

PIA Meeting for Programmatic Pixel

Privacy Tracking:

- PIA number: [PIA 2024-017](#)
 - Date of meeting: [n/a](#)
 - Present during meeting: [n/a](#)
 - 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):
 - [Currently, there is no direct ongoing agreement with the supplier in place. Historically, we have engaged the services of a media buying agency known as Federation. Their role involves managing the interactions with third-party advertising suppliers on an ad hoc basis. The university has an ongoing agreement with Federation.](#)
 - [Federation is liable to SFU for the actions or omissions of any subcontractor used. – see paragraph 3.04 of the agreement.](#)
- Was SFU's Privacy Protection Schedule (PPS) or Cloud Privacy Protection Schedule (CPPS) appended to the contract:
 - [No PPS is attached to the agreement with Federation, however, clause 6 of the agreement does set out a number of protections catered for in the PPS.](#)
- Purpose/Objective of initiative:
 - [Pixel tracking employs tiny, transparent images embedded within websites, or online advertisements. These pixels are used to track various user activities and behaviors across the internet.](#)
 - [When a user visits a webpage, or interacts with online content containing a pixel tracker, their actions trigger a request to the server hosting the pixel. This request includes information such as the user's IP address, browser type, device information, or location.](#)
 - [Pixel trackers can be used to monitor visitor traffic, navigation patterns, and user interactions. Website owners and marketers utilize this data to optimize website performance, enhance user experience, and measure the success of marketing campaigns.](#)
 - [The purpose of this campaign is to add two pixels to the SFU website in order to support on-going programmatic advertising. Specifically, monitoring and reporting on conversions, creating lookalike and retargeting audiences, and optimizing campaigns.](#)
 - [The two pixels to be added are:](#)
 - [The Trade Desk image pixel is a static tracking tag that contains a piece of HTML code. More specifically, it contains an invisible image \(1x1 pixel\), which is loaded from The Trade Desk's tracking domain \(adsrvr.org\) when the user visits a page.](#)

- Trade Desk collects the following information:
 1. User and Device Information:
 - IP address
 - User agent string (browser and device details)
 - Operating system and device type
 - Cookie IDs (first-party and third-party)
 2. Behavioral Data:
 - Referring URLs
 - Clicks and conversions
 3. Audience Segmentation Data:
 - Geographic location
 - Interest and demographic data (based on third-party data providers)
(provided in anonymised and aggregated form)
 - Retargeting segments
 4. Campaign Performance Data:
 - Ad impressions
 - Clicks
 - Conversions
 - Viewability metrics
- Floodlight uses Floodlight activities, which are snippets of HTML and JavaScript code. The Code is also known referred to as a tag.
 - Floodlight collects the following information:
 1. User and Device Information:
 - IP address
 - User agent string
 - Cookie IDs (first-party and third-party)
 - Device type and operating system
 2. Behavioral Data:
 - Referring URLs
 - Clicks and conversions
 3. Audience Segmentation Data:
 - Geographic location
 - Interest and demographic data (based on third-party data providers)(
provided in anonymised and aggregated form)
 - Retargeting segments
 - Google Audience data (based on Google's user data)
 4. Campaign Performance Data:
 - Ad impressions
 - Clicks
 - Conversions

- Viewability metrics
 - Video engagement metrics (for video ads)
- The vendors implement methods to acknowledge user preferences, including respecting Do Not Track requests and offering options to opt out.
- Though data collection can be customized based on the campaign requirements no such collection should enable the identification of individuals from whom the data is collected.
- Non-personal information elements involved:
 - Depending on the type of pixel - a pixel can collect various types of data including but not limited to age group of the audience, type of browser and Geo. Data is kept for 90 days.
- Personal information (PI) elements (e.g. email addresses, IP addresses, assignment work):
 - What personal information is collected?
 - IP addresses
 - The pixels support the passing of General Data Protection Regulation (GDPR), Global Privacy Platform (GPP), and Data Procession Option (DPO) consent information.
 - Geographic location
 - Interest and demographic data (based on third-party data providers) (provided in anonymised and aggregated form)
 - Is the information necessary for initiative?
 - Yes. It allows for optimization that improve campaign spend and impact overall return on investment.
 - 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):
 - IP addresses
 - Geographic location
 - Interest and demographic data (based on third-party data providers)(provided in anonymised and aggregated form)
- How and from whom is the newly collected PI collected:
 - Directly or indirectly from the individual:
 - Directly from the individual themselves.
 - Where will the Collection Notice be posted:
 - n/a - as no identifiable personal information is collected by the vendor or SFU.
 - 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:
 - The information collected will be used to support on-going programmatic advertising. Specifically, monitoring and reporting on conversions, creating lookalike and retargeting audiences, and optimizing campaigns.
- Who will have access to the PI:
 - Members of the Communications and Marketing team.
- Any foreseen disclosures of PI:
 - None other than those described above.

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:
 - Elise Mallory, Assistant Director, Digital Communications, Communications & Marketing elise_mallory@sfu.ca

Risk and Mitigation Strategies

Risks

Mitigation Strategies

