

CNIL consent exemption for Matomo Analytics Configuration guide

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Introduction

Matomo is an open source analysis software audience that protects your data and the privacy of your customers.

Website: matomo.org (english) or fr.matomo.org (french)

Matomo is used by over 1% of websites, over 1 million sites. The source code for the software is free and open-source, and hundreds of people have reviewed it to make sure it is secure and keeps your data private.

This guide details the steps to take to set up Matomo on your websites in exempt mode under the CNIL program.



Two Hosting Modes

When using Matomo, you can either host it yourself with Matomo self-hosted or use Matomo's cloud hosting servers. Both of these hosting modes (self-hosted or cloud) give you 100% ownership of the data and protect your users' privacy by default.

a) Matomo in self-hosted / On-Premise version

When you host Matomo on your servers, no one other than you has access to your data to process them (the Matomo team has no access to your data). Matomo can be downloaded for free from matomo.org/matomo-on-premise then installed on your servers or any other web host.

b) Matomo in cloud version: Matomo Cloud (Saas)

The InnoCraft company (which publishes Matomo and provides the Matomo Cloud service) undertakes to comply with the applicable regulations, and to provide the service only on behalf of the customer and not to not to use the data for their own account, and not to share the data with third parties.

These commitments can be found in particular in the Matomo Cloud DPA in the section "Nature and purpose of the intended processing of personal data":

"The processor (InnoCraft) does not pursue its own purposes with this data processing."

As well as in the section "Processor's obligations with respect to the controller":

"The processor (InnoCraft) shall guarantee the confidentiality of personal data processed hereunder."

And also in the Matomo Cloud Terms of Service:

"You own all right, title, and interest to your users data. We obtain no rights from you to your users data."



Procedure to follow

Follow these steps below to be able to set up Matomo on your sites in exempt mode.

1) deactivate "Visits log & Visitor profile" reports

It is necessary to **deactivate "Visits log & Visitor profile" reports** by following the steps below:

- 1. Log in as **Super User** in Matomo and go to **Administration**.
- 2. In the menu on the left, click on **System** and then on **General settings**.
- 3. On the page in the section Live, click Disable Visits log & Visitor Profile.
- 4. Click on the button Save.

The following features will be disabled as well: matomo.org/docs/real-time and matomo.org/docs/real-time-visitor-world-map

2) allow visitors to Opt-out from being tracked

On your website, for example in your privacy policy page, add a way for your visitors to "Opt-out" from being tracked by your Matomo server. By default, all visitors to your website are tracked, but if they opt-Out by clicking on the link in the Opt-out, all of those visitors will be ignored. You can include a line of HTML code to display this Opt-out in your website:

matomo.org/docs/privacy-how-to/#step-3-include-a-web-analytics-opt-out-featureon-your-site-using-an-iframe

3) verify that the default Matomo settings are still in place

For an existing Matomo installation, verify the following default settings are still in place.

a) ensure that the IP addresses are anonymous

Follow these steps to verify that the option is still activated:

- 1. Log in as **Super User** in Matomo and go to **Administration**.
- 2. In the menu on the left, click on **Privacy** and then on **Anonymize data**.
- 3. Make sure that the option **Anonymize Visitors' IP addresses** is enabled.

By default, Matomo limits the collection of location information at the city level, and removes the last two bytes from IPv4 addresses. (So for example for IPv4 addresses, an IPv4 would become 124.45.0.0 and an IPv6 would become 2001:db8:0:0:0:0:00). Although this is the default configuration, this option can be disabled by an administrator.

b) ensure that third-party cookies and cross-domain are not used

By default, Matomo only uses cookies called "first party". Each visitor is tracked only to the domain of the website in question. Although this is the default configuration, there are some advanced features that can be used when user consent is obtained.



In "exempted from obtaining consent" mode, it is important to check that:

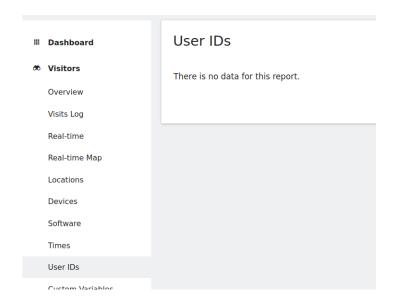
- The functionality of "Cross domain tracking" is not used on domains.
- The functionality of "third-party cookies" is not activated.

c) ensure that the "User ID" measurement is not used

In "exempted from collecting consent" mode, it is important that the User ID tracking is not used on the site. (To be able to measure a user ID, for example the login, username, email... then the user's consent must be obtained.)

By default, Matomo does not measure the User ID.

To verify that the User ID is not used on the site, in Matomo you just have to click on "Visitors" in the menu, then click on "User IDs". The report should say "There is no data for this report." which indicates that user IDs are not measured:



d) ensure that the ECommerce tracking is not used

In "exempted from obtaining consent" mode, it is important that the measurement of Ecommerce is not used on the site. (To be able to use the ECommerce measurement for a visitor, it would be necessary to ask for the user's consent.)

By default, Matomo does not measure ECommerce interactions, and therefore the "ECommerce" menu is not available. To check that ECommerce is disabled, you just have to check in Matomo in the main menu if there is an "ECommerce" category. If it exists, you can easily deactivate ECommerce functionality by following these steps:

- 1. Log in as **Super User** in Matomo and go to **Administration**.
- 2. In the menu on the left, click on Measurables (or Websites) and then on Manage.
- 3. Click on the icon **Edit** for your website.
- 4. Under the option **ECommerce** select **Not an Ecommerce site**.



Ecommerce	
Not an Ecommerce site	•

When enabled, the "Goals" report will have a new "Ecommerce" section. Matomo allows for advanced Ecommerce Analytics tracking & reporting. Learn more about Ecommerce Analytics. Default: Not an Ecommerce site

e) ensure that Heatmaps and Session Recordings are disabled

By default, Matomo does not measure heatmaps and does not record sessions. To ensure that Heatmaps and Session recordings are completely disabled, add the following line of code to Matomo's JavaScript tracking code:

```
paq.push(['HeatmapSessionRecording::disable']);
```

4) check that you are not collecting personal data

By default, Matomo does not automatically collect personal data.

It is advisable to check that you are not collecting personal data:

- If you are using **custom dimensions** in Matomo, it should be ensured that they do not collect personal data. By default, Matomo does not collect any custom dimension data. To verify that you are not collecting personal data in custom dimensions, follow these steps:
 - Log in as a Super User in Matomo and go to Administration.
 - o In the menu on the left, click **Measurables**, then **Custom Dimensions**.
 - For each dimension that could be listed, open the report and verify that it does not display any personal data.
- Page URLs and page titles and custom events may contain personal data, depending on how your website(s) are designed (for example, where the page URL includes an email, email, zip code, or a name). When this is the case, this personal data should be deleted from URLs and titles of pages and events:
 - developer.matomo.org/quides/tracking-javascript-quide#custom-page-title

Generally speaking, when you collect personal data, you should seek consent from your users. Learn more about Implementing tracking or cookie consent with the Matomo JavaScript Tracking Client.

For any questions, do not hesitate to contact the Matomo team via https://matomo.org/contact/

