



May 4, 2021

The Honorable Ron Wyden  
United States Senate  
221 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Bill Cassidy  
United States Senate  
520 Hart Senate Office Building  
Washington, DC 20510

The Honorable Kirsten Gillibrand  
United States Senate  
478 Russell Senate Office Building  
Washington, DC 20510

The Honorable Mark Warner  
United States Senate  
703 Hart Senate Office Building  
Washington, DC 20510

The Honorable Sherrod Brown  
United States Senate  
503 Hart Senate Office Building  
Washington, DC 20510

The Honorable Elizabeth Warren  
United States Senate  
309 Hart Senate Office Building  
Washington, DC 20510

Dear Senators,

Thank you for your letter regarding the privacy of bidstream data. Privacy and transparency are core to how our ads services work. We never sell people's personal information and all ad buyers using our systems are subject to stringent policies and standards, including restrictions on the use and retention of information they receive.

We understand that you are seeking information about how Google shares data relating to Americans with third parties and, in particular, whether that data may be obtained by foreign governments from Google and exploited to the detriment of our national security.

To that end, we answer your specific questions relating to our disclosure of bidstream data to third parties below, but please let us know if you would like a briefing to follow up on any of these answers:

1. Please identify the specific data elements about users, their devices, the websites they are accessing, and apps they are using that you provide to auction participants.

The information we share with Real-Time Bidding (RTB) buyers is communicated using two standard industry protocols: the OpenRTB protocol and the Authorized Buyers RTB protocol.

The fields supported by each protocol are publicly available, and described in detail on our [developer pages](#).

No Personally Identifiable Information (PII) is shared in bid requests. The only data that specifically pertains to a device (and by inference a user) are for web impressions, resettable cookie IDs and, for app impression, a pseudonymous mobile ad ID.

No Google account data is ever shared with RTB buyers. With respect to the types of data mentioned in your letter, any app name or URL shared is the app or URL the user is visiting at that time - this helps buyers select ads that are relevant to or appropriate for the content of the page the user is viewing. To preserve user privacy, Google truncates the IP address before sharing it with RTB buyers; and no demographic information, such as age or gender, is shared.

Similarly, contrary to some reports in the media, no national insurance details, credit card details or the like are shared by Google in bidstream data.

2. Please identify each company, foreign or domestic, to whom your firm has provided bidstream data in the past three years that is not contractually prohibited from sharing, selling, or using the data for any purpose unrelated to bidding on and delivering an ad.

All buyers are subject to proportionate restrictions on their use of bid request data. Generally, in accordance with [our authorized buyer policies](#), Authorized Buyers are required to use bid request data solely to bid into the exchange or frequency capping.

3. If your firm has contractual restrictions in place prohibiting the sharing, sale, or secondary use of bidstream data, please detail all efforts to audit compliance with these contractual restrictions and the results of those audits.


The authorized buyer policies require bidders to use data received from the service solely for the purpose of buying through the service or frequency capping. Google operates an annual audit program to assess bidders' compliance with this and other policies. Bidders found to be out of compliance with Google's policies will be required to remediate findings or face enforcement action and potential suspension or termination from the service. In 2020, we audited 40 Authorized Buyers, which based on the number of Authorized Buyers that were active in Q1 2021, equates to approximately 18% of active Authorized Buyers. (For the avoidance of doubt, as noted in the [Help Center](#), Authorized Buyers are third party ad networks and demand side platforms that bid into Google's Ad Exchange.) Audits focus on bidders' compliance with data related policies, including the policy referred to above. None of the Authorized Buyers audited were found to be non-compliant with the policy referenced above.

4. Please identify each foreign-headquartered or foreign-majority owned company to whom your firm has provided bidstream data from users in the United States and their devices in the past three years.

The identity of bidders is subject to non-disclosure obligations.

Again, we appreciate your attention to this area and we share your interest in the privacy of this data. Please reach out if you would like to further discuss any specific points.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Isakowitz". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping underline.

Mark Isakowitz  
Vice President  
Government Affairs & Public Policy, US & Canada  
Google