

27/06/2018

CONFIDENTIAL

Via Email

Katelin McInerney
Director, Media
MEAA
katelin.mcinerney@meaa.org

Sinddy Ealy
ABC section secretary
CPSU
Sinddy.Ealy@cpsu.org.au

Dear Katelin and Sinddy,

Re: PageUp privacy breach

I refer to your letter received by the ABC on Monday 25 June 2018.

Background

As you are aware, on 20 June 2018, the ABC sent an email to users of its online recruitment system notifying them of a recent security incident with PageUp. PageUp is a vendor that provides recruitment software services to the ABC.

The email further stated that based on current information, PageUp has advised that on the balance of probabilities, certain personal information relating to PageUp clients has been accessed. I understand that PageUp provides similar services to numerous Australian companies, who have been similarly affected. The email also stated that at this stage there is no evidence of exfiltration, only access – in other words, no information may actually have been stolen. The email recommended that the recipient check that there has been no unusual activity concerning their personal information, and also provided information about what the ABC is doing to respond to the incident.

Response to your queries

In your letter, you have referred to the ABC's obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**). The ABC takes these obligations very seriously, and, as stated in its email to users of its online recruitment system, has taken all recommended actions to minimise any further risks. I refer to the balance of the email dated 20 June 2018 in this regard. The ABC has made the required notifications to individuals and the regulator under the Privacy Act, and also temporarily suspended all recruitment activity as a precautionary measure. The ABC rejects the contention that the ABC has attempted to "downplay" the seriousness of this incident.

In relation to your specific queries, responses are set out below:

1. We are unable to confirm the number of staff affected by the incident at this stage, and are continuing to make inquiries.
2. It is not possible at this stage to distinguish between staff versus external applicants. All individuals who had used our online recruitment system were sent an email on 20 June 2018. The total number of individuals to whom this email was sent is a matter that is commercial in confidence. Would you please clarify the reason that you are seeking this information so we can further consider your request?
3. ABC management became aware of the unusual activity on 5 June 2018.
4. It is not appropriate for me to comment on a commercial and legal matter between the ABC and PageUp.
5. Please refer to my response to question 4 above.
6. Information about steps being taken by the ABC in relation to security of staff's personal information and data is set out below:
 - a. As noted in the ABC's email on 20 June 2018, the ABC is continuing to engage with PageUp and regulatory authorities regarding this incident. PageUp has stated that cybersecurity experts have confirmed they have not identified any further threats on our systems and PageUp is safe to use.
 - b. The ABC has a Privacy Policy and Information Handling Policy in place, which have been recently reviewed, and are in accordance with the *Privacy Act 1988* (Cth).
 - c. The ABC has a dedicated Privacy Officer who oversees privacy matters, including in relation to compliance.
 - d. The ABC has a dedicated information security team who oversees cybersecurity.
 - e. The ABC has a robust procurement process in place that is governed by the ABC's Procurement Policy. Due diligence is undertaken on potential vendors, and there is consideration of privacy and data security obligations, as applicable.
7. As noted above, PageUp provides recruitment software services to the ABC. At this stage, the ABC is not considering storing recruitment data on an internal system.

Further information about PageUp's response is available at the following website:

<https://www.pageuppeople.com/unauthorised-activity-on-it-system/>

I note that you have requested to be advised of all third-party vendors who have access to the private details of employees. The ABC will not be providing this information, as this information is commercial in confidence. However, as stated above, the ABC has processes and systems in place to maintain the security of staff's personal information, including in relation to our vendors.

Please contact me at viranna.cinda@abc.net.au or on (02) 8333 4491 if you would like to discuss this matter further.



Yours sincerely,

pp 

Cinda Viranna
Employment Counsel Lead
The ABC