

**DRAFT**



**ABC PRIVACY IMPACT  
ASSESSMENT  
PLATFORM MODERNISATION PROJECT**

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## ABC PRIVACY IMPACT ASSESSMENT: PLATFORM MODERNISATION PROJECT

### PART 1: BACKGROUND

This part of the PIA explains the background to the elements of the platform modernisation project considered in the PIA. Key aspects of this part relate to general matters of public policy which form a backdrop to the consideration of privacy compliance issues in Part 2.

#### 1. The Platform Modernisation Project: in context

Globally, Australia is ranked seventh in terms of video streaming penetration<sup>1</sup> with Australian audiences accessing an average of 3.7 video on demand (VOD) services per week.<sup>2</sup> According to ABC's VOD Survey, 85% of all Australians aged 18-75 claim to have used a VOD service.<sup>3</sup> Digital entertainment services and their audiences continue to grow.

While broadcast TV remains a highly popular medium, and will remain significant over the next five years, audiences are increasingly embracing new ways of watching, including VOD services accessed on smart TVs, tablets, and mobile devices. The high penetration of streaming and access to an increasing array of quality alternatives creates an audience expectation of basic features, functionality, and overall experience.

As the national broadcaster, it's important that the ABC continues to serve the public interest, by telling Australian stories reflecting Australian diversity, and by providing valued services that are responsive to the needs of Australian audiences. This is the bedrock of the ABC's Five year plan announced in June 2020.

Consequently, the ABC is planning the modernisation of its VOD service, **ABC iview**, which aims to improve the experience, making it easier for viewers to discover and access the ABC streaming content they love.

#### 2. What ABC services does this proposal affect?

This PIA concerns modernisation of ABC iview.

ABC iview represents 1.74 million (approximately 10.2%) of the ABC's 16.6 million digital weekly active audience members.

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<sup>1</sup> Statista, The Video Streaming Industry in Australia, Jun 2021

<sup>2</sup> ABC VOD Study, Aug 2021

<sup>3</sup> ABC VOD Study, Aug 2021



Figure 1: a sample of the services which the ABC uses to provide quality content to Australian and other audiences

In order to make ABC iView easy to access and use, with increased capacity to find content and receive recommendations, and the benefit of being remembered across devices, the ABC needs viewers to log in. To minimise the privacy impact of doing this, the ABC is using email addresses as log in IDs, and is not requiring viewers to provide information which identifies them, such as their names. Viewers email addresses may be pseudonyms.

The ABC will ensure that it keeps viewers' information securely. The ABC has taken steps to maximise viewer choice about use of data, and is continuing to do so, as described in this document. This is all part of the ABC's agenda of implementing industry leading best practice. The ABC will also apply responsible algorithm guidelines for the purpose of making viewer recommendations, in an ethical way with human oversight to avoid information bubbles, which it expects will set the standard for public broadcasters in Australia and perhaps internationally.

Viewers will remain able to access live ABC broadcast streams (**Livestreams**), including ABC NEWS, ABC Kids and ABC ME on ABC iView on the web without logging in.

All other television, radio and online services provided by the ABC, and the broader suite of ABC apps, are available without logging in.

The other three changes considered by this PIA are also designed to make it easier for viewers to find content they love, and to control their viewing experience. The ABC has enabled ABC Account holders to set up separate profiles within their ABC iView account (**ABC iView Profiles**), is collecting some more information from ABC Account holders, and unless viewers opt out, the ABC will arrange for them to receive promotions for ABC content likely to be of interest to them on Facebook and Google based on their viewing behaviour on ABC iView and other information the ABC collects.

### 3. Why Platform Modernisation of ABC iView is necessary and appropriate

The ABC considers it essential to implement the changes considered by this PIA. It has carefully considered the public policy and privacy implications of each of them, and has

determined that it is important to proceed with them expeditiously. This part of the PIA explains why this is the case.

Privacy compliance issues considered in Part 2 of this PIA are informed by the public policy issues set out in Part 1, in that they help inform the ABC's evaluation of whether any privacy impacts associated with the platform modernisation project are proportionate to the legitimate aims or objectives that the ABC is seeking to achieve.

**(a) *Log in: a critical element of platform modernisation***

**(i) *Delivering a quality service***

Viewers need to log in so that the ABC can provide them with key ABC iView features that are essential to a modern and compelling VOD service, including:

- Continue Watching - this feature allows ABC iView users to watch a program quickly and easily from where they last left off across different logged in devices. (This is convenient if you start a program on an iPad at home, and then continue watching on a smartphone for a commute).
- Watchlist - a list ABC iView users can create of their favourite ABC iView programs so that they are readily accessible whenever they are logged in to ABC iView. This gives the user quick and easy access to all of the episodes in that program.
- Viewing History – a user's Viewing History displays the programs they have watched on ABC iView while logged in. It helps users keep track of the programs they have watched and also signals which episode in a series users are up to.
- ABC iView Profiles – allows a personalised viewing experience under a primary ABC Account. Each profile can have their own Watchlist and Continue watching function. A useful feature for families or large households.
- Personalised recommendations – helps users find ABC content related to their interests.

**(ii) *Audience research and consultation***

Research is integral to how the ABC builds its product experiences. This modernisation initiative has been no exception, with comprehensive research informing the ABC's decision making.

Since March 2020 the ABC has received 28,820 product intercept surveys and beta survey responses. This consultation indicated that most people who have watched ABC iView

want features that require log in. Five out of the top six most popular features with users require log in.

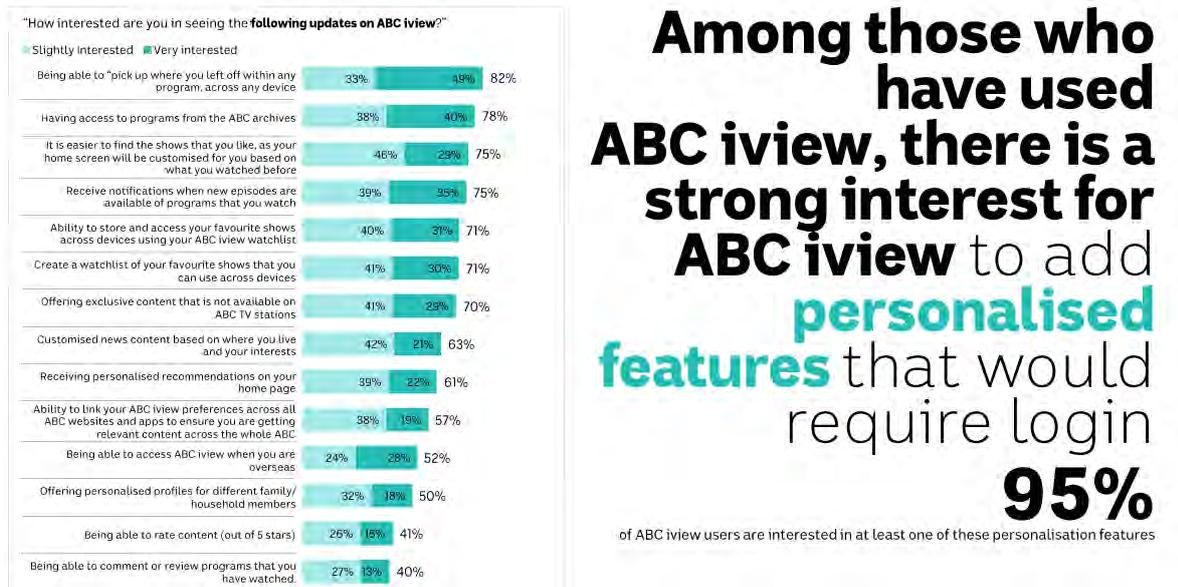


Figure 2: ABC Research indicating ABC iview users are keen for features that would require log in

This is further supported by evidence of strong take up of optional log in for ABC iview following a campaign highlighting the benefits of log in.

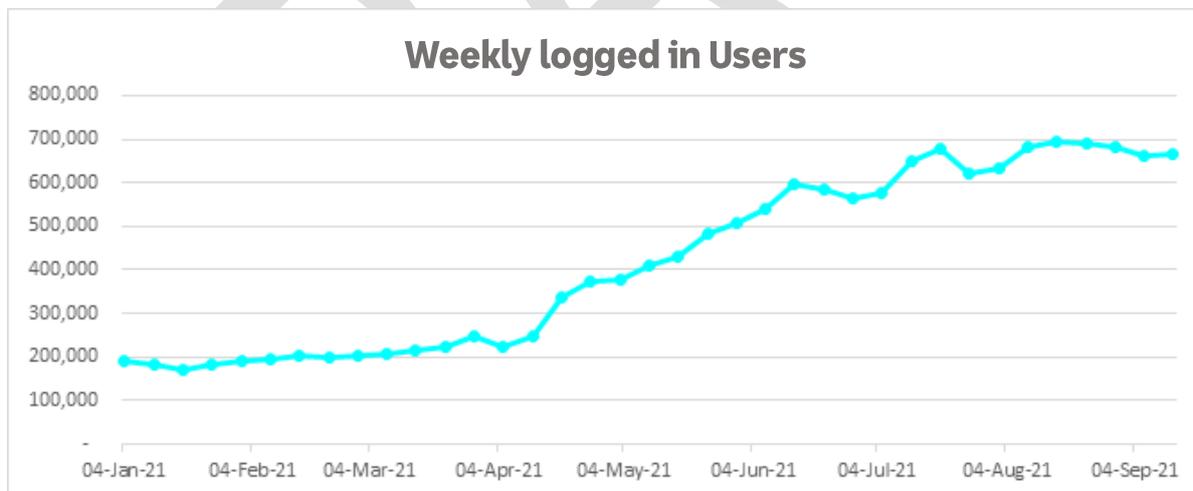


Figure 3: The number of weekly logged in ABC users since the start of 2021

The ABC has taken steps to ensure it addresses any concerns that members of the community may have about logging in, through the methods addressed later in this PIA, including ensuring the ABC provides accessibility support for the elderly and the young, enhancing audience privacy controls, providing more extensive audience facing privacy information, and ensuring that all live broadcast streams are available on ABC iview on the web without an account, including web that is accessible via a device such as a phone or a tablet.

### (iii) A rapidly changing market

Since 2018, the VOD market in Australia has become increasingly dominated by major global players. In particular, a 2020 ABC VOD study showed that in 2020 59% of interviewees had used Netflix in the past week, whereas 53% had done so in 2018. 86% of Australians were aware of it. YouTube had 74% awareness and 51% of people had used it in the last week in 2020. In contrast, Australian VOD platforms including ABC iview sit at 15% usage in the past week.

## VOD usage shows a repertoire market, dominated by Netflix and YouTube

**Netflix has further grown** past week usage to almost 60%. 1 in 2 claimed to have used YouTube in the past week. With the exception of SBS (down -4%), BVOD services fairly stable, with either a +/- point difference.

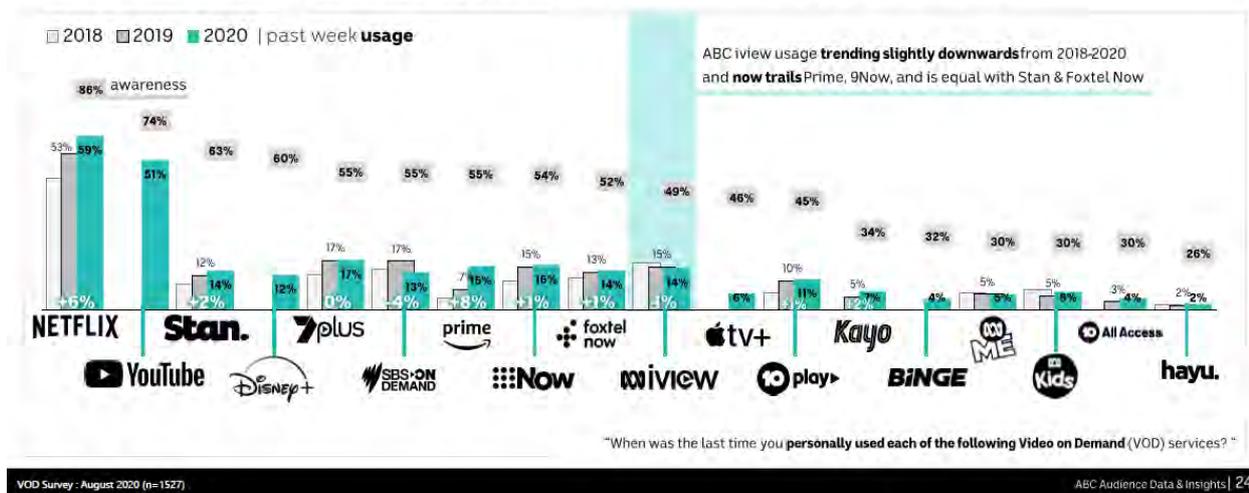


Figure 4: Netflix and YouTube are dominant in the VOD market

### (iv) Log in is necessary to meet charter obligations

Without the functionality enabled by log in, Australians will continue to turn to modern VOD services such as those offered by international VOD platforms.

This would, in the ABC’s view, have an adverse impact not only on the ABC’s ability to meet its charter objectives particularly its ability to provide digital media services, but also on other public policy outcomes, including that young people in particular will watch content in environments potentially providing less privacy protection, and which are not designed to meet relevant public policy objectives.

A key reason for this is that people who do not log in experience a version of ABC iview which does not make it easy for them to find content other than the most popular content which is featured prominently on ABC iview.

The ABC offers 4500 hours of content at any given time on ABC iview, and with such volume it is challenging for viewers to find ways to surface (or find) content that may be of interest to them. Viewers are then less likely to enjoy their experience on ABC iview

than those who log in, or those who access other players in the Australian VOD market where log in is a requirement.

A further reason is that viewers are likely to find ABC iview frustrating to use relative to other VOD platforms if they cannot Continue Watching content across devices, create Watchlists or review their Viewing History.

This trend of audience migration away from ABC iview is also detrimental for the producers of emerging or niche content who are unlikely to find audiences. Again, this would have a negative impact on audiences, as talented producers, on screen talent and writers would choose to work with VOD subscription alternatives, which are unaffordable to many low income Australian households.

**(v) Algorithms will be optional and responsible**

Log in will enable the ABC iview platform to make recommendations to viewers of content they are likely to enjoy based on their viewing history across devices.

Tailored recommendations will only make up a small part of the ABC iview landing page, and viewers will also be able to see general recommendations made to the public at large, and content which is popular amongst Australians generally.

This combination of general and specific recommendations is designed to enable viewers to find the content most relevant to them. It also means that the producers, actors and others who create the more than 4500 hours of content on the ABC iview platform have an opportunity to share their work with the people who like what they have produced. Without recommendations rails, the same content would be promoted to all viewers and less popular content would be less likely to be seen.

The ABC is developing a best-of-kind responsible algorithm guidelines to ensure that recommendations do not create any “information bubbles” and are appropriate and transparent. For example, children who do not access educational content will continue to be offered it. Senior policy and editorial staff have responsibility for developing and implementing the policy.

Prior to the launch of the log in requirement, the ABC will give the option to viewers to turn off the recommendations functionality, so that they only receive general and not user-specific recommendations.

**(vi) Log in is necessary to meet the needs of younger audiences**

The ABC is particularly concerned that it may lose younger viewers, who appear to favour the enhanced platform offerings of international VOD services, and have a more ‘elastic’ content appetite than other demographics. As stated by PWC in its Australian Entertainment & Media Outlook 2021-2025, ‘with elasticity comes a degree of transience and a lack of “loyalty” to one platform over another.’

This move is also supported by Deloitte’s Media Consumer Survey in 2020, the results of which are summarised in Figure 5 below. These viewers may be lost to the ABC altogether, as they prefer the enhanced VOD service and are unlikely to access ABC free

to air services in the alternative. They may not receive content reflecting the Australian community and its standards and values on those platforms which are owned by foreign companies.

Some international VOD services also present challenges such as the potential for misinformation and information bubbles which can cause adverse social outcomes. As stated by the ACCC in its Digital Platforms Inquiry Report, it is well recognised that ‘the availability of a wide range of high quality news and journalism provides significant benefits to Australian society and is important for the healthy functioning of democracy’. See also *Lange v Australian Broadcasting Corporation* (1997) 189 CLR 520.

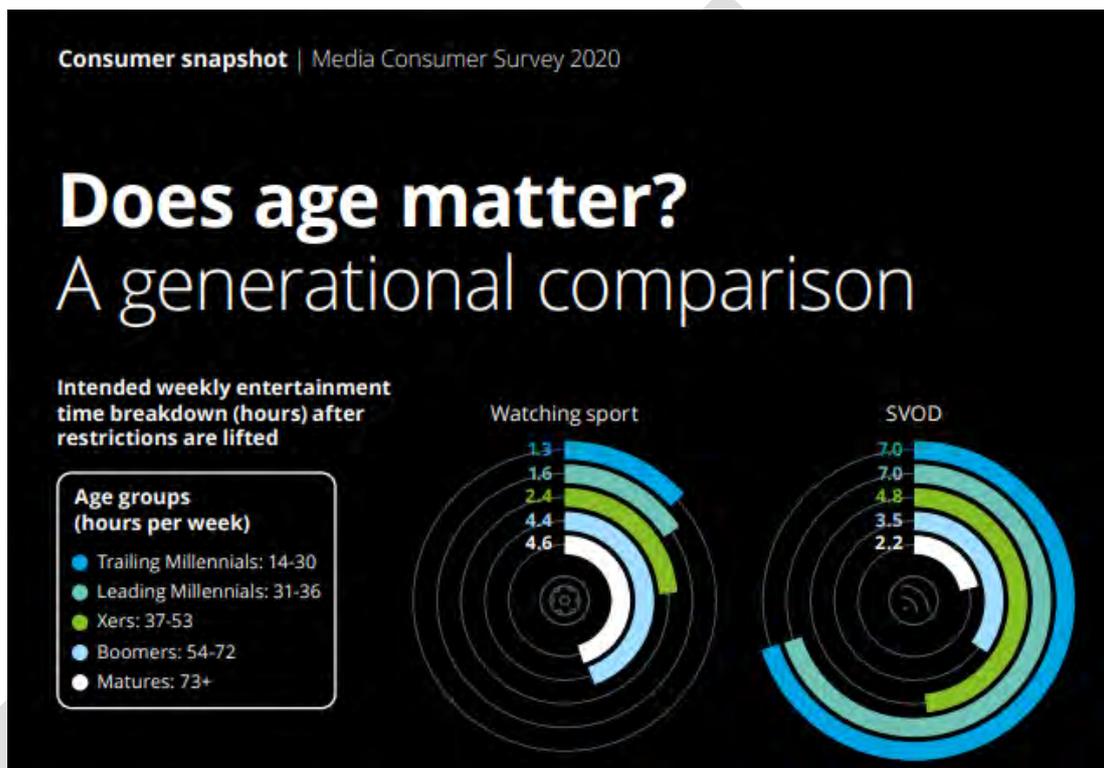


Figure 5: Age breakdown of viewing behaviour

Whilst it is not possible to be certain about the reason for younger viewers moving to international VOD services, there is reason to think that for those who do not log in, the fact that they will not receive any recommendations reflecting what they like to watch, and are not able to pause and resume, are likely to be key factors. Such viewers may not find content they would love from the ABC’s large catalogue. They may also be frustrated by the inability to stop and start content, and move seamlessly across devices. The ABC considers it important to address these issues.

The social impact of losing younger viewers by offering an out of date and hard-to-use VOD option for ABC iView can be further seen from the statistics in Figure 6 below, which show children moving to international VOD services in large numbers:

## Social impact of not introducing Login to Watch

Top services in Households w Kids 0-4	Top services in Households w Kids 5-9	Top services in Households w Kids 10-12	Top services in Households w Kids 13-17
YouTube 63%	YouTube 58%	NETFLIX 57%	YouTube 61%
NETFLIX 60%	NETFLIX 52%	YouTube 57%	NETFLIX 60%
Kids 39%	Kids 29%	Disney+ 24%	Disney+ 21%
Disney+ 31%	Disney+ 28%	7plus 21%	Now 21%
iView 25%	iView 24%	foxtel now 21%	7plus 20%
ABC Kids 19%   #8	ABC Kids 21%   #7	ABC Kids 14%   #10	ABC Kids 11%   #10

Figure 6: International VOD services dominant across the range of age categories for children

This social impact is significant: the ABC includes in its programs people who reflect Australia's demographic mix, culture and values. Platforms aimed at global audiences do not have this focus. It is important for children from a variety of backgrounds to see people like themselves on screens.

### (vii) Consultation with other public broadcasters

These views were reinforced by discussions with public broadcasters in comparable jurisdictions.

The ABC has consulted with or been informed by the experience of other public broadcasters BBC, CBC (Canada) and SBS. Each of them have implemented log in requirements. Key findings included:

- Audiences expect log in for many experiences, and once log in was implemented, it was broadly accepted;
- One broadcaster's reach figures dipped slightly when a log in requirement was introduced but after that initial phase, audiences have grown consistently ever since;
- It's been a 5 year journey for one broadcaster and if they were to approach it again, the team involved would jump to mandatory much sooner (video, audio experiences);
- Precedent set by Public Service Broadcasters (PSBs) and commercial players. BBC, CBC, and SBS all have a log in requirement, with over 80% of PSBs in the European Broadcasting Union requiring audiences to log in to some degree.

### (viii) Log in is necessary to overcome inertia

It should not be assumed that people would decide not to log in for privacy or other reasons. Research shows that there is a tendency for people to err on the side of not taking a step when that is an option for them. This has been expressed as follows:

“Somewhat simplified, with consumer inertia, or the status quo bias, it is meant that human beings stay passive instead of making an active choice, or refrain from taking an action that changes the status quo that would be economically rational to do.”

*Vladimir Bastidas, “Consumer Inertia, the New Economy and EU Competition Law”, Market and Competition Law Review 2 (1) (2018): 47-53*

Guidance prepared by the Behavioural Economics Team of the Australian Government for the Department of the Prime Minister and Cabinet accordingly states that:

‘... the evidence is overwhelming that **presenting one option as a default (the reference point) increases the chance it will be chosen.**

The default option is also the outcome that is realised when no active choice (choosing not to choose) is made by the consumer. An **ever-growing body of evidence suggests that this phenomenon can be successfully used to achieve improvements** in policy outcomes across a diverse number of areas.<sup>1</sup>

The policy objective in this case is to provide a quality VOD service to Australians that contributes to a sense of national identity by informing and entertaining, reflecting the cultural diversity of the Australian community, and ensuring that Australians gain the maximum benefit of the services offered by the ABC.

**(ix) Why not a dual system?**

Maintaining a “dual” system in which some people logged in and others did not would be undesirable for reasons including:

- (a) The use by those who did not log in, of a service that does not offer the same features and usability as other VOD services in the Australian market, would not attract viewers and that would adversely affect the provision of Australian content to viewers;
- (b) People who did not log in would not experience the benefits of logging in by reason of inertia rather than an active choice;
- (c) The ABC would have to incur costs on an ongoing strategy and approach for the logged in users and those who do not log in. Other factors which make a “dual” system more costly include additional testing overhead and less efficient marketing spend due to reduced ability to exclude engaged users from campaigns and efficiently make audiences aware of the breadth of ABC content available to them;
- (d) The ABC would find it more difficult and expensive to communicate with its viewers including to let them know about content they would like. This is significant in relation to the efficient use of taxpayer funds, and in relation to the ABC’s ability to reach audiences in circumstances in which international VOD

services have rich personalised data sets, mandatory log in and extensive features and content; and

- (e) The ABC would need to continue to fund costly and time-consuming research initiatives in order to comprehensively understand its audiences and their viewing needs. Introducing a log in requirement will facilitate valuable insights into audience segments and their viewing preferences, which will assist the ABC to meet its Charter obligations by producing content with a view to ensuring that Australians in different demographic groups, and with varying tastes, can locate and watch programs which they find informative and entertaining.

Further to above, continuing a “dual” system would impose ongoing expense to support a dwindling number of people who want to continue to use an out of date, less functional service.

ABC iview sits across a broad ecosystem of platforms and systems, including:

- Web: Chrome, Explorer, Firefox, Safari;
- Mobile: iOS, Android, Chromecast; and
- TV: Apple TV, Android TV, Smart TV, Partner Devices (Telstra TV, Foxtel), Legacy TV.

Within this ecosystem, the provision of a dual system for an indefinite period significantly increases the budgetary and personnel requirements required to build, maintain and execute the additional number of test cases to cover both logged in and non-logged in audiences.

For example, improving systems or user experience requires regression testing, where a recent program or code change is tested to ensure it has not adversely affected existing features. In the context of a dual system, this represents a significant burden in budget and personnel costs, and a poor use of public resources as costs are unable to be amortised across a single audience base.

Continuing a dual system also significantly restricts the capacity of the ABC to ensure the responsible expenditure of taxpayer funds in relation to the commissioning of content. Without the availability of logged-in user demographic information, the ABC has a limited ability to understand what different audiences are consuming on ABC digital products, and therefore cannot accurately inform decision-making around the creation and recommendation of content for audiences.

Without specific demographic detail, the ABC relies predominantly on the use of modelled or estimated demographic data, which is informed by broadcast measurement systems and does not accurately reflect viewing behaviour in digital contexts.

For example, initial analysis into ABC’s ‘opt-in’ registration data shows that the 2021 Comedy series *Superwog* was the biggest driver of new account sign-ups of the year, and attracted a younger and less-regular audience demographic to ABC iview.

However, when comparing the audience profile of *Superwog* viewers from the registration data, to the modelled demographic profiling, the differences were significant. This is likely due to the fact that the demographic modelling is less able to identify newer audiences and more likely to skew towards the broadcast demographic profile.

The insights gleaned from properly understanding audience engagement will feed into the content commissioning and distribution strategy for the ABC, aiding targeted opportunities for the ABC to reach under-served audiences. It will reduce reliance on third party analytics providers and inefficient survey and research processes, ensuring the ABC can identify and reach under-served audiences at a fraction of the time and cost currently required, serving those audiences quality content that reflects the diversity of Australia.

It is also worthwhile noting that about 834,000 ABC iView users do not currently log in to ABC iView to access content, such that they will be affected by the log in requirement (see Figure 7 below). It is important to see this number in the context of the 17.3 million VOD viewers in Australia. On average those 17.3 million Australians use an average of 3.7 VOD services per week. In an Australian context, this means the average VOD user has already made the decision to log in to other VOD platforms.

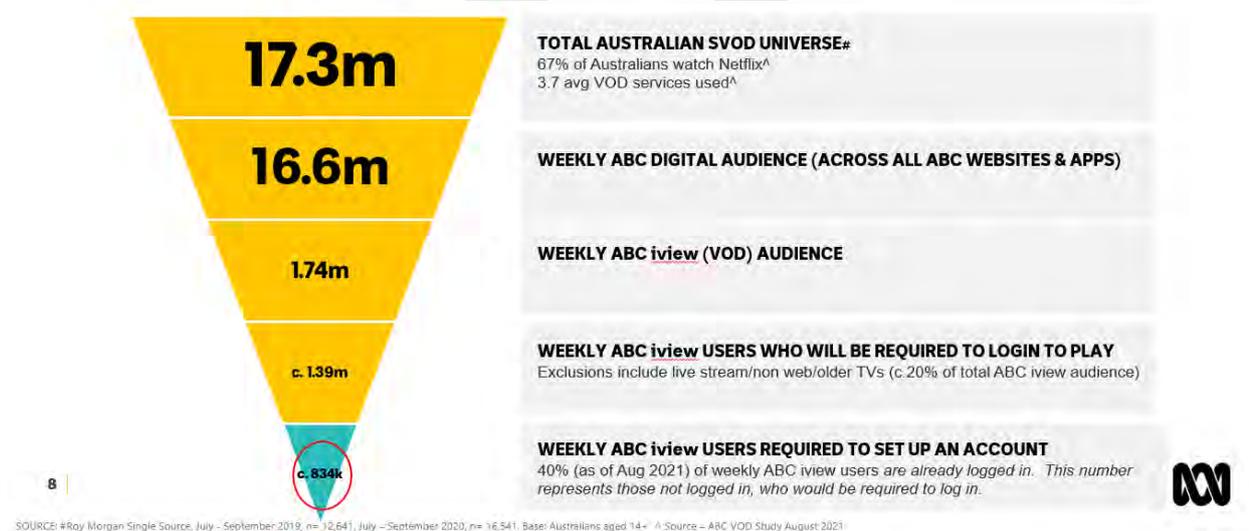


Figure 7: breakdown of audience members accessing ABC iView of the total video-on-demand universe

It is also important to note that even when log in is a pre-requisite for accessing ABC iView, those who do so will be doing so of their own free will. Virtually all of the content made available to viewers by logging in will be available on the Livestream ABC iView service on web without logging in, and the options to watch quality ABC content on a television, listen to radio content or use the ABC NEWS app without any need to log in are available.

### **(b) ABC iView Profiles enhance viewer choice and provide parental control**

The ABC introduced ABC iView Profiles on ABC iView from May 2021. ABC iView Profiles are a feature which allow multiple users accessing ABC iView on the same device to

distinguish themselves, so that the recommendations received by each person reflects their viewing activities.

ABC iView Profiles also allow parents to restrict the content selection on ABC iView for their child, reinforcing the ABC as a safe and relevant space for children's viewing. This is comparable to the approach of other VOD services and consists of a screen that is presented to users allowing them to distinguish who is watching. In the first instance, these profiles are limited to ABC iView on Smart TV, Android TV and web, and will be later available on Apple and Android mobile devices.



Figures 8: ABC iView Profiles enable kids to access suitable content

**(c) Additional fields of information from ABC Account holders**

The ABC has been collecting fields of personal information about ABC Account holders since mid 2021, namely, first name or nickname (pseudonym), postcode, year of birth and gender. These new fields of personal information are collected by the ABC so that it can check whether it is meeting the needs of people in different geographic and demographic groups. In relation to gender, there is a “prefer not to say” option and gender will not be used to tailor recommendations on ABC iview. Geographic information will be used to identify content to recommend to people, including in relation to emergencies which affect particular areas (e.g. Floods, bushfires). Age information will be used to inform the suggested content restriction settings in a child’s ABC iview Profile.

#### ***(d) Promotion of ABC content through Google and Facebook***

Finally, from time to time, the ABC intends to provide ABC Account holders with promotions on Google and Facebook for ABC programs likely to be of interest to them across their devices based on their viewing behaviour on ABC iview unless they opt out from receiving them.

The provision of information about ABC programs through digital platforms will improve the quality of the user experience and surface information about ABC programs for those segments of the community who spend much of their media time on digital platforms. This will be achieved partly by using Facebook’s “Custom Audiences” service and Google’s “Customer Match” service. Use of these services involves the provision of encrypted versions of the email addresses of ABC Account holders to Facebook and Google via a technology service provider called Tealium (the concept of encryption or “hashing” is explained in Part 2 below). ABC Account holders are able to opt out of the provision of an encrypted version of their email address to Facebook and Google via Tealium via their account settings.

In relation to advertising cookies offered by Google and Facebook, prior to the launch of the log in requirement on ABC iview, the ABC will offer a cookie consent pop-up, such that advertising cookies will not be used unless an individual has expressly opted in. In the context of apps, prior to the launch of the log in requirement on ABC iview, the ABC will turn off marketing SDKs, and they will only be turned back on when a consent pop-up is made available to audiences. In this way, the ABC will not use marketing SDKs in apps, until an individual has expressly opted in.

The ABC also uses analytics, ratings and functionality cookies and other similar technologies as explained in Part 2. They are considered essential at this stage for the functioning, measurement and rating of ABC iview and other ABC websites and apps.

## **4. Logging in is easy: the ABC’s accessibility initiatives**

The ABC has a lot of experience in supporting viewers to use its services, including in relation to log in to ABC iview. This section provides further information in this respect.

### ***(a) Who are the ABC iview audiences?***

ABC iview audiences account for approximately 10% (1.74 million – see Figure 7 above) of the ABC’s overall digital weekly active audience members.

The ABC presently estimates that on a weekly average approximately 834,000 members of its ABC iview audience are not logged in when using ABC iview.

Figure 9 below sets out ABC audience reach according to platform and shows that broadcast TV viewing continues to be the dominant way ABC audiences consume TV content. It is important to note that all ABC channels available on ABC iview are also broadcast on traditional TVs where there is no login requirement.

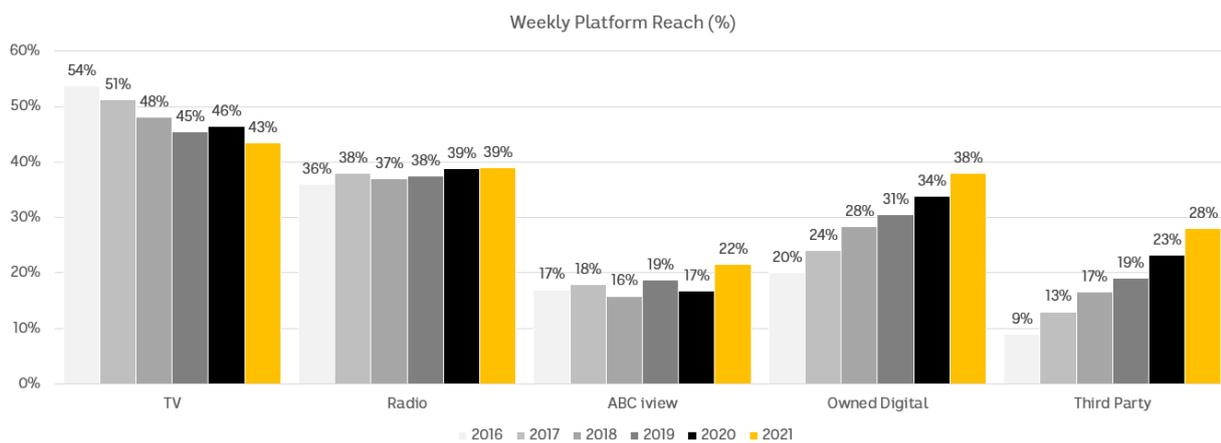


Figure 9: weekly platform reach as a percentage (%)

### (b) Accessibility is part of the ABC’s DNA

A core pillar of the ABC’s Five year plan (the **Plan**) is an “ABC for all Australians”. The key ways that the ABC is putting this plan into action are as follows:

- **Research:** the ABC has conducted extensive research and analysis across all audience segments to understand potential barriers to access, especially for those who may need additional help to access services through digital products. Two of these key demographics (older audiences and children) are specifically addressed below;
- **Consultation:** the ABC has consulted with different demographic groups through the ABC’s accessibility team, whose role is to consider access for Australians who are differently abled, as well as young and older Australians;
- **Accessibility Principles:** the ABC has designed its log in functionality around the key principles of ‘continued access’, ‘product & design’, and ‘communications, education & support’;
- **Training:** ABC employees have access to accessibility training and accessibility reference tools have been developed for the relevant teams, for example web development, to ensure an ‘all of ABC’ approach to accessibility; and
- **Support:** the ABC provides 24/7 information and support for audiences who require assistance.

**(i) Research and Consultation**

Research is integral to how the ABC builds its product experiences.

Figure 10 below shows that since March 2020, the ABC has received 28,820 product intercept surveys and beta survey responses in relation to evolving and improving ABC’s digital experiences.

The ABC ensures that it obtains a diversity of views in respect of age and location (by state and further broken down into inner city, outside a city and regional/rural). A further 245 interviews have been conducted with participants in remote regions.

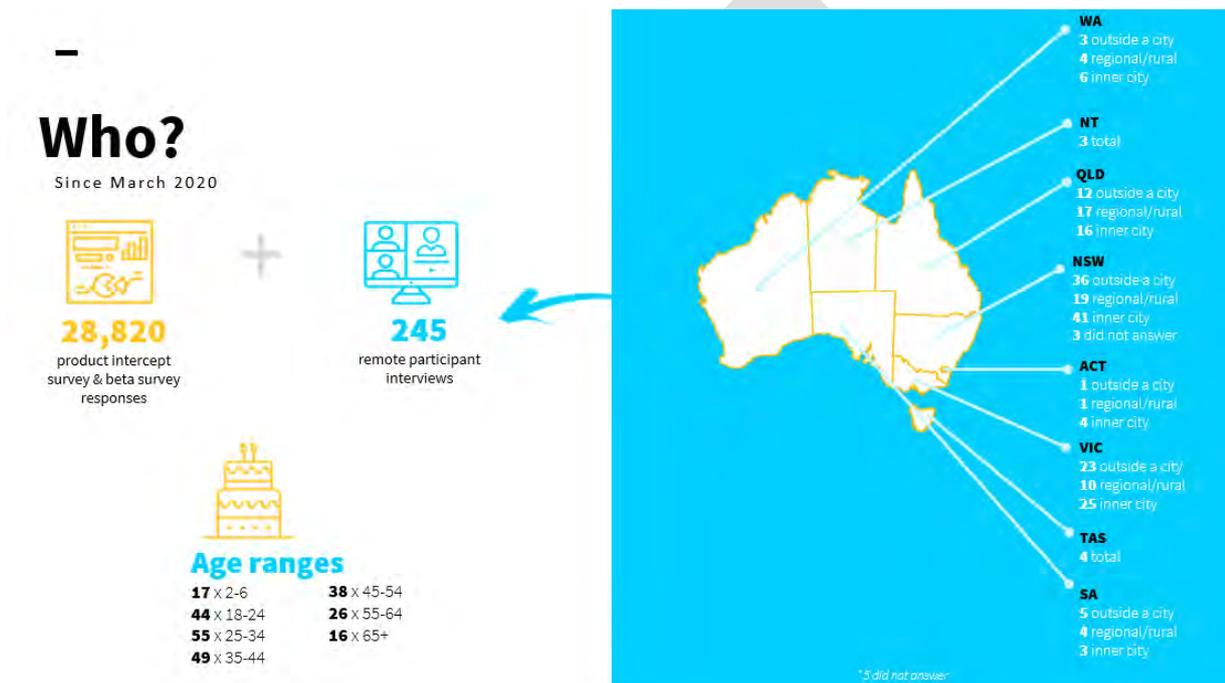


Figure 10: breakdown of age and location information of some of the research conducted by the ABC

**(ii) Accessibility Principles: Continued access**

The log in requirement only applies to ABC iview. For example, the ABC Kids, ABC ME and the ABC NEWS app products do not require log in.

Additionally, within ABC iview, all Livestream ABC broadcast channels will be available via ABC iview on web, without the need to log in.

The ABC has taken into account research obtained as part of the consultation process to make these decisions. The diagram below shows over the last 3 years the highest rate of monthly growth in minutes consumed on ABC iview has come from Livestreams of broadcast channels.

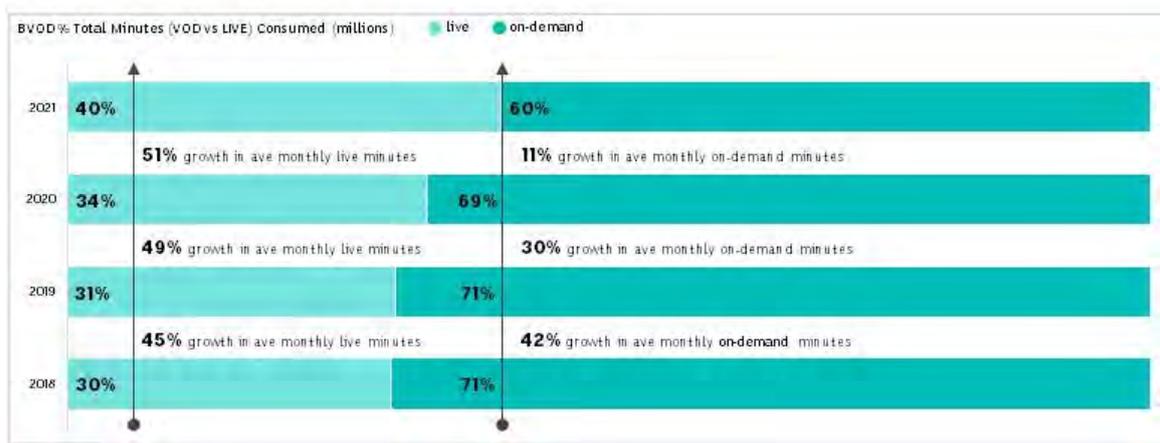


Figure 11: growth of live minutes compared with on-demand minutes as a percentage (%)  
 Source: OzTam VPN data 2018 – 2020 Full year. 2021 Jan – Aug.

### (iii) Accessibility Principles: Product & Design

Log in has been designed in accordance with website accessibility and co-design principles to create a frictionless audience experience for all.

In particular, the ABC has implemented child-friendly products, for example child profiles within ABC Accounts, and dedicated apps and features such as parental controls.

### (iv) Accessibility Principles: Communications, education & support

Each of the communications, education and support functions within ABC iView have been designed to cross multiple platforms to cater for the expansive media habits and support needs of the ABC iView audience.

Communications, in particular, will be guided by the needs of each particular audience. For example, when addressing children, the ABC will ensure that content and tone are appropriate, taking children's safety into account. For mature audiences (55+), the ABC will take into account below average capacity in relation to technology usage and knowledge and disability considerations.

### (c) Specific demographics

Figure 12 below represents a demographic breakdown of the ABC iView audience.

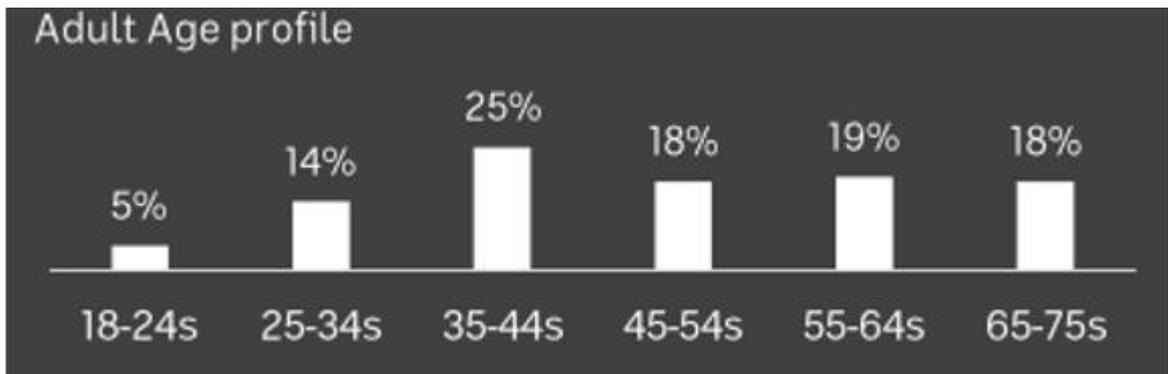


Figure 12: viewership by audience segment, in percentage (%). Source – ABC VOD Study 2021

(i) **Mature audiences**

Mature audiences (55+) make up approximately 21% of ABC viewership. The ABC has designed its log in functionality with ease of access for this audience in mind. The key learnings are as follows:

- this segment generally demonstrates lower technology usage and device ownership;
- this segment primarily views content by way of a television device and prefers traditional media and support channels, although 85% of adults aged 18–75 have used a VOD service;
- those aged 65+ are subject to an increased likelihood of disability, for example a vision or hearing impairment.

In taking these considerations into account, the ABC has implemented the following features as part of the log in requirement:

- the ability to set up a single log in so that repeat log in is not required;
- log in steps are concise and include explanatory information at each stage so as to allow for a frictionless experience; and
- those who do not want to log in to watch can access live content without logging in on ABC iview on web,

as well as the following communications and technical-support features:

- the education campaign for the log in to watch functionality will be featured on the mediums accessed most by this audience segment (TV and radio);
- all communication assets developed will be in plain English, avoiding technical terms, assuming limited technical capability;

- support from a human is available by phone between 8am-8pm (AEST) with the ability to fast-track such support by way of the “press 1” pathway;
- the implementation of Help Centre and Privacy Hub assets with closed captions, voice overs and step by step explainers, including written guides that may be sent by post or emailed; and
- a resource forecasting tool to reflect needs of this audience segment. As part of this, the ABC has upskilled the entire support team and budgeted for additional staff to meet this demand.

**(ii) Younger audiences**

The ABC has designed its log in functionality with ease of access for this audience in mind. Those in this audience segment:

- are concerned with acting responsibly;
- have above average capacity in respect of social media usage;
- prefer non-traditional support channels such as digital messaging; and
- are often visual learners.

In taking these considerations into account, the ABC has implemented the following product experience features as part of the log in requirement (see Figures 8 above):

- the ability for adult ABC Account Holders to create ABC iView Profiles for children under their own account on connected TVs;
- limiting access to age appropriate content within an ABC iView Profile via the ABC iView Parental Controls feature; and
- the ability to create dedicated ABC Accounts for children with default opt-out for encrypted email sharing.

The ABC requests the year of birth of the individual connected to a particular ABC iView Profile so that where necessary it can guide parents regarding appropriate content and recommend the content a child should have access to.

The ABC will also implement the following communications and technical-support features:

- the ABC is developing a child friendly version of its Privacy Collection Statement;
- education and information shared will be focused on security and safety and provided on preferred digital social media channels;
- the ABC will provide privacy tips for parents, who are responsible for ABC iView Profiles;

- the ABC will ensure it uses the appropriate tone and content;
- support teams will obtain the relevant working with children certification; and
- support will be available via chat functionality and social media.

#### **(d) Staff Training and Tools**

The ABC has ensured that the training provided to its employees and the reference tools used by the ABC ensure consistency and adherence to inclusivity. ABC employee training modules are available on 'Digital Accountability', 'Accountability and SEO' and 'Web Accessibility & Inclusive Design'. Similar principles are included in the ABC Help Centre Playbook.

The ABC also uses the following accessibility reference guides for product development and communications:



Figures 13: ABC product development reference guides

Figure 14 below sets out an excerpt from the Help Centre Playbook, on the guiding principles for creating an FAQ in the ABC Help Centres.

## Guiding principles for creating an article in the ABC Help Centres

- Your starting point: assume no prior knowledge and minimum technological understanding of audience member/user.
- Be accurate and genuine: avoid a sales brochure/formulaic response.
- Be concise: answer the question posed. Link to associated articles rather than attempt to cram all the information into the one article.
- Write in plain English - use words that the audience will understand, avoid technical jargon. Read what you have written out loud – does it make sense?
- Make it visually appealing – add visuals if possible/necessary. Use bold, indent, bullet points/numbering to add texture and layers.
- Be consistent with terminology (see Glossary), grammar, formatting, spelling (Australian English) and tense (present).

Figure 14: Guiding principles from ABC Help Centre Playbook

### (e) Audience Support

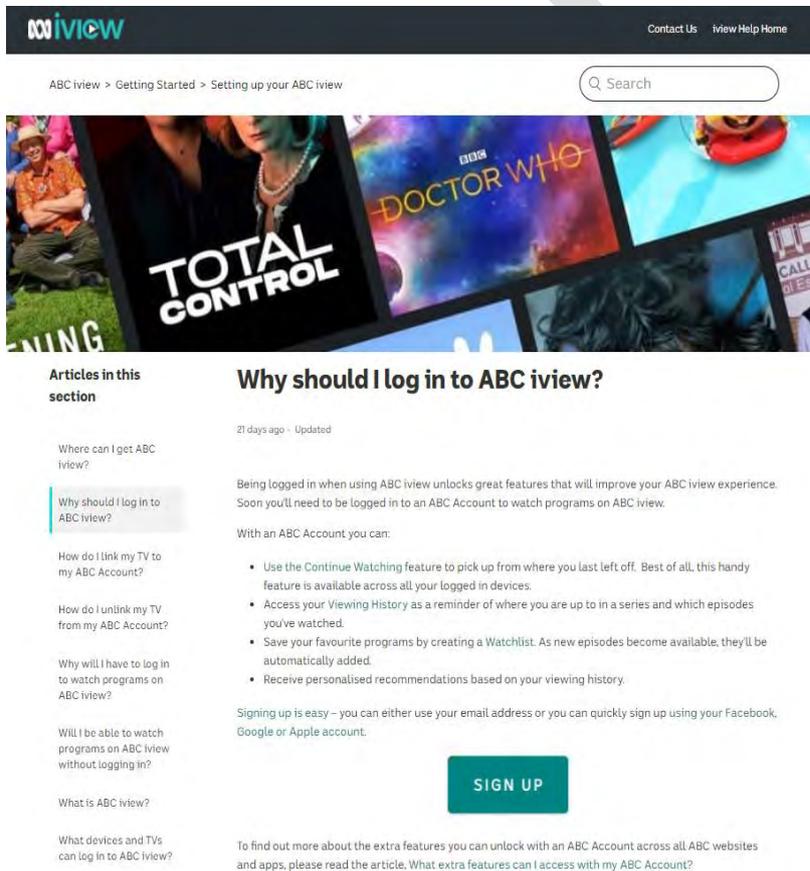
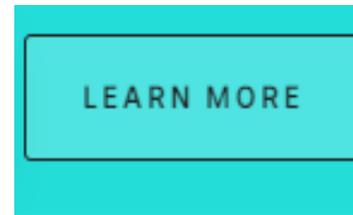
As part of the ABC's audience education and marketing campaign associated with the requirement to log in, the ABC Audience Support Team will remind viewers that help is on hand if they need it. Help is available via several channels.

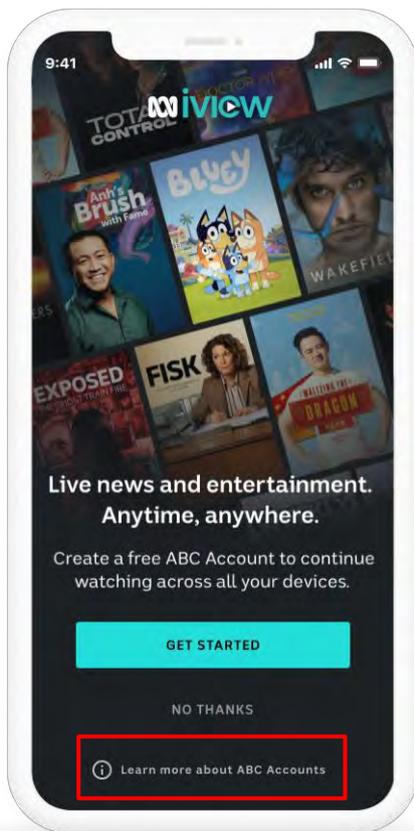
The ABC has an accessible and skilled ABC Support Team which provides information and support 7 days a week and 363 days a year. Contact channels include phone, email, social media, online Help Centre, letter and chat support. This team also manages the ABC Help Centre content and a dedicated Privacy Hub housing all information about ABC's privacy approach.

Help Centre resources and other support information provided by the ABC are directed towards the product journey and allowing audiences to understand:

- why log in is necessary;
- how to set up log in;
- how to make the most of log in; and
- how to access support as part of ongoing needs.

Some image examples of this are set out below in Figures 15 below.





Figures 15 – Learn more prompts and more information are available during the audience sign up journeys

As part of providing this support and ensuring that it is accessible to a diverse range of viewers across their log in journey, the ABC has ensured that its support team itself is diverse in terms of age (ranging between 20s-60s), cultural background, tenure, experience and disability. All team members are multi-skilled and have been trained and accredited accordingly. To ensure an environment of support and resolution, the key performance indicators of support team members are based on first contact resolution of issues and responsiveness and not average handling time.

The ABC's support function is accessible in practice (as designed) and the ABC constantly reviews its support function in the following ways:

- monitoring Help Centre search terms daily;
- monitoring the use of FAQs;
- reviewing the FAQ ratings (provided in the survey at the bottom of each page asking whether the FAQ was helpful) daily; and
- reviewing issues raised in support tickets (for example, see the diagram below breaking down issues raised).

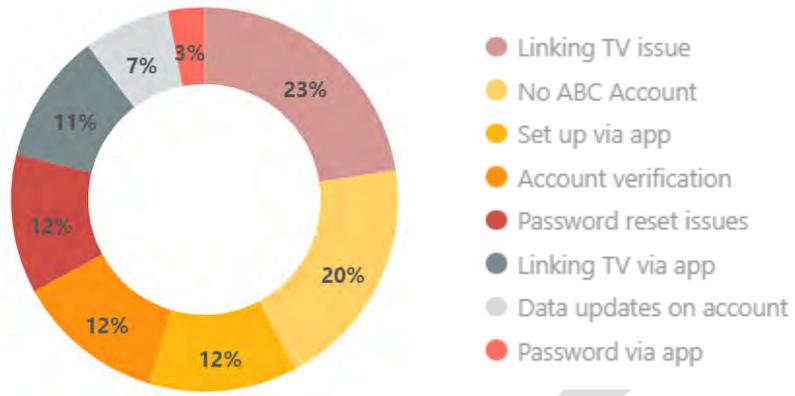


Figure 16: support tickets by issue

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## PART 2: PRIVACY IMPACT ASSESSMENT

As explained in Part 1, this document considers four changes to the ABC's practices. For ease of reference, we have given each of these changes shorthand references as follows:

- the ABC's decision to require users to utilise the same ABC iview with modern pause and resume features across devices (rather than allowing the option of using an out-of-date platform) is referred to as the **Single Platform** decision. The requirement to log in to utilise that platform is referred to as **Log in to Watch**;
- the introduction of profiles within a particular ABC Account on ABC iview is referred to as **ABC iview Profiles**;
- the collection of new fields of data as part of log in is referred to as **Additional Data**; and
- use of encrypted emails to convey promotion requests to Facebook and Google via Tealium is referred to as **Encrypted Email Promotion Requests**.

Together, these are referred to as the **Modernisation Features**.

For ease of reference, references to data have been classified in the following ways:

- **Log In Data** refers to the data collected upon Log in to Watch, meaning the ABC Account Holder's email address and the Additional Data;
- **Account Data** refers to the data relating to an account more generally, meaning engagement on ABC websites and apps; and
- **ABC iview Profile Data** refers to the data collected in relation to ABC iview Profiles upon their creation, meaning a name (or nick name), year of birth and content preferences for children's profiles.

It is important to bear in mind in relation to each of these changes that the ABC does not, and has no plans to, try to work out who the individual is who has set up each of its accounts. Nor does it try to work out who has set up, or used, each ABC iview Profile. Users will Log in to Watch by using an email address that does not include their name which would be likely to make it impossible for the ABC to do this. Users can also set up multiple accounts and ABC iview Profiles. Even where a real-sounding name is used in an email address, in the absence of any requirement for people to use their own names in setting up an email address, the ABC cannot be sure of the person's name or identity.

The approach taken below in this PIA reflects the caution and care which the ABC takes in relation to protection of viewer data. It considers whether the practices in question would comply with the Australian Privacy Principles (**APPs**) if and when they involve collection, use or disclosure of personal information.

Existing website and app practices, including in relation to cookies and other similar technologies, are outside the scope of this document. The ABC is reviewing those practices with a view to implementing best practices in the changing privacy and adtech environment, which is currently the subject of major reform processes.

In particular, by the launch of Single Platform, the ABC will offer effective user controls in relation to third party advertising cookies and other similar technologies in the context of both web browsers and apps (the **Advertising Cookies**). That is, the ABC will offer a

cookie consent pop-up, such that advertising cookies will not be used on web unless an individual has expressly opted in. In the context of apps, the ABC will turn off marketing SDKs, and they will only be turned back on when a consent pop-up is made available to audiences. In this way, the ABC will not use marketing SDKs in apps, until an individual has expressly opted in.

The ABC is also advocating a privacy-first approach in an industry and law reform context, in which some privacy practices are set on an industry-wide basis and are in the midst of review and revision.

The methodology for preparation of this PIA is set out in Schedule 1.

### ***Privacy by Design Approach***

The ABC has taken a privacy by design approach to these proposals. Specifically:

#### *Single Platform and ABC iview Profiles*

- (a) Individuals have the option of dealing with the ABC pseudonymously for the purpose of using ABC iview. The ABC has used email addresses for Log in to Watch and for accounts to minimise the privacy impact of these proposals. Individuals are not required to provide their name or gender to Log in to Watch or create ABC iview Profiles. To the extent that a year of birth or post code is requested, the individual is free to submit a response that may or may not be accurate. The choice is theirs.

#### *Encrypted Email Promotion Requests*

- (b) In relation to Encrypted Email Promotion Requests, the information provided to Facebook and Google via Tealium is encrypted or “hashed” meaning that they are only able to identify email addresses they already have in their own systems. The only additional information Facebook and Google receives are requests to serve users they have in common with the ABC, with particular ABC content promotions.
- (c) ABC Account holders are able to opt-out of the Encrypted Email Promotion Requests via their account settings. They will also be able to opt-out of receiving recommendations on ABC platforms which are specific to them. Upon the launch of Single Platform, Advertising Cookies will only be used on an opt-in basis.

#### *Additional Data*

- (d) The collection, use and disclosure of Additional Data is necessary to deliver a better VOD service, to ensure that the ABC is catering to the needs of all Australians.

As demonstrated above, the ABC wishes to take a privacy-protective approach to ensure the ABC complies with the APPs, and to protect and enhance the reputation of the ABC as Australia's most trusted media organisation. The ABC recognises the importance of ensuring that information is handled in line with community expectations and has consulted with the Australian public on their privacy concerns, as well as recognised privacy experts, and public broadcasters internationally who have introduced a login requirement on their VOD service.

A detailed analysis of the compliance considerations and approach in relation to the proposed changes is set out below.

### ***Privacy Impact Assessment Analysis***

The ABC appreciates that each of the 4 Modernisation Features may involve data which may not satisfy the definition of personal information under the Privacy Act, depending on the specifics of the data collected, and the context of its use or disclosure.

However out of an abundance of caution, and consistent with best practice, the ABC has assessed data aspects of the Modernisation Features by reference to the APPs, and considers that for the reasons below, they would be consistent with the APPs.

#### ***APP 1 – Open and transparent management of personal information***

The ABC considers that it has taken reasonable steps to implement practices, procedures and systems designed to ensure compliance with the APPs and the Australian Government Agencies Privacy Code. The ABC Privacy Manual, which provides an overview of the ABC Privacy Framework that was implemented in 2018, reflects this.

The ABC Privacy Policy, a copy of which is available [here](#), is made available on the ABC website, and is regularly referred to in communications with viewers to ensure that they are aware of it and can find it.

Updates have been made to the ABC Privacy Policy, ABC Privacy Collection Statement and ABC Terms of Use to:

- reflect changes to the way in which personal information will be handled as the ABC looks to help Australians find more content likely to be of interest to them, including:
  - requiring users to use a Single Platform to use ABC iview;
  - enabling users to create ABC iview Profiles on ABC iview;
  - collecting Additional Data as part of the signup process for ABC Accounts;  
and
  - use of Encrypted Email Promotion Requests;
- provide clearer explanations of relevant consents and opt out mechanisms; and
- ensure that these documents continue to be accurate, up-to-date and complete.

As explained in the ACCC's Digital Platforms Inquiry Final Report encryption or "hashing" generally refers to:

*a process in which a unique identifier using a hashing encryption process is allocated to an individual instead of using their personal information. This enables entities to use and share information about the same individual, without knowing that individual's identity. If the hashed identifiers 'match', the entities know that they are exchanging information regarding the same hashed individual and can, for example, target that individual with a relevant advertisement.<sup>4</sup>*

In the context of these promotion/advertising arrangements, Google and Facebook will only receive the request to serve a particular ABC content promotion and the encrypted email address of the intended recipient. If their systems already have the encrypted email address, then those systems can deliver the promotion/advertisement to the intended recipient.

The ABC has amended its privacy policy and notices so that use of Encrypted Email Promotion Requests will comply with the APPs to the extent they apply.

Further updates to the ABC Privacy Policy are anticipated prior to the launch of the Single Platform, including to:

- reflect the introduction of opt-in consent in relation to Advertising Cookies on ABC websites and apps;
- reflect the introduction of the ability for users to opt-out from receiving recommendations specific to them on ABC iview and other ABC websites and apps; and
- provide additional information to users about relevant data sharing arrangements.

The ABC is also developing an additional child friendly version of the ABC Privacy Collection Statement. It is working with its children's programming specialists and is considering a variety of means of providing this information, including use of audio-visual material and children's presenters.

Individuals may make a privacy inquiry or complaint to the ABC by contacting the ABC Privacy Officer whose contact details are provided in the ABC Privacy Policy.

The ABC Privacy Manual includes a procedure for handling privacy complaints and inquiries.

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<sup>4</sup> [Digital Platforms Inquiry – Final Report](#), ACCC, page 410.

The ABC has a dedicated privacy team including privacy law specialists to ensure complaints and enquiries are dealt with promptly and appropriately.

## **APP 2 – Anonymity and pseudonymity**

### **Single Platform**

The ABC acknowledges that some members of the public may wish to deal with the ABC anonymously or by using a pseudonym, and has designed the Modernisation Features to include this feature.

As explained in Part 1, the average Australian VOD user subscribes to 3.7 VOD services. This means that the average VOD user has already provided personal information to other VOD providers, and has logged in to those services. The ABC nonetheless acknowledges that some members of the public may prefer to use ABC services anonymously or pseudonymously.

An important distinction between the ABC iview service and most other VOD providers is that the ABC does not charge for access, and therefore does not collect payment information like other VOD providers.

The ABC will give people the option of logging in by signing up with an email address that does not include their name, and of using a nickname (which can be any combination of text) rather than their actual name. APP 2.1 provides that individuals must have the option of not identifying themselves, or of using a pseudonym, when dealing with an entity in relation to a particular matter. APP 2.2 provides that this does not apply in relation to a particular matter if:

- the entity is required or authorised by or under an Australian law, or a court or tribunal order, to deal with individuals who have identified themselves; or
- it is impracticable for the APP entity to deal with individuals who have not identified themselves or who have used a pseudonym.

The APP Guidelines indicate that APP 2 requires that both options (anonymity and pseudonymity) be made available to individuals dealing with an APP entity unless one of the two exceptions applies. They also indicate that it is implicit in APP 2 that an APP entity should ensure that, if applicable, individuals are made aware of their opportunity to deal anonymously or by pseudonym with an entity.

The ABC needs to use an identifier for ABC iview accounts in order to provide the Modernisation Features in respect of each account. The ABC needs to be able to reliably identify when an account is active over time so that it can deliver a higher quality VOD service (such as by enabling the user of the account to pick up where they left off). The provision of “digital media services” is one of the statutory functions of the ABC and delivering higher quality digital experiences is one of six strategic priorities outlined in its ABC Plan. In particular, the ABC Plan includes a commitment to “*Enable individuals to personalise their ABC experiences, allowing them to choose from options for customisation, receive relevant recommendations, resume listening or viewing across devices, create their own playlists, and filter content by topics and locations.*” It follows

that, in view of the strategic objectives of the ABC as they relate to ABC iView, and the matters raised earlier in this document, it would be impracticable for it to give viewers an option of not providing any means by which to track use of the platform across devices. The ABC considered whether continuing to maintain two platforms was a viable option, including by way of consultation with the BBC and other public broadcasters. The advice received by the ABC, and the conclusion that it reached, is that the Single Platform decision is necessary to achieve the objective of giving viewers a service of the quality they expect. Further details of the ABC's decision, including relevant public policy considerations, are set out earlier in this document.

As set out above, viewers will have the option of dealing with the ABC without identifying themselves, including by providing an email address that does not identify them. Free email accounts are readily available, and there is also no impediment to a viewer having more than one ABC Account if different email addresses are used. The APP Guidelines indicate that a pseudonym includes an email address that does not contain the actual name of the person.

As part of its privacy by design approach, the ABC will ensure that viewers are made sufficiently aware of the opportunity to deal with it by providing an email address that does not include their name (and providing a nickname to the extent that a first name is required). In those circumstances, the ABC is of the view that the Single Platform decision will be consistent with APP 2. The ABC notes that the APP Guidelines indicate that an email address which does not identify an individual is a category of pseudonym. In the circumstances, the ABC considers that the requirements of APP 2 are met in relation to ABC iView.

When considering APP 2 it is also important to note that the ABC also provides the opportunity to viewers to receive content anonymously through its other platforms including broadcast and the Livestream ABC iView service. It is arguable in those circumstances that APP 2 would be satisfied in any event even if the Single Platform decision required viewers to identify themselves: the ABC provides content in a variety of ways. ABC iView is just one service, and viewers need only Log in to Watch *if they want to avail themselves of the features of that particular service*.

### **Additional Information**

The Additional Information the ABC is now collecting as part of the sign up process for ABC Accounts (first name, postcode, year of birth and gender) does not prevent individuals from dealing with the ABC pseudonymously in relation to their ABC Account. This is because none of the four attributes, alone or together, are likely to identify a user to the ABC if the email address they provide does not include their name. Individuals are also made aware that they may provide a nickname as a means of ensuring that their account remains pseudonymous.

### **ABC iView Profiles**

The same applies in relation to ABC iView Profiles. When an ABC iView Profile is created on ABC iView a name (or nickname) is collected for adults, and a name (or nickname), year of birth and channel selection is collected for a child ABC iView Profile. The

collection of this information does not prevent ABC iView Profile holders from dealing with the ABC pseudonymously in relation to their ABC iView Profile. This is because none of these attributes, alone or together, are likely to identify a user to the ABC if the email address provided by the main account holder does not include their name. Individuals are also made aware that they may provide a nickname as a means of ensuring that their ABC iView profile is pseudonymous. For example, ABC iView Profiles for a household could be set up under the nicknames “A”, “B” and “C”. A single person could also set up multiple ABC iView Profiles.

### ***APP 3 – Collection of solicited personal information***

#### **Single Platform and ABC iView Profiles**

APP 3.1 puts in place a two-step process:

- identifying the ABC’s functions or activities; and
- determining whether the particular collection of personal information is reasonably necessary for, or directly related to, one of those functions or activities.

There is a question in this case, on the basis of whether a person is identified or reasonably identifiable, as to whether and to what extent personal information is collected. As already stated, the ABC is assessing the data aspects of the Modernisation Features by reference to the APPs, and will continue to do so in relation to APP3.

As explained in Part 1 and above, collection of the Log In Data and the ABC iView Profile Data is reasonably necessary for, or at least directly related to, the provision of digital media services as there is a clear and direct connection between the personal information being collected and the ABC’s provision of “digital media services”. This is because, as mentioned above, the ABC needs to be able to reliably recognise when a user utilises ABC iView over time so that it can deliver higher quality digital experiences such as pausing, playing across devices, and recommendations based on viewing choice (unless a user opts out) in accordance with the ABC Plan.

Introduction of ABC iView Profiles gives viewers the choice to set up an ABC iView Profile within an account so that content restrictions (in the case of children) and recommendations can be made by ABC iView Profile. Collection and use of the ABC iView profile Data is essential in order to provide that functionality. The year of birth and channel selection for child profiles assists parents and guardians in making appropriate content available for children based on their age group. ABC iView Profile names can be selected which have no connection to the real names or identities of users. In those circumstances, ABC iView Profile Data is necessary for provision of the ABC iView Profile functionality, and ABC iView Profiles can provide a layer of identity protection.

The Single Platform decision and the introduction of ABC iView Profiles on ABC iView may have the effect of identifying other data that the ABC already collects across ABC digital platforms using cookies and other similar technologies. To the extent that the Single Platform decision and the introduction of ABC iView Profiles on ABC iView has this effect,

the ABC's collection of this data is also at least directly related to the provision of digital media services.

This PIA does not consider the application of APP 3.1 to the additional information collected when a user signs up via "social sign in" as the provision of this information is optional (in the sense that ABC iView can be accessed without providing it) and it is outside of the scope of the Modernisation Features. That said, the only additional information that may be provided to the ABC when a user signs up via "social sign in" is a link to their profile photo, and this information is not currently used by the ABC. The ABC is in the process of conducting a separate review of "social sign in", to be completed prior to the launch of Single Platform.

### **Additional Data**

To the extent that the Additional Data is personal information, it is relevant to the statutory function of providing digital media services.

The ABC's purposes for collecting each of the new fields are as follows:

- First name – The purpose of collecting this information is so that users can make sure it's them who is logged in at a glance, get a friendly and personal experience, be addressed by a name they're comfortable with and let others know who they are when submitting stories and comments. The information also helps the ABC to increase open rates for email newsletters, personalise a selected avatar with audience members' names and helps facilitate pseudonymity under the APPs where Log in to Watch is required. Individuals will have the option of providing a nickname (or any word) rather than their actual first name if they wish to deal with the ABC pseudonymously.
- Postcode – The purpose of collecting this information is so that users can receive content that is relevant to where they live, including through recommendations informed by their location (unless they opt out), and receive important emergency information about their area. The information also helps the ABC to find an audience for local content and ensure it is reaching Australians outside of the metropolitan areas through analysis and research, media buying, commissioning and targeting. Postcode is also used to give users the option of utilising state or territory based Livestreams of broadcast content but functionality will exist so that any state or territory can be chosen by the user if the user does not wish to view the stream directed to their home state or territory. The ABC iView Livestream service will be available without a log in requirement. The ABC did not request individuals to provide their Local Government Area (LGA) as individuals are far more likely to know their postcode than their LGA, given a post code is information that is commonly used, shared and widely understood.
- Year of birth – The ABC has chosen to only collect Year of Birth, and not Date of Birth. The purpose of collecting Year of Birth information is so that the ABC can check whether its content is being accessed by people of different age groups, and can adjust its programming to meet the needs of any groups who are not

accessing ABC content. This information also helps the ABC to identify gaps in where it is serving its audiences, so that it may send audiences in particular age groups relevant communications about the availability of ABC content. For example, as explained earlier in this document, the rapid change in viewing habits across younger demographics with a large shift to international VOD platforms makes it particularly important for the ABC to monitor the success or otherwise of its strategies to produce Australian content which is relevant to that demographic group. The ABC did not collect an age band, for example a band that covers a five year bracket, rather than year of birth, due to the inability to determine if a person remains in a particular age bracket over a passing period of time. This presents significant issues for content recommendations, particularly in the context of children.

- Gender – The purpose of collecting this information is to help the ABC to ensure that it is creating content that reflects the interests of all audiences. Gender is captured as an analysis and insight attribute. The strategic direction is to capture this for the ABC to conduct cohort analysis to identify which genders are consuming content with a view to ensuring that commissioning and licensing decisions result in content which reflects the interests of all Australians. Gender is not used to make content recommendations on ABC iview.

Having considered the above, the ABC is of the view that collection of the Additional Data is reasonably necessary for, or at least directly related (in the sense that a clear and direct connection exists) to, the ABC's provision of digital media services. This is so because each of the new fields is collected by the ABC for the purpose of delivering higher quality digital experiences in accordance with its ABC Plan or otherwise improving its digital services by ensuring that they cater to the needs of all Australians.

There is a "prefer not to say" option in relation to gender for individuals who do not wish to disclose this information.

Without postcode, the ABC would be less able to deliver critical emergency information to individuals when location specific events such as floods or bushfires occur. Year of birth and postcode information are both also critical to the ABC ensuring that it is reaching, and catering to the needs of, all Australians.

Viewers will be given accurate information about the ABC's relevant practices prior to Log In Data, ABC iview profile Data or other Account Data being collected, and of course each viewer has the option of not logging in, and instead accessing ABC content through the ABC iview Livestream or one of the ABC's many other broadcast or online services. In those circumstances, the ABC is comfortable that the collection of data in connection with the Modernisation Features will be lawful and fair.

No sensitive information will be collected or inferred, which means that it is not necessary to consider APP 3.3. The ABC refers to past viewing behaviour for the purpose of making recommendations and serving promotions to ABC Account Holders. It is possible that programs addressing sensitive topics watched in the past by an ABC Account Holder could inform the broader selection of programs that are presented to that individual by way of promotions or recommendations in the future. However by

engaging in this process, the ABC does not infer sensitive information about the ABC Account Holder by way of forming an opinion about sensitive topics such as their racial or ethnic origin, political opinions, religious beliefs or sexuality. Nor does the ABC have a process in place by which such inferences could be recorded, which is a requirement for collection under section 6 of the Privacy Act.

The data collected when signing up for an ABC Account will be collected from the individual themselves. The ABC considers that individuals who sign up for an ABC Account via “social sign in” consent to the collection of personal information about them from the relevant third parties, with the result that an exception under APP 3.6 applies.

If and to the extent that personal information is collected about an ABC iView Profile holder from someone other than the individual concerned, on the basis that the personal information is collected from the ABC Account Holder, the ABC considers that an exception in APP 3.6 would apply because the ABC Terms of Use require the main account holder to obtain their consent (in the case of an adult) or consent on their behalf (in the case of a child).

If the ABC Account Holder has not opted out of recommendations, the ABC iView Profile Holder will receive recommendations on ABC iView that are informed only by their viewing behaviour as an ABC iView Profile Holder. The viewing behaviour of the ABC iView Profile Holder does not inform the recommendations received by the ABC Account Holder, and the viewing behaviour of the ABC Account Holder does not inform the recommendations received by the ABC iView Profile Holder.

#### ***APP 4 – Dealing with unsolicited personal information***

The ABC does not expect to receive unsolicited personal information as part of the Modernisation Features, so does not consider it necessary to consider APP 4 in this PIA.

#### ***APP 5 – Notification of the collection of personal information***

The ABC Privacy Collection Statement, a copy of which is available [here](#), is designed to notify individuals of all relevant matters.

Updates have been made to the ABC Privacy Policy, ABC Privacy Collection Statement and ABC Terms of Use to:

- reflect changes to the way in which personal information will be handled as the ABC looks to help Australians find more content likely to be of interest to them, including:
  - requiring users to use a Single Platform to use ABC iView;
  - enabling users to create ABC iView Profiles on ABC iView;
  - collecting Additional Information about users as part of the signup process for ABC Accounts; and
  - use of Encrypted Email Promotion Requests;

- provide more information about relevant consents and opt out mechanisms; and
- ensure that these documents continue to be accurate, up-to-date and complete.

Further updates are anticipated prior to the launch of the Single Platform, including to:

- reflect the introduction of opt-in consent in relation to Advertising Cookies on ABC websites and apps;
- reflect the introduction of the ability for users to opt-out from receiving recommendations specific to them on ABC iView and other ABC websites and apps; and
- incorporate a child friendly version of the ABC Privacy Collection Statement that the ABC is in the process of developing;
- provide additional information to users about relevant data sharing arrangements.

A link to the ABC Privacy Collection Statement is provided when signing up for an ABC Account and as part of the flow for creating an ABC iView Profile on ABC iView. The Terms of Use require that ABC Account holders must not create an ABC iView Profile for a child unless consent to those terms, which includes consent to the handling of any personal information in accordance with the ABC Privacy Collection Statement, is in place in relation to the child.

When children sign up for an ABC Account a link to the ABC Privacy Collection Statement is provided to their parent or guardian via email. As mentioned above, the ABC is also developing a child friendly version of the ABC Privacy Collection Statement prior to the launch of the Single Platform. This child friendly version of the ABC Privacy Collection Statement will be available as part of the flow for creating an ABC Account as well as in the ABC Help section of the website.

The ABC is developing a standalone privacy collection statement that is specific to registering for an ABC Account. As noted above, it is also developing a child-friendly set of resources explaining its data and privacy practices.

In accordance with the ABC's usual access practices, notices will be available in audio (for people who are vision impaired), and support will be available for anyone who needs it by accessing the support resources described in earlier parts of this document.

The ABC Terms of Use require the main account holder to ensure that any other people who use ABC iView Profiles are aware of the information contained in the ABC Privacy Collection Statement.

A reference to the ABC Privacy Collection Statement is also included on relevant ABC iView screens, so that ABC iView profile users can themselves access the ABC Privacy Collection Statement (See Figure 8 above).

To the extent that individuals sign up for an ABC Account via “social sign in”, they are provided with a link to the ABC Privacy Collection Statement, which notifies them of the collection of additional information about them from the relevant third parties, in addition to notices that are given by the third parties themselves.

#### **APP 6— Use or disclosure of personal information**

The ABC considers that the primary purpose for each of the relevant data collections is the provision of digital media services pursuant to its Charter. This includes providing recommendations rails in relation to each account and ABC iView Profile.

Importantly, each account and ABC iView Profile will also receive standardised access to news and popular content. This means that all users, whatever their viewing history, will see curated content rails offering the same news and current affairs content, and popular entertainment content. Viewers will therefore have the benefit of receiving popular content, and content which it is important for them to have access to from a public policy perspective, as well as a recommendations rail offering content likely to be of particular interest to them based on their past viewing choices.



Figure 17: Recommendation Rail as a single rail on the broader ABC iView screen

Some of the information collected is used for secondary purposes, as outlined in the ABC Privacy Collection Statement, including:

- helping the ABC understand more about the composition, needs and behaviours of its audiences to see whether the ABC is reaching a broad cross-section of Australians in accordance with its objectives;
- performing research and analysis aimed at improving the ABC’s content, services and reach; and
- providing audience members with information about ABC activities, products, services and events that may be of interest to them (including promotions for ABC content on third party digital services as well as on ABC digital services).

We consider that each of these secondary purposes are permitted under APP 6.2 if and to the extent it applies (noting the question as to whether any of the data is personal information) on the basis that each of these purposes is related to the primary purpose of the ABC providing digital media services pursuant to its Charter, and individuals are likely to expect use and disclosure for those purposes. The ABC Privacy Collection Statement creates a reasonable expectation that the data, including any personal information collected, will be used and/or disclosed for each of these secondary

purposes. For example, in relation to Encrypted Email Promotion Requests, the ABC Privacy Collection Statement explains the purposes for which personal information may be used which relevantly include to:

*...provide [audience members] with information about ABC activities, products, services and events that may be of interest to [them] (including promotions for ABC content on third party digital services as well as ABC digital services).*

The communications plan for the launch of the Single Platform will include notifying individuals of pertinent updates to the ABC Privacy Policy, ABC Privacy Collection Statement and ABC Terms of Use, to ensure that individuals are made sufficiently aware of any secondary use or disclosure of any personal information involved in the relevant practices. The communications plan also includes information about how individuals can opt-out of their hashed email addresses being shared with Facebook and Google.

Notice of any secondary uses or disclosures of information will be included in the ABC Privacy Collection Statement as a matter of good practice on the basis that some of it is personal information for Privacy Act purposes.

All existing ABC Account holders who have logged in since October 2020 (and been asked to agree to the updated ABC Privacy Policy, ABC Privacy Collection Statement and Terms of Use at that time) will have previously been notified of relevant secondary uses or disclosures in general terms, including the use or disclosure for the purpose of direct marketing.

In relation to requests made by enforcement agencies, the ABC has existing policies and practices in place to ensure that an appropriate compliance approach is taken in relation to any warrants or subpoenas that it receives.

The ABC utilises third party service providers to implement the Encrypted Email Promotion Requests, and has contracts in place with the relevant service providers. In particular, it has agreements in place with Google and Facebook to protect the Encrypted Email Promotion Requests shared with them via Tealium. As explained above, Facebook and Google will only be able to understand the Encrypted Email Promotion Requests if they already have the email addresses in question. The only additional information each of them will receive is the request to serve a particular ABC content promotion and the encrypted email address of the intended recipient. The ABC has taken a best practice approach of assessing the terms of the relevant agreements with Facebook and Google by reference to the obligations that apply in relation to the disclosure of personal information. As explained in relation to APP 8 below, the applicable terms offer privacy protection, including for the purpose of APP 6.

The terms of the agreement with Tealium are considered confidential but the ABC is comfortable that they also ensure compliance with APP 6.

As mentioned above, a detailed assessment of the ABC's existing use of cookies and other similar technologies, and the contractual measures in place with existing vendors, is outside the scope of this PIA. These matters are discussed further in relation to APP 7 and APP 8.

## **APP 7 – Direct marketing**

### *Encrypted Email Promotion Requests*

ABC Account holders are given the opportunity to opt out of Encrypted Email Promotion Requests via their account settings and to opt-out of receiving recommendations specific to them on ABC websites and apps.

When the ABC makes Encrypted Email Promotion Requests, it may select a promotion/advertisement to send on the basis of a particular email address and the viewing data associated with the account with that email address. Google and Facebook only receive the selected promotion/advertisement information in this context. This is a use of the data. The ABC utilises Tealium services for that purpose. In view of relevant contractual arrangements, this is likely to constitute a “use” rather than “disclosure” of data.

The ABC does not consider that APP 7 applies to this activity as APP 7 only applies to agencies specified in Part II of Schedule 2 of the *Freedom of Information Act 1982* (Cth) if the act or practice relates to documents in respect of its commercial activities or the commercial activities of another entity. The relevant acts and practices do not relate to commercial activities.

If APP 7 did apply, this activity would be permitted under APP 7.2 on the basis that:

- the ABC collects the email addresses, and the other data about individuals and their use of ABC digital services, from the individuals;
- the ABC Privacy Collection Statement and ABC Privacy Policy create a reasonable expectation that the relevant personal information will be used or disclosed for the purpose of direct marketing; and
- the ABC will be providing individuals with a simple means by which individuals may easily request not to have Encrypted Email Promotion Requests provided to Google and Facebook for this purpose via their ABC Account settings (child accounts will be opted out as default) and a simple means by which they may request not to receive recommendations specific to them on ABC websites and apps.

Advertising Cookies operate in a different way to the Encrypted Email Promotion Requests in that their presence on ABC websites and apps allows Facebook and Google to collect online identifiers (such as browser or device identifiers) together with event data (such as viewing behaviour on ABC websites and apps).

While a detailed assessment of the ABC’s use of Advertising Cookies is outside the scope of this PIA and is being addressed in a further PIA, it is worth noting in this document the ABC’s approach in this regard.

Prior to the launch of Single Platform, the ABC will offer a cookie consent pop-up, such that advertising cookies will not be used on web unless an individual has expressly opted

in. In the context of apps, the ABC will turn off marketing SDKs, and they will only be turned back on when a consent pop-up is made available to audiences. In this way, the ABC will not use marketing SDKs in apps, until an individual has expressly opted in.

Following the launch of the Single Platform, the ABC will also continue to use cookies and other similar technologies for critical purposes other than direct marketing, with robust disclosures. This includes cookies and other similar technologies used for analytics, ratings and website and app functionality purposes (the **Other Necessary Cookies**). Similar to the Advertising Cookies, to the extent that the Other Necessary Cookies are third party cookies, they allow those third parties to collect online identifiers (such as browser or device identifiers) together with event data (such as viewing behaviour on ABC websites and apps).

The ABC considers it necessary for it to continue to use the Other Necessary Cookies following the launch of the Single Platform because without these tools the ABC would be unable to:

- ensure the effective functioning of its websites and apps;
- measure the performance of its websites and apps effectively, including things like reach and engagement, to ensure that it is delivering on its ABC Charter objectives; and
- make planning and commissioning decisions that cater to the needs of all Australians.

The ABC has obligations under the Spam Act in relation to the sending of commercial electronic messages to ABC Account holders.

In particular:

- consent must be obtained before sending such messages;
- each such message must:
  - identify the ABC as the sender;
  - contain the contact details for the ABC; and
  - make it easy to unsubscribe.

The ABC has taken steps to ensure that relevant staff are aware of these obligations and has instructed them to comply with them.

#### ***APP 8 – Cross-border disclosure of personal information***

The ABC has reviewed its existing agreements with key vendors. The terms of a number of these agreements are confidential.

While a wholesale review of the existing agreements is outside the scope of this PIA, the key agreements that relate to the Modernisation Features are considered in this PIA.

To the extent that Encrypted Email Promotion Requests involve disclosure of any personal information, the ABC is assessing these arrangements against the standards that apply to personal information to ensure a best practice approach.

In relation to the Encrypted Email Promotion Requests provided to Google the ABC is of the view that APP 8 will not apply as the contracting entity is the locally based Google Australia. That said, the ABC acknowledges that Google has capacity to distribute data across different locations and out of an abundance of caution the ABC has applied an analysis in relation to APP 8.1, with its findings below.

In relation to the Encrypted Email Promotion Requests provided to Facebook via Tealium, APP 8 will not apply, as while the contracting entity is the overseas based Facebook Inc, the provision of the information will be a use rather than a disclosure. In such a scenario, the ABC must comply with the APPs in relation to that information and will be held accountable for a breach of the APPs if they are not complied with by Facebook.

In relation to a 'use' rather than 'disclosure' of personal information, the APP Guidelines relevantly provide that:

*...in limited circumstances providing personal information to an overseas contractor to perform services on behalf of the APP entity may be a use, rather than a disclosure. This occurs where the entity does not release the subsequent handling of personal information from its effective control. In these circumstances, the entity would not need to comply with APP 8. For example, where an APP entity provides personal information to a cloud service provider located overseas for the limited purpose of performing the services of storing and ensuring the entity may access the personal information, this may be a 'use' by the entity in the following circumstances:*

- a binding contract between the entity and the provider requires the provider only to handle the personal information for these limited purposes*
- the contract requires any subcontractors to agree to the same obligations, and*
- the contract gives the entity effective control of how the personal information is handled by the overseas recipient...<sup>5</sup>*

Any provision of Encrypted Email Promotion Requests to Facebook via Tealium will be a use, rather than a disclosure, as their standard terms:

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<sup>5</sup> See paragraph 8.14 of the [Australian Privacy Principle Guidelines](#).

- require Facebook to only handle the information for the purpose of providing the Custom Audiences service (see clause 1 of the Data Processing Terms and clauses 4 and 5 of the Customer List Custom Audiences Terms);
- require any subcontractor to agree to the same obligations (see clause 10 of the Data Processing Terms); and
- give the ABC effective control of how the information is handled by Facebook (see clause 10 of the Customer List Custom Audiences Terms).

Any personal information provided to Tealium will be hosted in Australia.

Notwithstanding the distinction between 'use' and 'disclosure' in relation to the overseas Facebook entity, and Google Australia's business practices in relation to the distribution of data, the standard terms of both Facebook and Google offer relevant privacy protections. The terms entered by the ABC in relation to the relevant products are standard terms, which apply to all users of those products.

In relation to Facebook, the following data protection terms apply to the provision of Encrypted Email Promotion Requests:

- Clause 4 of the Customer List Custom Audiences Terms relevantly provides that Facebook will not share the hashed data with third parties or other advertisers and will delete the hashed data promptly after the match process is complete;
- Clause 5 of the Customer List Custom Audiences Terms relevantly provides that Facebook will not:
  - give access to or information about the ABC's audiences created from the hashed data to third parties or other advertisers;
  - use the ABC's audiences created from the hashed data to append to the information they have about their users or build interest-based profiles; or
  - use the ABC's audiences created from the hashed data except to provide services to the ABC, unless they have the ABC's permission or are required to do so by law;
- Clause 4 of the Data Processing Terms, which are incorporated by reference into Facebook's standard terms, relevantly provides that Facebook will assist the ABC by appropriate technical and organisational measures, insofar as this is possible, to enable the ABC to fulfil its binding obligations to respond to requests from data subjects for the exercise of their data subject rights;

- Clause 9 of the Data Processing Terms relevantly provides that, to the extent required by law, Facebook will notify the ABC without undue delay of the discovery by Facebook of a data breach involving personal information including:
  - details of the nature of the breach and number of records affected;
  - the category and approximate number of affected data subjects;
  - the anticipated consequences of the breach; and
  - any actual or proposed remedies for mitigating its possible adverse effects;
- Clause 10 of the Data Processing Terms relevantly provides that, where Facebook subcontracts its obligations, it will only do so by way of a written agreement with the subcontractor which imposes obligations on the subcontractor no less onerous than as are imposed on Facebook; and
- The ABC also refers to the security provisions discussed below in relation to APP 11.

Similarly, in relation to Google, with respect to the provision of Encrypted Email Promotion Requests:

- The article “How Google uses Customer Match data”, relevantly provides that Google won’t:
  - use the hashed data for any purpose other than to create the ABC’s audiences and ensure compliance with Google’s policies;
  - share the hashed data with other Google teams other than to create the ABC’s audiences and ensure compliance with Google’s policies;
  - use the hashed data or the fact that a Google user is in the ABC’s audiences to build or enhance profiles of users;
  - share the hashed data with any third party, including other advertisers, except to meet any applicable law, regulation, legal process or enforceable governmental request;
  - share the fact that a Google user is in the ABC’s audiences; or
  - retain the hashed data for any longer than necessary to create the ABC’s audiences and ensure compliance with Google’s policies; and
- The ABC understands the information will be handled in accordance with the Google Ads Data Processing Terms, which relevantly provide that Google will:
  - unless European laws to which Google is subject require other processing, in which case Google will inform the ABC unless prohibited from doing so, process ABC personal data only in accordance with applicable law:

- (a) to provide the services and any related technical support;
  - (b) as further specified via the ABC's use of the services and any related technical support;
  - (c) as documented in the form of the agreement including the Data Processing Terms; and
  - (d) as further documented in any other written instructions given by the ABC and acknowledged by Google as constituting same;
- o if it becomes aware of a data incident, notify the ABC of the data incident and promptly take reasonable steps to minimise the harm and secure ABC personal data;
- o if it receives a request from a data subject in relation to ABC personal data:
  - (a) if the request is made via a Data Subject Tool, respond directly to the data subject's request in accordance with the standard functionality of that Data Subject Tool; or
  - (b) if the request is not made via a Data Subject Tool, advise the data subject to submit his or her request to the ABC, and the ABC will be responsible for responding to such request;
- o when engaging any subcontractor, ensure via a written contract that the subcontractor only accesses and uses ABC personal data to the extent required to perform the obligations subcontracted to it, and does so in accordance with the agreement including the Data Processing Terms;
- The ABC also refers to the security provisions discussed below in relation to APP 11.

The terms of the agreement with Tealium are confidential. The ABC is comfortable that they also offer an acceptable level of privacy protection.

#### ***APP 9— Adoption, use or disclosure of government related identifiers***

The projects do not involve any adoption of a government related identifier, so APP 9 does not need to be considered.

#### ***APP 10— Quality of personal information***

ABC Account holders have the ability to update any personal information they provide as part of the sign-up process via their account settings.

The ABC will consider other ways to provide individuals, including ABC iView Profile holders, with opportunities over time to review any personal information collected about them to ensure that it is accurate, up to date and complete.

### **APP 11 – Security of personal information**

The security measures that apply to the provision of Encrypted Email Promotion Requests to Facebook and Google via Tealium are considered below.

The ABC undertakes cyber security assessments which involve an audit of the security measures the ABC, and key vendors, have in place for the purpose of protecting viewer data generally.

This will supplement the security audit that was undertaken last year.

In relation to the Encrypted Email Promotion Requests communicated to Facebook via Tealium:

- Clause 4 of the Customer List Custom Audiences Terms relevantly provides that “Facebook will implement processes and procedures to maintain the confidentiality and security of the Hashed Data ... including by maintaining technical and physical safeguards that are designed to (a) protect the security and integrity of data while it is within Facebook’s systems and (b) guard against the accidental or unauthorised access, use, alteration or disclosure of data within Facebook’s systems”.
- Clause 3 of the Data Processing Terms relevantly provides that “Facebook shall implement appropriate technical and organisational measures to protect the Personal Information Processed under these Data Processing Terms...”
- Facebook’s Data Security Terms are expressly incorporated into the Customer List Custom Audiences Terms and the Data Processing Terms.

In relation to the Encrypted Email Promotion Requests communicated to Google via Tealium:

- The Google Privacy Policy, which is incorporated by reference into Google’s standard terms, relevantly provides:

*All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we’ll notify you and help guide you through steps to stay better protected.*

*We work hard to protect you and Google from unauthorised access, alteration, disclosure, or destruction of information we hold, including:*

- *We use encryption to keep your data private while in transit*
  - *We offer a range of security features, like Safe Browsing, Security Checkup, and 2 Step Verification to help protect your account*
  - *We review our information collection, storage and processing practices, including physical security measures, to prevent unauthorised access to our systems*
  - *We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.*
- The article “How Google uses Customer Match data” relevantly provides that:
    - “We use employee access controls to protect your data files from unauthorised access”; and
    - “We are also committed to ensuring that the systems we use to store your data files remain secure and reliable. We have dedicated security engineering teams to protect against external threats to our systems. We store all your data files in an encrypted format to protect against unauthorised access.”
  - The ABC understands the information will be handled in accordance with the Google Ads Data Processing Terms, which relevantly provide that:
    - Google will implement and maintain technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access as described in Appendix 2 (the **Security Measures**);
    - the Security Measures include measures:
      - (a) to encrypt personal data;
      - (b) to help ensure the ongoing confidentiality, integrity, availability and resilience of Google’s systems and services;
      - (c) to help restore timely access to personal data following an incident; and
      - (d) for regular testing of effectiveness.

The terms of the agreement with Tealium are confidential and the ABC is comfortable that they ensure that any personal information handled by Tealium is protected. A cyber security assessment has also been undertaken by the ABC in relation to Tealium.

The ABC has a Data Breach Response Plan in place.

In view of the fact that emails are encrypted when provided to Facebook and Google, the risk of any third party accessing the email addresses is considered to be very low (as the third party would need the email to understand the encrypted data).

The ABC will consider the application of the plan to Account Data relating to use of the ABC iview service and Account Data more generally as part of its planning to ensure that it is well-placed to prevent data breaches, and to manage a data breach if one occurs.

The ABC will retain the personal information for as long as it is needed for the purpose of providing digital media services to the individual, subject to its obligations under the *Archives Act 1983* (Cth), as mentioned below.

The personal information collected by the ABC as part of this project will be contained in Commonwealth records. This means that, once this information is no longer needed for the purpose of providing digital media services to the individual, the ABC may still be required to retain it in accordance with the *Archives Act 1983* (Cth).

The ABC is reviewing its processes for deleting and/or de-identifying ABC Account information and this will be finalised prior to the launch of Single Platform. These processes address how the ABC ensures that any personal information provided to third parties is deleted or de-identified.

In relation to the Encrypted Email Promotion Requests to Facebook:

- Clause 4 of the Customer List Custom Audiences Terms relevantly provides that Facebook “will delete the Hashed Data promptly after the match process is complete”.
- Clause 2 of the Data Security Terms relevantly provides that Facebook’s security measures will include “Procedures for secure deletion and disposal of data, subject to the Applicable Product Terms”.

In relation to Encrypted Email Promotion Requests to Google:

- The article “How Google uses Customer Match data” relevantly provides that “We won’t retain your data files for any longer than necessary to create your Customer Match audiences and ensure compliance with our policies. Once those processes are complete, we’ll promptly delete the data files you uploaded via the Google Ads interface or the API.”
- The Google Privacy Policy includes a link to the article “How Google retains data we collect” which relevantly provides:
  - “Some data you can delete whenever you like, some data is deleted automatically, and some data we retain for longer periods of time when necessary”;

- “In some cases, rather than provide a way to delete data, we store it for a predetermined period of time. For each type of data, we set retention timeframes based on the reason for its collection... We also take steps to anonymise certain data within set time periods...”; and
- “Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time.”
- The ABC understands the information will be handled in accordance with the Google Ads Data Processing Terms, which relevantly provide that:
  - for services with deletion functionality, if the ABC deletes certain personal data Google will delete such personal data from its systems as soon as reasonably practicable and within a maximum period of 180 days unless European require storage; and
  - for services without deletion functionality, Google will comply with any reasonable request from the ABC to facilitate the deletion of personal data, insofar as this is possible taking into account the nature and functionality of the services and unless European laws require storage.

#### ***APP 12 – Access to personal information***

Individuals can request access to their personal information held by the ABC by contacting the ABC Privacy Officer whose contact details are provided in the ABC Privacy Policy.

The ABC Privacy Manual includes a procedure for handling requests for access to, or correction of, personal information.

#### ***APP 13 – Correction of personal information***

Individuals can seek correction of their personal information held by the ABC by contacting the ABC Privacy Officer whose contact details are provided in the ABC Privacy Policy.

The ABC Privacy Manual includes a procedure for handling requests for access to, or correction of, personal information.

ABC Account holders have the ability to update any personal information they provide as part of the sign-up process via their account settings.

The ABC will consider other ways to provide individuals, including ABC iView Profile holders, with opportunities over time to review any personal information collected about them to ensure that it is accurate, up to date and complete

## SCHEDULE 1: PIA details and methodology

The ABC has prepared this PIA using the PIA tools developed by the OAIC.

Name of project	Platform Modernisation
Name of entity	Australian Broadcasting Corporation ( <b>ABC</b> )
Date	8 October 2021
PIA Ref No.	20144(2)
PIA version number	1
PIA Drafter	<b>Name:</b> Michael Boland, Privacy Officer <b>Email:</b> <a href="mailto:privacy.abc@abc.net.au">privacy.abc@abc.net.au</a>
Has the Privacy Officer of your entity been consulted in the drafting of this PIA?	Yes
Privacy Officer	Name: Michael Boland Email: <a href="mailto:privacy.abc@abc.net.au">privacy.abc@abc.net.au</a>

### ***Stakeholder identification and consultation***

The ABC has consulted with a range of internal and external stakeholders including:

- the members of the Australian public by various methods such as surveys and focus groups;
- other public broadcasters including the BBC, the CBC and SBS;
- the OAIC;
- the Executive Leadership Team of the ABC;
- ABC Audiences division;
- ABC Audience Data & Insights;
- ABC Legal;
- ABC Digital Product; and
- ABC Cyber Security.

The outcomes of those consultations are, where relevant, summarised in this report.

The ABC is required by the Australian Government Agencies Privacy Code to maintain a register of the PIAs it conducts. A version of that register is published on the ABC website, as is also required by the Code, and will be updated to include a reference to this PIA. The ABC is not required to publish the PIAs it conducts and has, to date, elected not to do so. The PIAs usually contain privileged and confidential information.

However, given the public interest surrounding the Single Platform decision, the ABC intends to make this PIA available to the public, either in whole or part.

### ***Map information flows***

To support this PIA the ABC has undertaken an exercise to identify relevant information flows. The flow of information is discussed further in Part 2 of this report where relevant to our analysis of the privacy impacts. Information flows have been identified and analysed through a series of consultations with ABC technical and marketing staff over a period of 2 years. The ABC takes security seriously and the details of information flows are therefore confidential.

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