Self-Assessment Table

This Self-Assessment Table is based on the self-assessment tool concerning the implementation of an audience measurement solution exempt from consent, published by CNIL in July 2025.

Objective	Criterion	Technical Measure	Criterion met	Action to undertake/Impact
1. The sole purpose for which the tool is used is the measurement of the audience of the website or application.	1.1 The provider makes available instructions for disabling any functionality that falls outside the defined scope.	N/A	**Yes.** The Matomo CNIL compliance mode automatically disables all functionalities incompatible with the consent exemption. Activation of such functionalities is technically prevented while the mode is enabled. Clear documentation and in-product information are provided to explain the **scope and limitations** of this mode.	1. Enable CNIL compliance mode for the relevant site and go to **Privacy** > **Compliance**. 2. Click **Enforce All Settings**, or toggle on each required setting and click **Save**. 3. Refer to your CNIL assessment results and implement additional in-product configuration requirements for aspects outside Matomo's control (e.g., listed in the Matomo UI under "**Managed outside this page**").
	1.2 The data collected is minimised in relation to the intended purpose of audience measurement.	(A) If data from HTTP header fields ("headers") is collected (such as browser version, operating system, device type, screen size), this data must be minimised. Example: Only collect the major version of the	**Yes.** The full User-Agent string is never stored or exported.	1. Do not transmit custom dimensions or other parameters that carry detailed device strings or full User-Agent. 2. **Device Model Detection Disabled**: The **Visitors > Devices > Device Model** report is unavailable, and device model information is not collected. 3. **Major Browser and OS Versions**: Browser and operating system version reports under **Visitors > Software** only show major versions.

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		operating system or browser.		Detailed version analysis and segmentation are unavailable. 4. Only derived, minimised fields are stored. 5. **Screen Resolution Disabled**: Screen resolution information is not collected, and screen resolution reports under **Visitors > Devices** are unavailable.
		(B) The solution collects no more than three types of events: • The simple presence of a person on a page, along with information related to that page (e.g. name, type, etc.) • The use of a feature by that person (e.g. button click, link click), along with related information (e.g. destination, label, etc.) • Statistics on page load time, scrolling behaviour, or time spent on a page.	**Yes.** Data collection is limited to permitted events. Ecommerce analytics may be enabled only without collecting order identifiers or exposing e-commerce segments allowing identification or singling-out.	1. **Ecommerce Data Collection** is restricted, and specific segments are disabled for Order ID, Order Revenue, Product Price, Product Name, Product SKU. Overall ecommerce conversion and revenue metrics remain available. 2. **Ecommerce - Order ID Anonymisation Enabled** - The Order ID is automatically anonymised. Original Order IDs cannot be viewed. Ecommerce Order ID reports and related segments are unavailable. 3. It is optional but recommended to completely disable Ecommerce tracking in your website's settings. 4. Ensure **no personal identifiers** are sent to Matomo (e.g. in Custom Dimensions). 5. When creating Custom Events, ensure that they fall into the three categories of events permitted by CNIL (listed in the **Technical Measure** column).
2. The provider offers the service under the	2.1 The provider makes available a standard Data	N/A	**Yes.** For Matomo Cloud, a standard Article 28 GDPR-compliant Data Processing	None.

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processor regime.	Processing Agreement (DPA) that includes the mandatory clauses listed in Article 28 of the GDPR and qualifies the provider as a data processor.		Agreement is made available to customers and incorporated into contractual documentation. DPA is incorporated by reference into our TOS. In On-Premise deployments, the publisher remains solely responsible for hosting and processing.	
	2.2 No pooling of raw audience measurement data from multiple clients is implemented by the provider.	N/A	**Yes.** Matomo does not pool or mix data from multiple clients. Each Customer's data is fully isolated and stored in a separate database (in Matomo Cloud) or within the infrastructure they themselves control (if self-hosted).	**Raw Data Retention Configured** - raw visit data older than 744 days is automatically deleted. Historical aggregated reports may remain available according to the configured report-retention settings. Longer retention periods, over 25 months exceed CNIL recommendations for exempt analytics data. You can configure a shorter retention period if preferred.
	2.3 No reuse of data for the provider's own purposes, regardless of the intended use (e.g. service improvement, fraud prevention, etc.), is implemented.	N/A	**Yes.** Data is processed solely on behalf of the publisher. Matomo complies with the requirement that data is not reused by the provider for its own purposes. In self-hosted mode, this is guaranteed technically; in Cloud mode it is enforced contractually and operationally.	None.

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	2.4 The provider, acting as a data processor, makes available a point of contact to receive and handle questions and complaints from prospects to clarify any doubts regarding compliance.	N/A	**Yes.** For Matomo Cloud customers: Contact details are provided in DPA. For On-Premise users, a dedicated privacy contact address and contact form are available: privacy@matomo.org or contact form: matomo.org/contact.	None.
3. The tool does not allow tracking of the individual outside the targeted website or application.	3.1 No import of external data is possible.	• Deactivation of any collection or import of customer identifiers (or "CRM"), UTM parameters, or campaign identifiers in URLs. • The referrer, if collected, is limited to the domain ("host"). • Any integration with third-party tools is excluded.	**Yes.** External data import is not possible. CRM identifiers and user identifiers are rejected. Only the referrer host is retained.	1. **PII Data Filtering Enabled** - the Matomo-recommended URL parameter exclusion list is automatically applied to filter out personal information identifiers. 2. **Campaign Parameter Masking Enabled**- all campaign parameters (e.g., utm and mtm) and advertising identifiers are discarded at ingestion and not stored. Campaign attribution and aggregate acquisition metrics remain available, but original campaign names and keywords cannot be viewed or used to distinguish individual campaigns. 3. **Advertising Conversion Export Disabled** - tracking and export features of the Advertising Conversion Export plugin are disabled to prevent exporting conversion data to advertising platforms. 4. **Referrer Anonymisation Enabled** - Only the referrer host or referrer type is collected. Full referrer URLs, including paths and query parameters, are not stored. Attribution reports

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				remain available, but detailed referrer paths and query parameters cannot be viewed, reported, or segmented. . 5. Do not pass CRM IDs or enable third-party marketing connectors. 6. Ensure tagging does not inject prohibited parameters. Verify your tag recipes do not add such fields.
	3.2 No identifier that enables tracking across multiple domains is used.	• If the identifier used is a cookie, it is set internally ("first-party") to prevent global navigation tracking.	**Yes. Matomo uses first-party cookies by default.** This means that the cookies Matomo sets are tied to publisher's own website's domain (e.g. `example.com`), not to a third-party domain.	1. **Third-party cookies** and cross-domain tracking features are disabled. 2. Do not enable the Matomo cross-domain tracking.
		• If the IP address is used, it is only for city-level geolocation and is then pseudonymised by removing at least the last octet.	**Yes.** IP addresses are truncated by removing the last two octets (IPv4) or the last two bytes (IPv6).	1. **IP Anonymisation Enabled** - anonymisation of visitors' IP addresses is automatically enabled to prevent the collection of full IP addresses. 2. **IP Address Mask Length** - IP anonymisation is configured to mask **3 bytes** of each visitor's IP address. At least 2 bytes must be masked to provide the required level of anonymisation.
		• Any method aimed at generating an identifier using device characteristics	**Yes.** Matomo uses config_ID – a site-specific hash of device/ browser characteristics rotated every 24h to prevent cross-site	1. **Visits log and Visitor Profiles Disabled** - the Visits Log and Visitor Profiles are automatically disabled and cannot be viewed. 2. Aggregated real-time reports stay available while the Visits Log is turned off. Only the "Last 24 hours"

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		(digital fingerprinting) includes a site-specific component in the hash calculation (e.g. the current domain) to prevent tracking across multiple domains (“cross-site”), as well as a time-based component (to ensure the fingerprint has a limited lifespan).	tracking. Read more about the config_id.	and "Last 30 minutes" totals are shown, and counts are rounded. No individual visitor, visit, session or action level information is exposed.
		• Any tagging that allows the collection of personal information (e.g. via forms) is excluded.	**Yes.** Personal identifiers are stripped or rejected before storage.	1. **PII Data Filtering Enabled** - the Matomo-recommended exclusion list is automatically applied to filter out personal information identifiers. 2. **User ID Tracking Disabled** - User ID collection is disabled. Tracking implementations must not send User IDs using setUserId or equivalent methods. 3. You can apply additional filters by including the relevant parameters to the **Excluded Parameters** field in your website settings. 4. Do not send names, emails, post codes or other personal data and user identifiers in events, URLs, Page Titles, or Custom Dimensions.

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	3.3 Any functionality aimed at cross-referencing, deduplicating, or measuring a unified reach of content ("reach") is excluded.	• Deactivation of tools related to measuring reach.	**Yes.** In CNIL compliance no features aimed at cross-referencing, deduplicating or measuring reach are enabled.	None if other CNIL requirements are configured.
4.The data is used solely to produce anonymous statistical data.	4.1 Whether for visualisation within the tool's interface or during export, all reports generated by the solution contain only anonymous statistics.	Aggregation and rounding to the nearest ten. If this is not possible, an analysis is conducted to justify the anonymity of the data (see the G29 opinion on the subject).Le G29 publie un avis sur les techniques d'anonymisation | CNIL	**Yes.** All visit-level views and APIs (Visits Log, Visitor Profile, real-time, raw exports) are disabled. All visualisations within the tool's interface or during export and all reports generated by the solution contain only anonymous statistics. Only aggregated statistics remain accessible. Warehouse or data-sync that could bypass aggregation is disabled. Viewing or exporting Visit-level RAW data is not possible. Rounding to the nearest ten is described below.	None if other CNIL requirements are configured.
	4.2 Anonymisation is effective regardless of the selection criteria chosen by the client of the solution (a		**Yes.** Segments enabling singling-out (identifiers, precise timestamps, fingerprint components, Ecommerce identifiers) are disabled.	1. **Segmented Data Rounding Enabled** - Count-based metrics in segmented reports, exports, and API responses are rounded to the nearest 10. Any non-zero value below 10 is displayed as 10. Unsegmented reports continue to show exact totals.

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	combination of criteria must not allow a user to be singled out).		When segmentation is used, count-based metrics are rounded to the nearest multiple of 10 in reports, exports, and API responses.	2. **Segment Availability Restricted**- segments based on Visitor IP Address (visitIP), Site Time - Hour (**visitServerHour**) representing the time of the last action. Ad Click IDs are disabled (used in Advertising Conversion Export which is also disabled in CNIL mode).
	4.3 No tracking of the navigation of an individual user is possible.	Deactivation of any session replay-type functionality.	**Yes.** Heatmaps and session recordings are disabled and cannot be collected, viewed or exported. Individual navigation paths cannot be reconstructed.	1. **Heatmaps - Heatmap Recording Disabled** - Heatmaps are automatically disabled. New heatmap interaction data is not collected, and heatmap reports are unavailable. 2. **Heatmaps - Session Recording Disabled** - Session recordings are automatically disabled. New session recordings are not collected. Session replay recordings and playback features are unavailable. 3. **A/B Testing Disabled** - A/B testing features are disabled and all existing and historical experiment data is permanently deleted.
5.The right to object is respected.	5.1 An objection mechanism is implemented insofar as the processing of personal data within the meaning of the GDPR exists.	Objection available in the form of a button or clickable link within the privacy policy of the visited website or application.	**Yes.** Matomo provides an opt-out iframe or link that may be embedded by the publisher in the privacy policy, allowing users to object to audience measurement.	1. A Matomo opt-out interface must be manually configured and made available to visitors. Read more on how to configure opt-out of tracking. 2. Keep the opt-out active and clearly visible on the website (e.g. in the publisher's privacy policy which should be clearly linked and visible and inform visitor of use of Matomo trackers). 3. Matomo does not determine compliance status for settings with a **Manual** status.
	5.2 Sufficient measures are	Place an opt-out cookie or measure and add a	**Yes.** The opt-out mechanism relies on a dedicated opt-out	1. The opt-out is active and clearly accessible.

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	implemented to ensure that the refusal is respected over time.	digital fingerprint to a blocklist	cookie ensuring that the user's objection is persistently respected over time.	2. The manually configured opt-out mechanism stops tracking when visitors request to opt out.