



**Australian
Privacy
Foundation**

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6 November 2012

Randy Dean
CEO
Digital Post Australia Pty Limited

Dear Mr Dean

Re: Digital Post Service

We refer to our letter of 22 April 2012 and your reply of 22 June.

Thanks for your reply. We note that it appears long on aspiration, but unfortunately rather short on substantive response to the questions we asked about consultation and the conduct of a Privacy Impact Assessment (PIA). They remain largely unanswered.

We further note that:

- Australia Post launched its service at the end of October
- Australia Post conducted something in the form of a PIA, but failed to engage with consumer and privacy advocacy organisations, and the consumer-appropriateness and personal information security risk profile of its service accordingly remains somewhat in doubt

To deliver benefits as improvements in design or reductions in personal information security or privacy risk, PIA processes need to be performed in advance, as part of the design process, not in arrears. We suggest that the opportunity still exists for your organisation to differentiate its offering by performing a meaningful PIA, including effective consultation processes, prior to finalising the design, and remain happy to assist.

Thank you for your consideration.

Yours sincerely

Vice-Chair, for the Board of the APF
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