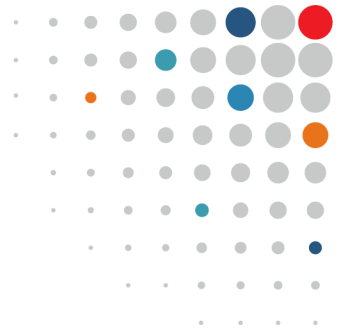




9 October 2024

9(2)(a)

Thank you for your Official Information Act 1982 request, received on 21 September 2024. You requested:

1. *Please consider this correspondence to be a request pursuant to the Official Information Act 1982.*
2. *Does Social Investment Agency pay for advertising services on Facebook, Instagram, LinkedIn, Google, TikTok or any other digital platform?*

The Social Investment Agency has not paid for any advertising services on Facebook, Instagram, LinkedIn, Google, TikTok or any other digital platform.

- a. *If so, how much money has been spent, by year, on advertising on each of these platforms?*

The Social Investment Agency has not spent any money on advertising platforms.

- b. *Does Social Investment Agency use any agencies to place or manage that advertising, if so, who?*

On one occasion, in August 2024, Ministry of Business, Innovation and Employment used advertising on LinkedIn for recruitment of the Social Investment Board on behalf of the Social Investment Agency.

*If Social Investment Agency uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?*

Ministry of Business, Innovation, and Employment (MBIE).

- c. *If Social Investment Agency uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and Social Investment Agency.*

Social Investment Agency does not have any legal agreement between MBIE regarding placing advertising. Therefore, I have decided to refuse this part of your request under section 18(e):

- that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

3. *If Social Investment Agency uses advertising 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 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 Social Investment Agency 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 Social Investment Agency rely on for this disclosure?*
- f. *If so, what was the origin of the information that was included in these custom lists?*
- g. *If so, did the Social Investment Agency 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 advice provided.*
- h. *If so, what security measures are used to protect the privacy of individuals?*
- i. *If so, is Social Investment Agency 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 Social Investment Agency 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 Social Investment Agency consult with the office of the Privacy Commissioner on this practice? If so, when?*
- m. *If so, has Social Investment Agency received any reports about the effectiveness of custom 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?*

The Social Investment Agency (SIA) has not created a custom audience list for advertising on LinkedIn or any other digital platform. Therefore, I have decided to refuse this part of your request under section 18(e):

- that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

4. *Has any person from Social Investment Agency had any meetings, whether in person, via videoconference or other method, with any representatives from Meta, Google, LinkedIn, TikTok, or any digital advertising platform in the last 12 months?*

- If so, who was present during these meetings?*
- If so, please provide the agenda, notes, minutes or any communications associated with these meetings.*
- Does Social Investment Agency have a dedicated account manager with Meta, Google, LinkedIn, TikTok or any other digital platform. If so, what is the name of this person or the names of these people?*

The Social Investment Agency has not had any meetings with representatives from Meta, Google, LinkedIn, TikTok or any other digital advertising firm in the last 12 months. Therefore, I have decided to refuse this part of your request under section 18(e):

- that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

*Please provide any correspondence, email, document or record held by Social Investment Agency on the subject of custom audience lists, advertising on Meta, Facebook, Instagram, Google or TikTok or any platform for the period 1 September 2024 and today.*

The Social Investment Agency does not hold any information relating to custom audience lists. Therefore, I have decided to refuse this part of your request under section 18(e):

- that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

Under section 28(3) of the Act, you have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Nāku iti noa, nā



Kirsty Anderson

**Manager, Communications and Engagement**