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<https://privacy.org.au/about/contacts/>

19 November 2020

Mayor Tom Tate  
City of the Gold Coast  
PO Box 5042  
GCMC QLD 9726

[mayor@goldcoast.qld.gov.au](mailto:mayor@goldcoast.qld.gov.au)

Dear Mayor Tom Tate

**Re: City of Gold Coast using big data to support economic growth**

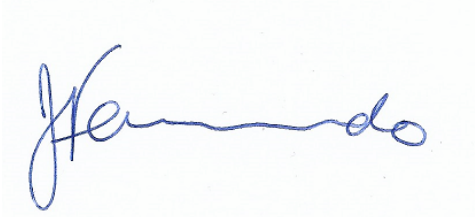
The Australian Privacy Foundation (APF) is the country's leading privacy advocacy organisation. A brief backgrounder is attached.

I refer to an article published by itNews on November 16, 2020<sup>(1)</sup>, stating that the City of Gold Coast is data mining and reorients mobile phone visitor data to support economic growth, which has prompted several questions of interest to the Australian community as follows.

1. Can you confirm that the DSpark app re-purposes Optus mobility data from different sources including mobile phone towers and GPS level data from apps on the Optus mobile network and Council data from its "free wi-fi"<sup>(1)</sup>?
2. Please point me to the Privacy Impact Reports supporting the DSpark implementation?
3. What organisations participated in the consultations supporting the DSpark implementation?
4. What organisations vetted and stand by assertions of "anonymity", that the data mining "does not include any personally identifiable information (PII) other than the "the age and gender of a device holder" ... "for demographic analysis" and "minimum sample size" to "understand where people are moving" <sup>(1)</sup>?

There is a growing need for transparency measures to be implemented across Australia given the rapid pace of technological development/pervasive social media and other apps and privacy in the context of community trust to progress digital implementations. So I thank you for responding to my questions.

Yours sincerely

A handwritten signature in blue ink that reads "Fernando". The signature is written in a cursive style with a large initial 'F'.

Dr. Juanita Fernando  
Vice Chair, APF  
0408131535

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#### REFERENCE

1. Bennett, Tess. City of Gold Coast plugs into mobile data. itNews, Nov 16 2020. Available from:  
<https://www.itnews.com.au/news/city-of-gold-coast-plugs-into-mobile-data-555534>

## Australian Privacy Foundation

### Background Information

The Australian Privacy Foundation (APF) is the primary national association dedicated to protecting the privacy rights of Australians. The Foundation aims to focus public attention on emerging issues that pose a threat to the freedom and privacy of Australians. The Foundation has led the fight to defend the right of individuals to control their personal information and to be free of excessive intrusions.

The APF's primary activity is analysis of the privacy impact of systems and proposals for new systems. It makes frequent submissions to parliamentary committees and government agencies. It publishes information on privacy laws and privacy issues. It provides continual background briefings to the media on privacy-related matters.

Where possible, the APF cooperates with and supports privacy oversight agencies, but it is entirely independent of the agencies that administer privacy legislation, and regrettably often finds it necessary to be critical of their performance.

When necessary, the APF conducts campaigns for or against specific proposals. It works with civil liberties councils, consumer organisations, professional associations and other community groups as appropriate to the circumstances. The Privacy Foundation is also an active participant in Privacy International, the world-wide privacy protection network.

The APF is open to membership by individuals and organisations who support the APF's Objects. Funding that is provided by members and donors is used to run the Foundation and to support its activities including research, campaigns and awards events.

The APF does not claim any right to formally represent the public as a whole, nor to formally represent any particular population segment, and it accordingly makes no public declarations about its membership-base. The APF's contributions to policy are based on the expertise of the members of its Board, SubCommittees and Reference Groups, and its impact reflects the quality of the evidence, analysis and arguments that its contributions contain.

The APF's Board, SubCommittees and Reference Groups comprise professionals who bring to their work deep experience in privacy, information technology and the law.

The Board is supported by Patrons The Hon Michael Kirby AC CMG and The Hon Elizabeth Evatt AC, and an Advisory Panel of eminent citizens, including former judges, former Ministers of the Crown, and a former Prime Minister.

The following pages provide access to information about the APF:

- Policies <https://privacy.org.au/publications/by-date/>
- Media <https://privacy.org.au/home/updates/>
- Current Board Members <https://privacy.org.au/about/contacts/>
- Patron and Advisory Panel <https://privacy.org.au/about/contacts/advisorypanel/>

The following pages provide outlines of some of the campaigns that the APF has conducted:

- The Australia Card (1985-87) <https://privacy.org.au/About/Formation.html>
- Credit Reporting (1988-90) <https://privacy.org.au/campaigns/consumer-credit-reporting/>
- The Census (2006) <https://privacy.org.au/campaigns/census2006/>
- The Access Card (2006-07) <https://privacy.org.au/campaigns/id-cards/hsac/>
- The Media (2007-) <https://privacy.org.au/campaigns/privacy-media/>
- The MyHR (2012-) <https://privacy.org.au/campaigns/myhr/>
- The Census (2016) <https://privacy.org.au/campaigns/census2016/>