Privacy Impact Assessment
for the

Department of Homeland Security
Use of Google Analytics

DHS/ALL – 033

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Abstract

The Department of Homeland Security (DHS or the Department) is planning to utilize Google Analytics (www.google.com/analytics) for viewing and analyzing traffic to the Department’s public-facing website(s), including components (Department’s websites). Google Analytics is a free, external, third-party hosted, website analytics solution that generates robust information about the interactions of public-facing website visitors with the Department. Google Analytics must collect the full IP Address, which Google will then mask prior to use and storage, and proceed with providing the Department non-identifiable aggregated information in the form of custom reports. The Department has implemented the IP Address masking feature\(^1\) within Google Analytics to avoid the use and storage of the full IP Address. For example, when the last octet is truncated from the IP address, 192.168.0.1 becomes 192.168.0. This masking will affect the geographic location metric within Google Analytics. Google Analytics uses first-party cookies to track visitor interactions. DHS shall not collect, maintain, or retrieve personally identifiable information (PII) including a visitor’s Internet Protocol (IP) Address during this analytics process operated by Google. Google Analytics shall not provide to DHS, share with Google or any Google product for additional analysis, or use the full or masked IP Address or information to draw any conclusions in the analytics product. The Department has expressly chosen to opt-out of sharing information with Google or any Google product for additional analysis. This privacy impact assessment (PIA) is being conducted to identify and mitigate privacy concerns associated with the use of Google Analytics.

Overview

Purpose of Google Analytics

The Department will use aggregated information provided by Google Analytics for the purpose of improving Departmental services online through measurement and analysis of public-facing website traffic. Specifically, the Department will use non-identifiable aggregated information provided by Google to:

- track visits to the Department’s public-facing website(s);
- monitor the size of the Department’s audience; and
- better understand the interactions of visitors in order to improve the functionality of the Department’s public-facing website(s) and the user experience.

However, to use Google Analytics, the product must collect the full IP Address for analytics purposes, which Google will then mask prior to use storage, and proceed with providing the Department non-identifiable aggregated information in the form of custom reports.

DHS shall not collect, maintain, or retrieve PII including a visitor’s IP Address during this analytics process operated by Google. Google Analytics shall not provide to DHS, share

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\(^1\) IP masking is a customization to Google Analytics tracking that changes how Google Analytics uses and stores the IP address of visitors to the Department’s website. By default, Google Analytics collects the entire IP address of website visitors to provide general geographic reporting. When IP masking is enabled, which the Department has implemented, Google Analytics removes the last octet of the visitor’s IP Address at the time of collection prior to use and storage.
with Google or any Google product for additional analysis, or use the full or masked IP Address or information to draw any conclusions in the analytics product. Google will receive the data to process and provide aggregate statistics back to DHS. The only information that is available is the non-identifying aggregated information in the Google Analytics interface in the form of custom reports that is only available to the Department’s public affairs officials, and senior leadership. Under no circumstances shall the Department use Google Analytics to:

- collect or track PII;
- collect or track a visitor’s full or masked IP Address;
- track individual user-level activity on the Internet outside of the Department’s website(s);
- cross-reference any data gathered from Google Analytics against PII to determine individual user-level online activity; or
- collect or track employees on the Department’s internal facing web initiatives or products.

Tracking Methods

The Department’s public affairs officials will tag pages on the Department’s public-facing website(s) with a Google Analytics Tracking Code (the Google Code). The Department’s privacy policy provides information on how to opt-out of having cookies dropped in the visitor’s browser. Visitors using a cookie blocker application will be able to visit the Department’s public-facing website(s) and no information about their website experience will be processed by Google Analytics.

When an individual visits the Department’s website(s), the Google Code places a cookie on the visitor’s computer. This service will allow DHS to analyze its traffic. While these cookies belong to Google and not the Department, DHS will manage how long cookies will remain active on the Department’s public-facing website(s). OPA and component public affairs officials will set the life of the cookie for no longer than six months at which point it will automatically delete. OPA and component public affairs officials may choose a shorter cookie life.

The Google Code on the Department’s website(s) will send information to Google. The Google Analytics tool will process aggregated information and send back reports on: 1) visitors; 2) traffic sources; 3) content; and 4) goals.

This Google Code is a snippet\(^2\) of JavaScript that acts as a beacon, collecting visitor data. This data is collected through a combination of JavaScript\(^3\) and Google cookies which are used by the Google Analytics tool to collect the data, send it back to Google data collection servers for processing, and present the website public-facing statistics to Google Analytics account holders on its website interface. This tool will be accessed by the Department’s public affairs officials so they can better understand the behavior of visitors on the website(s) and make changes to improve visitors’ experience on the website(s).

IP Address Masking

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\(^2\) Small, stand-alone section of java code.

\(^3\) A scripting programming language most commonly used to add interactive features to websites.
To use Google Analytics, the product must collect the full IP Address, which Google will then mask prior to use and storage, and will only provide the Department non-identifiable aggregated information in the form of custom reports. Using masked IP Address still allows Google Analytics to determine some geographic and network information to provide in aggregate to the Department. Google Analytics does this by using publicly available information from public information made available by Internet regulatory authorities and matches part of the IP Address to what is essentially a public phonebook of IP Addresses. It is public information to know who owns what IP Address block, the same as with a mailbox or phone system. Google Analytics completes the matching and then provides the non-identifiable information in aggregate to the Department showing information like “32% of users are from Washington, D.C.” or “50% of users are from outside of the United States,” for example.

No IP Address information is made available to the public affairs officials at the Department, only the aggregated data like “32% of users are from Washington, D.C.” or “50% of users are from outside of the United States.”

**Reporting**

**Custom Reports:** Custom reports can be created by website administrators in the Department to display Google Analytics data. Some examples of custom reports the Department could construct are “how are the keywords performing in different countries” or “should we target the website to Spanish-speaking users.” More information on how the Department may create custom reports can be found at Google. Information gleaned from custom reports will be used by the Department’s public affairs officials to improve the user experience on the Department’s public-facing website(s). This information will be shared internally with senior leadership in the Department. All collected information is non-identifiable and presented in aggregate.

**Analysis Intelligence:** Google Analytics monitors report data and automatically sends alerts to the Department’s public affairs officials when there are significant changes in data patterns as defined by DHS. The Department’s public affairs officials will review the change in data pattern and determine if the Department needs to add or modify content to help meet users’ need.

**Dashboard:** Appendix A is an illustration of the summary metrics that are available in the Google Analytics website interface in the context of historical or average website data.

**Section 1.0 Authorities and Other Requirements**

1.1 **What specific legal authorities and/or agreements permit and define the collection of information by the project in question?**

The President’s Transparency and Open Government Memorandum (January 21, 2009) and the OMB Director’s Open Government Directive
Memorandum (December 8, 2009) direct federal departments and agencies to harness new technologies to engage the public and serve as one of the primary authorities motivating the Department’s efforts to use Google Analytics.

The Secretary of Homeland Security’s Efficiency Review, Section III, Office of Public Affairs Cross-Component Coordination Task Force Directive requires the Department’s use of Google Analytics to be coordinated with OPA, unless otherwise directed by statute, executive order, or regulation.

Authorities supporting the Department’s use of Google Analytics include:

A. 6 U.S.C. § 112, “Secretary; functions;”
B. 6 U.S.C. § 142, “Privacy Officer;”
C. 5 U.S.C. § 301, the Federal Records Act;
D. Section 208 of the E-Government Act of 2002;
E. The President’s Memorandum on Transparency and Open Government, January 21, 2009;
F. The OMB Director’s Open Government Directive Memorandum, December 8, 2009;
G. OMB Memorandum M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010;\(^5\)
H. OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010;\(^6\)
I. The Secretary’s Efficiency Review, Section III, Office of Public Affairs Cross-Component Coordination Task Force Directive;
J. DHS Website Privacy Policy;\(^7\)
K. Google Terms of Service;\(^8\)
L. Google Privacy Policy;\(^9\)
M. Google Analytics Opt-out Browser Add-on;\(^10\)
N. Google Code of Conduct;\(^11\) and

\(^7\) Available at http://www.dhs.gov/xutil/sc_1157139158971.shtm.
\(^8\) Available at http://www.google.com/accounts/TOS.
\(^10\) Available at http://tools.google.com/dlpage/gaoptout?h= en. (Available for Internet Explorer (versions 7 and 8), Google Chrome (4.x and higher) and Mozilla Firefox (3.5 and higher)).
O. Google Security and Product Safety.12

As a result of this new technological relationship between the Department and the public, it is imperative that DHS engage the public in a manner that complies with federal accessibility, privacy, information security, and records laws. To ensure that the Department’s use of social media complies with federal laws, executive orders, regulations, and policies, and to apply standards consistently across the entire Department, the Office of the General Counsel (OGC), Office for Civil Rights and Civil Liberties (CRCL), Privacy Office (PRIV), Office of Public Affairs (OPA), Chief Information Security Office (CISO), and Office of Records Management (Records) will collaborate to ensure that all documents related to social media are cleared to ensure that compliance issues are considered and coordinated before implementation.

1.2 **What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

No SORN is required because the Google Analytics custom reports are non-identifiable aggregate information, which is all that is provided to the Department. Google Analytics is an external, third-party hosted, website analytics solution.

1.3 **Has a system security plan been completed for the information system(s) supporting the project?**

Google Analytics is an external, third-party hosted, website analytics solution. While no internal system security plan is required, information security equities have been reviewed and considered through this review. Users should consult with Google Security and Product Safety for more information.13

1.4 **Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

The Department’s Office of Records Management, Office of General Counsel, and other components are working together internally and with NARA, to determine if the use of unidirectional social media applications creates records and if so the applicable records schedule(s). If it is determined that use of unidirectional social media applications creates government records, such records will be retained indefinitely until a records schedule is approved. Once a determination is made and an appropriate schedule identified and/or approved, the Department will follow that approved records schedule.

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1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

Information sent from the Department’s website(s) is not covered under the PRA.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

2.1 Identify the information the project collects, uses, disseminates, or maintains.

The Department will collect aggregated information on user interactions on the Department’s website(s) such as number of visits, visitors, and browsers. See Appendix A for additional detail. To use Google Analytics, the product must collect the full IP Address for analytics purposes, which Google will then mask prior to use and storage, and proceed with providing the Department non-identifiable aggregated information in the form of custom reports. The aggregated information will be shared within OPA, with senior leadership throughout the Department, and with components to help improve the Department’s website(s) information for the public.

2.2 What are the sources of the information and how is the information collected for the project?

Google Analytics will collect aggregated information from visitors to the Department’s website(s) using a combination of JavaScript and first party cookies from the google.com domain. Pages on the Department’s website(s) will be tagged with Google Code. This code is a snippet of JavaScript that acts as a beacon, collecting visitor data (such as browser, operating system, referring page, and duration of page visit) and sending it back to Google data collection servers for processing.

2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

To use Google Analytics, the product must collect the full IP Address for analytics purposes, which Google will then mask prior to use and storage, and

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14 A scripting programming language most commonly used to add interactive features to websites.
proceed with providing the Department non-identifiable aggregated information in the form of custom reports.

2.4 **Discuss how accuracy of the data is ensured.**

The information captured by the Google Code and transferred to Google Analytics is assumed to be accurate. The Department’s website(s) will be able to check the Google Analytics usage statistics against the prior website statistics package to ensure consistency of data. There are no other auditing capabilities or accuracy safeguards in place.

2.5 **Privacy Impact Analysis: Related to Characterization of the Information**

To minimize any possible privacy risk to visitors to the Department’s website(s), the Department will not allow sharing of Google Analytics data with any of the Google products. This decision to opt-out means that the information is not shared with any Google products (such as AdWords, AdSense). This is set within the Google Analytics Settings “Edit Account and Data Sharing Settings.” The only information that is available is the aggregated information in the Google Analytics interface that is exclusively available to the Department’s public affairs officials, and senior leadership.

Also, individuals visiting the Department’s public-facing website(s) will be about to opt-out completely. The Department’s privacy policy provides information on how to opt-out of having cookies dropped in the visitor’s browser. Visitors using a cookie blocker application will be able to visit the Department’s public-facing website(s) and no information about their website experience will be processed by Google Analytics.

**Section 3.0 Uses of the Information**

The following questions require a clear description of the project’s use of information.

3.1 **Describe how and why the project uses the information.**

The aggregated information collected by Google Analytics is used for the purpose of improving usability, evaluating visitors’ usage of the Department’s website(s), and compiling reports on website activity for website operators. Analytics can also be used to determine the “top tasks” on the website (e.g., the most visited pages / items). This information will be used to track visits to the Department’s website(s), monitor the size of the Department’s audience, and understand the interactions of the Department’s website(s) visitors. In addition, this aggregate information will also be used to improve the Department’s website(s), improve the user experience, and provide more user-centric content to better serve those visitors.
3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

The Department has access to aggregated data from Google Analytics, such as the number of visitors, types of browsers those visitors use, and referring websites. The Department will use this data to track the Department’s website(s) usage and make informed updates. These website metrics can be provided in tabular or chart format to show changes over time or comparing one part of the website to another. The Department will also have access to custom reporting using aggregated data provided by Google Analytics.

3.3 Are there other components with assigned roles and responsibilities within the system?

The Department shares website metrics (such as browser usage, operating system, website visits, and visitors) with the Department’s public affairs officials, senior leadership, and upon request to the Department’s website(s) content providers, such as the Office of Immigration Statistics, so they can make better business decisions as to what products they produce. Google Analytics allows creation of “view reports only” accounts that could be created to share specified website statistics reports with Department content providers without the ability to modify the account.

When sharing as described above, the Department shares website metrics in one of two ways. Metrics can be shared via email with an Excel attachment with those individuals who have a need to know these metrics in the performance of their duties in managing the Department’s website(s). Other export formats for Google Analytics include PDF, CSV, XML and TSV. Google Analytics, metrics may also be shared via the web by allowing a “view reports only” view of the DHS Google Analytics account page.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Only pre-approved DHS registered users will have full access to the Google Analytics account and aggregated data. Pre-approved registered users include the Department’s public affairs officials who manage the account. Password controls will be set following best practices (mixed case with numbers, special characters, and longer than 10 characters). Internal training is provided and non-authorized personnel and authorized users who access the account inappropriately may be subject to disciplinary action.
The information in the Excel attachments are not password protected as there is no confidential, sensitive, or “need-to-know” information in the website statistics. Fairly accurate approximation of the Department’s data already exists on commercial websites.\textsuperscript{15}

**Section 4.0 Notice**

The following questions seek information about the project’s notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

4.1 **How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

Notice regarding the Department’s use of website measurement technology will be provided on the privacy policy page or a separate page for analytics with a link from the privacy policy page of the website and also through this PIA. Privacy policies will be updated to include information on the use of website measurement technology and instruct the user on the use of cookies for this purpose and instructions on how to block them. The Google Analytics privacy policy can be found at the following web site: http://www.google.com/intl/en/analytics/privacyoverview.html.

4.2 **What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

Users will be provided directions on the privacy policy page of the website on how to delete cookies or alter their settings to refuse the cookie. Because the information is transferred in aggregate, users will not have the ability to consent to a particular use of the information. Users will have the ability to either participate or decline. If a user decides not to participate in the information collection, the webpage and its entire contents will still be available for reading, printing, or saving. Users can also use Google’s opt-out browser add-on beta tool to opt-out of DHS.gov.\textsuperscript{16} The Google Analytics privacy policy can be found at http://www.google.com/intl/en/analytics/privacyoverview.html.

4.3 **Privacy Impact Analysis: Related to Notice**

The privacy risks associated with the use of Google Analytics and notice have to do with the collection and use of the user’s information, potential for use

\textsuperscript{15} Available at http://www.alexa.com/siteinfo/dhs.gov#.

\textsuperscript{16} Available at http://tools.google.com/dlpage/gaoptout.
of the information beyond that for which notice was provided, and lack of awareness as to the use of the individual information.

DHS shall not collect, maintain, or retrieve information that could be PII including a visitor’s full or masked IP Address. Google Analytics shall not provide to DHS, share with Google or any Google product for additional analysis, or use the full or masked IP Address or information to draw any conclusions in the analytics product. Notice to the individual will clearly state that the Department is using website measurement technology to improve the function of the website and the user’s experience. The privacy policy will further state what information is being collected, the purpose for the collection, and the uses for the data.

Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

5.1 Explain how long and for what reason the information is retained.

The Department’s Records Officer is working with OPA and the National Archives and Records Administration (NARA) to determine what, if any, records exist or will be produced with this tool. Once the Department’s Records Officer and NARA make that determination, and a records schedule is assigned (if necessary), this tool will follow that records schedule. Until then, all records are maintained indefinitely.

5.2 Privacy Impact Analysis: Related to Retention

The Department’s Records Officer is working with OPA and the National Archives and Records Administration (NARA) to determine what, if any, records exist or will be produced with this tool. Once the Department’s Records Officer and NARA make that determination, and a records schedule is assigned (if necessary), this tool will follow that records schedule. Until then, all records are maintained indefinitely.

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.
6.1 **Is information shared outside of DHS as part of the normal agency operations?** If so, identify the organization(s) and how the information is accessed and how it is to be used.

The Department may share Google Analytics custom reports internally and with external organizations.

6.2 **Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.**

A SORN is not required because the Google Analytics custom reports are non-identifiable aggregate information.

6.3 **Does the project place limitations on redissemination?**

The Department may share Google Analytics custom reports internally and with external organizations. Because the Google Analytics custom reports are non-identifiable aggregate information, redissemination limitations are not required.

6.4 **Describe how the project maintains a record of any disclosures outside of the Department**

The Department may share Google Analytics custom reports internally and with external organizations. Because the Google Analytics custom reports are non-identifiable aggregate information, redissemination limitations are not required.

6.5 **Privacy Impact Analysis: Related to Information Sharing**

The Google Analytics custom reports that the Department may share are non-identifiable aggregate website(s) metrics, therefore the privacy impact is negligible.

**Section 7.0 Redress**

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.
7.1 **What are the procedures that allow individuals to access their information?**

Google Analytics only provides non-identifying aggregated information in the form of custom reports. Thus, there is no individual data to access.

7.2 **What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

The Department’s website(s) metrics information is only available in non-identifying aggregated format in the form of custom reports. No individually identifiable information is available to access or correct.

7.3 **How does the project notify individuals about the procedures for correcting their information?**

See 7.2.

7.4 **Privacy Impact Analysis: Related to Redress**

The Department’s website(s) metrics information is only available in non-identifying aggregated format in the form of custom reports. No information is available to access or correct.

**Section 8.0 Auditing and Accountability**

The following questions are intended to describe technical and policy based safeguards and security measures.

8.1 **How does the project ensure that the information is used in accordance with stated practices in this PIA?**

There is an ability to create “read only” views within Google Analytics as well as a full administrative view which allows modification of custom reports. There is no automated toolkit to indicate possible misuse. There is no ability to audit Google Analytics.

8.2 **Describe what privacy training is provided to users either generally or specifically relevant to the project.**

All federal employees and contractors are required to participate in annual privacy training. Access to Google Analytics will be limited to users who have completed annual privacy training.
8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?

The Department’s Google Analytics accounts are administered by the Department’s public affairs officials. Only Department-approved public affairs officials who have taken annual privacy training may log-in to the account to retrieve the non-identifying aggregated data in the form of custom reports. Procedures for administering the account are documented internally and accessible only to administrators. Account access will follow Department policies as outlined in DHS Security Policy Directive 4300A, Section 5.1.1 for secure passwords.

Passwords are updated frequently. The Department’s public affairs officials are advised that any misuse may result in disciplinary action.

8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

As a result of this new technological relationship between the Department and the public, it is imperative that DHS engage the public in a manner that complies with federal accessibility, privacy, information security, and records laws. To ensure that the Department’s use of social media complies with federal laws, executive orders, regulations, and policies, and to apply standards consistently across the entire Department, OGC, CRCL, PRIV, OPA, CISO, and Records will collaborate to ensure that all documents related to social media are cleared to ensure that compliance issues are considered and coordinated before implementation.

Responsible Officials

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Approval Signature

Final signed version on file with the DHS Privacy Office.

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security
APPENDIX A

Dashboard: below is an illustration of the summary metrics that are available in the Google Analytics website interface in the context of historical or average website data.

Website Usage:

- Pageviews - A single webpage viewed by a human through a browser.
- Pages per Visit - The total number of pages divided by the number of visits for any given period of time.
- Bounce Rate - The percentage of website visitors who visit the Department’s website(s) and leave (bounce away) without getting any deeper into the website. Each page has its own bounce rate.
- Average Time on Website - Total amount of time spent on the Department’s website(s) by all visitors divided by the total number of webpages being tracked.
- Percent New Visits – The percent of new visits to the Department’s website(s).

Map Overlay

- Number of visits from number countries/territories – Visits by the location of the visitors (location comes from the users Internet Protocol address).

Visitors Overview

- Visitors - A user that visits the Department’s website(s). The initial session by a user during any given date range is considered to be an additional visit and an additional visitor. Any future sessions from the same user during the selected time period are counted as additional visits, but not as additional visitors.
- Visits - A visit begins when a visitor enters the Department’s website(s) with an entry click and views a succession of one or more pageviews. The end of a visit is signaled by an exit click or a period of inactivity. The next event (click) will be a new visit.
- Absolute Unique Visitors – represents the number of unduplicated (counted only once) visitors to a website over the course of a specified time period.
- Pageviews - A single webpage viewed by a human through a browser.
- Average Pageviews - The total number of pageviews divided by the total number of unique visitors for the same period.
- Time on Website – How long a user spends on the Department’s website(s).
- Bounce Rate - The percentage of website visitors who visit the Department’s website(s) and leave (bounce away) without getting any deeper into the Department’s website(s). Each page has its own bounce rate.
- New Visits – Visits to the Department’s website(s) from a “first-time” visitor.
• Browser - Examples include: Internet Explorer, Firefox, and Safari.
• Connection Speed - Examples include: Cable, T1, and Dialup.

**Traffic Sources**
• Direct Traffic - Users who came directly to the domain.
• Referring Websites - Users who came from another website but not a search engine.
• Search Engines - Examples include: Google, Yahoo, and Bing.

**Content Overview**
• Pageviews - A single webpage viewed through a browser.
• Unique Views - The number of unique users that access a webpage. This is determined by a combination of the IP address of the user accessing the webpage and the cookie file.
• Bounce Rate - The percentage of website visitors who visit your website and leave (bounce away) without getting any deeper into your website. Each page has its own bounce rate.
• Top Content – A listing of the pages with the largest pageviews.