

# Privacy Impact Assessment and Report

## Rice water productivity open innovation challenge – Brightidea platform

### 1. Threshold Assessment

A Threshold Assessment was conducted resulting in the need to conduct a PIA. The initial Threshold Assessment identified the following areas that need to be addressed by a PIA:

- Collecting personal information or a new way of collecting /storing personal information
- Transferring of personal information outside of Australia

This PIA addresses how the collection, storage, access, use and disposal of personal information that is collected from external stakeholders during the execution of the Rice water productivity open innovation challenge will be handled to ensure no privacy breaches are made.

The following personal information will be collected during the course of the Rice water productivity open innovation challenge project in order to meet project objectives and create positive impact for rural industries and associated communities.

- Full name
- Email address
- Phone
- Company/Organisation name
- Country
- State
- Innovation idea (non-confidential)

### 2. PIA PLAN

**Aspects of the Rice water productivity open innovation challenge in-scope for this PIA:**

- Collection of personal information.
- Access to personal information.
- Storage of personal information.
- Use of the personal information.
- Destruction of personal information after use.

**Conducting the PIA:**

Laura Skipworth conducted the PIA in consultation with internal and external stakeholders. The PIA was conducted after a threshold assessment identified the need for the PIA. The PIA was conducted inline with the Rice water productivity open innovation challenge project timeline to ensure the PIA, risk management and implementation of findings could be implemented prior to personal information being collected from external stakeholders.

**Stakeholder consultation:**

Internal AgriFutures Australia stakeholders

- Louise Heaslip
- Nicole Legovich
- Gerard McTaggart
- Lauren Sharkey
- Erin Hulm
- Lucinda Staley
- John Smith

#### External stakeholders

- Brian Ruddle – Impact Innovation
- Alexandra Connors – Impact Innovation
- Gonzala Jara – Impact Innovation
- Laurie Lewin – Rice Advisory Panel
- Antony Vagg – Rice Advisory Panel
- Russell Ford – Rice Advisory Panel
- Bert Collard – NSW DPI

#### PIA implementation:

The implementation of the outcomes of this PIA will continue throughout the entirety of the Rice water productivity open innovation challenge and continue until all elements of the challenge have ceased.

### 3. The project

**Project:** Rice water productivity open innovation challenge

#### Roles and responsibilities:

Project leads:

- Lucinda Staley – AgriFutures Australia
- Gonzala Jara – Impact Innovation

Project working group participants:

- John Smith – AgriFutures Australia
- Laura Skipworth – AgriFutures Australia
- Brian Ruddle – Impact Innovation
- Alexandra Connors – Impact Innovation
- Laurie Lewin – Rice Advisory Panel
- Antony Vagg – Rice Advisory Panel
- Russell Ford – Rice Advisory Panel
- Bert Collard – NSW DPI

Speciality expertise:

- Lauren Sharkey – AgriFutures Australia - Communications

#### Scope:

For the rice industry to remain a competitive user of farm business resources, transformational change is required.

This requires the identification of a more sustainable approach to production by significantly increasing the rice industries dollar return per megalitre (\$/ML) in water systems across Australia.

The Australian rice industry is supported by AgriFutures Australia who manage the rice industries research, development and extension program.

AgriFutures Australia is launching this open innovation challenge aimed at finding potential technologies or solutions to improve water productivity for rice by 75% in the next five years.

Selected technologies or solutions will have the potential for funding through the rice research, development and extension (R,D&E) program with the ultimate objective being industry wide adoption. Commercialisation and IP arrangements will be determined as part of ongoing project discussions.

Potential solutions must be applicable to a broadacre setting in Australia, and could be related, but not necessarily limited, to:

- Agronomic technologies and solutions
- Production management technologies or solutions
- Remote sensing technologies or solutions
- Plant genetics technologies or solutions
- Genetic traits to improve water efficiency or productivity
- Water management technologies or solutions
- Technologies or solutions that optimize water use in on-farm systems
- Technologies or solutions from other industries that could solve the challenge

Technologies or solutions should be able to provide a demonstrable impact within a 5-year period.

**Project objectives:**

- Launch the rice industry challenge “improving water productivity for a large medium grain by 75% in five years” on the Brightidea open innovation platform.
- Monitor progress and support AgriFutures during the four-week idea collection phase.
- Manage the evaluation process to obtain a short list for validation.
- Provide a final report containing ideas/innovations and outcomes, including future recommendations.

### 3. Stakeholder Consultation

The PIA stakeholder consultation process was conducted in the critical planning phase of the Rice water productivity open innovation challenge project, in order to collect and store personal information according to best practice, whilst minimising risk to members of the public and AgriFutures Australia.

**Internal stakeholder consultation:**

Legal; Erin Hulm

- Reviewed and deemed the Privacy Policy of both Impact Innovation and Brightidea appropriate and in alignment with the AgriFutures Australia’s Privacy Policy.
- Provided the standard AgriFutures Australia template for the Privacy Collection Notice.

Information Technology; Nicole Legovich & Gerard McTaggart

- The Brightidea platform and open innovation challenge process was discussed with Nicole to identify any areas of potential risk and mitigation strategies to be included in the PIA.
- The Brightidea platform security was assessed by Gerard and deemed acceptable to AgriFutures Australia.

Governance; Lousie Heaslip

- Privacy training was implemented by AgriFutures Australia, Salinger Privacy, educate all AgriFutures Australia staff on how to collect, store and dispose of personal information that is collected during the execution of organisational programs and projects
- Louise is also the organisation’s Privacy Officer and approved the initial Threshold Assessment

Records Management; Lucinda Staley

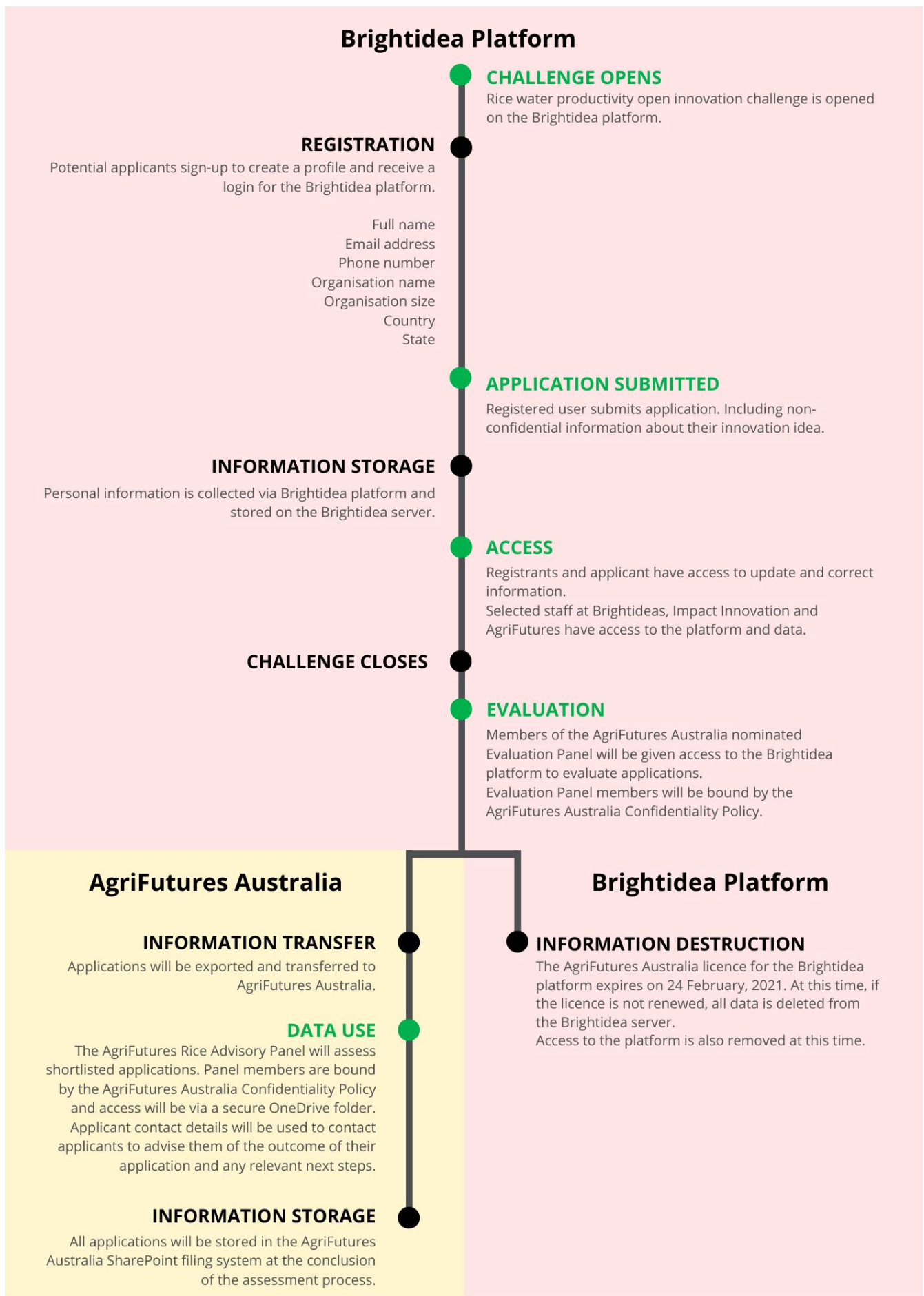
- Provided insight into the use of collected personal information.

**External stakeholders:**

Brightidea Platform; Gonzalo Jara

- Innovation Strategist at Impact Innovation and project lead.
- Specialist expertise in managing large innovation programs using the Brightidea platform.
- Provided insight into the Brightidea platform and how data is collected, stored, accessed and destroyed.

## 5. Map the personal information flow



## 6. Privacy Risks

- Personal information not being used for the purpose it was collected.
- Personal information being able to be accessed by people outside of AgriFutures Australia.
- Personal information not being deleted from the Brightidea server.
- Personal information being misused by third-party agencies or stored outside of the Brightidea platform (or AgriFutures).
- The Brightidea server is hosted outside of Australia.

## 7. Identify options to address the privacy risks

- Limiting amount of personal information collected during sign-up/registration; collecting only information that is critical to progressing their idea to further development.
- Restrict information use to align with the expectations of applicants at the time that they entered information into the idea management platform; using information to contact applicants regarding the outcome of their applications and any further requirements associated with the application.
  - A Privacy Collection Notice outlining this use has been added to the application form.
- Knowing exactly who at Impact Innovation and Brightideas have access to the personal information.
  - Impact Innovation are the consultants contracted to run the Rice water productivity open innovation challenge and their project team is required to have access to the AgriFutures Australia Brightideas platform to conduct their contracted work.
  - Three specified employees at Brightideas are required to have access to the AgriFutures Australia Brightideas platform to resolve any technical issues that may arise. AgriFutures Australia and Impact Innovation have the ability to obtain the names of these exact individuals.
- The Privacy Policy for both Impact Innovation and Brightidea have been reviewed and assessed as acceptable for AgriFutures Australia to work with.
- Impact Innovation have advised that they do not store any information that is entered into the Brightidea platform.
- Following AgriFutures Australia ICT Policy and Confidentiality Policy to restrict access to information.
- Briefing staff on how information entered into the Brightidea platform is to be stored, accessed, used and destroyed.
- The security measures implemented by Brightidea have been assessed and found to be acceptable to AgriFutures Australia. Some of these measures include:
  - Brightidea's applications are hosted by Amazon Web Services (AWS). AWS engages with external certifying bodies and independent auditors to provide considerable information regarding policies, processes, and controls resulting in certifications, audit reports, or attestations of compliance such as SOC 2, ISO 27001, ISO 27017 and CSA.
  - Data center facilities feature a secured perimeter with multi-level security zones, 24/7 manned security, CCTV video surveillance, multi-factor authentication mechanisms for access control and security breach alarms.
  - The network is protected by redundant network and web application firewalls, best-in-class router technology, secure HTTPS transport over public networks, regular audits, and Intrusion Detection and/or Prevention technologies (IDS/IPS) which monitor and/or block malicious traffic and network attacks.
  - Brightidea has a number of compliance and security certifications, including:
    - SOC2 Type II Audit (completed December 31, 2019).
    - Registered for Cloud Security Alliance STAR Self-Assessment Level 1.
    - Certified with US-EU Privacy Shield and US-Swiss Privacy Shield.

## 8. Respond and review

Actions taken to ensure data collected for the storage in the Rice water productivity open innovation challenge project is treated in line with the Privacy Principles.

### Collection

- Reviewed information fields being used in the application and refining to only critical information being collected.
- Data collection notice included in the application submission page.

### Use

- To contact applicants regarding the outcome of their applications and any further requirements associated with the application.

### Access

- Give applicants access to data to update or alter.
- AgriFutures Australia staff to comply with the AgriFutures Australia ICT and Confidentiality Policies
- Impact Innovation and Brightidea staff to comply with their respective Privacy Policies (as identified as acceptable to AgriFutures Australia).
- Secure access through OneDrive for the Advisory Panel.

#### Storage

- Securely stored on the Brightidea server until end of AgriFutures Australia licence.
- Securely stored at AgriFutures Australia on OneDrive and SharePoint.
- Disposing of information collected once the purpose that it had been collected for has expired.

#### Review

- This PIA if any new use of data is proposed.

## Document Information

Date PIA completed:	15/09/2020
Status:	Complete
Prepared by:	Laura Skipworth
Position:	Research Coordinator – Rice, Ginger & Export Fodder
Email:	Laura.skipworth@agrifutres.com.au


## Endorsement and approval

Project manager:

I **recommend** the project proceeds as proposed in this document.


Name:	Lucinda Staley		
Position:	Research Manager – Rice, Ginger & Export Fodder		
Signature		Date:	15/09/2020

The following officer/s have **endorsed** this document:

Name:	John Smith		
Position:	General Manager - Research		
Signature		Date:	16/09/2020

Project Executive/privacy officer/senior management:

I **agree** to the project proceeding as proposed in this document.

Name:	Louise Heaslip		
Position:	General Manager – Corporate (Privacy Officer)		
Signature		Date:	18.09.2020