

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

April 27, 2021

**OPDIV:**

CMS

**Name:**

Adsmovil

**TPWA Unique Identifier:**

T-8400031-652671

**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.

N/A

**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: N/A

**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 Adsmovil to deliver behaviorally targeted digital advertising to identify relevant audience by tracking user online activities across various websites over time. Adsmovil will leverage contextual, search, location-based, and behavioral targeting to connect with Hispanic consumers in Spanish and culturally targeted content. Adsmovil will leverage data to extend reach via over the top television (OTT) to extend reach.

Adsmovil's audience reach capabilities will ensure more people in the target audiences are exposed to messaging that will encourage them to learn more at Medicare.gov. Adsmovil does not collect PII in the course of these advertising activities and therefore, does not share PII with CMS. Adsmovil provides CMS with advertisement engagement reports, including click through rates and video completion rates, to determine the effectiveness of advertising campaigns.

Adsmovil may also provide conversion-tracking reports to allow CMS to determine the effectiveness of transaction based 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 that may utilize Adsmovil are; [www.CMS.gov](http://www.CMS.gov), [www.Medicare.gov](http://www.Medicare.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 Adsmovil, 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 OPDIV?**

Other...

**Please describe how the public navigate to the third-party website or application:**

CMS websites do not link to Adsmovil because Adsmovil is a tool used to place and track digital advertising.

**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 using Adsmovil.

**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. Adsmovil does not collect or share PII.

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

Not applicable. Adsmovil 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. Adsmovil does not collect or share PII.

**What other privacy risks exist and how will they be mitigated?**

CMS will conduct periodic reviews of Adsmovil's privacy policy to ensure its policies continue to align with the agencies objectives, privacy policy and do not present unreasonable or unmitigated risks to users. CMS uses Adsmovil solely for the purposes of improving consumer engagement with CMS websites by directing consumers to CMS websites using targeted advertising.

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 sensitive.

Additional Background: The non-personally identifiable information collected by Adsmovil may include: IP address, browser types, operating systems, domain names, access dates and times and app interaction, referring website addresses, online transactions, browsing and search activity, device IDs and network type and service provider. Adsmovil uses that information to judge which advertisements are more appealing to users and which result in greater advertisement engagement or conversions, such as interactions with CMS websites.

Mitigation: Tealium iQ Privacy Manager is a tool that keeps track of users' preferences in reference to tracking and will prevent web beacons from firing when a user has opted out of tracking for advertising purposes. Tealium iQ Privacy Manager can be accessed through information provided on the privacy policy on CMS websites. A large green "Modify Privacy Options" button turns off the sharing of data for advertising purposes that can be accessed through the CMS website's privacy policy. Another alternative is for users to disable cookies through their web browser.

All Adsmovil publishers have a privacy and cookie policy that are compliant with the California Consumer Privacy Act (CCPA) and Adsmovil does not collect user data from any publisher. Users can find Adsmovil's privacy policy on Adsmovils web page: <https://adsmovil.com/en/privacy-policy/>

To request that Adsmovil no longer use information for marketing purposes, users can email and request to be take off.

Privacy Preference Department  
Adsmovil Data Products  
Email  
[contacto@adsmovil.com](mailto:contacto@adsmovil.com)