

# Google Analytics & GDPR

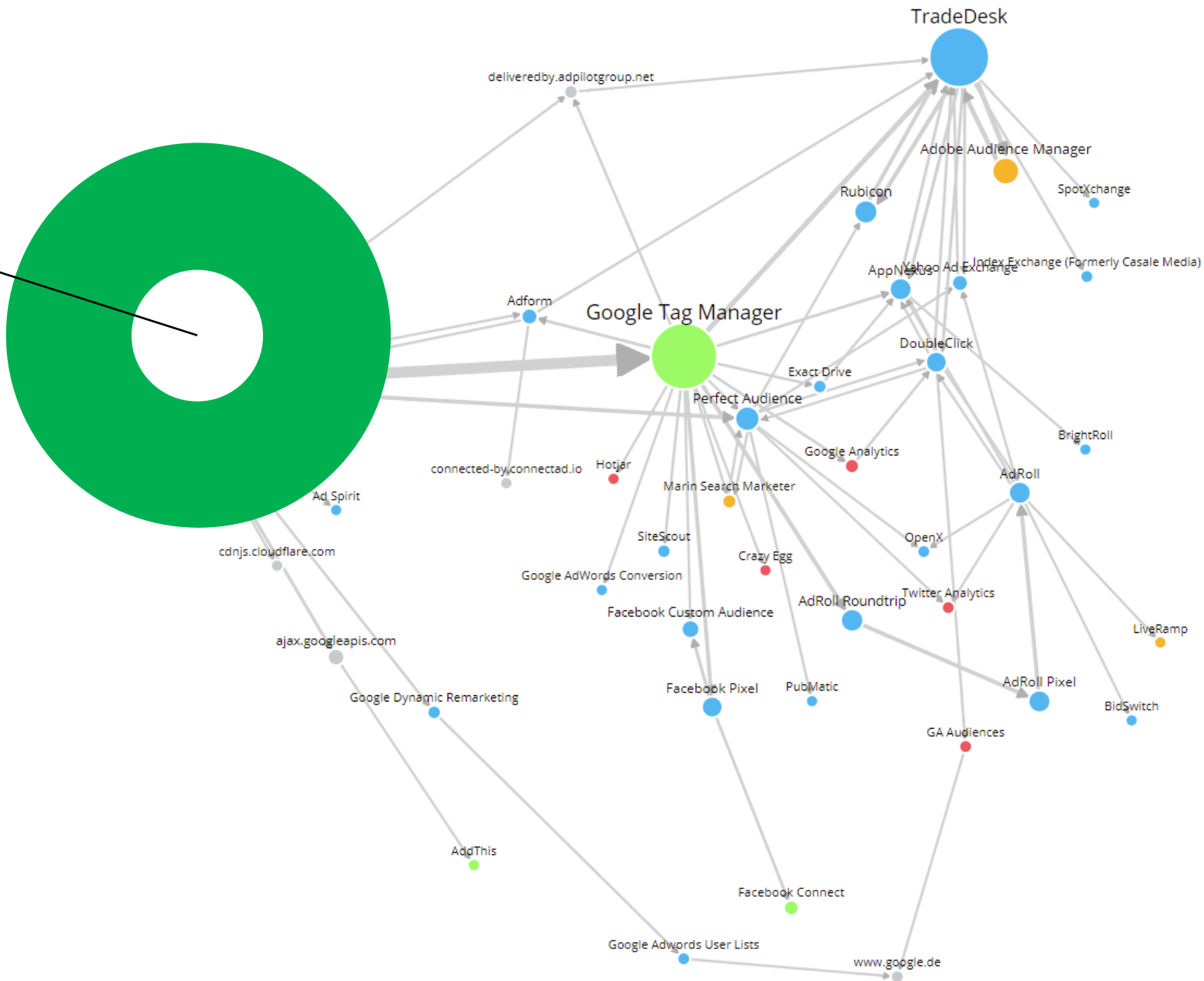
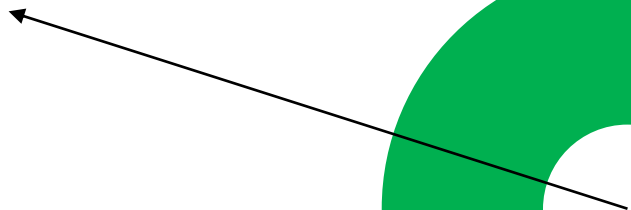
TEHNIKALIJE



# Ovo nisu pravni savjeti!

Ovo su tehničke mogućnosti kojima možete biti više GDPR compliant!

# Zašto GDPR?



# Jel vaš Google Analytics uopće prikuplja osobne podatke?

Pitanje je za pravnike.

# Što su osobni podaci? #1

Osobni podaci jesu sve informacije koje se odnose na **pojedince čiji je identitet utvrđen ili se može utvrditi**. Različite informacije, koje zajedno prikupljene mogu rezultirati utvrđivanjem identiteta određene osobe, također čine osobne podatke.

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data\\_hr](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data_hr)

# Što su osobni podaci? #2

Osobni podaci koji su deidentificirani, šifrirani ili **pseudonimizirani**, ali se mogu upotrijebiti za ponovno utvrđivanje identiteta osobe ostaju osobnim podacima te su obuhvaćeni područjem primjene OUZP-a.

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data\\_hr](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data_hr)

# Što su osobni podaci? #3

Osobni podaci koji su učinjeni **anonimnima** na način da se identitet pojedinca ne može ili se više ne može utvrditi više se ne smatraju osobnim podacima. Da bi podaci bili zaista anonimizirani, **anonimizacija mora biti nepovratna.**

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data\\_hr](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data_hr)

# Što je procesuiranje?

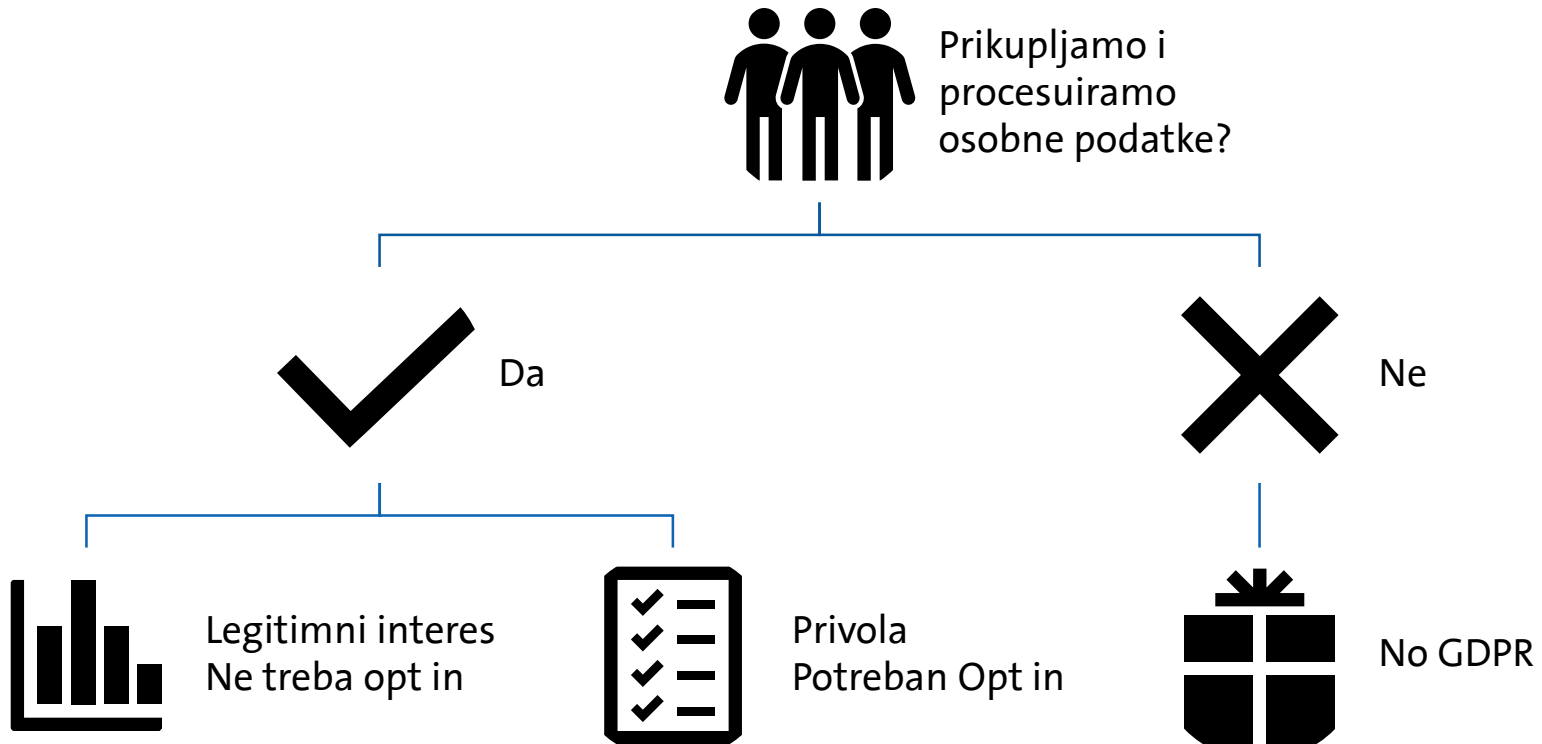
Obrada obuhvaća širok raspon radnji koje se obavljaju na osobnim podacima, uključujući i radnje ručnim ili automatiziranim sredstvima.

**... prikupljanje, strukturiranje, pohrana, uporaba, ...**

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-constitutes-data-processing\\_hr](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-constitutes-data-processing_hr)



# GDPR?



*A Lawful Basis for processing Personal Data, under the GDPR and these are set out in Article 6.1*

# Legitimni interes (Controller/Processor)

## Mora proći LIA (Legitimate Interest Assessment) test:

1. Identify a Legitimate Interest (Svrha > Web Analytics)
2. Necessity Test (Postoji li neki drugi način?)
3. Balancing Test (priroda, efekt, zaštita)

<https://www.dpnetwork.org.uk/wp-content/uploads/2018/04/DPN-Guidance-A4-Publication.pdf>

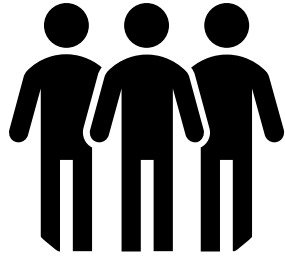
# Prava (data subject)

- Informiranje
- Ispravak
- Pristup
- Prijenos
- Prigovor
- Brisanje
- Ograničenje
- Donošenje odluka

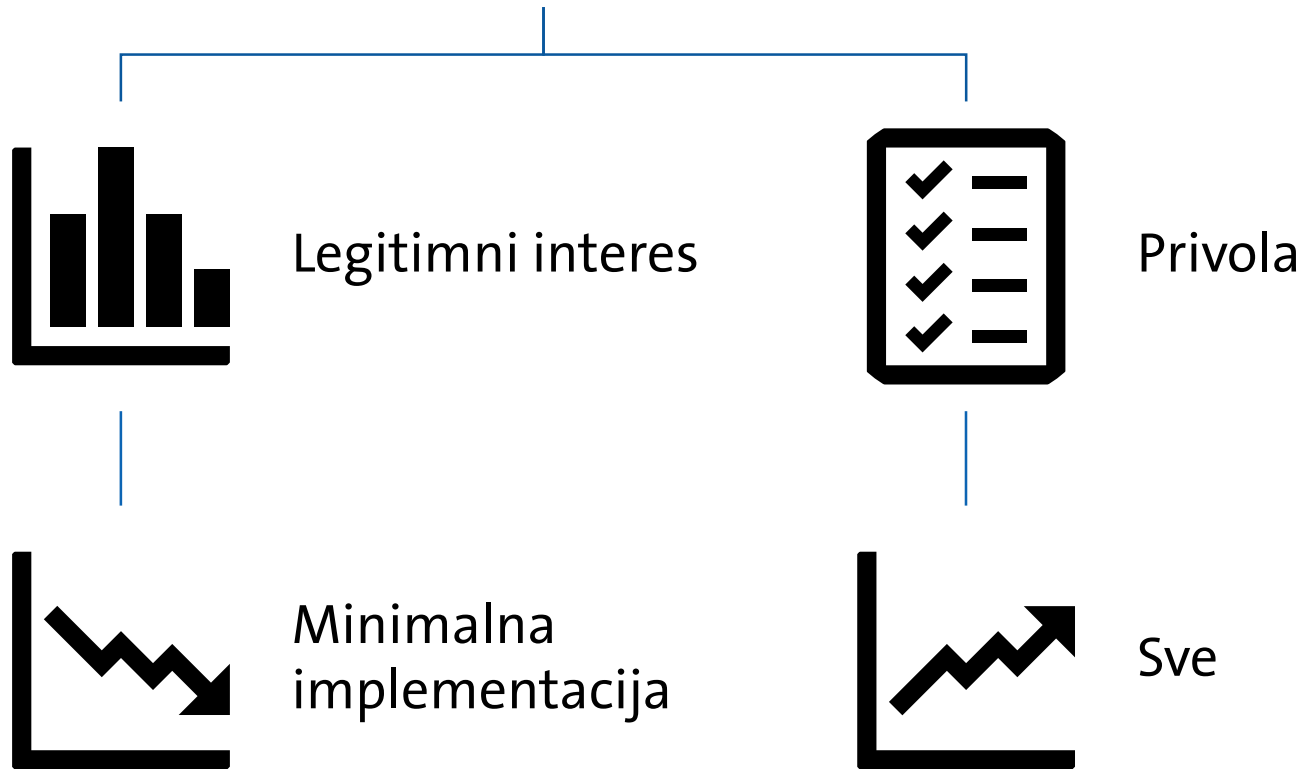
# Ključni pojmovi

- **Anonimizacija** podataka (nema mogućnosti povezivanja)
- **Pseudoanonimizacija** (postoji mogućnost povezivanja (dodatni izvori) ali postoje procedure koje spriječavaju takvu pojavu)
- **Zaborav** (Brisanje)
- **Minimalizacija** (što manji obim informacija / trajanje)

# GA GDPR?



Možda ili sigurno prikupljamo i procesuiramo osobne podatke



# Google Analytics opt in

## Ako nemamo Legitimni Interes!

- Korisnik prilikom pristupa stranici **bira / daje pristanak**
- Ništa se ne smije ispucati (tagovi) bez pristanka
- Per browser / per cookie

# Google Analytics opt in samo features

**Korisnika pratimo minimalnom implementacijom odmah u startu a koristimo dodatne mogućnosti samo uz consent:**

- IP
- Remarketing & Advertising features
- User Id
- Ostalo – vezano za dodatne informacije (custom dimensions, setup)

# Google Analytics opt out

Korisniku uvijek dajemo mogućnost za opt out!

- <https://tools.google.com/dlpage/gaoptout>
- Interno rješenje koje blokira daljnje praćenje korisnika ovisno o izboru – u cijelosti ili samo dijelovi



# Minimalna implementacija

Tehničko pitanje. Bazirano na legitimnom interesu (Web Analytics) uz isključivo osnovne postavke Google Analyticsa i minimalnu mogućnost identificiranja korisnika.

# 1

## IP (IP adresa + lokacija)

1. **anonymizelp: true** – 1.1.1.1 >

1.1.1.0

<https://support.google.com/analytics/answer/2763052?hl=en>

2. **Override IP** – 1.1.1.1 > 1.1.0.0

<https://developers.google.com/analytics/devguides/collection/protocol/v1/parameters#uip>

3. **Override IP** – 1.1.1.1 > 0.0.0.0

# 2

## Remarketing & Advertising

**displayFeaturesTask: null**

Ne šalji ništa što koristi 3<sup>rd</sup> party osim ako nije dan eksplicitni consent

<https://developers.google.com/analytics/devguides/collection/analyticsjs/display-features#disabling-display-features>

<https://support.google.com/analytics/answer/2444872>

# 3

## User Id

**userId:** undefined

Ne šalji ništa što potencijalno može identificirati korisnika osim ako nije dan eksplicitni consent

<https://support.google.com/analytics/answer/3123662?hl=en>

[https://support.google.com/analytics/answer/3123666?hl=en&ref\\_topic=3123660](https://support.google.com/analytics/answer/3123666?hl=en&ref_topic=3123660)

HINT: Pseudoanonimizacija može značajno smanjiti slučaj reverzibilne identifikacije korisnika

# 4

## Custom Dimensions

**dimension1:** undefined

Ne šalji ništa što potencijalno može identificirati korisnika osim ako nije dan eksplicitni consent (dob, spol, interes, userId, lokacija ...)

<https://support.google.com/analytics/answer/3123662?hl=en>

[https://support.google.com/analytics/answer/3123666?hl=en&ref\\_topic=3123660](https://support.google.com/analytics/answer/3123666?hl=en&ref_topic=3123660)

HINT: Pseudoanonimizacija može značajno smanjiti slučaj reverzibilne identifikacije korisnika

# 5

## Slučajnosti

### Page dimenzija:

[/newsletter/?e=moj@email.com](#)

<https://support.google.com/analytics/answer/6366371?hl=en>

(PII best practices)

<https://support.google.com/analytics/answer/1010249?hl=en>

(exclude query parameters)

[https://developers.google.com/analytics/devguides/collection/analyticsjs/pages#modifying\\_page\\_urls](https://developers.google.com/analytics/devguides/collection/analyticsjs/pages#modifying_page_urls)

(Page path override)

# 6

## Data Retention

Čuvamo podatke samo na razdoblje za koje procjenjujemo da možemo imati odnos sa korisnikom.

<https://support.google.com/analytics/answer/7667196?hl=en>

Dodatna opcija – cookieExpires: < 63072000 (manje od dvije godine)

# 7

## User Deletion API

Sad će samo što nije ...

<https://developers.google.com/analytics/>

User Deletion API

Coming soon: Delete all data in a Google Analytics property associated with a user identifier.



# 8

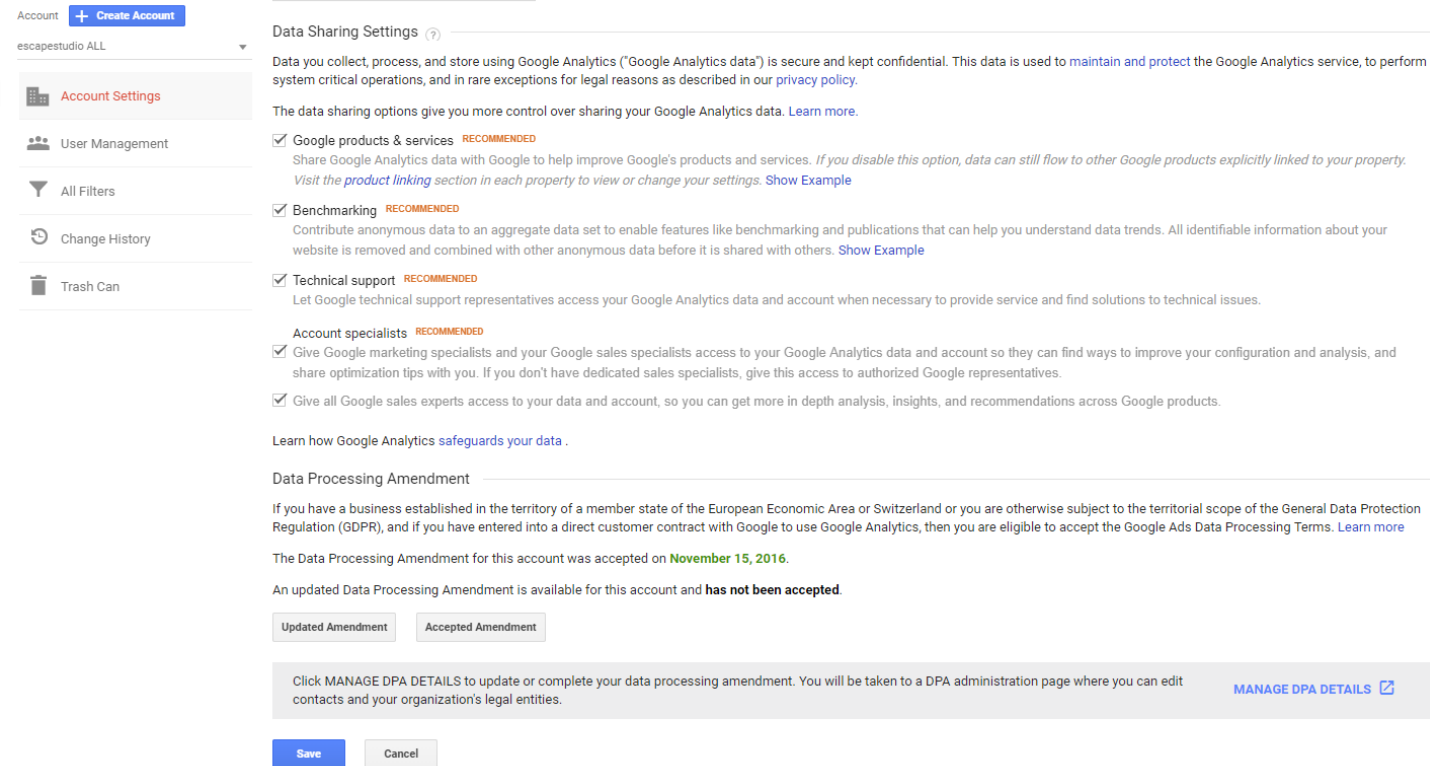
## Bilo koje polje koje se može modificirati

Većina stvari koju šaljete možete modificirati prije slanja u Google Analytics

*TransactionId, User Agent, Client Id ...*

<https://developers.google.com/analytics/devguides/collection/protocol/v1/parameters>

# Google Analytics Ostalo



The screenshot shows the Google Analytics 'Data Sharing Settings' page. On the left is a navigation sidebar with 'Account Settings' highlighted. The main content area is titled 'Data Sharing Settings' and contains several sections:

- Data Sharing Settings**: A heading with a help icon.
- Introduction**: A paragraph explaining that data is secure and confidential, used to maintain and protect the service, and in rare exceptions for legal reasons as described in the privacy policy.
- Data sharing options**: A paragraph stating that these options give more control over sharing data, with a 'Learn more' link.
- Google products & services** (RECOMMENDED): A checked checkbox with a sub-paragraph: 'Share Google Analytics data with Google to help improve Google's products and services. If you disable this option, data can still flow to other Google products explicitly linked to your property. Visit the product linking section in each property to view or change your settings. Show Example'.
- Benchmarking** (RECOMMENDED): A checked checkbox with a sub-paragraph: '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): A checked checkbox with a sub-paragraph: '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): A checked checkbox with a sub-paragraph: '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** (checked): A checked checkbox with a sub-paragraph: '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.'
- Learn how Google Analytics safeguards your data**: A link.
- Data Processing Amendment**: A heading.
- Introduction to DPA**: A paragraph explaining that businesses in the EEA or Switzerland are subject to GDPR, and those with direct contracts with Google are eligible to accept the Google Ads Data Processing Terms. A 'Learn more' link is provided.
- Accepted DPA**: A paragraph stating the DPA was accepted on November 15, 2016.
- Updated DPA**: A paragraph stating an updated DPA is available but has not been accepted.
- Buttons**: 'Updated Amendment' and 'Accepted Amendment' buttons.
- MANAGE DPA DETAILS**: A button with an external link icon.
- Footer**: A grey box with text: 'Click MANAGE DPA DETAILS to update or complete your data processing amendment. You will be taken to a DPA administration page where you can edit contacts and your organization's legal entities.'
- Final Buttons**: 'Save' and 'Cancel' buttons.

[https://support.google.com/analytics/answer/1011397?hl=en&ref\\_topic=2919631](https://support.google.com/analytics/answer/1011397?hl=en&ref_topic=2919631)

# Za sva dodatna pitanja ...

... a moguće i odgovore pronađite ove ljude u dvorani:



# Hvala GDPRu na dodatnom poslu!

I Vama na pažnji!