

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

January 23, 2026

OPDIV:

CMS

Name:

Talroo

TPWA Unique Identifier:

T-8774525-597345

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 Talroo to deliver targeted display advertising aimed at raising awareness of campaign messaging. While the owned and operated properties under the Talroo umbrella may optionally collect email addresses and phone numbers for the purpose of first-party job alert subscriptions, this data collection is independent of the advertising activities conducted on behalf of CMS.

As such, no personally identifiable information (PII) is shared with CMS in connection with these advertising efforts.

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 Talroo, consumers can learn about CMS campaigns through other advertising channels such as digital radio and video, CMS websites, and social media.

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...Not Applicable.

Please describe how the public navigate to the thirdparty website or application:

Not Applicable. The CMS websites do not link to Talroo. Ads will be placed on third-party sites that are owned and operated by Talroo.

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.

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. Talroo does not share PII.

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

Not Applicable. Talroo does not 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

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

CMS will conduct periodic reviews of Talroo's privacy policy to ensure its policies continue to align with agency objectives and privacy policies and do not present unreasonable or unmitigated risks to user's privacy interests. CMS uses Talroo solely for the purposes of improving consumer engagement with CMS websites by directing consumers to CMS websites through the use of targeted advertising. Because Talroo will not be storing or processing any PII that CMS may themselves process there is no user data privacy risk associated with Talroo's data collection.

Use of Cookies and Web Beacons for Targeted Advertising Based on Sensitive Information

Potential Risk: Talroo uses cookies for ad targeting but never based on sensitive information.

Additional Background: Talroo's pixel is only ever used for the collection and storage of cookie IDs and IP addresses*. IP addresses are not a field Talroo requires for our advertising solutions so the pixel can be configured to not store this sensitive information prior to sharing the pixel for deployment with CMS.

Mitigation: Risk is mitigated by not collecting sensitive information.