



**Australian  
Privacy  
Foundation**

<http://www.privacy.org.au>



<http://www.efa.org.au/>

13 May 2010

Mr I. Flynn  
Public Policy & Government Affairs  
Google Australia  
iflynn@google.com

Dear Mr Flynn

**Re: Collection and Use of WiFi-Related Information**

As you know, Electronic Frontiers Australia (EFA) represents Internet users concerned with on-line freedoms and rights, and the Australian Privacy Foundation (APF) is the country's primary public interest organisation focussing on privacy issues.

We refer to the blog post entitled 'The importance of geolocation services' which was posted on the Lat Long Blog on 23 April 2010. This says that:

"Google has contributed [to the development of geolocation services] by creating its 'My Location' API, which relies on a database of locations collected by Google Maps for mobile *as well as by our Street View cars, which catalog the location of Wi-Fi access points* (the public "beacon" part described above) at the same time as they are collecting Street View imagery and 3D laser scans of buildings" (emphasis added).

A 'public beacon' is described as follows:

"By treating Wi-Fi access points or cell towers as 'beacons', smartphones are able to fix their general location quickly in a power-efficient way, even while they may be working on a more precise GPS-based location. This can be done without any intrusion into the privacy of a Wi-Fi network. *We only use information that is publicly broadcast (for example, that list of Wi-Fi hotspots you see in the anytime you open the "join network" option on your PC).* It doesn't involve accessing the network to send or receive data" (emphasis added).

You are no doubt aware of the criticism raised by Peter Schaar, the German Federal Commissioner for Data Protection regarding your collection of WiFi-related information as part of the Street View image collection exercise. Similarly, the UK's Information Commissioner's Office has also indicated that it will seek assurances from Google about what WiFi-related information is being collected and how it will be used.

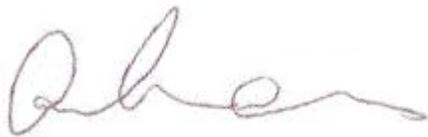
We note that Australian privacy law may be relevant to the conduct of such activities in Australia.

Accordingly, we would appreciate it if you would advise us:

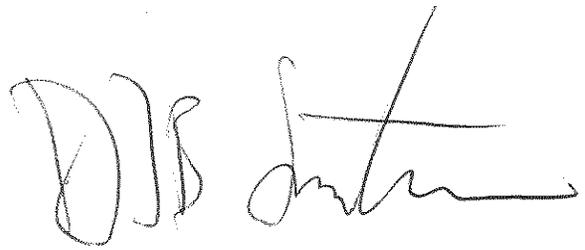
1. What type of wireless network information is Google collecting (i.e. what beyond the SSID and MAC address is being recorded)?
2. What is the purpose of collecting this data?
3. Beyond the purposes that led to its collection, how does Google intend to use, store and make available this information?
4. What other information, beyond that mentioned in the blog post, does Google collect as part of its provision of the StreetView product, beyond the recently revealed wireless network information, and self evident information such as visual depictions of streets?

Thank you for your consideration.

Yours sincerely



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