

May 7, 2018

Chairman Joseph Simons
The Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

Re: In the Matter of Google, Inc. Purchase Tracking

Dear Chairman Simons and FTC Commissioners:

We write to you regarding the enclosed Complaint against Google, originally filed with the Federal Trade Commission by the Electronic Privacy Information Center (“EPIC”) on July 31, 2017. Today, EPIC renews our request that the Commission act on this urgent matter and enjoin Google from continuing to violate the privacy of millions of American consumers.

The EPIC Complaint concerns Google’s “Store Sales Measurement” practice. Google correlates in-store credit card transactions with online advertising clicks to track when a consumer clicks on an advertisement and subsequently makes an in-store purchase. To accomplish this, Google collects billions of credit card transactions containing personal information from third-party data brokers and matches those offline transactions with the online activity of consumers. This tracking of consumer purchases is without precedent and also raises questions as to what else Google does with the consumer data it obtains.

Although Google purports to protect the privacy of the millions of consumers it tracks, it refuses to provide information on the technique that it uses; it is impossible for consumers to verify that their private activities are protected. Google also fails to provide consumers with an easily-accessible means of opting out.

Google has continued to deploy the “Store Sales Measurement” practice since EPIC first brought this Complaint before the Commission almost a year ago. Google’s conduct is unfair and deceptive in violation of Section 5 of the FTC Act. EPIC respectfully urges the Commission to investigate Google, enjoin these practices, and protect the privacy of American consumers.

Thank you for your consideration of this request. We look forward to working with you on this and other important issues.

Sincerely,

Marc Rotenberg

Marc Rotenberg
EPIC President

Sam Lester

Sam Lester
EPIC Consumer Privacy Counsel