



# Te Kawa Mataaho

Public Service Commission

4 October 2024

9(2)(a) privacy

9(2)(a) privacy

## Official Information Request

**Our Ref: OIA 2024-0254**

I refer to your official information request received on 21 September 2024 where you asked:

*“1. Please consider this correspondence to be a request pursuant to the Official Information Act 1982*

*2. Does Public Service Commission pay for advertising services on the Facebook, Instagram, LinkedIn, Google, Tik Tok or other digital platform?*

*a. If so, how much money has been spent, by year, on advertising on each of these platforms?*

*b. Does Public Service Commission use any agencies to place or manage that advertising, if so who?*

*c. If Public Service Commission uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?*

*d. If Public Service Commission uses any agencies to place or manage that provide copies any and all legal agreements between that advertising agency and Public Service Commission.*

*3. If Public Service Commission uses advertising services on digital platforms as above, does (or has) the agency created "custom audience" lists as part of those campaigns?*

*a. If so, please provide a list of the custom lists that have been generated, including the number of people on that list and what market segmentation was being targeted by that campaign and the date for which each custom audience was generated, along with when these audience lists were uploaded and to which platform?*

*b. If so, what privacy analysis was conducted prior to custom audience lists being generated?*

*c. If so, was the Minister responsible ever made aware that Public Service Commission was undertaking this activity? If so, which Minister was it, and when were they notified?*

*d. If so, what advice was sought prior to this activity taking place?*

*e. If so, what lawful basis does Public Service Commission rely on for this disclosure?*

*f. If so, what was the origin of the information that was included in these custom audience lists?*

*g. If so, did Public Service Commission receive any specific advice as to the efficacy of the security measures around these lists, if so, who provided this advice and when was it provided? Please provide copies of the advice provided.*

*h. If so, what security measures are used to protect the privacy of individuals?*

*i. If so, is Public Service Commission still generating and uploading custom audiences, or is this practice "on hold". If it is on hold, when and why was it put on hold?*

j. If so, can people "opt-out" of being included in these custom audience lists, and if so, how many people have done so?

k. If so, has Public Service Commission received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.

l. If so, did Public Service Commission consult with the office of the Privacy Commissioner on this practice? If so, when?

m. If so, has Public Service Commission received any reports about the effectiveness of custom audience lists? If so, please provide these.

n. If so, for each upload of the custom audience lists to each platform, what percentage of these were "matched" against the current users of each platform?

4. Has any person from Public Service Commission had any meetings, whether in person, by videoconference or other method, with any representative from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months?

a. If so, who was present during these meetings?

b. If so, please provide the agenda, notes, minutes and any communications associated with these meetings.

c. Does Public Service Commission have a dedicated account manager with Meta, Google, LinkedIn, Tok Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?

5. Please provide any correspondence, e-mail, document, or record held by Public Service Commission on the subject of custom audience lists, advertising on Meta, Facebook, Instagram, Google, Tik Tok or any other platform for the period 1 September 2024 and today."

### Information not held

Te Kawa Mataaho Public Service Commission (the Commission) does not advertise on social media or any digital advertising platform and has not meet with any representative from any social media or digital advertising platform.

I am therefore refusing this part of your request under section 18(e) of the Official Information Act 1982 (OIA) on the grounds the information requested does not exist.

### Information being released

Listed in the table below is communication between the Commission and the Inland Revenue Department during the period 1 September 2024 to 21 September 2024 regarding custom audience lists.

I have decided to release these documents with some information being withheld under section 9(2)(a) of the OIA in order to protect the privacy of natural persons, including deceased people.

In making my decision, I have considered the public interest considerations in section 9(1) of the OIA.

Item	Date	Document Description	Decision
1	12 September 2024 @ 8.22am 12 September 2024 @ 8.18am	<b>EMAIL THREAD:</b> Titled - Custom Audience lists	Released in part

2	20 September 2024 @ 4.51pm	<b>EMAIL:</b> Titled: Update on Hashing Item	Released in part
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If you wish to discuss this decision with us, please feel free to contact [Enquiries@publicservice.govt.nz](mailto:Enquiries@publicservice.govt.nz).

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Please note that we intend to publish this letter (with your personal details removed) and enclosed documents on the Te Kawa Mataaho Public Service Commission's website.

Yours sincerely



Nicky Dirks

**Manager – Ministerial and Executive Services  
Te Kawa Mataaho Public Service Commission**

**From:** [Martin Kessick](#)  
**To:** [James Grayson](#)  
**Subject:** RE: Custom Audience lists  
**Date:** Thursday, 12 September 2024 8:22:00 am  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Thanks James. Talk soon.

Regards

**Martin Kessick**  
**Assistant Commissioner | Kaikōmihana Tautāwhi**

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**From:** James Grayson 9(2)(a) privacy  
**Sent:** Thursday, 12 September 2024 8:18 am  
**To:** Martin Kessick 9(2)(a) privacy  
**Subject:** Custom Audience lists

**This email was sent from someone outside of Te Kawa Mataaho. Please take extra care.**

[IN CONFIDENCE]

Hello Martin,

Here is a little bit of background on the media stories related to our marketing process we use for targeted advertising on Meta (Facebook, Instagram), LinkedIn and Google.

Talk soon.

Thanks,

James.

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## **Background**

IR uses custom audience lists for targeted advertising on Meta (Facebook, Instagram), LinkedIn and Google. 'By using custom audience advertising, we're able to increase the compliance of collecting tax revenue and dispersing payments by targeting only customers who need to see the advert.

Custom audience lists are a tool our marketing team use to help reach our customers who need to update their information with us. We recently received an Official Information Act (OIA) request and media enquiries in relation to our use of custom audience lists on social media.

## **What is a custom audience list?**

A custom audience list is a list of specific customers who we want to target with our advertising. For example, student loan customers who are overseas or GST customers who have returns due. By using these lists we're able to only target those customers who need to see the message and we're also able to reach them on a channel they use i.e. their Facebook account.

## **What data is uploaded to the social media platforms?**

Social media platforms offer a custom audience feature that allows businesses and government departments to upload information to an encrypted site for direct marketing purposes. The use of custom audience lists, and social media targeting is common practice.

The lists we upload are all hashed, meaning the data on them is un-identifiable. Hashing is a type of cryptographic security method that turns identifiers into randomised code and cannot be reversed. This means identities of our customers are protected. For example, [John.Doe@ird.govt.nz](mailto:John.Doe@ird.govt.nz) may become wLKziR/6RoXDv1MDaXLH1UNUC9nIVr97jrTnL4TcxsM= through the hashing process.

The hashed data from our list is only used if it can be matched with what the individual has already provided on their social media account. If a customer hasn't provided information on their social media accounts or doesn't have an account, then none of the hashed IR data is used.

It is also important to clarify that IR is not selling any data to the social media platforms – or anyone for that matter. We take our customers privacy seriously and have rigor in how we use social media. This is why we've limited this practice to Meta, LinkedIn and Google.

IR operates well within the guidelines of the NZ Information Security manual, which is maintained by the Government Communications Security Bureau.

## **Why are we being asked about our use of custom audience lists?**

We recently received an Official Information Act (OIA) request and media enquiries in relation to our use of custom audience lists on social media. Following the media articles, we have also received customer enquiries.

## **Custom audience media timeline:**

- 17 May 2024. OIA: 24OIA2206 Buckingham on the use of social media. This was sent to the MoR office for noting.
- 27 August 2024. Media release on specific justification for IRD sending personal information to social media platforms. This was emailed directly to the MoR's office. It also included links to earlier relevant OIAs.

- 09 September 2024: We have responded to multiple media enquiries about this (our response is below).

### **Custom audience media response 09 September 2024:**

For advertising purposes, Inland Revenue uploads custom audience lists securely to Meta (Facebook and Instagram), LinkedIn and Google. Inland Revenue does not upload custom audience lists to X (previously known as Twitter) or TikTok.

A custom audience list is a list of specific customers who Inland Revenue wants to target.

The data is hashed when it is uploaded meaning that it is not identifiable when it gets to the social media platform.

Hashing is a type of cryptographic security method that turns identifiers into randomised code and cannot be reversed so identities are protected. For example, [John.doe@ird.govt.nz](mailto:John.doe@ird.govt.nz) may come out hashed as `wLKziR/6RoXDv1MDaXLH1UNUC9nIVr97jrTnL4TcxsM=`. Meta, for example, uses this hashed information and compares it to its own hashed information to build custom audiences.

Inland Revenue uses custom audience lists on the social media platforms to reach relevant customers who are on these platforms. The purpose of using custom audience advertising is to increase the compliance of collecting tax revenue and dispersing payments by targeting only customers who need to see the advert. Examples of where we regularly use custom audience advertising are:

- a. Student loan customers who have debt owing. We separate these audiences into different segments for accuracy, such as those based overseas, those within New Zealand who are self-employed and those based in New Zealand earning salary and wages.
- b. GST customers who have returns and/or a debt due
- c. Income tax debt – customers who have tax debt and would benefit from setting up an instalment arrangement to manage this debt
- d. Working for Families customers who need to update their information with Inland Revenue.

Social media platforms offer a custom audience feature which allows businesses and government departments to upload information to an encrypted site for direct marketing purposes.

Each social media platform has its own privacy principles in place that it must adhere to. These privacy principles were reviewed by Inland Revenue to ensure that customer information is protected and only used for the intended purpose.

Inland Revenue is satisfied that this information is deleted when the hashing process has been completed.

Inland Revenue does not have the ability to identify customers who would like to opt out of advertising. However, customers can opt-out of being shown specific ads by editing their advertising preferences in the social platforms

they use.

Inland Revenue only has access to information that is publicly available on social media platforms.

Inland Revenue continuously reviews our processes to ensure what it is doing is safe. Off the back of these enquiries and comments from the US Federal Trade Commission and European Data Protection Supervisor, we have begun looking further into the use of hashing to ensure it is still safe to use.

The following information is publicly available on our website [Privacy policy \(ird.govt.nz\)](#)

***Why you might see a certain advertisement on social media***

*We may also use or disclose your information to third parties to assist us to communicate or market our services to you.*

*To reach groups of people with information that is relevant to them while protecting their privacy, we sometimes provide [hashed](#) and fully anonymised information to social media channels when placing advertisements. In this process, your personal information is treated with the utmost integrity by us. The social media channel is not given any identifiable information. We fully comply with our obligations under the Tax Administration Act and the Privacy Act to protect your personal information.*

Also, here are links to OIA's on this topic that have already been proactively released.

<https://www.ird.govt.nz/-/media/project/ir/home/documents/oia-responses/june-2024/2024-06-18-details-on-ir-advertising-including-privacy-impact-assessments-and-meta.pdf?modified=20240729033724&modified=20240729033724>

<https://www.ird.govt.nz/-/media/project/ir/home/documents/oia-responses/july-2022/2022-07-11-marketing-and-advertising-costs.pdf?modified=20220815004713&modified=20220815004713>

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**From:** [Joanne Petrie](#)  
**To:** [Martin Kessick](#)  
**Cc:** [Peter Mersi](#)  
**Subject:** Update on Hashing Item  
**Date:** Friday, 20 September 2024 4:51:56 pm

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[IN CONFIDENCE RELEASE EXTERNAL]

Kia ora Martin

Just giving you visibility of the below landing page which we will use as a base to respond to customer complaints/OIAs/Privacy Requests in relation to the custom audience lists/hashing media.

[www.ird.govt.nz/customaudiencelists](http://www.ird.govt.nz/customaudiencelists)

Please let me know if you have any questions.

Have a great weekend.

Nga mihi  
Jo

Jo Petrie  
Team Lead & Management Support (CE & DC ED&I) – Executive Services  
Enterprise Design & Integrity  
Inland Revenue  
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