



Reference: 24-OIAD-015

9(2)(a)

26 September 2024

9(2)(a)

Response to your Official Information Act Request

Thank you for your email of 22 September 2024 requesting the following under the Official Information Act 1982 (the Act):

Does Independent Children's Monitor pay for advertising services on the Facebook, Instagram, LinkedIn, Google, Tik Tok or other digital platform?

- a. *If so, how much money has been spent, by year, on advertising on each of these platforms?*
- b. *Does Independent Children's Monitor use any agencies to place or manage that advertising, if so who?*
- c. *If Independent Children's Monitor uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?*
- d. *If Independent Children's Monitor uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and Independent Children's Monitor.*

If Independent Children's Monitor uses advertising services on digital platforms as above, does (or has) the agency created "custom audience" lists as part of those campaigns?

- a. *If so, please provide a list of the custom lists that have been generated, including the number of people on that list and what market segmentation was being targeted by that campaign and the date for which each custom audience was generated, along with when these audience lists were uploaded and to which platform?*

- b. *If so, what privacy analysis was conducted prior to custom audience lists being generated?*
- c. *If so, was the Minister responsible ever made aware that Independent Children's Monitor was undertaking this activity? If so, which Minister was it, and when were they notified?*
- d. *If so, what advice was sought prior to this activity taking place?*
- e. *If so, what lawful basis does Independent Children's Monitor rely on for this disclosure?*
- f. *If so, what was the origin of the information that was included in these custom audience lists?*
- g. *If so, did Independent Children's Monitor receive any specific advice as to the efficacy of the security measures around these lists, if so, who provided this advice and when was it provided? Please provide copies of the advice provided.*
- h. *If so, what security measures are used to protect the privacy of individuals?*
- i. *If so, is Independent Children's Monitor still generating and uploading custom audiences, or is this practice "on hold". If it is on hold, when and why was it put on hold?*
- j. *If so, can people "opt-out" of being included in these custom audience lists, and if so, how many people have done so?*
- k. *If so, has Independent Children's Monitor received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.*
- l. *If so, did Independent Children's Monitor consult with the office of the Privacy Commissioner on this practice? If so, when?*
- m. *If so, has Independent Children's Monitor received any reports about the effectiveness of custom audience lists? If so, please provide these.*
- n. *If so, for each upload of the custom audience lists to each platform, what percentage of these were "matched" against the current users of each platform?*

Has any person from Independent Children's Monitor had any meetings, whether in person, by video conference or other method, with any representative from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months?

- a. *If so, who was present during these meetings?*
- b. *If so, please provide the agenda, notes, minutes and any communications associated with these meetings.*
- c. *Does Independent Children's Monitor have a dedicated account manager with Meta, Google, LinkedIn, Tik Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?*

Please provide any correspondence, e-mail, document, or record held by Independent Children's Monitor on the subject of custom audience lists, advertising on Meta, Face book,

Instagram, Google, Tik Tok or any other platform for the period 1 September 2024 and today.

The scope of your request was interpreted to be for the listed information regarding purchased online advertising services and online audience customisation services.

Beyond standard advertisement of job vacancies, Aroturuki Tamariki | Independent Children's Monitor, has not paid for advertising on digital platforms or had any meetings or communications regarding online audience customisation services.

As we hold no information in scope of your request, your request is refused under section 18(e) of the Act *that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.*

You have the right to seek an investigation and review by the Office of the Ombudsman of my decision to refuse 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, Aroturuki Tamariki publishes responses to requests for official information on our [OIA responses page](#). If you have any queries about this, please feel free to contact us on info@aroturuki.govt.nz.

Ngā mihi nui



Nova Banaghan

Acting Chief Executive