



Industry Engagement on the Adoption of Precise Positioning Information

Privacy Impact Assessment Report

14 December 2020

Document information

Date PIA completed:	14 December 2020	
Status:	<input checked="" type="checkbox"/> New PIA	<input type="checkbox"/> Update. Date of previous version:
Prepared by:	Team Lead, Engagement and Evaluation, Positioning Australia	

Endorsement and approval

Project Manager/Responsible Official:

I recommend the project proceeds as proposed in this document.

Position:	Director, National Geodesy
Date:	1 February 2021

Privacy Officer:

I support the project proceeding as proposed in this document.

Position:	Director, Governance
Date:	1 February 2021

1 Introduction

1.1 Purpose

This Privacy Impact Assessment (PIA) Report:

- identifies possible impacts on the privacy of individuals' personal information, and
- recommends options for mitigating or minimising any negative impacts.

1.2 Applicable legislation

This PIA analyses the privacy impacts of collecting, storing, using and disclosing personal information for the purposes of the project against the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988*.

1.3 Project description

The project will survey representatives from across the Australian positioning community for the purpose of undertaking research related to positioning user requirements and use cases.

This project is a joint project between Geoscience Australia, FrontierSI, Curtin University and Positioning Insights to develop standards supporting the transfer of precision positioning data. In order to develop these standards, representatives from across the Australian positioning community will be surveyed on how their business uses precise positioning.

1.4 Stakeholders consulted

This PIA was undertaken in consultation with the Privacy Officer.

2 Personal information flows

This section explains how personal information will flow through the entity's systems and processes as a result of the project. It describes:

- what personal information will be collected and how it will be used and disclosed
- who will have access to it, and
- how it will be stored and protected.

Personal information – Information or an opinion about an identified individual, or an individual who is reasonably identifiable

Sensitive personal information – A subset of personal information that includes information or an opinion about an individual's race, political opinions, religious beliefs, professional memberships, union membership, sexual orientation, criminal record or health

Business process/activity	Components of personal information <i>(For example, name, date of birth, address)</i>	Collection <ul style="list-style-type: none"> • <i>From?</i> • <i>By whom?</i> • <i>How?</i> • <i>Lawful authority (if any)?</i> 	Storage <ul style="list-style-type: none"> • <i>How?</i> • <i>Where?</i> • <i>By whom?</i> • <i>For how long?</i> 	Use <ul style="list-style-type: none"> • <i>By whom?</i> • <i>Why?</i> • <i>When?</i> • <i>How?</i> • <i>Lawful authority (if any)?</i> 	Disclosure <ul style="list-style-type: none"> • <i>By whom?</i> • <i>To?</i> • <i>Why?</i> • <i>When?</i> • <i>How?</i> • <i>Lawful authority (if any)?</i>
Conduct survey	First name Last name Company they work for Work phone number Email address	Representatives of businesses that make up the Australian positioning community An email will be sent inviting them to complete the survey Responses will be collected through a web-based survey tool (Typeform) and sent to a Google Doc for ease of analysis	Typeform is a company based in Spain The Google Doc will be stored on a cloud-based server	Contact details are being collected to facilitate ongoing dialogue with survey respondents	No personal information will be disclosed outside the project

3 Analysis

3.1 Privacy risks

Privacy principle	Proposed information handling practices	Identified risks
<p>Consideration of personal information privacy (APPs 1 & 2)</p> <ul style="list-style-type: none"> • Open and transparent management • Anonymity and pseudonymity 	<p>Terms and conditions for the questionnaire have been prepared which communicate the purpose of the collection and how information will be collected, used and disclosed. The Geoscience Australia Privacy Policy, available at ga.gov.au/privacy, is also made available and explains how the entity manages personal information, including the mechanisms for inquiries and complaints.</p> <p>As a key objective of the project is to facilitate ongoing dialogue with the Australian positioning community, contact details have been requested from respondents. For this reason, it is not practical to engage with the participants anonymously or by pseudonym. Completion of the survey is a voluntary activity.</p>	<p>None</p>
<p>Collection of personal information (APPs 3 to 5)</p> <ul style="list-style-type: none"> • Collection of solicited personal information • Dealing with unsolicited personal information • Notification of collection 	<p>The collection of personal information is limited to basic contact information so that additional information can be sought if required. No sensitive personal information is collected.</p> <p>The terms and conditions and privacy policy are made available to respondents prior to the collection of any personal information. The notification includes the use of a third party system to support the collection and transfer of data and notes that the data collected will be stored and transmitted overseas.</p> <p>Acceptance of the terms and conditions is sought prior to the collection.</p> <p>The third party service provider is bound by EU privacy legislation which affords substantially similar protections to Australian privacy legislation.</p>	<ul style="list-style-type: none"> • Personal information is collected by an overseas third party that is not bound by the Australian Privacy Act.
<p>Dealing with personal information (APPs 6 to 9)</p> <ul style="list-style-type: none"> • Use or disclosure • Direct marketing • Cross-border disclosure • Adoption, use or disclosure of government related identifiers 	<p>All collected identifiable information related to any individual, organisation or group will be anonymised and aggregated, including any findings from this project that are released publicly, unless participants agree to identifying data being made public.</p> <p>All information collected or stored by third parties remains the property of Geoscience Australia (and project partners) and will not be shared or used by those parties, except to support the collection and transfer of data for the purpose of this project and future projects where prior approval from participants has been received.</p>	<ul style="list-style-type: none"> • Personal information is shared with an overseas third party that is not bound by the Australian Privacy Act. • Personal information is either not removed, or de-identification of personal information before disclosure is not sufficiently robust to prevent re-identification.

Privacy principle	Proposed information handling practices	Identified risks
	Overseas third parties supporting the collection and transfer of data are bound by EU and/or US privacy legislation which afford substantially similar protections to Australian privacy legislation.	
Integrity of personal information (APPs 10 & 11) <ul style="list-style-type: none"> • Quality • Security 	<p>Validation of contact information is not required at the point of collection. Should the data be found to inaccurate at a later stage, the project team can make enquiries with the relevant organisation.</p> <p>All data collected will be securely stored and retained for the project duration and will then be destroyed in accordance with our national archives records disposal authority.</p> <p>Any personal information that is stored in Geoscience Australia's corporate systems is protected in accordance with the requirements of the Protective Security Policy Framework (PSPF).</p> <p>Notwithstanding that the likelihood of significant harm to individuals in the event of unauthorised access or disclosure is judged to be low, any suspected or known data breaches will be handled in accordance with the Personal Information Data Breach Response Plan.</p>	<ul style="list-style-type: none"> • Unauthorised disclosure of personal information, e.g. data breach.
Access to, and correction of, personal information (APPs 12 & 13) <ul style="list-style-type: none"> • Access • Correction 	<p>Individuals may request access to and/or correction of any personal information held by Geoscience Australia in accordance with the privacy policy at www.ga.gov.au/privacy.</p>	None

4 Actions to address the identified privacy risks

#	Identified privacy risk	Existing controls that contribute to managing the identified risk	Recommended actions
1	Personal information is collected by and shared with overseas third parties that are not bound by the Australian Privacy Act.	Overseas third parties supporting the collection and transfer of data are bound by EU and/or US privacy legislation which afford substantially similar protections to Australian privacy legislation.	Nil
2	Personal information is either not removed, or de-identification is not sufficiently robust to prevent re-identification.	Notwithstanding there being a small likelihood that personal information is accidentally disclosed through human error or can be reconstructed, the risk of serious harm to any individual should this occur is unlikely given the nature of the information. The information handling practices outlined in the previous section are considered appropriate and proportionate to the risk.	Nil
3	Unauthorised disclosure of personal information, e.g. data breach.	Existing technical controls and procedures are in place to protect data held within the entity's corporate systems. Data that is handled by overseas third parties, though largely out of the entity's control, is protected by legislation substantially similar to Australia's. Given that a data breach by a third party is unlikely to result in serious harm to any individuals, the existing controls are considered proportionate to the risk.	Nil

5 PIA outcomes

5.1 Agreed recommended actions

#	Recommendation	Agreed Yes/No
1	Nil	

5.2 Action plan

#	Actions to be taken	Responsibility for action	Date for completion
1	Nil		