to assist with measuring the efficacy of marketing campaigns. The pixel will allow Facebook to know which users have clicked on an advertisement and landed on the SFU website. This will allow SFU to optimize advertisements towards these users.
 - Data related to the Pixel data is stored for 180 days. After this, people are removed from these audiences.
- Non-personal information elements involved:
 - A pixel (piece of code) will be added to SFU's websites that will allow Facebook to know when a user has clicked an advertisement and landed on the SFU website.
- Personal information (PI) elements (e.g. email addresses, IP addresses, assignment work):
 - What personal information is collected?
 - SFU collects no personal information. We do not know which users are clicking

- ads. They are not identifiable by us nor is this information shared with us. Thus SFU is never has custody or control of these records generated by Facebook.
- Facebook does collect IPs address for users if the user has allowed location data to be captured by Facebook in their personal settings but this too is not shared with SFU. See: <https://www.facebook.com/privacy/policy?subpage=2.subpage.6-HowWeUseLocation>
- Is the information necessary for initiative?
 - Yes
 - We do not need IPs address to be captured. If a user chooses to restrict Facebook’s ability to collect data on their location, that has no impact on SFU’s program or activities.
- Is the information sensitive?
 - No.
- What information is newly collected by the initiative, vs information already collected and newly used (eg. Student email addresses are already known, and may be newly used for this software):
 - n/a
- How and from whom is the newly collected PI collected:
 - Directly or indirectly from the individual:
 - SFU isn’t collecting any PI thus no collection notice is required.
 - Where will the Collection Notice be posted:
 - n/a
 - Collection notice language to be used:

~~[Program] collects personal information on behalf of SFU under the authority of the University Act (RSBC 1996, c.468) and the Freedom of Information and Protection of Privacy Act (RSBC 1996, c.165), [if applicable, cite also any applicable administrative policies approved by the University's Board of Governors; other provincial or federal legislation or regulation; binding legal contracts such as collective agreements; etc.]. The personal information collected includes [list elements].~~

~~It is related directly to and needed by the University [describe why (i.e. the purpose) the information is needed]. The information will be used [must describe all uses and be specific]. The information may be disclosed to [list third parties, if applicable].~~

~~If you have any questions about the collection and use of this information please contact [Position Title, Business Address or Email, Business Phone Number].~~

- How will the PI be used:
 - n/a
- Who will have access to the PI:
 - n/a
- Any foreseen disclosures of PI:
 - n/a

Questions for Privacy Team:

- Legal Authority for collection, use, and disclosure
 - Collection: [26\(c\)](#)
 - Use: [32\(a\)](#)
 - Disclosure: [33\(2\)\(d\)](#)
- Privacy risks and responses/mitigations:
 - Physical security risks:
 - [n/a](#)
 - Over-collection risks:
 - [n/a](#)
- Do the decisions made affect an individual:
 - [n/a](#)
 - Ensure accuracy and completeness:
 - [n/a](#)
 - Retained at least 1 year:
 - [n/a](#)
 - Disposal:
 - [n/a](#)
- Process to correct PI:
 - [n/a](#)
- Role designated accountable:
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