SUPER AWESOME

Setting up Google Analytics for kids' apps and sites

Updated on 13 October 2020

You should always establish your own data compliance policies and seek the advice of duly qualified professionals, including legal advice, as applicable. The following is general information on the subject only. It is not and should not be considered legal advice nor should it be relied upon to guarantee your own compliance.

Current data privacy laws in the US and EU restrict the collection and processing of personal data from children under 13 (US) or under 16 (EU). Other countries such as China and India are rolling out similar legislation. In each case, personal data includes things like IP addresses, geolocation, usernames, device IDs, and other persistent technical identifiers.

As a publisher (website, app, connected toy or other digital service) you are legally liable for any such data collected from kids using your service. When you rely on third-party technology, you must ensure they are compliant too. We often get asked how to configure **Google Analytics** (or similar solutions) to be compliant on a kids' site.

Currently, we are not aware of any analytics solutions that can guarantee compliance with kids' data privacy laws, e.g., **COPPA** or GDPR-K. If you decide to use a solution such as Google Analytics on your kids' site or app, then you will need to configure your set-up to minimise the collection of personal data including persistent identifiers.

The following covers key risk areas when you use Google Analytics, including IP addresses and geo-location; data sharing settings; advertising features; data collection settings; and audience marketing.

Google Analytics and cookie consent (ePrivacy) on kids' sites

We're often asked how a kids' website or app can be compliant with both the ePrivacy Directive (aka the Cookie Law) and GDPR-K when it comes to analytics. The problem arises due to an inherent conflict between the two laws, which should have been resolved with a revised ePrivacy Regulation to be implemented alongside the GDPR. Alas, this was not achieved.

Under GDPR, it may be possible to rely on legitimate interest for processing personal data for analytics. But under ePrivacy, any data collection that is not 'strictly necessary' requires consent. And if consent is required on a kids' site, then it must meet the standard of GDPR's Article 8. That suggests you would need to contact a parent and verify their identity in order to enable Google Analytics.

The regulators are well aware of this contradiction, and there have been numerous discussions and draft amendments to fix it, but at this point it's unclear if a new ePrivacy law will be passed before 2021.

So, what is a kids' website to do? Firstly, your website is unique—find out where you stand legally, and seek legal advice about your situation. But, for a pragmatic approach that takes into account the intent of the laws and current best practice, here is how we see it:

Key points:

1. You have a legitimate interest to operate analytics to improve and grow your service.
2. Children have a fundamental right to access your service.
3. Your obligation is to minimise the collection of personal data from kids.

Implementation:

1. Configure your analytics solution to anonymise any data collected, including truncating IP addresses to make them 'non-personal'.
2. Don't share data with Google Analytics or any other provider.
3. Disable tracking, advertising and audience building features.
4. Don't map user IDs from your analytics platform to any other marketing solution.

Transparency & notices:

1. Implement your standard cookie consent banner as required under ePrivacy.
2. Explain comprehensively in your privacy policy:
   a. what data you are collecting and processing;
   b. how you are keeping it safe and abiding by the principles above; and
   c. that you believe your implementation of analytics meets the standard required by the legitimate interest legal basis in relation to your child users.
3. Ensure your privacy notice meets all the other requirements of GDPR, including the transparency standard of the Age Appropriate Design Code.

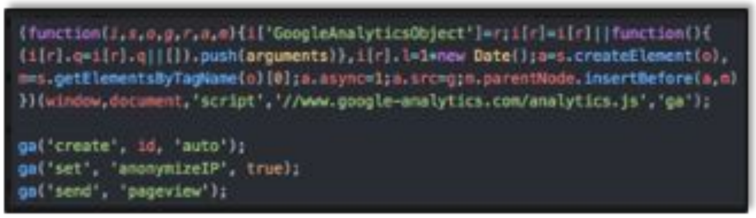
Whilst this approach does not conform with the most literal reading of each of these conflicting laws, it does achieve the aims of both while supporting the commercial viability of kid-safe digital experiences.

The rest of this guide walks you through the detail of configuring Google Analytics.

A privacy-preserving set-up is achievable with Google Analytics by doing the following:

1. Truncate IP addresses so that precise location cannot be collected or used:

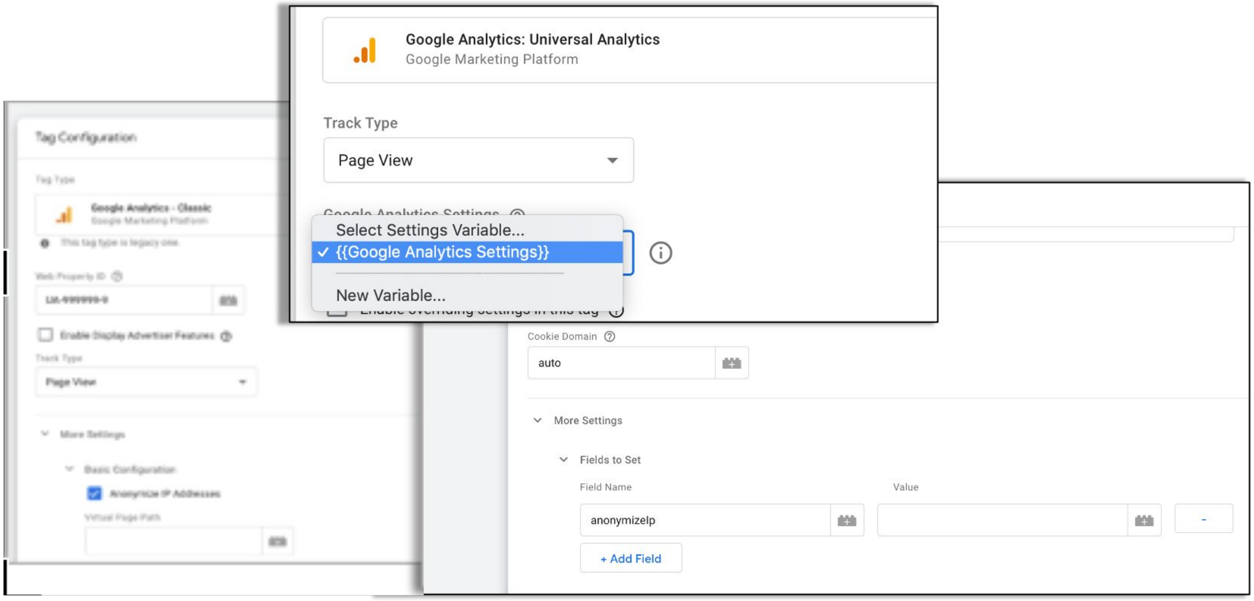
A. If using /analytics.js/ select the ‘anonymizeIP’ setting when you initialize Google Analytics on your page. *This must be done prior to setting up any events and should be set-up as follows:* ga(‘set’, ’anonymizeIP’, true)



```
(function(i,s,o,g,r,a,m){i['GoogleAnalyticsObject']=r;i[r]=i[r]||function(){
(i[r].q=i[r].q||[]).push(arguments)},i[r].l=1*new Date();a=s.createElement(o),
m=s.getElementsByTagName(o)[0];a.async=1;a.src=g;m.parentNode.insertBefore(a,m)
})(window,document,'script','//www.google-analytics.com/analytics.js','ga');

ga('create', id, 'auto');
ga('set', 'anonymizeIP', true);
ga('send', 'pageview');
```

B. If using Google Tag Manager, you can adjust the settings in your tag by going to: “More Settings” > “Fields to Set” > Add new field named ‘anonymizeIP’ with a value of “true”



Tag Configuration

Tag Type: Google Analytics - Classic (Google Marketing Platform)

This tag type is legacy one.

Web Property ID: UA-999999-9

☐ Enable Display Advertiser Features

Track Type: Page View

More Settings > Basic Configuration

☑ Anonymize IP Addresses

Virtual Page Path

Google Analytics: Universal Analytics (Google Marketing Platform)

Track Type: Page View

Google Analytics Settings: ✓ {{Google Analytics Settings}}

Select Settings Variable...
New Variable...
Enable overriding settings in this tag

Cookie Domain: auto

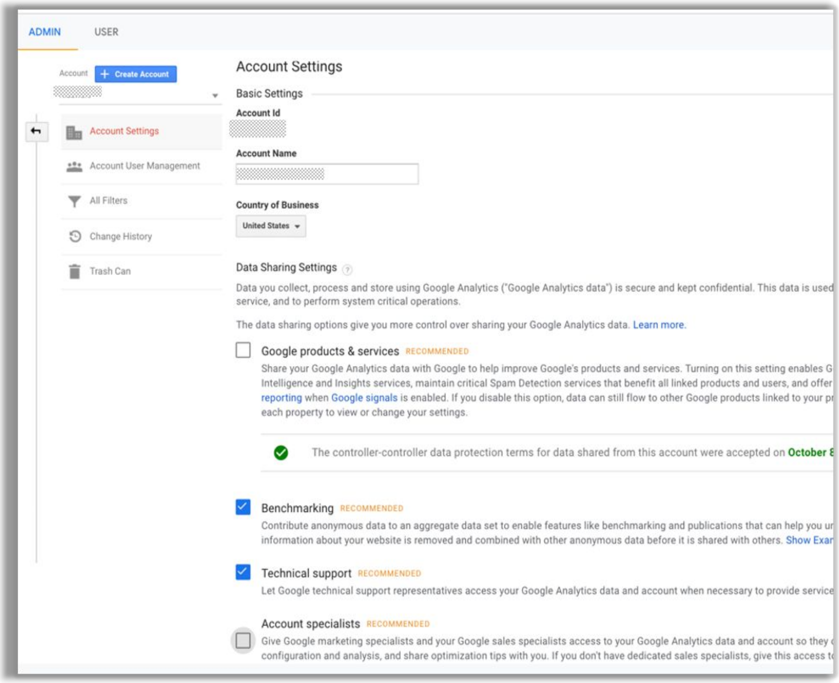
More Settings > Fields to Set

Field Name	Value
anonymizeIp	

2. Disable data sharing settings in your account:

Go to “Account Settings” > “Data Sharing Settings” and disable the following options:

- Data sharing with Google Products & Services
- Data sharing with account specialists
- Give all Google sales experts access to your data



Account Settings

Basic Settings

Account Id

[redacted]

Account Name

[redacted]

Country of Business

United States

Data Sharing Settings

Data you collect, process and store using Google Analytics ("Google Analytics data") is secure and kept confidential. This data is used service, and to perform system critical operations.

The data sharing options give you more control over sharing your Google Analytics data. Learn more.

□ Google products & services RECOMMENDED
Share your Google Analytics data with Google to help improve Google's products and services. Turning on this setting enables G Intelligence and Insights services, maintain critical Spam Detection services that benefit all linked products and users, and offer reporting when Google signals is enabled. If you disable this option, data can still flow to other Google products linked to your pr each property to view or change your settings.

✓ The controller-controller data protection terms for data shared from this account were accepted on October 8

☑ Benchmarking RECOMMENDED
Contribute anonymous data to an aggregate data set to enable features like benchmarking and publications that can help you ur information about your website is removed and combined with other anonymous data before it is shared with others. Show Exar

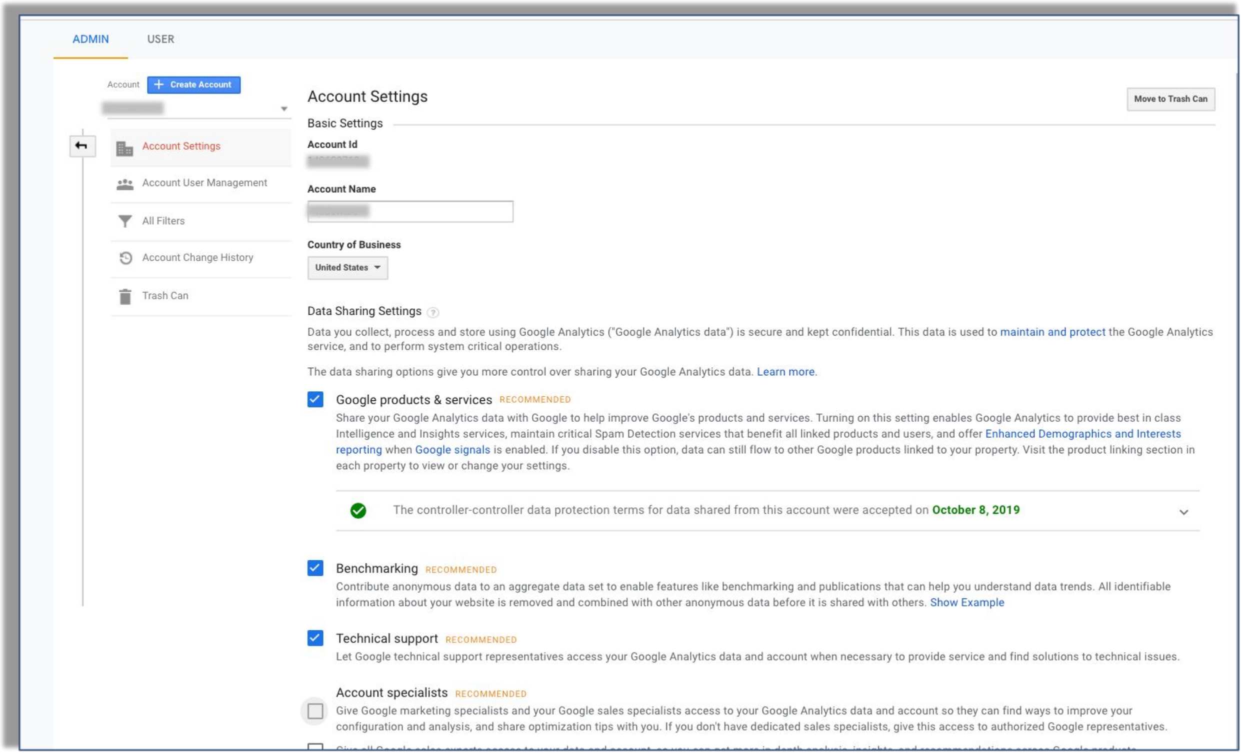
☑ Technical support RECOMMENDED
Let Google technical support representatives access your Google Analytics data and account when necessary to provide service

□ Account specialists RECOMMENDED
Give Google marketing specialists and your Google sales specialists access to your Google Analytics data and account so they c configuration and analysis, and share optimization tips with you. If you don't have dedicated sales specialists, give this access to

3. Change property settings to adjust tracking and advertising features:

A. Go to "Property Settings" and ensure the following is disabled:

- "Advertising Features" > "Demographics and Interest Reports"
- "In-Page Analytics" > "Use Enhanced Link Attribution"
- "User Analytics" > "Users Metric in Reporting"



Account Settings

Basic Settings

Account Id

[redacted]

Account Name

[redacted]

Country of Business

United States

Data Sharing Settings

Data you collect, process and store using Google Analytics ("Google Analytics data") is secure and kept confidential. This data is used to maintain and protect the Google Analytics service, and to perform system critical operations.

The data sharing options give you more control over sharing your Google Analytics data. Learn more.

☑ Google products & services RECOMMENDED
Share your Google Analytics data with Google to help improve Google's products and services. Turning on this setting enables Google Analytics to provide best in class Intelligence and Insights services, maintain critical Spam Detection services that benefit all linked products and users, and offer Enhanced Demographics and Interests reporting when Google signals is enabled. If you disable this option, data can still flow to other Google products linked to your property. Visit the product linking section in each property to view or change your settings.

✓ The controller-controller data protection terms for data shared from this account were accepted on October 8, 2019

☑ Benchmarking RECOMMENDED
Contribute anonymous data to an aggregate data set to enable features like benchmarking and publications that can help you understand data trends. All identifiable information about your website is removed and combined with other anonymous data before it is shared with others. Show Example

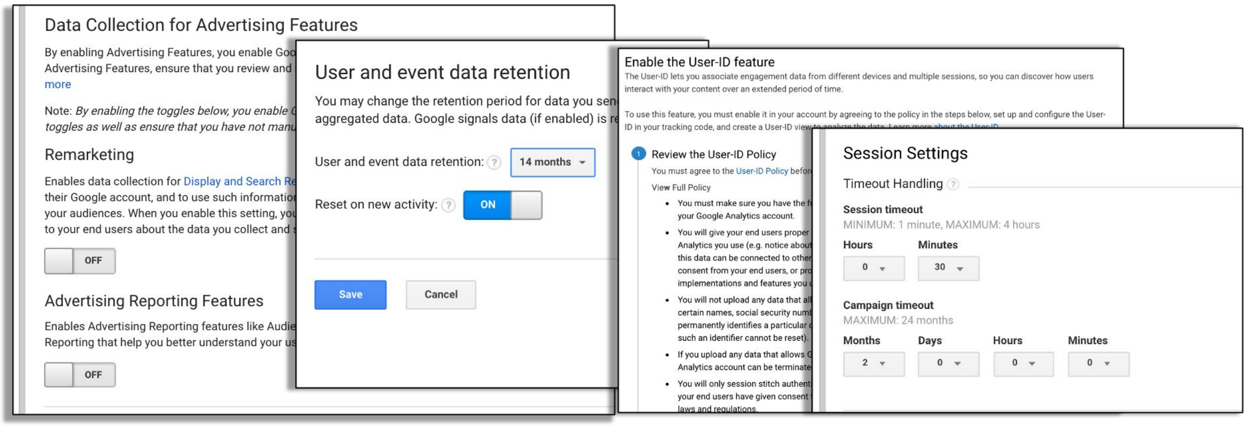
☑ Technical support RECOMMENDED
Let Google technical support representatives access your Google Analytics data and account when necessary to provide service and find solutions to technical issues.

□ Account specialists RECOMMENDED
Give Google marketing specialists and your Google sales specialists access to your Google Analytics data and account so they can find ways to improve your configuration and analysis, and share optimization tips with you. If you don't have dedicated sales specialists, give this access to authorized Google representatives.

□ Give all Google sales experts access to your data and account, so you can get more in-depth analysis, insights, and recommendations across Google products

B. Go to “Tracking Info” and change the following:

- “Data Collection” > disable “Remarketing” and “Advertising Reporting Features”
- “Data Collection” > set to the lowest possible value (currently 14 months)
- “User ID” > “Off”
- “Session Settings” >
  - 30-minute session timeout
  - 60-day (2 month) campaign timeout



Data Collection for Advertising Features

By enabling Advertising Features, you enable Goo
Advertising Features, ensure that you review and
more

Note: *By enabling the toggles below, you enable G
toggles as well as ensure that you have not manu*

Remarketing

Enables data collection for Display and Search Re
their Google account, and to use such informatio
your audiences. When you enable this setting, yo
to your end users about the data you collect and s

OFF

Advertising Reporting Features

Enables Advertising Reporting features like Audie
Reporting that help you better understand your us

OFF

User and event data retention

You may change the retention period for data you sen
aggregated data. Google signals data (if enabled) is re

User and event data retention: 14 months

Reset on new activity: ON

Enable the User-ID feature

The User-ID lets you associate engagement data from different devices and multiple sessions, so you can discover how users interact with your content over an extended period of time.

To use this feature, you must enable it in your account by agreeing to the policy in the steps below, set up and configure the User-ID in your tracking code, and create a User-ID view to analyze the data. Learn more about the User-ID

1 Review the User-ID Policy

You must agree to the User-ID Policy befor

View Full Policy

- You must make sure you have the f
your Google Analytics account.
- You will give your end users proper
Analytics you use (e.g. notice about
this data can be connected to other
consent from your end users, or pro
implementations and features you u
- You will not upload any data that all
certain names, social security numb
permanently identifies a particular d
such an identifier cannot be reset).
- If you upload any data that allows G
Analytics account can be terminate
- You will only session stitch authent
your end users have given consent
laws and regulations.

Session Settings

Timeout Handling

Session timeout
MINIMUM: 1 minute, MAXIMUM: 4 hours

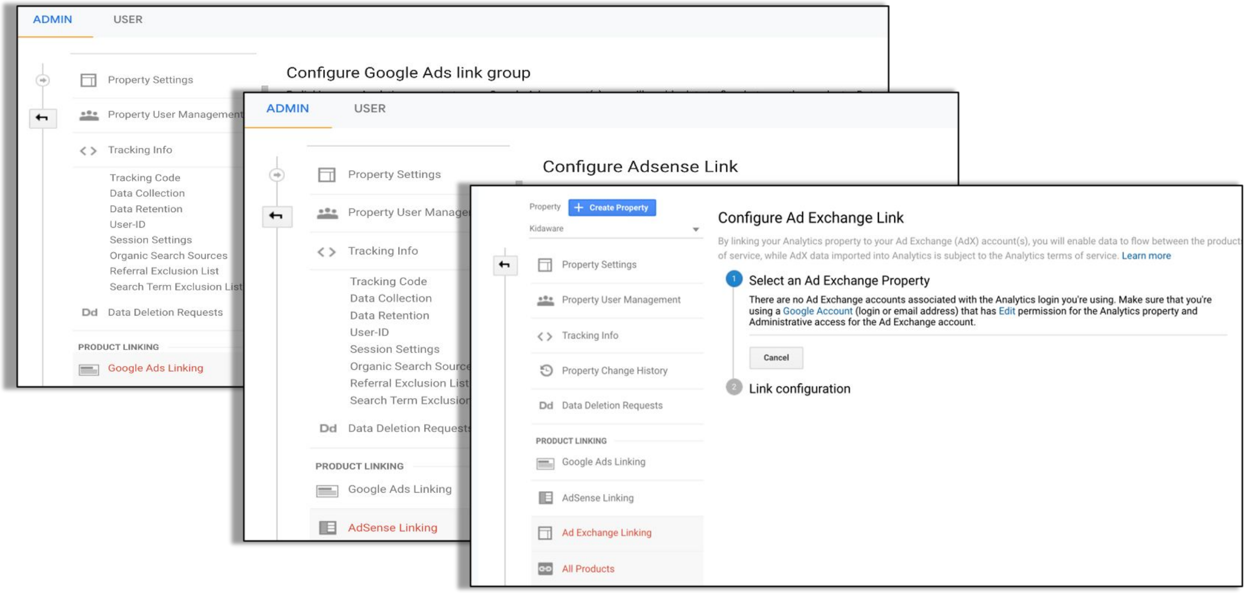
Hours: 0
Minutes: 30

Campaign timeout
MAXIMUM: 24 months

Months: 2
Days: 0
Hours: 0
Minutes: 0

C. Under “Product Linking”, data sharing should be disabled (where possible).

- *This is to prevent any analytics data feeding into other Google services.*



Configure Google Ads link group

Configure Adsense Link

Configure Ad Exchange Link

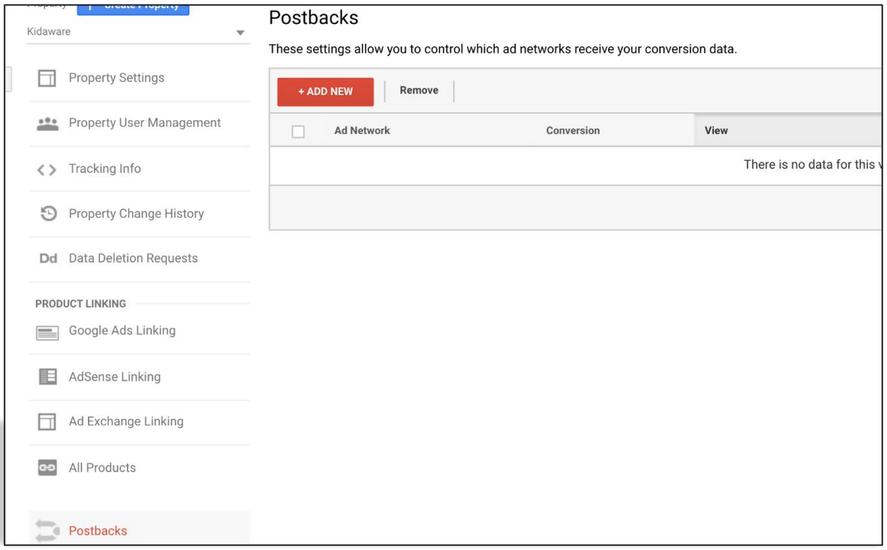
By linking your Analytics property to your Ad Exchange (AdX) account(s), you will enable data to flow between the product
of service, while AdX data imported into Analytics is subject to the Analytics terms of service. Learn more

1 Select an Ad Exchange Property

There are no Ad Exchange accounts associated with the Analytics login you're using. Make sure that you're using a Google Account (login or email address) that has Edit permission for the Analytics property and Administrative access for the Ad Exchange account.

2 Link configuration

D. “Postbacks” should be disabled where possible (unless you can verify that the ad networks that send post-back data are compliant with applicable data protection laws)

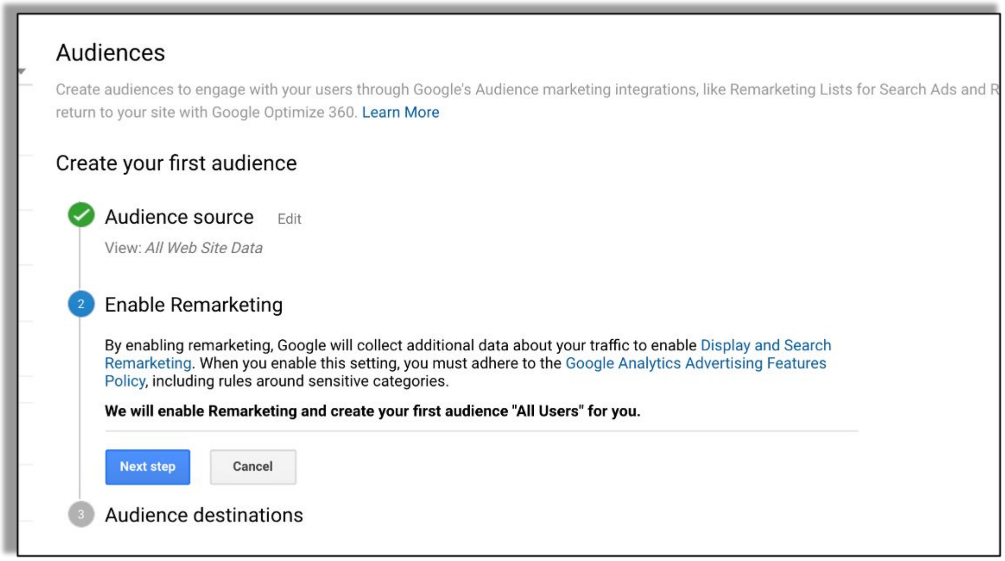

Postbacks

These settings allow you to control which ad networks receive your conversion data.

There is no data for this v

E. “Audience Definitions” should be disabled.

- *By disabling “Remarketing” under Step 3(B), “Audience Definitions” should automatically be disabled. Use this step as a way to double-check.*


Audiences

Create audiences to engage with your users through Google's Audience marketing integrations, like Remarketing Lists for Search Ads and R return to your site with Google Optimize 360. Learn More

Create your first audience

Audience source Edit

View: *All Web Site Data*

2 Enable Remarketing

By enabling remarketing, Google will collect additional data about your traffic to enable Display and Search Remarketing. When you enable this setting, you must adhere to the Google Analytics Advertising Features Policy, including rules around sensitive categories.

We will enable Remarketing and create your first audience "All Users" for you.

3 Audience destinations

The above set-up will limit what you can and cannot do with user data across your sites/apps. The below chart outlines some of these effects:

CAN STILL DO

- Determine the location of users (eg, country, city) visiting website/app
- Contextually target users with advertising
- Track user flows, referring websites, etc.
- Retain user data for up to a maximum of 14 months

CANNOT DO

- Report on demographics (including age/gender) and/or user interest categories (affinity/in-market segments)
- Target users with interest-based advertising or re-marketing campaigns
- Benchmark against other companies
  - Includes benchmarking against channel groupings (display, social, paid search, etc.), location, device types
  - Includes benchmarking metrics such as session data, bounce rates, etc.

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