Privacy Impact Assessment and Report
(Marketo)

1. Threshold Assessment

A Privacy Threshold Assessment was conducted which indicated a PIA was necessary as this project:

- Collected personal information or involved a new way of collecting and storing personal information.
- Involves data matching with personal information activities.
- Involves the migration of some personal information from the CRM.
- Will involve user authentication.

2. PIA Plan

This project covers the implementation of Marketo (marketing automation platform) to manage communication outputs and customer engagement for AgriFutures. Marketo is intended to complement and integrate with several other systems including the CRM and CMS.

Privacy planning is a key aspect of this project as the system will be collecting new user information, integrating with other systems that contain personal information and migrating data to and from the CRM.

This project is led by Jennifer Galloway, Senior Manager, Communications. The project team consists of Pip Grant, Senior Manager, Agrifood Engagement and Events, Petri Swart, Manager, Communication Channels, Gerard McTaggart, Systems Coordinator and Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements). Jennifer will also be responsible for the PIA.

Privacy will be considered throughout the project:

- At collection –
  - Customers are required to opt-in to receive communications and have read/accepted the AgriFutures Australia Privacy Policy and General Collection statement
  - Internal staff will be set up in the system.
  - User data will be migrated from the current system – Click dimensions and the CRM.
  - A clean out of all data in these systems will occur to ensure we have the most up-to-date information and permissions to contact our customers and that customers are aware of our updated Privacy Policy.

- Storage
  - Part of the procurement process for Marketo defined that all data be stored securely in Australia. This is a cloud-based solution, but the data will be hosted in an Australian Data Centre.
• **Access**
  - Users will have the ability to request access to their information and for updates to be made.
  - Users have the ability to update their preferences or opt-out entirely at any time and can also request that their information be removed from the system.
  - Access to the system is limited to internal staff as required for their role, and to developers when required for integrations with other systems including our website, the CRM and the event platform.

• **Policy and procedures**
  - The AgriFutures Privacy Policy and General Collection Statements will be updated to comply with GDPR regulations and Marketo data collection capabilities.
  - Business rules will be established to ensure staff understand best practice/uses of the platform.
  - Staff training will also be conducted.

Stakeholder consultation will be built into the project timeline as required.

Privacy will be considered throughout the life cycle of the project and as any additional changes are made to the system in future.

### 3. Project Description

**Project: Marketo**

**Description of project**

In 2020, AgriFutures Australia undertook an assessment of the current email campaign capabilities and ability to measure customer engagement through Click Dimensions. Subsequently, a decision was made to look to a more advanced marketing automation platform that would ensure better customer experience, efficiencies, and reporting.

**Benefits of Marketo:**

- Marketing Automation tools provide a rich set of features to support the rapid development and communication of new campaigns.
- The ability to measure, track and report engagement across our platforms and campaigns in order to develop more relevant content for our stakeholders.
- It allows us to be more agile and quickly optimise engagement based on changes in market conditions or customer preference and behaviour.
- It allows targeted communication to customers/stakeholders across a broad range of online and offline channels—from social media and other web channels to email, direct mail, events, and more.
- Lead Scoring also drives efficiency improvements and allows specified rules to automatically identify leads with the greatest likelihood of conversion/engagement. Having this information allows resource heavy one-on-one interactions to be targeted in contexts with the greatest possible return.

**Roles and responsibilities:**

Jennifer Galloway, Senior Manager, Communications) will be the strategic lead for this project with Petri Swart, Manager, Communications Channel and assistance from Gerard McTaggart, Systems Coordinator.
Marketowill be providing technical staff to assist with the implementation of the new platform.

**Scope:**
AgriFutures Australia is replacing our current email system Click Dimensions with Marketo. This project will encompass the implementation of Marketo, including integrations with core systems: the CRM and the website. There will also be a migration of data from Click Dimensions.

Privacy elements

Personal information will be collected from customers to ensure we understand their preferences:

This will include:

- Email: (required)
- First Name: (required)
- Last Name: (required)
- Organisation:
- Job Title: (dropdown list, plus option for 'Other' with text box)
- Industry: (dropdown list, plus option for 'Other' with text box)
- State/Territory/County: (dropdown list that updates from Country selection above)
- Mobile Phone number:
- Interests: (dropdown list)

4. **STAKEHOLDERS**

**Stakeholder consultation:**

Privacy and the security of the personal information collected were a core requirement of the system and thoroughly investigated as part of the procurement process by the selection panel which comprised:

Belinda Allitt, GM, Communications
Pip Grant, Senior Manager, Agrifood Engagement and Events
Nicole Legovich, Senior Manager, Information Systems and Business Improvements
Erin Hulm, Manager, Legal Services

An internal Marketo Reference Group was also established to ensure we had coverage across all communication needs for the business.

Jennifer Galloway, Senior Manager, Communications

**Sam Noon, Content Producer & Editor (Contractor)**
Agrifood Engagement & Events

**Sam Munro, Manager, Communications**
Business Development
Georgina Davies, Manager, Communications Channels (maternity leave)
Lauren Sharkey, Manager, Communications Research
Dallas Pearce, Manager, Projects Agrifood Engagement and Events
Petri Swart, Manager, Communication Channels
Holli Walsh, evokeAG Coordinator

Internally, as part of the contract review process, Erin Hulm, Manager, Legal Services reviewed Marketo’s Activity Data Retention Policy and was satisfied that it complied with Australian privacy laws.

5. PERSONAL INFORMATION FLOW

1. Users will need to opt-in to receive information through email campaigns, social marketing and SMS messages.
2. A user’s email address will be used as verification of their identity.
3. Marketo’s munchkins capabilities track onsite behaviour and update customer records to reflect their behaviour to ensure information sent is personalised and relevant.
4. The information is stored in Marketo. Activity and Campaign Membership data will be stored for a rolling period of 25 months past the activity date, and high-volume activity data will be retained for a rolling period of 90 days past the activity data. After 90 days these activities will be permanently deleted. See for further information https://nation.marketo.com/t5/knowledgebase/marketo-activities-data-retention-policy-under-the-hood/ta-p/251191
5. Selected data fields will also be updated and stored in the CRM.
6. The data will be stored securely and hosted within Australia.
7. Through their subscription preferences customers receive tailored communications from AgriFutures
8. Instances where information is shared (such as surveys) will require additional information being sent to the customer for their permission to opt-in when they receive notification.
9. Access to data will be limited to those who require it to perform their duties.
10. Users will be able to request to see their data and for it to be updated and if necessary, removed.

6. PRIVACY IMPACTS & MITIGATION

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<thead>
<tr>
<th>Risk</th>
<th>Mitigation</th>
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<tbody>
<tr>
<td>Data is lost/altered during the migration</td>
<td>• Data in both the CRM and Click Dimensions will be backed up and has disaster recovery provisions.</td>
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<td>• Customers will be advised of the introduction of new data collection and be given access to check their personal information is correct</td>
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<td>Data is used for an intent other than the one it was collected for</td>
<td>• Access to the data will be controlled based on the user’s role.</td>
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<td>• A collection notice will be included at the point of collection notifying potential users how their data will be used.</td>
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• AgriFutures staff will comply with this and will seek permission to contact users for any purpose not covered by the collection notice.

Data is accessed without permission

• While every precaution is taken to secure the data, should a breach occur, AgriFutures Australia will follow their Data Breach Response Plan.

7. RESPOND AND REVIEW

This PIA will be revisited throughout the project to ensure that any additional privacy aspects that arise are properly addressed.

Document Information

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<thead>
<tr>
<th>Date PIA completed:</th>
<th>30/04/2021</th>
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<tbody>
<tr>
<td>Status:</td>
<td>Draft completed</td>
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Endorsement and approval

Project manager: Belinda Hutt

I recommend the project proceeds as proposed in this document.

Name: Jennifer Galloway
Position: Senior Manager, Communications
Signature: Belinda Hutt
Date: 8/6/21

The following officer/s have endorsed this document:

Name: Nicole Legovich
Position: Senior Manager, Corporate (Information Systems and Business Improvements)
Signature: Nicole Legovich
Date: 8/06/2021

Project Executive/privacy officer/senior management:

I agree to the project proceeding as proposed in this document.

Name: Louise Heaslip
Position: General Manager, Corporate
Signature: Louise Heaslip
Date: 08.06.2021