

Audience measurement without consent

How to set up Piwik PRO to comply with CNIL guidelines

Context

CNIL (the French data protection authority) has launched a programme that allows some analytics solutions to be exempt from consent collection as described [here](#).

This guide walks you through the configuration details and considerations needed to configure your instance accordingly.

Disclosures & prerequisites

Product version

This guide relates to the product: “Piwik PRO Analytics Suite”. The product’s changelog is [available here](#).

Data protection requirements

Make sure that your organization has signed or [accepted a Data Processing Agreement](#), and specifically that Piwik PRO is **not authorized to** process the data collected on your behalf in commercial activity other than by providing a service to you.

In case you need to sign a Data Processing Agreement with Piwik PRO, please contact: legal+dpa@piwik.pro together with your instance address, authorized signer email and your company details.

Use of consent management

Piwik PRO supplies a consent management solution together with its analytics platform.

This guide relates to a configuration where Piwik PRO Consent Manager is being used by you. If that is not the case, make sure your third party vendor is able to recreate the technical setup.

Scope of necessary processing

The exemption revolves around limiting the use of the data collected on your website to within your own domains and applications only. The following measurements can be considered as necessary for the website administrator:

- the measurement of the audience, page by page;
- the list of pages from which a link was followed to request the current page (sometimes called "referrer") whether internal or external to the site, by page and aggregated on a daily basis;
- the type of terminal, browser and screen size of visitors, by page and aggregated on a daily basis;
- statistics on page loading times, by page and aggregated on an hourly basis;
- statistics on time spent on each page, bounce rate, scrolling depth, per page and aggregated on a daily basis;
- statistics on user actions (click, selection), per page and aggregated on a daily basis;
- statistics on the geographical area of origin of requests, per page and aggregated on a daily basis.

Joining the data with other data sources

Do not join the information collected under exemption with other data sources. If you collect data from external data sources that do not fall under the scope (specifically any personal data), be sure to remove the connections under Analytics → Settings → Integrations.

Use the default tracking configuration as described in this guide. Refrain from applying custom dimensions or assigning other identifiers to visitors who did not consent to tracking.

Joining the data with external data sources as mentioned above will void your consent exemption status.

Data exports

In order to stay in line with the programme, you may not export or process raw data related to non-consented users.

Make sure to implement technical and organizational measures in your company to refrain from such data processing.

Each existing user may remove credentials to the API in this way:

User panel → API credentials → select "x" next to credentials → Delete

In case your organization requires raw data access, please set up dedicated custom dimensions (session and event level). Use them to differentiate non-consented traffic (under the exemption) from the opt-in traffic (safe for exports). When accessing the raw data via API, make sure to filter the traffic with consent.

By default,

- “Session log” under **Piwik PRO → Reports** remains hidden,
- Application provides a warning/prompt, related to the consent exemption programme, whenever there is an attempt to generate API keys for raw data access.

Contact support@piwik.pro with a request to disable the aforementioned defaults. Note that this change will break the CNIL exemption guidelines.

Product configuration

Your consent notice

Piwik PRO may be configured to collect the data within the scope of necessary processing regardless of the consent (prior to consent being given or after the visitor declines the non-necessary data processing). It is highly recommended to transparently inform your users of the scope of necessary data processing.

Navigate to the **Consent Manager → Consent templates → select a desired form → Edit template** and add suitable disclosures. For example, consider the following text:

“We will create and analyze aggregated datasets related to the use of this site.”

Your privacy policy

When disclosing partners who process the data on your behalf, make sure to list Piwik PRO. For example, consider using the following message (the **selected text** specifically relates to the exemption):

“We use Piwik PRO Analytics Suite to collect first-party data about website visitors based on online identifiers; we create user profiles based on user browsing history and calculate metrics related to website usage such as bounce rate, depth of visits, page views etc. We

host our solution in Germany¹ and the data is stored for a period of 25² months. (Purpose of processing data: Analytics, Conversion tracking based on consent, Legal basis: Art. 6 (1)(a) GDPR). **We may also use the aforementioned platform to collect aggregated metrics on the use of our website or application, within the scope of necessary processing. You may use the opt-out below to stop all data collection.**"

Use the opt-out from **Administration → Platform → Opt-out generator → amend the Opt-out message → Copy to clipboard → paste the form** on your privacy policy page.

Your product instance settings

Piwik PRO comes with default settings, so make sure to replicate the configuration below in each module:

Administration

Administration → Platform → Privacy Settings →

- **Mask IP addresses** → enable
Keep at least 1 byte masked.
- **Use masked IP address for location and network data** → enable

Administration → Websites & apps → select your site → Settings → Privacy →

- **Ask visitors for consent** → enable
- When visitors don't consent → select "**Collect data without using cookies**"

Administration → Websites & apps → select your site → Settings → Tracking → enable "**Whitelist page URLs**"

Tag Manager

Tag Manager → Tags → Piwik PRO tag → Advanced tag settings → Consent type → select "Analytics"

Advanced administrators

Refer to the Piwik PRO [developer documentation](#) in case you would like to access the above-mentioned features programmatically.

¹ Refer to your Data Processing Agreement or reach out to support@piwik.pro to verify the location of your data.

² Refer to your contract with Piwik PRO. In the case of Piwik PRO Core the default is 13 months.