

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

September 27, 2019

**OPDIV:**

CMS

**Name:**

The Trade Desk

**TPWA Unique Identifier:**

T-5902846-266296

**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 The Trade Desk to deliver behaviorally targeted digital advertising to relevant audiences by tracking user online activities across various websites over time. The Trade Desk does not collect PII in the course of these advertising activities and therefore, does not share PII with CMS. The Trade Desk 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 The Trade Desk are; [www.CMS.gov](http://www.CMS.gov), [www.Medicare.gov](http://www.Medicare.gov), [www.MyMedicare.gov](http://www.MyMedicare.gov), [www.Medicaid.gov](http://www.Medicaid.gov), [www.InsureKidsNow.gov](http://www.InsureKidsNow.gov), [HealthCare.gov](http://HealthCare.gov), and [CuidadoDeSalud.gov](http://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 The Trade Desk, 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 The Trade Desk. The Trade Desk 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 The Trade Desk

**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. The Trade Desk does not collect or share PII.

**If PII is shared, how are the risks of sharing PII mitigated?**

Not applicable. The Trade Desk does not 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?**

**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, The Trade Desk uses data segments to profile users for advertising purposes, including health-related segments. Use of these segments to deliver CMS advertising to these populations may be considered by some individuals to be delivering advertising based on sensitive criteria.

**Additional Background:** The Trade Desk 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 The Trade Desk may include; device identifiers, IP addresses, URLs, cookie IDs, browsers, devices, and location of ad served.

**Mitigation:** CMS and The Trade Desk provide consumers with information about the use of persistent cookies and related technologies. This information includes what data is collected and the data gathering choices included in their website privacy policies, including choices related to behaviorally targeted advertising.

Opt-out of advertising at: <https://www.adsrvr.org/>

Click on the "Ad Choices" logo in the corner of an ad served by The Trade Desk; and The Trade Desk participates in the Digital Advertising Alliance (DAA), which provides consumers with the ability to opt-out of data collection for behavioral advertising by all companies who participate in the DAA. The Trade Desk also works with the US-based opt out pages [www.aboutads.info/choices](http://www.aboutads.info/choices) and [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)