US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

September 27, 2019

OPDIV:

CMS

Name:

Adobe Ad Cloud

TPWA Unique Identifier:

T-1531119-343245

Is this a new TPWA?

Yes

Will the use of a third-party Website or application create a new or modify an existing HHS/OPDIV System of Records Notice (SORN) under the Privacy Act?

No

If SORN is not yet published, identify plans to put one in place.

Not Applicable

Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?

No

Indicate the OMB approval number expiration date (or describe the plans to obtain OMB clearance).

Expiration Date: 1/1/01 12:00 AM

Describe the plans to obtain OMB clearance.

Explanation: Not Applicable

Does the third-party Website or application contain Federal Records?

No

Describe the specific purpose for the OPDIV use of the third-party Website or application:

CMS will use Adobe to deliver behaviorally targeted digital advertising to relevant audiences by tracking user online activities across various websites over time. Adobe does not collect PII in the course of these advertising activities and therefore, does not share PII with CMS. Adobe provides CMS with conversion tracking reports to allow CMS to determine the effectiveness of advertising campaigns. Conversion tracking provides information about users' activities regarding ads, including whether an ad is clicked on or a transaction is completed. The CMS websites which may utilize Adobe are; www.CMS.gov, www.Medicare.gov, www.MyMedicare.gov, www.Medicaid.gov, www.InsureKidsNow.gov, HealthCare.gov, and CuidadoDeSalud.gov.

Have the third-party privacy policies been reviewed to evaluate any risks and to determine whether the Website or application is appropriate for OPDIV use?

Yes

Describe alternative means by which the public can obtain comparable information or services if they choose not to use the third-party Website or application:
If consumers do not want to interact with advertisements from Adobe, consumers can learn about CMS campaigns through other advertising channels such as TV, radio, CMS websites and in-person events.

Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?
No

How does the public navigate to the third party Website or application from the OPIDIV?
Other...

Please describe how the public navigate to the thirdparty website or application:
Not applicable. The CMS websites do not link to Adobe. Adobe is a tool used to place and track advertising on third-party sites.

If the public navigate to the third-party website or application via an external hyperlink, is there an alert to notify the public that they are being directed to anongovernmental Website?
No

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?
Yes

Provide a hyperlink to the OPDIV Privacy Policy:
https://www.cms.gov/privacy/

Is an OPDIV Privacy Notice posted on the third-part website or application?
No

Is PII collected by the OPDIV from the third-party Website or application?
No

Will the third-party Website or application make PII available to the OPDIV?
No

Describe the PII that will be collected by the OPDIV from the third-party Website or application and/or the PII which the public could make available to the OPDIV through the use of the third-party Website or application and the intended or expected use of the PII:
Not applicable. CMS does not collect any PII through the use of Adobe.

Describe the type of PII from the third-party Website or application that will be shared, with whom the PII will be shared, and the purpose of the information sharing:
Not applicable. CMS does not use Adobe to collect or share PII.

If PII is shared, how are the risks of sharing PII mitigated?
Not applicable. CMS does not use Adobe to collect or share PII.

Will the PII from the third-party website or application be maintained by the OPDIV?
No

Describe how PII that is used or maintained will be secured:
Not applicable

What other privacy risks exist and how will they be mitigated?

CMS will conduct periodic reviews of Adobe's privacy policy to ensure its policies continue to align with agency objectives and privacy policies and do not present unreasonable or unmitigated risks to user's privacy interests. CMS uses Adobe solely for the purposes of improving consumer engagement with CMS websites by directing consumers to CMS websites through the use of targeted advertising.

Potential Risk: The use of cookies, pixels, and web beacons generally presents the risk that an application could collect information about a user's activity on the Internet for purposes that the users did not intend. The unintended purposes include providing users with behaviorally targeted advertising, based on information the individual user may consider to be sensitive. In addition, Adobe uses data segments to profile users for advertising purposes, including health-related segments.

Additional Background: Adobe collects non-personally identifiable information by placing a cookie or pixel (also known as a web beacon) on CMS websites and on advertisements sponsored by CMS on third party websites. The non-personally identifiable information collected by Adobe may include; IP address, browser types, operating systems, domain names, access dates and times, referring website addresses, online transactions and browsing and search activity.

Mitigation: CMS and Adobe provide consumers with information about the use of persistent cookies and related technologies. Tealium iQ Privacy Manager is a tool that keeps track of users' preferences in reference to tracking and will prevent web beacons from firing when a user has opted out of tracking for advertising purposes. When a user is routed to CMS websites by clicking on a CMS advertisement displayed through Adobe and the Tealium iQ Privacy Manager is present on CMS websites, users are able to control which cookies they want to accept from CMS websites.

Opt-out of advertising at: https://www.adobe.com/privacy/opt-out.html;