

[REDACTED]  
[REDACTED]

17 October 2024

Dear [REDACTED]

**Re: Official Information Act Request: Information sharing with Meta, Facebook and other platforms**

Thank you for your email of Sunday 22 September in which you requested information under the Official Information Act 1982.

The full wording of your request and EECA's response is attached as **Appendix One**.

Some information is being withheld pursuant to the following sections of the Act:

- 9(2)(b)(ii) - to protect information where making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or is subject to the information.

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.

Please note that it is our policy to proactively release our responses to official information requests where possible. Our response to your request will be published shortly at <https://www.eeca.govt.nz/about/news-and-corporate/official-information/> with your personal information removed.

Yours sincerely



Megan Hurnard  
**Group Manager, Insights, Data and Communications**

## Appendix One

**Q1: Does EECA pay for advertising services on the Facebook, Instagram LinkedIn, Google, Tik Tok or other digital platform?**

- *If so, how much money has been spent, by year, on advertising on each of these platforms?*
- *Does EECA use any agencies to place or manage that advertising, if so who?*
- *If EECA uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?*
- *If EECA uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and EECA.*

Advertising spend for the current year and the past three financial years is detailed in the table below.

	FY21/22	FY22/23	FY23/24	FY24/25 YTD
Google & YouTube	\$941,277	\$1,280,049	\$1,498,580	\$280,853
TikTok	\$16,328	\$35,157	\$10,276	\$0
META	\$424,987	\$621,282	\$465,867	\$64,345
LinkedIn	\$113,416	\$108,142	\$173,015	\$15,212
<b>TOTAL</b>	\$1,496,008	\$2,044,631	\$2,147,738	\$360,409

EECA contracts MBM (Multi Market Services New Zealand Limited) to manage media placements, alongside advertising spend managed internally.

MBM are contracted under a Media Services Agreement and were procured via the All-of-Government (AoG) panel.

There are two documents containing legal agreements between EECA and MBM:

Item #	Name of document	Description	Decision
1	27 July Media Services Agreement EECA and MBM - signed	Contract signed July 2021.	Refuse in full:  - 9(2)(b)(ii)
2	MBM contract variation 1 2023_24 signed	Extension of the contract above. This was signed in September 2023.	Refuse in full:  - 9(2)(b)(ii)

**Q2: If EECA uses advertising services on digital platforms as above, does (or has) the agency created “custom audience” lists as part of those campaigns?**

- *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 was generated, along with when these audience lists were uploaded and to which platform?*
- *If so, what privacy analysis was conducted prior to custom audience lists being generated?*
- *If so, was the Minister responsible ever made aware that Energy Efficiency and Conservation Authority was undertaking this activity? If so, which Minister was it, and when were they notified?*
- *If so, what advice was sought prior to this activity taking place?*
- *If so, what lawful basis does Energy Efficiency and Conservation Authority rely on for this disclosure?*
- *If so, what was the origin of the information that was included in these custom audience lists?*
- *If so, did Energy Efficiency and Conservation Authority 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 the advice provided.*
- *If so, what security measures are used to protect the privacy of individuals?*
- *If so, is Energy Efficiency and Conservation Authority 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?*
- *If so, can people "opt-out" of being included in these custom audience lists, and if so, how many people have done so?*
- *If so, has Energy Efficiency and Conservation Authority received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.*
- *If so, did EECA consult with the office of the Privacy Commissioner on this practice? If so, when?*
- *If so, has Energy Efficiency and Conservation Authority received any reports about the effectiveness of custom audience lists? If so, please provide these.*
- *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?*

EECA has not created custom audience lists as part of these campaigns.

**Q3: Has any person from EECA had any meetings, whether in person, by videoconference or other method, with any representative from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months?**

- *If so, who was present during those meetings?*
- *If so, please provide the agenda, notes, minutes and any communications associated with these meetings.*
- *Does EECA have a dedicated account manager with Meta, Google, Tik Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?*

EECA has not had any meetings with the mentioned platforms, or other digital platforms, in the past 12 months.

***Q4: Please provide any correspondence, e-mail, document, or record held by EECA on the subject of custom audience lists, advertising on Meta, Facebook, Instagram, Google, Tik Tok or any other platform for the period 1 September 2024 and today.***

EECA did not have any correspondence with the mentioned platforms, or any other platforms, on the subject of “custom audience lists” for the period 1 September 2024 until today.