



9 December 2024

OIAD-1378

9(2)(a)

Dear 9(2)(a)

Thank you for your email of 11 November 2024 requesting the following under the Official Information Act 1982 (the Act):

I am writing to request information under the Official Information Act 1982. My request relates specifically to the use of personal data for targeted online marketing by your ministry/department. I am seeking detailed information on any targeted marketing practices in the last 5 years involving personal data, particularly where individuals or groups are identified and communicated with on digital platforms. Please provide responses to the following:

1. Use of Personal Data for Targeted Marketing Campaigns

- Please confirm if the ministry has engaged in any online marketing campaigns that used personal data to target individuals or specific demographic groups on platforms such as Meta (Facebook, Instagram), Google Ads, or similar digital advertising services.
- For each such campaign, please provide:
 - o The date range of the campaign.
 - o The nature of the targeted audience (e.g., by age, location, interest).
 - o The types of personal data used to define these audiences.
 - o The third-party platforms or services involved.

2. Methodology and Data Types for Targeting

- Describe the specific data categories used for targeted marketing (e.g., demographic data, browsing behaviors, metadata) and how they were obtained.
- Clarify whether any information shared for marketing purposes was anonymized or aggregated, and if so, what steps were taken to ensure anonymization.

3. Agreements and Compliance with Privacy Standards

- Provide information on any agreements with third-party platforms regarding data sharing or targeted advertising.
- Outline the measures taken to ensure that the ministry's targeted marketing activities comply with New Zealand's Privacy Act and other relevant data protection standards.
- Have there been any breaches of privacy standards? Please share details of incident if so

4. Review or Audit of Targeted Marketing Practices

- *Has the ministry conducted any internal reviews or external audits regarding the ethical or legal considerations of using personal data for online marketing purposes?*

o If so, please include the date of the review, its scope, and any recommendations made to address privacy or ethical issues.

The Ministry for the Environment (the Ministry) has collated information in-scope of point 1 your request in the document titled *OIAD-1378 Targeted Marketing* which is being released to you in full.

The Ministry is extending the timeframe for its response to point 1 of your request for “...*the nature of the targeted audience*...” under section 15A(1)(b) of the Act, as consultations necessary to make a decision on that point of your request are such that a proper response cannot reasonably be made within the original timeframe.

We will now respond to this point of your request on, if not before, 28 January 2025, which is an extension of 20 working days.

Regarding point 2 of your request, the Ministry uses the generic metrics provided in each social media platform to create targeted advertising campaigns. These metrics are based on a user’s profile and the data they share with the platform. This is managed through the platform and the use of the platforms’ terms and conditions.

Regarding point 3 of your request, the Ministry does not have any agreements with third-party platforms regarding data sharing or targeted advertising.

Regarding point 4 of your request, the Ministry has not conducted a review of our target marketing practices.

You have the right to seek an investigation and review by the Office of the Ombudsman of my decision to withhold information relating to this request, in accordance with section 28(3) of the Act. The relevant details can be found on their website at:

www.ombudsman.parliament.nz.

Please note that due to the public interest in our work the Ministry for the Environment publishes responses to requests for official information on our [OIA responses page](#) shortly after the response has been sent. If you have any queries about this, please feel free to contact our Ministerial Services team: ministerials@mfe.govt.nz.

Yours sincerely

Electronically approved by Clayton Foster

Clayton Foster

Manager – Channels and Content

Ministry for the Environment | Manatū Mō Te Taiao