



03 October 2024

Shane Gibson

[fyi-request-28360-f5d74f72@requests.fyi.org.nz](mailto:fyi-request-28360-f5d74f72@requests.fyi.org.nz)

Dear Shane Gibson

Thank you for your request made under the Official Information Act 1982 (OIA), received on 11 September 2024. You requested the following:

*Please provide a copy of the Privacy Impact Assessment that was done as part of this data sharing arrangement.*

**Inland Revenue takes privacy very seriously. We have not leaked or sold any taxpayer information.**

We advertise on social media because it is an effective tool to inform customers of their tax obligations or entitlements like Working for Families and FamilyBoost. Using custom audience lists on social media allows organisations to securely upload de-identified information (referred to as hashed information) for direct marketing purposes. We have used custom audience lists on Meta (Facebook and Instagram), LinkedIn and Google.

On 12 September we paused the use of custom audience lists while we undertake an internal review of this practice (undertaken by our Chief Information Security Office (CISO)). We did this due to public concern and to provide reassurance that we take the public's concerns seriously. We are also working with the Office of the Privacy Commissioner who are assessing whether there are any privacy issues with hashing.

The New Zealand Information Security manual, which is maintained by the Government Communications Security Bureau (GCSB), has guidelines on information assurance and systems security. Our standards with relation to hashing operate within these guidelines.

More information on our use of custom audience lists, including how this complies with the Privacy Act 2020, is on our website at [www.ird.govt.nz/customaudiencelists](http://www.ird.govt.nz/customaudiencelists). This page will be updated when the review has been completed or if we have further information to share.

**Information requested**

A privacy impact assessment helps identify whether a project will impact on people and their information, how any risk can be reduced and ensures the project complies with the Privacy Act 2020.

The following privacy impact assessments are enclosed as **Appendix A:**

Date	Document Title	Decision
1. September 2016	Use of Facebook’s Custom Audience for advertising campaigns – Brief Privacy Analysis	Released in full.
2. September 2024	Use of Custom Audience on social media for advertising campaigns – Privacy Threshold Assessment	Released in full.

Inland Revenue conducted a privacy impact assessment in 2016. In September 2024, Inland Revenue conducted a new privacy impact assessment to assess the use of custom audience on social media for advertising campaigns. This version contains more detail, but the privacy impact rating is the same.

**Right of review**

If you disagree with my decision on your OIA request, you can ask an Inland Revenue review officer to review my decision. To ask for an internal review, please email the Commissioner of Inland Revenue at: [commissionerscorrespondence@ird.govt.nz](mailto:commissionerscorrespondence@ird.govt.nz).

Alternatively, under section 28(3) of the OIA, you have the right to ask the Ombudsman to investigate and review my decision. You can contact the office of the Ombudsman by email at: [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz).

If you choose to have an internal review, you can still ask the Ombudsman for a review.

Thank you again for your request.

Yours sincerely



Pip Knight  
**Service Leader, Marketing & Communications**