



21 November 2024

[Redacted]

Dear [Redacted]

Thank you for your request made under the Official Information Act 1982 (OIA), received on 8 November 2024. You requested the following (numbered in parts for ease of response):

- 1. Copies of all documented evidence on which Peter Mersi based his assertion in a news conference on Tuesday this week that the Taxpayers' Union and media had engaged in a concerted campaign about IRD's custom audience social media marketing, that included some misrepresentation of information, as it pertains to RNZ (i.e. not if it pertains only to the Taxpayers' Union);*
- 2. Re OIA response 24-572 that shows an email IRD sent on Sept 10 (that begins, Tuesday, September 10, 2024 10:17 AM To: Claire Baillie Claire.Baillie@mpi.govt.nz; 'shaun.jones@acc.co.nz etc) to scores of public agencies, and re the question posed in it, 'Do any of your teams use custom audiences?' – pls advise pls advise the number of agencies that responded, the number that responded to say they do not, and the number that responded to say they do. Re this latter group, if possible pls identity each agency/dept etc said they do.*
- 3. Copies of any and all communications other than purely admin comms, that arose from the sending of the Sept 10 email above, including any and all between IRD and any of those other agencies, and internally between parties at IRD.*

### **Part 1: Context of statements about a concerted campaign**

Inland Revenue recognises the importance of building and maintaining public trust as a cornerstone of an effective tax and social policy system. We value the role of media in fostering public understanding and accountability and we respect their professionalism and integrity.

The Commissioner's statements during the media interview of 5 November 2024 reflect his observations on public concerns generated by extensive media reporting on Inland Revenue's use of hashing and custom audience lists. The breadth of reporting and journalistic investigation demonstrated the legitimate public interest in this issue.

The Commissioner's remarks acknowledged this, and that the nature of some of the social media posts by the Taxpayers' Union had led to potential misunderstandings around Inland Revenue's data security practices. For example, there were public claims of data being "leaked" and that Inland Revenue had "lied" about this. Some of these comments were reported in mainstream media.

The Commissioner's remarks were intended as a general observation of the nature of the information being put out in the public domain influencing public opinion, and not as an assertion of a concerted misrepresentation campaign as it pertains to RNZ. Therefore, your request for copies of documented evidence as it pertains specifically to RNZ is refused under section 18(e) of the OIA as the information does not exist.

### Part 2: Number of agencies who responded to the email

Ten agencies responded to the email of 10 September 2024, mostly to acknowledge receipt of it. Three agencies responded that they do not use custom audience lists, and none responded that they do. As no agencies advised that they use custom audience lists, your request for the identity of each agency or department who responded that they use custom audience lists is refused under section 18(e) of the OIA as the information does not exist.

### Part 3: Email correspondence relating to the email to other agencies

We have identified 10 emails in scope of your request as outlined in Table 1 below and attached as **Appendix A**. I am releasing the 10 emails to you in part, with some contact information withheld under section 9(2)(a) of the OIA, to protect the privacy of natural persons.

**Table 1: Emails released as per Appendix A**

Item	Date	Document	Decision
1.	10/09/2024	Custom audiences OIA	Partially released
2.	10/09/2024	RE: Custom audiences OIA	Partially released
3.	10/09/2024	RE: Custom audiences OIA	Partially released
4.	10/09/2024	RE: Custom audiences OIA	Partially released
5.	10/09/2024	RE: Custom audiences OIA	Partially released
6.	10/09/2024	RE: Custom audiences OIA	Partially released
7.	10/09/2024	RE: Custom audiences OIA	Partially released
8.	11/09/2024	RE: Custom audiences OIA	Partially released
9.	11/09/2024	RE: Custom audiences OIA	Partially released
10.	21/10/2024	RE: Custom audiences OIA	Partially released

### Right of review

If you disagree with my decision on your OIA request, you can ask an Inland Revenue review officer to review my decision. To ask for an internal review, please email the Commissioner of Inland Revenue at: [commissionerscorrespondence@ird.govt.nz](mailto:commissionerscorrespondence@ird.govt.nz).

Alternatively, under section 28(3) of the OIA, you have the right to ask the Ombudsman to investigate and review my decision. You can contact the office of the Ombudsman by email at: [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz).

If you choose to have an internal review, you can still ask the Ombudsman for a review.

**Publishing of OIA response**

We intend to publish our response to your request on Inland Revenue's website ([ird.govt.nz](http://ird.govt.nz)) as this information may be of interest to other members of the public. This letter, with your personal details removed, may be published in its entirety. Publishing responses increases the availability of information to the public and is consistent with the OIA's purpose of enabling more effective participation in the making and administration of laws and policies and promoting the accountability of officials.

Thank you again for your request.

Yours sincerely



Pip Knight  
**Service Leader, Marketing & Communications**

**From:** [Pip Knight](#)  
**To:** s 9(2)(a)

**Cc:** s 9(2)(a)  
**Subject:** Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 10:16:00 am  
**Attachments:** image001.png

---

Kia ora all,

You're likely aware that we (Inland Revenue) are getting a number of media queries and OIAs on our use of custom audience lists in social media.

I thought I'd touch base as I'd assume you'll also be getting a few OIAs on this topic coming your way. Do any of your teams use custom audiences?

I thought it might be helpful to share our key messages (obviously how agencies use custom audiences will vary, this is our response):

- the use of custom audiences lists (which includes the process of hashing data when the lists are uploaded) is common practice, and we operate well within the guidelines of the NZ Information Security manual, which is maintained by the GCSB.
- we can only match customer data as they have already provided it to the social media platform (we do not provide new data) and all data for custom audience lists is hashed when uploaded. This means it is un-identifiable when it gets to the social media platform. Hashing is a type of cryptographic security method that turns identifiers into randomised code and cannot be reversed so identities are protected. For example, [John.doe@ird.govt.nz](mailto:John.doe@ird.govt.nz) may come out hashed as wLKziR/6RoXDv1MDaXLH1UNUC9nIVr97jrTnL4TcxsM=.

Cheers,

Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014  
s 9(2)(a)



## Document 2

**From:** [Kate Goodman](#)  
**To:** [Pip Knight](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 10:23:17 am  
**Attachments:** image001.png

---

Kia ora Pip

HUD doesn't use them, that I'm aware of.

Cheers

Kate

---

**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 10:17 AM  
**To:** s 9(2)(a)

s 9(2)(a)



s 9(2)(a)

**Subject:** Custom audiences OIA

Kia ora all,

You're likely aware that we (Inland Revenue) are getting a number of media queries and OIAs on our use of custom audience lists in social media.

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Cheers,

Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014

s 9(2)(a)



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## Document 3

**From:** [Kirsty Anderson](#)  
**To:** [Pip Knight](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 10:29:24 am  
**Attachments:** image001.png

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Thanks for letting us know, cheers Kirsty

---

**From:** Pip Knight § 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 10:17 AM  
**To:** § 9(2)(a)

[Redacted content]

s 9(2)(a)

[REDACTED]

s 9(2)(a)

**Subject:** Custom audiences OIA

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Cheers,

Pip

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s 9(2)(a)



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# Document 4

**From:** [Geoff Bilbrough](#)  
**To:** [Pip Knight](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 10:49:51 am  
**Attachments:** image001.png

---

Thanks for this Pip.

---

**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 10:17 AM  
**To:** s 9(2)(a)

[Redacted content]

s 9(2)(a)

[REDACTED]

s 9(2)(a)

**Subject:** Custom audiences OIA

Kia ora all,

You're likely aware that we (Inland Revenue) are getting a number of media queries and OIAs on our use of custom audience lists in social media.

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Cheers,

Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014

s 9(2)(a)



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## Document 5

**From:** [Felicity Drader](#)  
**To:** [Pip Knight](#)  
**Cc:** [Shalleen Hern](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 11:13:02 am  
**Attachments:** image001.png

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Kia ora Pip

Thanks for getting in touch and sharing your key messages.

I understand our two privacy teams have connected on this – yesterday or Friday? At MSD we don't currently use custom audience lists in social media for individuals or companies/organisations.

I really enjoyed your presentation on how you and your team have been using targeting. It's getting harder and harder to reach people with important messages through traditional channels, particularly in a way we can measure, and I was excited to learn more!

I was planning to pop you an email you about catching up for a coffee – to meet you and chat about marketing and other things happening in our spaces. I expect you're a tad busy right now. I can get in touch in a couple of weeks.

Flis

**Flis (Felicity) Drader**  
**General Manager Service Delivery Communications, Ministry of Social Development**

s 9(2)(a)

Kia ora all,

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Cheers,

Pip

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s 9(2)(a)



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## Document 6

**From:** [Bryan McDaniel \[TSY\]](#)  
**To:** [Pip Knight](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 11:17:00 am  
**Attachments:** image003.png

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Thanks very much, Pip.

Ngā manaakitanga,

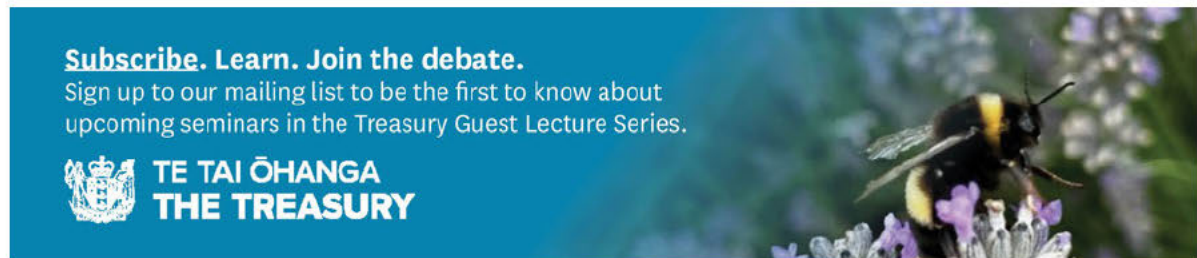
Bryan McDaniel

Bryan McDaniel (he/him) | Principal Advisor – Communications and Engagement | Te Tai Ōhanga – The Treasury


s 9(2)(a)

[z](#)

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 **TE TAI ŌHANGA  
THE TREASURY**

---

**From:** Pip Knight s 9(2)(a)

**Sent:** Tuesday, September 10, 2024 10:17 AM

**To:** s 9(2)(a)

[Redacted content]

s 9(2)(a)

[REDACTED]

s 9(2)(a)

**Subject:** Custom audiences OIA

You don't often get email from [pip.knight@s 9\(2\)\(a\)](#). [Learn why this is important](#)

Kia ora all,

You're likely aware that we (Inland Revenue) are getting a number of media queries and OIAs on our use of custom audience lists in social media.

I thought I'd touch base as I'd assume you'll also be getting a few OIAs on this topic coming your way. Do any of your teams use custom audiences?

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Cheers,

Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014

s 9(2)(a)



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## Document 7

**From:** [Claire Baillie](#)  
**To:** [Pip Knight](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Tuesday, 10 September 2024 11:31:13 am  
**Attachments:** image001.png

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Thank you Pip, really helpful.

Also let's schedule a catch up soon!

---

**From:** Pip Knight § 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 10:17 AM  
**To:** § 9(2)(a)

[Redacted content]

s 9(2)(a)

[REDACTED]

s 9(2)(a)

**Subject:** Custom audiences OIA

Some people who received this message don't often get email from [pip.knight@ird.govt.nz](mailto:pip.knight@ird.govt.nz) s 9(2)(a) [Learn why this is important](#)

Kia ora all,

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Cheers,

Pip

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s 9(2)(a)



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## Document 8

**From:** [Pip Knight](#)  
**To:** [Shaun Jones](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Wednesday, 11 September 2024 1:34:00 pm  
**Attachments:** image001.png

---

Cool. Thanks for confirming.

So far we've not found any other govt. agency doing it... which was a surprise.

Have a great day.

Pip

---

**From:** Shaun Jones s 9(2)(a)  
**Sent:** Wednesday, September 11, 2024 12:58 PM  
**To:** Pip Knight s 9(2)(a)  
**Subject:** RE: Custom audiences OIA

Hi Pip,

Confirming we don't run campaigns using hashed customer data on social platforms.

**Shaun Jones** (He/Him)  
Head of External Engagement, ACC

s 9(2)(a)

[ACC Website](#) | [ACC Newsroom](#) | [Facebook](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#) | [Twitter](#)

---

**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 12:14 PM  
**To:** Shaun Jones s 9(2)(a)  
**Subject:** RE: Custom audiences OIA

Thanks Shaun.

Do you use custom audiences at all? It doesn't sound like many (or even any) other govt agencies do.

Cheers,

Pip

---

**From:** Shaun Jones s 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 12:07 PM  
**To:** Pip Knight s 9(2)(a)  
**Subject:** RE: Custom audiences OIA

Thanks for this, Pip. Appreciate you sharing it.

Confirming that we haven't received any OIAs on customer audiences yet.

**Shaun Jones (He/Him)**  
Head of External Engagement, ACC

s 9(2)(a)

[ACC Website](#) | [ACC Newsroom](#) | [Facebook](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#) | [Twitter](#)

---

**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, September 10, 2024 10:17 AM  
**To:** s 9(2)(a)

[Redacted content]



s 9(2)(a)

[Redacted text block]

s 9(2)(a)

**Subject:** Custom audiences OIA

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Cheers,

Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014

s 9(2)(a)



## Document 9

**From:** [Charlotte Wilson](#)  
**To:** [Pip Knight](#)  
**Cc:** [Thomas Allen](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Friday, 11 October 2024 9:50:12 am  
**Attachments:** image001.png

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Kia ora Pip,

Thanks for the update and my apologies for not acknowledging earlier. This was very helpful. While I generally prefer to answer the questions asked and not anticipate too much, if we know something is likely to come up then it's good to be proactive.

Hopefully I can repay the favour sometime; if you are up for a coffee sometime, please let me know.

Ngā mihi,  
Charlotte

---

**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, 8 October 2024 11:58 am  
**To:** Charlotte Wilson s 9(2)(a)  
**Cc:** Thomas Allen s 9(2)(a)  
**Subject:** RE: Custom audiences OIA

Hi Charlotte,

Our review covers all advertising that has used custom audience lists, so whilst we've not specifically called out recruitment if we'd used custom audience lists for recruitment then this would be included.

Hope that is helpful.

Thanks,  
Pip

---

**From:** Charlotte Wilson s 9(2)(a)  
**Sent:** Tuesday, October 8, 2024 9:50 AM  
**To:** Pip Knight s 9(2)(a)  
**Subject:** RE: Custom audiences OIA

Kia ora Pip,

We are currently in the midst of responding to the Crown Law version of this query.

It has sparked a conversation about the different online advertising platforms we use for recruitment and whether they should be included in scope. Did you confine your response to advertising on social media?

Also, was there any follow-up relating to recruitment advertising in particular or did the query remain focused on social media only?

I'm happy to chat if you would prefer.

Ngā mihi,  
Charlotte

---

**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, 10 September 2024 10:17 am  
**Subject:** Custom audiences OIA

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Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014  
s 9(2)(a)



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## Document 10

**From:** [Pip Knight](#)  
**To:** [Lindsay Young](#)  
**Subject:** RE: Custom audiences OIA  
**Date:** Monday, 21 October 2024 4:46:00 pm  
**Attachments:** image001.png

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Thanks Lindsay.

Yes all good to release.

Cheers,  
Pip

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**From:** Lindsay Young s 9(2)(a)  
**Sent:** Monday, 21 October 2024 4:00 pm  
**To:** Pip Knight s 9(2)(a)  
**Subject:** RE: Custom audiences OIA  
**Importance:** High

Kia ora Pip,

You may be aware that we received a similar OIA. My team member, Kurt Sharpe, was working on our response. He's on leave now and I've picked up the tail of the OIA.

Before we release it on Thursday, I want to confirm with you that you've been made aware that the below email will be included in our response, redacting your phone numbers.

Can you please confirm?

Thank you

Ngā mihi nui,

**Lindsay Young** (she / her)  
Digital, Brand & Marketing Manager  
Strategic Communications & Engagement Unit  
Conservation House Wellington | Whare Kaupapa Atawhai  
Phone: s 9(2)(a)

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**From:** Pip Knight s 9(2)(a)  
**Sent:** Tuesday, 10 September 2024 10:17 am  
**To:** s 9(2)(a)

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

s 9(2)(a)

[Redacted text block]

s 9(2)(a)

**Subject:** Custom audiences OIA

Kia ora all,

You're likely aware that we (Inland Revenue) are getting a number of media queries and OIAs on our use of custom audience lists in social media.

I thought I'd touch base as I'd assume you'll also be getting a few OIAs on this topic coming your way. Do any of your teams use custom audiences?

I thought it might be helpful to share our key messages (obviously how agencies use custom audiences will vary, this is our response):

- the use of custom audiences lists (which includes the process of hashing data when the lists are uploaded) is common practice, and we operate well within the guidelines of the



NZ Information Security manual, which is maintained by the GCSB.

- we can only match customer data as they have already provided it to the social media platform (we do not provide new data) and all data for custom audience lists is hashed when uploaded. This means it is un-identifiable when it gets to the social media platform. Hashing is a type of cryptographic security method that turns identifiers into randomised code and cannot be reversed so identities are protected. For example, [John.doe@ird.govt.nz](mailto:John.doe@ird.govt.nz) may come out hashed as wLKziR/6RoXDv1MDaXLH1UNUC9nIVr97jrTnL4TcxsM=.

Cheers,

Pip

Service Leader Marketing and Communications  
Inland Revenue | P O Box 2198 | Wellington 6014

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