

PIA Meeting for LinkedIn Pixel

Privacy Tracking:

- PIA number: 2023-084
 - Date of meeting: [via correspondence](#)
 - Present during meeting: [n/a](#)
 - These notes taken by: [Ernest Soares & 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, reviewed by Steve MacGregor.](#)
- Has a contract been signed with vendor (if yes, send to privacy team for review with these answers):
 - [n/a](#)
- Was SFU's Privacy Protection Schedule (PPS) or Cloud Privacy Protection Schedule (CPPS) appended to the contract:
 - [n/a](#)
- Purpose/Objective of initiative:
 - [Similar to the Facebook pixel initiative, the LinkedIn Insight Tag 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.](#)
 - [The LinkedIn Tag is placed on the SFU website and will share data with LinkedIn to allow for more in-depth campaign reporting.](#)
 - <https://www.linkedin.com/help/lms/answer/a427660?trk=hc-articlePage-peopleAlsoViewed>
- Non-personal information elements involved:
 - [A tag \(piece of code\) will be added to SFU's websites that will allow LinkedIn 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 LinkedIn.](#)
 - [The LinkedIn Insight Tag does enable the collection of data regarding members' visits to our website, including the URL, referrer, IP address, device and browser characteristics \(User Agent\), and timestamp. The IP addresses are truncated or hashed \(when used for reaching members across devices\), and members' direct identifiers are removed within seven days in order to make the data pseudonymous. This remaining pseudonymized data is then deleted within 180 days.](#)
 - [Is the information necessary for initiative?](#)

- Yes – website visits, URL & referrer
 - We do not need IPs address to be captured. If a user chooses to restrict LinkedIn'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: SFU has a process in place to correct or annotate an individual's personal information upon request: <https://www.sfu.ca/archives/fippa/changes-corrections.html>
- Role designated accountable:
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