

**Submission to the Senate Economic Reference
Committee's investigation into the Influence of
International Digital Platforms:**

Representing young people's thoughts and opinions

Feb 2023
Supported by Reset.Tech Australia

About this submission

We are a group of young people who have been working with Reset.Tech, supported by the Y NSW, who have been working since September 2022 around issues concerning young people's privacy in the digital world.

We are excited to make this submissions to the Senate Economic Reference Committee's investigation into the Influence of International Digital Platforms, specifically question D, regarding;

the collection and processing of children's data, particularly for the purposes of profiling, behavioural advertising, or other uses;

Our response to this question is below, as well as our broader thinking about what should and should not be allowed to happen to young people's data in the digital world and some YouGov polling data of 506 16 & 17 year old Australians. We hope these provide a compelling evidence base about what young people think about the collection and processing of their data,

We would also be delighted to organise and host an online 'young person's evidence session' for the Committee should you wish to speak to us or more young people directly. We could arrange for ourselves and a group of peers to join a group call, so you can gather more 'lived experience' evidence.

Please feel free to reach out to us about this, or any further questions or queries, via Rys at rys@au.reset.tech

The collection and procession of children's data

- Fundamentally, young people do not want their data used to sell them things, especially without their consent. Young people's data is not company's "private property" - it should be treated as belonging to young people and companies should be considered caretakers of such data.
- We believe that children and young people's data should only be collected and processed in ways that are in their best interests. This means that where profiling, behavioural advertising or other uses are not clearly in young people's best interests, it should not be allowed.
- Additionally, we are concerned that too much data is too often collected about children and young people, and that it is stored for too long, and shared with too many people. We think better protections are needed to prevent massive databases being created about young people.
- We also believe that children and young people should also have more control and say in how data is collected and used, where it is in their best interests and not too much has been collected. We are concerned that we are often not clearly asked or consulted, especially when it comes to the way data is used in advertising or profiling. Privacy policies are confusing and complex, and tricks are often used to sneak our data (e.g. "cookies" should be called "data grabbers").
- Lastly, as a principle, we believe that children and young people should have the right to delete their data. We would like to see clear and simple ways developed that young people can ask for their data to be deleted, including for advertising and profiling if it is collected.
- We believe that these principles apply to the way young people's data is used for advertising and profiling. For advertising and profiling, young people's data should:
 - Only be used in ways that are in their best interests (and not to target them with risky ads or because they're vulnerable);
 - Only be collected and used carefully and where needed (rather than collecting loads of data so they can really personalise ads, based on your live location for example), and;
 - Young people should have more control over the way it is used for advertising and profiling (rather than this being hidden in the terms of

service with a 'click to accept', or having data sold and shared that we don't know about or haven't clearly agreed to).

- Young people should be able to simply and easily request that any data collected and profiled about them for advertising should be deleted (rather than it being held forever without any control).

Specifically, this means that we think that advertising should not be turned on by default for young people. Young people should be able to opt-in and choose to have advertising overall, *and* also be able to choose if they want their data used to personalise these ads or not. These options and what they mean need to be clearly and honestly explained and meaningful choices provided. Where young people opt-in, data collection to personalise advertising needs to be done carefully and with not too much data. If young people do 'opt-in', they need to be able to change their mind and request that the data be deleted.

We support a ban on behavioural advertising, but we are aware it might be unpopular or difficult to implement.

- We are aware that the Committee is exploring the collection and use of children's data as they hold additional rights. While this is very welcome, we'd also encourage you to think about protections right up until the age of 25, to ensure extra safety and privacy for young people as they transition into adulthood.
- Alongside better rules and laws to protect our data, we think that young people should be more educated about their privacy rights and be more aware about how to stay private and what they can do if something goes wrong.

Our principles for using young people's data

We developed our own policy about what should happen to young people's data in general, which is below. We hope this gives you an understanding of the type of protection children and young people's data should be afforded.

To realise young people's best interests young people's their personal information should:

- Must be only collected and used in ways that advance their best interests

- Be collected and used only when it is needed. No one should be able to collect data that they do not strictly need, including GPS data and “cookies”. Don’t collect or use these unless they are needed
- Be collected and used only when young people have clearly been asked:
 - Agreeing to confusing privacy policies, or out of date policies, is not enough. Fine print isn’t okay, it’s got to be clear
 - Young people should be asked about all the types of information that is going to be collected, and all the ways it is going to be used. A single ‘yes’ or ‘no thanks’ button isn’t good
- Personal information should not be used in any ways other than what young people were clearly asked about
- Young people should not be pushed or tricked into agreeing to data collection, for example:
 - Dark patterns - don’t make the ‘yes’ button bigger than the ‘no thanks’ button
 - Rename “cookies” as “data grabbers”
- Be collected, used and stored in safe and secure ways
- Be kept for as long as is it needed only
- Not be sold or traded to other companies
- Young people should have the right to request it be deleted
- Companies that collect and use young people’s data should be accountable to them. If something goes wrong, it should be the company’s responsibility to provide help and support and fix it
- Not be used in ways that can harm, including in algorithms that make apps addictive or encourage harmful content in ‘for you’ feeds
- Companies should have to be transparent about what information they are collecting, and who they are sharing or selling it to. This means being clear with each individual
- Young people should be supported and educated about privacy, their rights and risks
- Don’t have advertising turned on by default for young people. Young people should be able to opt-in to advertising overall, and also be able to choose if they want their data used to personalise these ads or not.

We want to see all young people under 18 protected, as this is their rights. But we would also encourage you to think about protections right up until the age of 25, to ensure extra safety and privacy for young people as they transition into adulthood.

Polling

In April 2022, YouGov polled a representative sample of 506 Australian teenagers, aged 16 & 17. The poll was commissioned by Reset.Tech Australia, who have shared the data with us to include in this submission focussing on young people’s perspectives.

The poll asked teenagers **if they trusted that digital platforms and apps handled their data carefully**. It found higher levels of distrust than trust; 32.7% of young people did not trust that their information was handled carefully, compared to 26.7% who did trust that it was handled carefully. (Note this polling was done before the Medibank and Optus breaches). It also found significant ‘mixed feelings’, with 38.6% of young people neither trusting nor distrusting.

Reset.Tech Australia interviewed young people to help interpret these findings, and interviewees suggested that the normalisation and inevitability of privacy intrusions in their digital worlds may help explain why so many young people had mixed feelings. As one young woman explained *‘if I was given that question, I’d say “Sweet Jesus, like no, I don’t think I trust them with my privacy.” But at the same time, you know, I’m on every social media that there is so. And I think a large part of that is... not caring’*. Another young man outlined *“because you rely on it. So it’s not even about whether or not you can, you don’t really have the choice to trust it or not. You just have to use it because everyone else is on it. It isn’t about whether or not you believe in your privacy”*.

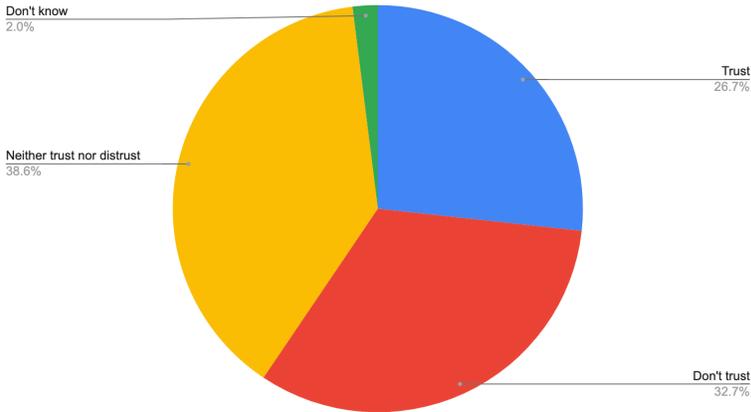


Figure 1: Responses to the question ‘Do you trust digital platforms and apps to handle your information carefully?’ n=506

Young people who took part in the poll were asked to explain where their trust or distrust came from.

A lot of the young people who distrusted digital platforms and services to treat their information with care suggested that business model and profit motives of platforms was a key source of their concern:

Because they are in it for the business of making money they don't care about the individual

They want money

Because big companies only care about money and will do anything to get more money, including disrespecting privacy

It's possible it's all being sold no matter what I do.

Because I know that they do not care about me as the individual. They want money.

Specifically, the collecting and processing of personal data for advertising and profiling came up as a source of concern:

Although data may be anonymous it still gives away information about you online that is collected by companies to create an online profile of you.

I just feel as if they are storing my data for ulterior reasons, primarily ads

Some young people who lacked trust noted core concerns around the lack of transparency:

Well i don't read the terms and conditions because they are too long so i don't know what they are doing with my info

Because I don't know what they do with my information

Lastly, the risk of hacking and other scandals reduced trust:

Because hacking is very easy on social media apps and people could get my info such as bank details.

Because of previous scandals with Facebook and other platforms selling data, and apps advertising to me products that I discussed in private conversations on that app

The importance of an effective regulatory framework was one of the key drivers of trust, among the young people who did have trust that their data was handled carefully:

Because of laws to protect consumer privacy

Because I sign a terms and conditions contract that outlines my privacy rights

*Because if they don't there are severe repercussions.
Because they are big companies, and if they don't comply with regulations
they will be hit with fines.*

Trust also emerged from a sense of data processing not being that 'important' or a belief that young people's data didn't need privacy:

*I don't have anything to hide from them
I do not share anything on these platforms that I would be uncomfortable
with being public, I make sure that I am safe on these sorts of platforms
I don't have much information that is compromisable*

Lastly, trust emerged because being young in 2023 simply requires the use of these digital platforms and products:

*Because there is no other option
Because many other people do*

For those who neither trusted nor distrusted that their data was handled carefully, many young people just hadn't thought about it yet or just weren't bothered either way

*I don't know what they do with my information but it doesn't bother me
enough
I tend not to think much about it
I don't care*

Some young people's expressed genuinely ambivalent perspectives:

*I neither trust nor distrust digital platforms and apps with my privacy as I
generally do know what types of data they are collecting eg. my interests,
and common searches. However, I am unsure of what they use all the data
for.
Because sometimes they can check your data when you give them no
permission they can probably override the system but at sometime I think
they do keep privacy*

While others just did not feel they knew enough:

*I don't know enough about their privacy policies
I don't know what to trust anymore*

The poll also asked teenagers **if they knew what information was being collected about them by these digital platforms and apps.** Young people were asked 'do you agree or disagree with the following statement: When I use digital platforms and apps, I know about the amounts and types of data and information the platforms are

collecting about me.' This uncovered a significant 'knowledge gap', 41.9% of young people suggested that this did not know the amounts and types of data and information that digital platforms and apps were collecting, more than the 36% who felt this did know. Again, 22% expressed mixed sentiments.

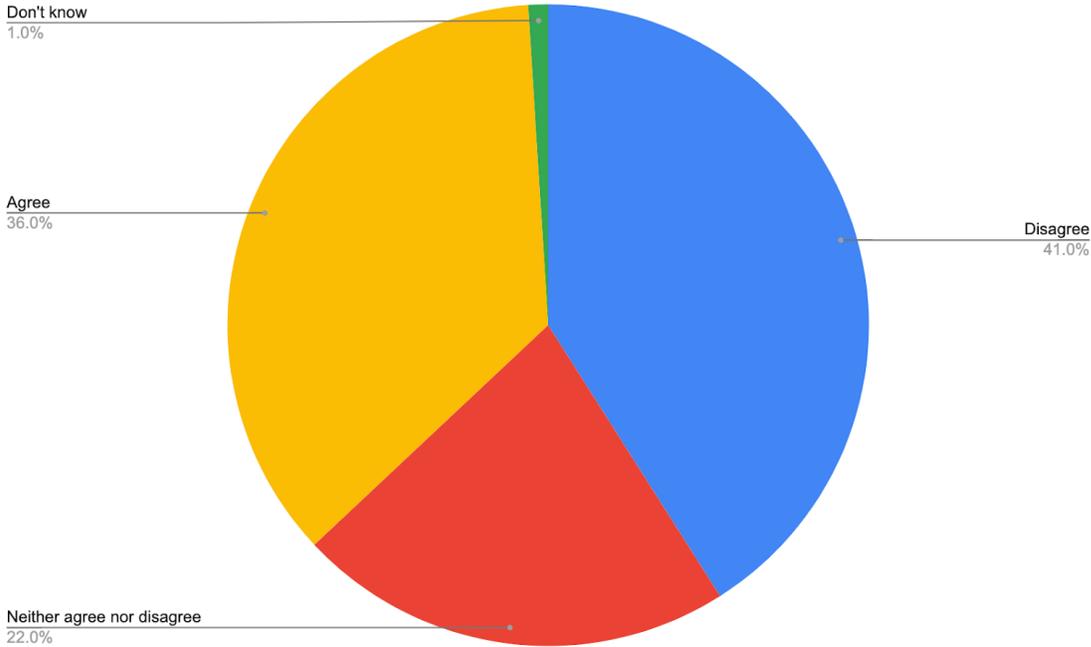


Figure 2: Young people's response to the question 'Do you agree or disagree with the following statement: When I use digital platforms and apps, I know about the amounts and types of data and information the platforms are collecting about me.' n=506

We also asked **if young people trusted digital platforms and apps to respect their privacy.** 39.6% of young people said they did not trust digital platforms and apps with their privacy, compared to 27.7% who did. Again, a significant number of young people (37.7%) expressed mixed sentiments. This suggests a strong trust gap for young people.

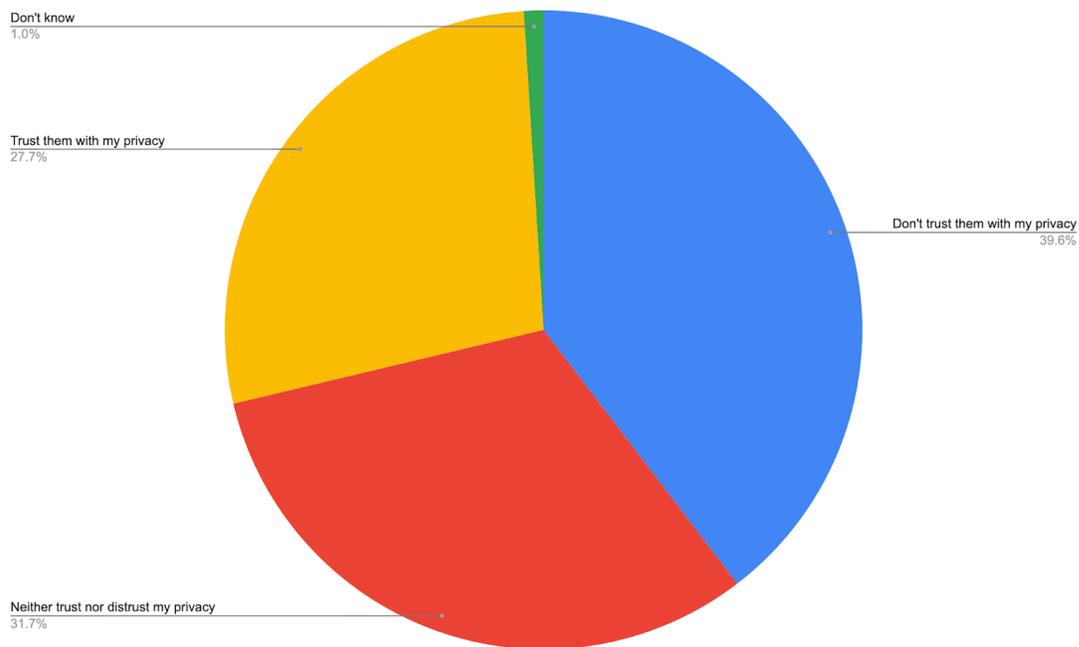


Figure 3: In your opinion, when thinking about whether digital platforms and apps respect your privacy.... (n=506)

Lastly, we asked **what, if anything, would make young people trust digital products more with their privacy.** A list of possible suggestions was provided, as well as the option to provide open text input and offer new suggestions.

Suggestions to improve trust in privacy	% who agreed
If platforms offered me more transparency (i.e., about what personal data they are collecting and what they do with it)	67%
If platforms offered me more control (i.e., more choice over what data platforms can collect and what they do with it)	62%
If platforms only used my information in ways that I had signed up for, and not for other purposes whenever they want	61%
If platforms offered better ways to make complaints and fix privacy problems when something goes wrong	41%
If platforms did not sell my data to corporate interests	65%
If platforms did not target me with personalised ads	41%
If platforms agreed to respect my rights in general	57%
Other	1%

Figure 4: Responses to the question ‘What would make you trust digital platforms and apps more with your privacy? (n=506, respondents could select multiple answers).

Young people offered plenty of other suggestions, and more options for choice and control came up lots, eg:

Choice

I know this provision exists with some digital platforms but having the ability to choose what sort of data the platform collects would increase transparency and trust in my opinion

More control over my privacy and I decide what I wish to disclose and that doesn't restrict my use of the app

Options

More options

Giving me a say in the privacy's control

Not having to give away information to gain access to apps

A few young people said they'd like the choice to be able to opt out of the current business model, and they'd like the option to pay instead of being data harvested.

Just let me pay a fee for no ads and no information gathering

Being able to see the trail of my data (where it goes, and how much it sells for), and the (sic) consequently having the option to opt out via an equivalent fee.'

Transparency was also a key suggestion to improve trust in privacy

Knowing how they use my data

If I knew what they used it for

Maybe being told what they will use my info for

Being blatant in what is being used and how

I would trust them more if they say exactly what they are doing with the data collection

Being able to see what data they are collecting

If the digital platforms and apps were transparent from the beginning about the data collected and whom it is sold or shared to.

Transparency that shows absolutely everything they take

Suggestions around minimisation came up a few times as well:

Not collect lots of our data

Don't store it on databases, no personalised adverts

Nothing really, an option to not collect any data would be ideal

If they didn't use my data

Personalised ads and data sale were also noted as significant barriers to trust

That they don't sell to other companies

Them not listening to me and giving me targeted ads, them not selling my info (sic)

Less ads targeted toward my age group, I generally don't fit in with other people my age.

Not selling my data to third parties, not subscribing me to emails and letting me control what data they collect and having full transparency

Less targeted ads