

## Privacy Impact Assessment and Report (CRM)

### 1. Threshold Assessment

A Privacy Threshold Assessment was conducted which indicated a PIA was necessary as this project:

- Collected personal information or Involved a new way of collecting and storing personal information.
- Involves data matching with personal information activities.
- Involves the migration of some personal information from the Marketo.
- Will involve user authentication.

### 2. PIA Plan

This project covers the upgrade of the Customer Relationship Management system (CRM) for customer engagement at AgriFutures.

AgriFutures is currently running Dynamics CRM 2016 on-premise with multiple use cases and various levels of adoption. We are looking to upgrade our CRM to a cloud-based solution to integrate with Marketo – Marketing Automation platform.

This project will also be driving a whole of business approach and understanding to the way we interact and manage our key stakeholder relationships and subsequent appropriate information management.

Privacy planning is a key aspect of this project as the system will be collecting new user information, integrating with other systems that contain personal information and migrating data to and from Marketo, and SharePoint.

This project is led by Jennifer Galloway, Senior Manager, Communications. The project team consists of Pip Grant, Senior Manager, Agrifood Engagement and Events, Petri Swart, Manager, Communication Channels, and Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements). Jennifer will also be responsible for the PIA.

Privacy will be considered throughout the project:

- At collection –
  - Syncing from Marketo – customers will have to opt-in to receive communications and have read/accepted the AgriFutures Australia Privacy Policy, Cookie Policy and General Collection statement
  - Contacts/Accounts manually input and updated by staff – special permissions will be established regarding access to opting in contacts. Special permissions will also be set up regarding access to Levy Payer information.

- Internal staff will be set up in the system.
- User data will be migrated from the current system – Click dimensions and the existing CRM.
- A clean out of all data in these systems will occur to ensure we have the most up-to-date information and permissions to contact our customers and that customers are aware of our updated Privacy Policy.
- Storage
  - Part of the procurement process for CRM defined that all data be stored securely in Australia. This is a cloud-based solution, but the data will be hosted in an Australian Data Centre.
- Access
  - Users will have the ability to request access to their information and for updates to be made.
  - Users can update their preferences or request that their information be removed from the system.
  - Access to the system is limited to internal staff as required for their role, and to developers when required for integrations with other systems including K2, Marketo, SharePoint and the event platform.
- Policy and procedures
  - Data collection will comply with the AgriFutures Privacy Policy and General Collection Statements.
  - Business rules will be established to ensure staff understand CRM best practice/uses.
  - Staff training will also be conducted.

Stakeholder consultation will be built into the project timeline as required.

Privacy will be considered throughout the life cycle of the project and as any additional changes are made to the system in future.

### 3. Project Description

**Project:** CRM

Objectives of CRM upgrade

- Establish a whole of business approach and understanding to the way we interact and manage our key stakeholder relationships and subsequent appropriate information management.
- Strengthen the quality and consistency of engagement with our stakeholders and allow the business to make better decisions through a single view of the stakeholder and real-time actionable insights.
- Move the organisation from the view that the CRM is a piece of specific technology to a more holistic approach in how we create better efficiencies and value for ourselves and our stakeholders.
- Formalise AgriFutures data governance management. Manage risk regarding privacy legislation compliance with tracking of collection notices, central repository of personal information to make management easier and consistent.
- Allow the business to strategically action the recommendations that were delivered in the AgriFutures 2020 Stakeholder Survey:
  - Be accessible
  - Be responsive
  - Active listening

- Ensure clarity “process, information, outcomes”
  - Deliver – “do what we say we are going to do”
- Develop standard KPI’s across the business for individuals in measuring the effectiveness and use of the CRM.
- Having this information allows resource heavy one-on-one interactions to be targeted in contexts with the greatest possible return.

**Roles and responsibilities:**

Jennifer Galloway, Senior Manager, Communications) will be the strategic lead for this project with Petri Swart, Manager, Communications Channel and Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements).

Data3 will be providing technical staff to assist with the implementation of the new platform.

**Scope:**

This project covers the upgrade of the Customer Relationship Management system (CRM) for customer engagement at AgriFutures.

AgriFutures is currently running Dynamics CRM 2016 on-premise with multiple use cases and various levels of adoption. We are looking to upgrade our CRM to a cloud-based solution to integrate with Marketo – Marketing Automation platform.

**Privacy elements:**

Personal information will be collected from customers to ensure have a whole of customer view in relation to relationship management.

This will include:

- Email: (required)
- First Name: (required)
- Last Name: (required)
- Organisation:
- Job Title: (dropdown list, plus option for ‘Other’ with text box)
- Occupation: (dropdown list, plus option for ‘Other’ with text box)
- Industry: (dropdown list, plus option for ‘Other’ with text box)
- State/Territory/Country: (dropdown list that updates from Country selection above)
- Mobile Phone number:
- Interests: (dropdown list)
- Address: Street, City, State, Postcode, Country
- Levy Payer: Yes or No
- Gender
- Marital Status
- Spouse/Partner Name
- Birthday
- Role (dropdown list, plus option for ‘Other’ with text box)
- Field of Interest (dropdown list, plus option for ‘Other’ with text box)

#### **4. STAKEHOLDERS**

##### **Stakeholder consultation:**

Privacy and the security of the personal information collected were a core requirement of the system and thoroughly investigated as part of the procurement process by the selection panel which comprised:

Jennifer Galloway, Senior Manager, Communication  
Pip Grant, Senior Manager, Agrifood Engagement and Events  
Nicole Legovich, Senior Manager, Information Systems and Business Improvements

An internal CRM Reference Group was also established to ensure we had coverage across all needs for the business.

Jen Galloway – Snr Comms Manager  
Nicole Legovich – Snr Manager Corporate Information Systems and Business Improvements  
Kristy Middlebrook - Data Coordinator  
David Lord – Manager, Community - growAG.  
Dallas Pearce – Manager, Projects, Agrifood Engagement and Events  
Pip Grant, Snr Manager, Agrifood Engagement and Events  
Petri Swat – Manager, Communications Channels  
Tom McCue – Snr Manager, Emerging Industries  
Lauren Sharkey – Manager, Communications Research  
Annie Lane – Coordinator, Research  
Gerard McTaggart – Systems Coordinator

Internally, as part of the contract review process, Erin Hulm, Manager, Legal Services reviewed the contract, the project brief and was satisfied that it complies with Australian privacy laws.

#### **5. PERSONAL INFORMATION FLOW**

1. Data will be synced from Marketo for subscription opt ins and other events and forms.
2. Data can also be added manually by staff members with key fields and functions locked for security purposes.
3. A user's email address will be used as verification of their identity.
4. Data will not be used for any other purpose other than what it was originally collected for ie: opt in to receive newsletter.
5. The data will be stored securely and hosted within Australia.
6. Through their subscription preferences collected in Marketo and stored in the CRM customers will receive tailored communications from AgriFutures.
7. Access to data will be limited to those who require it to perform their duties.
8. Frequent reports will run to ensure data is accurate, up-to-date and clean.
9. Users will be able to request to see their data and for it to be updated and if necessary, removed.

**6. PRIVACY IMPACTS & MITIGATION**

| Risk   | Mitigation  |
|--|---|
| Data is lost/altered during the migration                          | <ul style="list-style-type: none"> <li>• Data in both the CRM and Click Dimensions will be backed up and has disaster recovery provisions.</li> <li>• Customers will be advised of the introduction of new data collection and be given access to check their personal information is correct</li> </ul>  |
| Data is used for an intent other than the one it was collected for | <ul style="list-style-type: none"> <li>• Access to the data will be controlled based on the user's role.</li> <li>• A collection notice will be included at the point of collection notifying potential users how their data will be used.</li> <li>• AgriFutures staff will comply with this and will seek permission to contact users for any purpose not covered by the collection notice</li> </ul> |
| Data is accessed without permission                                | <ul style="list-style-type: none"> <li>• While every precaution is taken to secure the data, should a breach occur, AgriFutures Australia will follow their Data Breach Response Plan</li> </ul>  |

**7. RESPOND AND REVIEW**

This PIA will be revisited throughout the project to ensure that any additional privacy aspects that arise are properly addressed.


**Document Information**

|                     |                                      |
|---------------------|--------------------------------------|
| Date PIA completed: | 25/05/20201                          |
| Status:             | Draft completed                      |
| Prepared by:        | Jennifer Galloway                    |
| Position:           | Senior Manager, Communications       |
| Email:              | Jennifer.Galloway@agrifutures.com.au |


**Endorsement and approval**

Project manager:

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


|           |   |       |             |
|-----------|---|-------|-------------|
| Name:     | Jennifer Galloway   |       |             |
| Position: | Senior Manager, Communications  |       |             |
| Signature |  | Date: | 5 July 2021 |

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

|           |   |       |            |
|-----------|---|-------|------------|
| Name:     | Pip Grant   |       |            |
| Position: | A/g General Manager, Communications and Capacity Building                         |       |            |
| Signature |  | Date: | 06/07/2021 |

**Project Executive/privacy officer/senior management:**

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

|           |   |       |            |
|-----------|---|-------|------------|
| Name:     | Louise Heaslip  |       |            |
| Position: | General Manager, Corporate  |       |            |
| Signature |  | Date: | 13.07.2021 |