Google Data processing & protection guide for Enhanced Conversions



Setting the Scene: The Evolving Ads Ecosystem and the Importance of First-Party Data

Third party cookies are deteriorating. What does that mean for advertising and measurement?

Much of online advertising makes use of a basic, widely available technology called cookies, which are part of the basic architecture of the web. They help with things like measuring the effectiveness of a company's ad campaign or enabling a particular advertiser to reach the consumers it wants to reach. But the tools that advertisers have historically relied on to measure results – such as cookies and other identifiers – are rapidly changing. Browsers and mobile operating systems are shifting away from mechanisms that identify, follow and/or analyse users across sites and apps by restricting third-party cookies and mobile ad identifiers. The loss of the ability for advertisers to {observe} users in this way makes it more difficult to serve them targeted ads and measure the effectiveness of those ads. This is already leading the industry from a deterministic approach (knowing) to a probabilistic approach (predicting). First party data plays a key role in making those predictions as accurate as possible.

For more information about Chrome's new approach to third parties cookies, go to www.privacysandbox.com

What is First-Party Data?

First-party data is information that an organisation collects directly from its customers (including offline), site visitors and app users during their interactions with the company products and services. At its core, first-party data represents a direct relationship between a person and a business, with data shared knowingly.

How does first party data help my organisation in a world without third party cookies?

The deterioration of third party cookies comes with an inevitable loss of signals that advertisers have historically relied on for audience building, conversion measurement, but also bidding & optimization. To make up for that loss, marketers need to build a mitigation plan by shifting towards tactics that allow them to achieve their business goals in this new environment.

First party data is gathered in a direct relationship between an advertiser and their customer, and therefore doesn't rely on third party cookies. This is why first party data will continue to be a durable solution for the future as a foundation to preserve observability. Using responsibly gathered first-party data can help marketers better understand customer needs and deliver a better customer experience. At the same time it can provide value for your business, all while respecting the privacy of your customers.

Why should my organisation prioritise future proofing measurement now?

Advertisers already face measurement gaps from existing restrictions on third-party cookies such as Safari ITP and Firefox ETP. Regardless of when additional privacy changes land, privacy-centric measurement solutions can already deliver performance gains. Prioritizing future proofing your measurement now can help you feel prepared for future privacy changes. It is necessary to safeguard against future disruption and ensure comprehensive conversion reporting now and in the future.

About Enhanced Conversions

What is the main benefit of adopting this product?

Enhanced Conversions for Web

Enhanced conversions is a feature that can improve the accuracy of your conversion measurement and unlock more powerful bidding. It supplements your existing conversion tags by sending hashed first party conversion data from your website to Google in a privacy safe way. The feature uses a secure one-way hashing algorithm called SHA256 on your first party customer data, such as email addresses, before sending to Google.

Enhanced Conversions for Leads

Enhanced conversions for leads simplifies and improves measurement of offline transactions that came from a website lead or visitor. You can upload or import conversion data into Google Ads using hashed first-party customer data from your website lead forms. Unlike the standard version of offline conversion imports, enhanced conversions for leads doesn't require you to modify your lead forms or customer relations management (CRM) systems to receive a Google Click ID (GCLID). Instead, it uses information that was already captured about your leads, like email addresses, to measure conversions.

How does Enhanced Conversions for Web work?

To understand how the data flow works from advertiser servers to Google's servers, see the below diagram that outlines how Enhanced Conversions data is used.



Resources:

<u>About enhanced</u>
<u>conversions</u>

Key Privacy & Data Principles

Jump to section: Data Type | Usage | Storage | Security | Advertiser Controls | Retention & Deletion

Data Type

Which data is collected / used for this first-party data product to function?

Enhanced Conversions for Web

Enhanced Conversions for Web enables more accurate conversion measurement by allowing conversion tags to capture hashed customer data advertisers collect on their conversion page (e.g. email addresses) and then matches it against hashed Google signed-in data.

Enhanced Conversions for Leads

Enhanced Conversions for Leads allows you to use hashed, first-party user-provided data (e.g. email addresses) from your website lead forms for offline lead measurement. When you upload your leads, the provided hashed information is used to attribute back to the Google Ad campaign.

Resources:

<u>About enhanced</u>
<u>conversions</u>

Usage

How does Google handle my customers' data?

Enhanced Conversions for Web

Google Ads enhanced conversions for the web allows you to measure online conversions using your first-party data (e.g. email address, phone number). Google is committed to protecting the confidentiality and security of the data that you share with us. <u>This article</u> explains how Google handles the data files that you upload for use in Enhanced Conversions for Web. The <u>Google Ads Data Processing Terms</u> also apply to data files that you upload for use in Enhanced Conversions for Web.

Enhanced Conversions for Leads

The data that you upload will be used to match your offline customer transactions to clicks that landed on your website and submitted a lead form. This matching allows you to report offline conversions driven by Google ad interactions. We'll keep your data confidential and secure using the same industry-leading standards that we use to protect our own users' data. This article explains how Google handles the data files that you upload for use in enhanced conversion for leads. The <u>Google Ads Data Processing Terms</u> also apply to data files that you upload for use in Enhanced Conversions for Leads.

Resources:

 How Google uses <u>enhanced</u> <u>conversion data</u>



Can Google process my first party data to serve its own purposes?

Enhanced Conversions is a processor service. Acting as a processor under GDPR means Google cannot use any personal data shared by an advertiser for Enhanced Conversions for its own purposes. Hashed personal data shared with Google for Enhanced Conversions is only used by Google to determine (a) if it matches a Google user's hashed data value; and (b) if that hashed data value can be attributed to a click in order to report a conversion in the relevant customer's account.

Improving our products and services

Google uses privacy-safe event data for the overall benefit of advertisers for certain features such as automated bidding to improve their overall quality and accuracy. Google's models may, for example, learn attribution rates in aggregate, such as the number of clicks and number of conversions reported across Google's customer base. However, none of the activity to improve automated bidding (a) uses information tied to a particular advertiser; (b) is associated with a Google user's profile; or (c) involves sharing information about an advertiser's campaign in a way that it could be used to inform the campaign of another advertiser.

Spam and fraud detection

Google may use privacy-safe event data for spam and fraud detection, and to ensure compliance with our Enhanced Conversions policies.

Is data collected and used for EC used to benefit Google and/or other advertisers?

Google only uses advertiser-provided data shared for EC to provide services to that advertiser, as described in the <u>How Google uses enhanced conversion data policy</u>. Google does not share advertiser-provided EC data with any other advertiser. Google uses privacy-safe event data for the overall benefit of advertisers for certain features such as automated bidding to improve their overall quality and accuracy, for spam and invalid activity detection, and to ensure compliance with Enhanced Conversions policies.

<u>How Google</u> <u>uses enhanced</u> <u>conversion data</u>

Retention & Deletion

How long does Google store our data, and how can I request deletion?

Google's data retention period for hashed PII provided by advertisers for Enhanced Conversions for Web in Google Ads & SA360 is 20 days. Advertisers can request to expedite deletion by reaching out to their Google sales representative. Resources:

How Google uses
<u>enhanced</u>
<u>conversion data</u>

Storage

Where do you store my Data?

Data is stored in Google's distributed data centre network, with servers in locations such as EMEA, US and APAC, and elsewhere. Google operates data centres globally and to maximise the speed and reliability of our services, our infrastructure is generally set up to serve traffic from the data centre that is the closest to where the traffic originates. Therefore the precise location of Google advertising and analytics personal data may vary depending on where such traffic originates, and this data may be handled by servers located in the EEA and UK or transferred to third countries. Our customers' properties where Google advertising and analytics products are implemented are generally available globally and often attract a global audience. The technical infrastructure that supports these products is deployed globally to reduce latency and ensure redundancy of systems. Information about the locations of Google data centres is available <u>here</u>.

Does Google offer the option to store data locally?

Google does not localise data received from advertisers and is not stored only in a specific country or region. We own and operate data centers around the world to keep our products running 24 hours a day, 7 days a week. We distribute data across multiple data centres, so that in the event of a fire or disaster, it can be automatically shifted to stable and protected locations.

Resources:

- <u>Safeguards for</u> international data transfers with <u>Google's</u> advertising and analytics products
- Discover our data center locations

Resources:

Data and Security

Advertiser Controls

What controls does Google provide to advertisers?

Enhanced Conversions for Web

Enhanced Conversions for Web is an opt-in measurement service. Advertisers have control in turning EC off anytime in the UI, can choose which conversion actions they want to implement EC and request deletion of their EC data in response to an end user deletion requests. Advertisers can also request to accelerate default retention periods by reaching out to their Google sales representative.

Enhanced Conversions for Leads

Enhanced Conversions for Leads is an opt-in measurement service. The advertiser's website sends us a piece of hashed lead information (email or phone number) specified by them. If both email address and phone number are available, only one is required to match back with Google Ads in order for the upload to be successful.

Security

How does Google ensure my data is secure?

Enhanced Conversions uses a secure hashing algorithm called SHA256, which is an industry standard for one-way hashing that can not be unencrypted. Advertiser's 1PD is automatically hashed (unless already hashed by the customer) and formatted before it is sent securely to Google's servers. Additionally, even in the event of a data leak no readable PII would be revealed. Customers can also hash customer data themselves using the SHA256 algorithm. The data is always encrypted in Google's servers, with strict access controls of Googlers with data access.

Google has also earned ISO 27001 certification for the systems, applications, people, technology, processes and data centers serving Enhanced Conversions. <u>Download</u> the Google Ads/Analytics Scope Expansion Certificate – ISO27001 (PDF).

Enhanced Conversions is also subject to the <u>Google Ads Data Processing Terms</u>, and customers benefit from the privacy commitments and protections outlined in detail in those terms, including in connection with data security.

How is my customer alerted in the event of a data breach?

Keeping users' information safe, secure and private is among our highest priorities at Google. Over the years, we have worked closely with data protection authorities around the world and have implemented strong privacy protections that reflect their guidance.

The <u>Google Ads Data Processing Terms</u> apply to data files that advertisers upload for use in Enhanced Conversions, and we will inform you of incidents involving your data as set forth in the <u>Google Ads Data Processing Terms</u>.

Who has access to my data at Google?

The data that you upload will be used to match your customers to Google Accounts and report the online conversions driven by Google ad interactions. We'll keep your data confidential and secure using the same industry-leading standards that we use to protect our own users' data.

Here's how the data you upload is handled:

- **Limited data use**: Google will only use the data you shared for Enhanced Conversions to provide you services, including technical support.
- Limited data access: Google uses encryption and employee access controls to protect your data from unauthorized access.
- Data security: Google is committed to ensuring that the systems that we use to store your data remain secure and reliable. Google has earned <u>ISO 27001 certification</u> for the systems, applications, people, technology, processes and data centers serving a number of Google products, including Enhanced Conversions.

Resources:

- <u>SHA-256</u> <u>Algorithm:</u> <u>Definition -</u> <u>Google Ads Help</u>
- <u>SHA256 Hashing</u> <u>Demo</u>

Business Data Responsibility

How Google uses enhanced conversion data

Google

Glossary

Controller

'Controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. Read more.

- Google Ads Controller-Controller Data Protection Terms
- Google Measurement Controller-Controller Data Protection Terms

Conversions

An action that's counted when someone interacts with your ad or free product listing (for example, clicks a text ad or views a video ad) and then takes an action that you've defined as valuable to your business, such as an online purchase or a call to your business from a mobile phone. Read more.

Conversion Modelling

Conversion modeling refers to the use of machine learning to quantify the impact of marketing efforts when a subset of conversions can't be observed. With a modeling foundation in place, observable data can feed algorithms that also make use of historical trends to confidently validate and inform measurement. Read more.

Cookie

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about how Google uses cookies and how Google uses data, including cookies, when you use our partners' sites or apps. Read more.

• Our advertising and measurement cookies

Customer data

Customer data is the customer information that you've collected in the first-party context—for example, information you collected from your websites, apps, physical stores, or other situations where customers shared their information directly with you.

There are many types of customer data, some of the common data types are email addresses, first names, last names, phone numbers, and country of residence. Read more.

Encrypted

As the data you create moves between your device, Google services, and our data centers, it is protected by security technology like HTTPS and Transport Layer Security. We also encrypt email at rest and in transit by default, and encrypt identity cookies by default.

Read more, more and more.

First-party (1P) customer data

Data collected by the organisation itself. First-party data could include CRM related information, behavioural data, subscription/registration data. Read more.

GDPR

The General Data Protection Regulation (GDPR) went into effect on May 25, 2018, replacing the 1995 EU Data Protection Directive. The GDPR lays out specific requirements for businesses and organizations who are established in Europe or who serve users in Europe. It regulates how businesses can collect, use, and store personal data. Read more.

Google Signed-in users

Users logged in Google properties.

Hash algorithm SHA256

HA-256 stands for Secure Hash Algorithm 256-bit and it's used for cryptographic security. Cryptographic hash algorithms produce irreversible and unique hashes. The larger the number of possible hashes, the smaller the chance that two values will create the same hash. Read more.

Hashed

Hashed data maps the original string of characters to data of a fixed length. An algorithm generates the hashed data, which protects the security of the original text. Read more.

Hashing

Hashing means you are transforming a piece of information, for example an email address, into a long code of numbers that cannot be reverted back. The hashing algorithm used in Google Products is an industry wide used and patented method called SHA-256.

ISO 27001 Certified

ISO 27001 is one of the most widely recognized, internationally accepted independent security standards. Google has earned ISO 27001 certification for the systems, applications, people, technology, processes and data centers serving Customer Match. Our compliance with the ISO standard was certified by Ernst & Young CertifyPoint, an ISO certification body accredited by the Dutch Accreditation Council, a member of the International Accreditation Forum (IAF). Certificates issued by Ernst & Young CertifyPoint are recognized as valid certificates in all countries with an IAF member. Certificate can be downloaded at <u>Google's Business Safety Compliance page</u>. Customers should feel assured that the data provided to Google during use of Customer Match is secured using robust information security processes and controls.

Machine Learning

The process in which a computer distils regularities from training data. An algorithm "learns" to identify patterns, like occurrence of certain elements (e.g. words, images) or combinations of elements, that determine or inform operational decisions. Read more.

Match Rate

Match Rate is a calculation of the number of rows of uploaded data for which we are able to match to a Google user.

Performance-Max

Performance Max is a new goal-based campaign type that allows performance advertisers to access all of their Google Ads inventory from a single campaign. It's designed to complement your keyword-based Search campaigns to help you find more converting customers across all of Google's channels–YouTube, Display, Search, Discover, Gmail, and Maps. Read more.

Personally Identifiable Information

This is information that is provided to us which personally identifies the individual, such as name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with the individual's Google Account. Read more. Google's position on what is considered Personal Data see <u>here</u>.

Processor

'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Read more.

• Google Ads Data Processing Terms

Pseudonymous data

Pseudonymous data means data which has undergone a process of 'Pseudonymisation' as that term is defined in the GDPR: "the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Purposes

The Transparency and Consent Framework (TCF) organizes data processing using "Purposes." Each purpose has a corresponding legal basis of "Consent" or "Legitimate Interest." Read more.

Similar Audiences

Similar audiences targeting allows you to show ads to people who share characteristics with people on your existing remarketing lists. Read more.

Smart Bidding

A subset of automated bid strategies that optimize for conversions or conversion value. Smart Bidding uses machine learning to optimize your bids to maximize conversions and conversion value across your campaign or bidding portfolio. Target CPA, Target ROAS, Maximize conversion and Maximize conversion value are all Smart Bidding strategies. Read more.