# Submission to the Government response to the Privacy Act Review Report

Everyone should be able to enjoy the benefits of using digital technologies to work, learn and play. This can happen when we have safe digital environments that enable people’s health and wellbeing. However, the  
extensive collection, use and disclosure of people’s information is being used to fuel digital marketing practices that are harming our community.

Our key focus in the discussion of privacy reforms is the extensive processing of people’s information to relentlessly track, monitor and profile them to target them with advertising tuned to their personal attributes and behaviours to sell them alcoholic products. This commercial cyberstalking enables advertisers to learn people’s individual susceptibilities and vulnerabilities to target them with advertising that is most likely to influence their perceptions and behaviour. These insights are used by companies selling addictive and harmful products such as alcohol, to aggressively market their products.

By design, people who purchase harmful and addictive products the most are targeted by digital marketing models the most. Extensive data collection allows digital platforms to develop detailed psychometric profiles that are combined with detailed accounts of people’s browsing behaviour. These insights are used to tailor marketing activities, including content and messaging, towards an individual’s specific susceptibilities. In the case of alcohol marketing, this ability to prey on people’s susceptibilities is particularly harmful because it can disproportionately target people who are at risk of or experience alcohol dependence. FARE and VicHealth conducted a survey of 220 people seeking to reduce alcohol, gambling and unhealthy foods. People who were trying to avoid alcohol advertisements indicated that they were unable to avoid these online, even when they had opted out of marketing;

*“I am an alcoholic and I feel targeted with marketing that promotes alcohol despite choosing preferences within browsers not to see alcohol.”*

*– FARE survey participant*

*“I struggle with alcohol and have struggled with gambling in the past so when I see [online advertisements], I sometimes get tempted and triggered...The constant bombardment with the marketing is wearing down my resilience.”*

*– FARE survey participant*

*“I’m in recovery so don’t need or want to be seeing alcohol ads.”*

*– FARE survey participant*

The below-the-line and ephemeral nature of digital marketing also means that companies selling harmful and addictive products can target their digital marketing to children and young people out of sight. For example, companies selling alcoholic products have been shown to upload information about children to digital platforms and for digital platforms to generate and tag children with alcohol-related advertising interests.

A privacy-by-design approach is needed. Being commercially cyberstalked should not be the default requirement for using online services. The health and wellbeing of our families and communities must be prioritised over commercial interests.

[read the submission](https://fare.org.au/wp-content/uploads/FARE-Submission-to-the-Government-Response-to-the-Privacy-Act-Review-Report.pdf)