

# Privacy Impact Assessment and Report

## (grow<sup>AG</sup>. User portal)

### 1. Threshold Assessment

A Privacy Threshold Assessment was conducted which indicated that a Privacy Impact Assessment was necessary for this project:

- Collect personal information or a new way of collecting/storing and using personal information;

### 2. PIA Plan

This project covers the development of a user login and portal function for grow<sup>AG</sup>. to enhance the user experience on grow<sup>AG</sup>.

The grow<sup>AG</sup>. portal is a crucial step in grow<sup>AG</sup>. service offering particularly with a focus on building a valuable and self-sustaining program. This project will deliver value back to the user through a personalised experience, notifications and automated updates based on preference settings and the ability to see historical engagement or saved content on the site. This project will also create efficiencies in the grow<sup>AG</sup>.s communications teams workflow and will give the larger team access to greater insights on user activity, engagement and impact.

Privacy planning is a key aspect of this project as this will be a new way of collecting data and will change the way that certain data will be used.

This project is led by Rebecca Bradford, Manager, grow<sup>AG</sup>. In the Global Innovation Networks team.

The project team consists of:

- Harriet Mellish, General Manager, Global Innovations Networks
- Rebecca Bradford, Engagement Manager, Global Innovations Networks
- Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements)
- Stephani-Kate Bratton, General Counsel, Corporate

Privacy and data storage will be considered throughout the project:

At collection:

- When signing up users will have to accept the AgriFutures Australia Privacy Policy and General Collection Statement.
- Data will be stored in-line with the AgriFutures Australia Privacy Policy and Collection Statement.

Storage:

- Human data is stored and geospatially optimised within Australia on cloud-based servers, affirming compliance with the data residency requirement. This ensures that all user data transmitted, stored and processed within the website and portal remains exclusively within the Australian jurisdiction, safeguarding the sensitive information of our users.
- Once submitted, this information is directly stored in a secure database hosted on cloud servers based in Australia.
- The storage complies with Australian data sovereignty requirements, ensuring legal compliance and enhanced security.
- Human website communication is protected via SSL encryption to ensure the security and confidentiality of all transmitted data. All data is backed up regularly and is subject to stringent data retention policies to prevent unauthorized access and data loss.

Access:

- Users will have the ability to update their contact or business information through the portal administration and through requests to the grow<sup>AG</sup>. team.
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- Users will be able to set up 2FA authentication to add further security to their data access.
- Users can log in to the website to update their personal information whenever they wish.
- Administrators can also update user information via a Content Management System (CMS).
- All data is backed up regularly, and stringent data retention policies are in place to minimize risks related to unauthorized access and data loss.
- Users can also request their data to be permanently deleted unless a specific legal requirement dictates otherwise. In such cases, a de-identification process is undertaken.
- Data used in the portal is provided to Australian based web developer company Humaan, who has already been housing and managing the current data collected (which is the same as the data that will be collected for portal use). All data is housed in Australia. No other third parties are provided data.

#### Policy and procedure

- The AgriFutures Australia Privacy Policy and General Collection Statements will be used and adhered to.
- Business rules will be established to ensure project team understand best practice/uses of the portal development and use, including insights and user activity tracking.

Internal stakeholders were consulted during the procurement process to complete this Privacy Impact Assessment. These included Harriet Mellish (General Manager, Global Innovation Networks) Nicole Legovich (Senior Manager ITC).

Privacy will be considered throughout the lifecycle of the project and as any additional changes are made to the app in the future, for example any new functionality is used or features are added to the app.

### 3. Project description

The grow<sup>AG</sup> platform has been successfully run for 2 and a half years, since launch in April of 2021. Through this time the site has been updated in small ways but has remained in a state of Minimum Viable Product (MVP). The next iteration and step for grow<sup>AG</sup> to remain relevant and competitive is to develop a user portal and login function to allow for a personalised experience and greater user engagement.

Working with Humaan to develop the portal, allows us to create a fully customised experience, and portal, what Humaan will deliver:

#### Accounts Management:

- Support for the creation and management of all user accounts on the GrowAG platform, including 2 factor authentication and account deletion.
- Manage My Preferences screen.

#### Accounts Homepage:

- Users will have access to an account homepage that springboards them into the curation of their account, including favorites, managing preferences, and seeing historical listing of Opportunities enquired with.
- Users will also have access to a simple account overview to guide on "Using your account", supporting onboarding and understanding.

#### User Content Preferences:

- Design and development of the account area to support for users to manage interest and preferences for notification of new content relating to:
  - Content Types (Organisations, Opportunities, Stories & Research Projects), and
  - Content Filters (Industries, Readiness, etc.)
- Support for users to favourite individual Opportunities and Organisations and prompt for users to Sign Up or Log In if they use those actions without being logged in.
- Through favoured content, users will be notified of when an Organisation publishes new items, or when an Opportunity window is close to closing.
- Inclusion of Prompt Dialog to Log in or sign up.

#### Notifications:

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- Development of Website Notifications Listing and Email notifications for
  - When new content is published that aligns to their interests.
  - When an Organisation favourited publishes new content.
  - When an Opportunity is close to closing for EOI.

The benefits of the use of a portal feature for AgriFutures grow<sup>AG</sup> include:

- **User friendly:** Humaan will develop a custom portal that will be user friendly and easy to navigate.
- **Personalisation:** The portal will provide a personalised experience to our users and will allow users to set up notification preferences to ensure they don't miss any opportunities, content or updates, and save content to review/track in future.
- **Analytics and reporting:** grow<sup>AG</sup> team will be able to pull greater insights from user activity which will provide greater visibility on the engagement and impact of the program.
- **Improved user engagement:** Users will be able to see who they have reached out to, giving them a history and improved engagement.

**Roles and responsibilities:**

- Rebecca Bradford grow<sup>AG</sup> – Leading the project and portal build, liaising and project management with Humaan, internal consultation, Privacy Impact Assessment and co-management of the portal through to launch and implementation – to be handed over to incoming SM role.
- Harriet Mellish, General Manager Global Innovation Networks – Overseeing the project and app build, internal consultation, signing agreement and approving relevant budget lines.
- Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements) – reviewing technical interoperability, data storage, and privacy implications of the platform.

**Privacy elements:**

Personal information will be collected on the front end of the website via a sign up portal and then pushed through to the CMS where the data can be administered by the grow<sup>AG</sup> team. Users will then be able to access a portal where their data is stored and they can manage it.

The data collected will include:

- First name
- Surname
- Organisation
- Organisation Type
- Email
- Phone Number/s
- Postcode/Country
- Industry
- Occupation/job title
- User type

#### 4. Stakeholder consultation

The consultation process gathered informal feedback from key users received by the Engagement and Senior Managers.

An internal consultation was held to outline what was required of the portal usage and ensure that the portal can be iterated and developed further with additional features as need arises. This discussion ensure Humaan had all relevant capability in building the app and customising the functionality tailored to AgriFutures Australia's requirements.

#### 5. Personal information flow

1. Users will visit the website and set up a user accounts, where they will enter their data.
  2. Data will be used by the grow<sup>AG</sup> team to facilitate connections.
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3. Users can manage, request copies and request permanent deletion of their data in their portal.
4. Users will be able to prefill enquiries and submissions using their data, in a logged in state.
5. Data will be shared with other users only when a user submits an enquiry for an opportunity or project and agrees to share that information via the enquiry form.
6. Data shared via an enquiry form will also flow through K2 for management from team.
7. Data will be stored, used and disposed of in accordance with the AgriFutures Australia Privacy Policy and Collection Notice. AgriFutures Australia own all data.

## 6. Identify the privacy impacts

Risk	Mitigation
Data is used for purposes that users have not opted-in for	<ul style="list-style-type: none"> <li>• Users will be made aware of the AgriFutures Australia Data Collection Notice, which outlines how data will be used and stored.</li> <li>• AgriFutures staff have been trained in data use and the Privacy Policy.</li> </ul>
Data is used for an intent other than the one it was collected for	<ul style="list-style-type: none"> <li>• A collection notice will be included at the point of collection notifying potential users how their data will be used.</li> <li>• AgriFutures staff will comply with this and will seek permission to contact users for any purpose not covered by the collection notice.</li> </ul>
Data is accessed without permission	<ul style="list-style-type: none"> <li>• Humaan prioritise privacy and access to the database is restricted to authorized personnel only, which is restricted to the administrators and technicians who maintain the website and related technology.</li> <li>• Personal data is stored in a secure database on cloud servers based in Australia, complying with Australian data sovereignty requirements.</li> <li>• Humaan's website communication is protected via SSL encryption to ensure the security and confidentiality of all transmitted data. All data is backed up regularly and is subject to stringent data retention policies to prevent unauthorized access and data loss.</li> <li>• While every precaution is taken to secure the data, should a breach occur, AgriFutures Australia will follow their Data Breach Response Plan.</li> </ul>

## Dealing with Risk

Privacy Risk Assessment Matrix (Relative Severity of Risk)

Likelihood	Consequences				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
5 Almost Certain	S	H	H	E	E
4 Likely	M	S	H	E	E
3 Possible	L	M	S	H	H
2 Unlikely	L	L	M	S	H
1 Rare	L	L	L	M	S

Risk Rating	Risk score	Description
E	(9-10)	Extreme risk – Generally not tolerated, requires risk transfer or discontinuation of activity/risk.
H	(7 – 8)	High risk – Avoid where possible, if unavoidable likely to require strict management in the form of risk action plans and formalised reporting.
S	(6)	Significant risk – Likely to require formal monitoring and management by the Leadership Team Team.
M	(5)	Medium risk – Likely to require day to day management oversight.
L	(2-4)	Low risk – Generally accepted with minimal ongoing review.

Using the risk matrix, the risk of implementing the new portal is Medium (5) as the risks are possible but minor, and there is not a significant change to how personal information submitted by users currently is managed. Any associated privacy risk will be reviewed occasionally to identify any privacy issues and ensure our users are confident in how their data is being managed and stored.

### 8. Respond and review

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

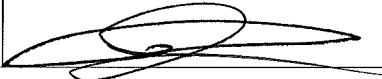
### Document Information

Date PIA completed:	Wednesday, 15 November 2023
Status:	Draft completed
Prepared by:	Rebecca Bradford
Position:	Engagement Manager, grow <sup>AG</sup>
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Endorsement and approval

Project manager:

I recommend the project proceeds as proposed in this document.

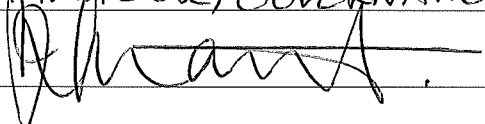
Name:	Rebecca Bradford		
Position:	Engagement Manager grow <sup>AG</sup> .		
Signature		Date:	17/11/23

The following officer has endorsed this document:

Name:	Harriet Mellish		
Position:	General Manager, Global Innovation Networks		
Signature		Date:	17/11/23

Privacy officer:

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

Name:	JESSICA GRANT		
Position:	MANAGER, GOVERNANCE & COMPLIANCE (PRIVACY OFFICER)		
Signature		Date:	17-11-23