Education New Zealand
Manapou ki te Ao
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PO Box 12041
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New Zealand

P: +64 4 472 0788
E: info@enz.govt.nz

www.enz.govt.nz
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17 October 2024

S 9 (2)(a)

Dear S 9 (2)(a)

Official Information Act 1982 request – information-sharing agreements between Education New Zealand and social media platforms

I refer to your Official Information Act request (OIA), received by Education New Zealand (ENZ) on 23 September 2024. We have answered your questions in turn below.

Please note ENZ's brief is to promote New Zealand as a destination for international education. Our activities on digital platforms are targeted at 18–24-year-olds and their parents in parts of People's Republic of China, India, Japan, South Korea, Thailand, Viet Nam, Brazil, Colombia, France, Germany, Indonesia, Middle East, Philippines, Sri Lanka and the USA. We also target the parents of school aged children (YR9+) in some countries also.

Study with New Zealand (www.studywithnewzealand.govt.nz) is the only website that collects information for the development of custom audiences.

For the purposes of this response, we have defined "custom audiences" to be any audiences created for digital advertising purposes built from first party data held by ENZ.

It is important to note that everyone that visits the Study with New Zealand is presented a cookie consent form on arrival. They have the option to opt in or out as per the Study with New Zealand Privacy Policy available here:
https://www.studywithnewzealand.govt.nz/en/privacy-policy

The following are the options we present to users of our website, a user can come back and update their preferences at any point of time.

- Essential First Party Cookies (Required)
  Modern websites require some cookies to enable essential functionality and monitor performance. Therefore, these cookies are always turned on.

- Personalisation
  These cookies allow us to analyse your activity to show you more relevant content on our website and in the emails, we may send you, should you subscribe to them.

- Analytics
  With these cookies we analyse how you use our website so we can improve it. This information is shared with third-party providers, but no personal information is included.

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- Advertising
Advertising cookies enable us to show you more relevant information in our ads. This information is shared with third-party ad platforms, but not other advertisers.

Upon signing up with an email address to the Study with New Zealand website, we also capture consent of a user agreeing to our privacy policy.

Please find below our responses to your questions:

Does Education New Zealand pay for advertising services on the Facebook, Instagram, LinkedIn, Google, TikTok or other digital platforms?

Yes, we do. Digital platforms are an important part of our activities to attract international students to study in New Zealand.

a. *If so, how much money has been spent, by year on advertising on each of these platforms?*

	1 July 2023 – 30 June 2024
Facebook	$213,198.73
Google	$991,113.01
Grand Total *	**$1,204,311.74**

b. *Does Education New Zealand use any agencies to place or manage that advertising, if so who?*

MBM Wellington.
United Media Services (UMS), People's Republic of China only.

c. *If Education New Zealand uses any agencies to place or manage that advertising, what is (or are) the names of those agencies?*

Please see our response to Question B.

d. *If Education New Zealand uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and Education New Zealand.*

Education New Zealand considers our agreements with these agencies to be commercially sensitive and will not be released. As such this part of your request is being declined under section 9(2)(j)(i) - enable a Minister of the Crown or any public service agency or organisation holding the information to carry out, without prejudice or disadvantage, commercial activities.

If Education New Zealand uses advertising services on digital platforms as above, does (or has) the agency created "custom audience" lists as part of these campaigns?

Yes, custom lists have been generated by ENZ for use by the digital platforms. Custom lists are not part of our marketing activities in People's Republic of China.

e.   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?

Please find attached as Appendix One. The communication between ENZ and the digital platforms is a continuous automated process, as a result, the list is dynamic. As visitors that consent, and meet the custom list definition, their information is passed to the digital platform. This means that the numbers presented in Appendix One are the number targeted over time starting on 1 July 2023. This is due to the fact MBM became our agency on from that date. Information prior to this is declined under section 18e) of the OIA, as the information requested does not exist.

f.   If so, what privacy analysis was conducted prior to custom audience lists being generated?

ENZ's privacy analysis is not specific to the creation of custom audiences. Our processes for collecting data and offering opt out procedures, and the Study With New Zealand Privacy Policy were reviewed and revised by the Privacy team at MinterEllisonRuddWatts in May 2022. Then in November 2022, at the time of some additional functionality being added to the Study With New Zealand website, further advice was sought from MinterEllisonRuddWatts with their recommendations being implemented in full. It is our practice that when we make changes to the collection of personally identifiable information, we seek legal advice.

Our systems were established to comply with the Government's Protective Security Requirements by a partner agency that was ISO27001 compliant. ISO/IEC 27001 is an international standard that provides guidance for managing an organization's information security.

g.   If so, was the Minister responsible ever made aware that Education New Zealand was undertaking this activity? If so, which Minister was it, and when were they notified?

As this relates to an operational matter our responsible Minister was not informed. This is an operational matter that is a core part of our business.

h.   If so, what advice was sought prior to this activity taking place?

Please refer to our response to Question F regarding the legal advice sought and implemented in relation to the Privacy Policy.

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i.   *If so, what lawful basis does Education New Zealand rely on for this disclosure?*

ENZ's Study With New Zealand Privacy Policy is available here and sets out the basis on which we obtain and share information. https://www.studywithnewzealand.govt.nz/en/privacy-policy .

j.   *If so, what was the origin of the information that was included in these custom audience lists?*

ENZ collects the relevant information for custom audience lists through the Study with New Zealand website.

k.   *If so, did Education New Zealand 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.*

Please refer to our response to Question F.

l.   *If so, what security measures are used to protect the privacy of individuals?*

Data held within Tealium is encrypted using AES256. Data transmission uses SSL/TLS 1.2 or stronger. Access to data in Tealium is password protected and requires two-factor authentication.

Access is restricted to selected and approved staff at ENZ and agency partners.

m.   *If so, is Education New Zealand 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?*

ENZ continues to use custom audiences as part of our core business.

n.   *If so, can people "opt-out" of being included in these custom audience lists, and if so, how many people have done so?*

As noted above all subscribers have the option to opt out when they subscribe and communications with them offer the opportunity to unsubscribe and manage their preferences at any time. Given the dynamic nature of this process preferences are updated immediately. Again, please refer to the Privacy Policy https://www.studywithnewzealand.govt.nz/en/privacy-policy

Our systems do not enable us to easily tell how many did not consent. As such, we are refusing this part of your request under section 18(e) of the OIA, that the document alleged to contain the information requested does not exist.

o. *If so, has Education New Zealand received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.*

ENZ has received no complaints about this process.

p. *If so, did Education New Zealand consult with the office of the Privacy Commissioner on this practice? If so, when.*

ENZ has not consulted with the Office of the Privacy Commissioner on this practice.

q. *If so, has Education New Zealand received any reports about the effectiveness of custom audience lists? If so, please provide these.*

As these reports are important in informing ENZ budgetary decisions. They are commercially sensitive and will not be released. As such this part of your request is declined under section 9(i) of the OIA - enable a Minister of the Crown or any public service agency or organisation holding the information to carry out, without prejudice or disadvantage, commercial activities.

r. *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?*

The tables in Appendix Two outlines how many people in each of our source markets match the profile of users in our custom audiences.

Has any person from Education New Zealand 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?

There were no specific meetings between ENZ and those platforms directly. However, ENZ staff attended two networking events hosted by TikTok and Google.

ENZ has, along with marketers from other organisations, attended information seminars with representatives of digital advertising

platforms in the past 12 months.

29 May 2024 / Platforms Happy Hour: TikTok
26 June 2024 / MBM || Google – Durable Measurement Client Event

s.   *If so, who was present during these meetings?*

NA

t.   *If so, please provide the agenda, notes, minutes and any communications associated with these meetings.*

NA

u.   *Does Education New Zealand have a dedicated account manager with Meta, Google, Linkedin, Tok Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?*

No, ENZ does not have a dedicated account manager with any digital advertising platform.

Please provide any correspondence, e-mail, document, or record held by Education New Zealand 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.

Please refer to Appendix Three for a copy of relevant correspondence. Please note that this has been partially released to you as some names and contact details have been withheld under section 9(2)(a) of the OIA – privacy of natural persons

Information about how to make a complaint is available at https://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. Please contact us if you have any questions about this.

Yours sincerely

Di Solomon
General Manager
Government Relations

Appendix One: Tealium audiences, created since 1 July 2023 related to Question E

(note this page is blank due to the size of the table on the following page)

Audience Name	Definition	Total Visitors @ 23 Aug 2024	Visitors in last 90 days	Sent to DV360	Sent to Google Ads	Sent to META
All Visitors	Out of the box default audience.	1,740,719	826,697	Y	Y	N
Active Researchers Retarget Google	The main retargeting audience. Most users on SWNZ that have an active session will qualify. Display ad consent = TRUE AND Google user ID = populated AND At least 1 Active Session AND Not emailable AND No more than 10 visits to SWNZ AND No more than 10 minutes on SWNZ AND Not a Scholarship Seeker	670,569	294,508	Y	Y	N/A
Converted to Student Visa	Student visa record confirmed via Immigration NZ integration	626	105	N	N	N
Country Researchers Retarget	Latest SWNZ session mostly engaged in country research pages (Why NZ, How to Apply, Blog) AND No more than 2 visits to SWNZ AND Not emailable	595,771	326,843	Y	Y	N/A
Course Researchers Retarget	Latest SWNZ session mostly engaged in course research pages (Study Options, Course Finder, Inventory Items) AND No more than 2 visits to SWNZ AND Not emailable	329,397	122,751	Y	Y	Y
Display Ad Suppression	Display Ad consent = FALSE OR From Unsuitable (Grey and Blue) Markets OR Scholarship Seeker OR Already signed up to DB	102,371	37,767	N - to confirm use case	N - to confirm use case	N/A
Enquired in last 12 months	Has submitted any type of enquiry within last 12 months	18,057	2551	Y	Y	Y
High Likelihood of Enquiring	Predictive model deems there is an 85% chance this person will submit an enquiry in the next 7 days	22,009	593	Y	Y	Y
High Likelihood of Returning	Predictive model deems there is a 65% chance this person will make a return visit in the next 7 days	217,331	119,239	N - see comments	N - see comments	N
High Likelihood of Signing Up	Predictive model deems there is an 80% chance this person will sign up to the database in the next 7 days	25,227	3315	Y	Y	Y
Inventory Deciders Lookalikes Google	A subset of the Active Researchers retargeting audience. These users are more engaged and have spent time in the course finder At least 5 inventory search events OR At least 3 inventory item views OR At least 1 abandoned enquiry OR At least 1 provider referral click AND Not a Scholarship Seeker AND Google ID Populated AND From top 2 Market Priorities (Green and Orange)	36,665	12,616	Y	Y	N/A
Inventory Deciders Retarget Google	A subset of the Active Researchers retargeting audience. These users are more engaged and have spent time in the course finder At least 5 inventory search events OR At least 3 inventory item views OR At least 1 abandoned enquiry OR At least 1 provider referral click AND Not a Scholarship Seeker AND Google ID Populated AND From top 2 Market Priorities (Green and Orange) AND Display Ad consent = TRUE	33,455	12,036	Y	Y	N/A
Offshore Study Interest	Favourite delivery mode (inferred) is Online or Pathways (as opposed to onshore in NZ)	52,471	20,326	Y	Y	N/A
Recent DB Signups - Facebook Lookalikes	Anyone signed up to the SWNZ database should be used for lookalikes	14,038	5648	N/A	N/A	Y
Recent DB Signups - Google Lookalikes	Anyone signed up to the SWNZ database should be used for lookalikes. This audience requires Google User Id to be populated	9143	3658	Y	Y	N/A
Undergrad Study In NZ Interest	Favourite delivery mode in onshore in NZ AND Favourite level of study (inferred) is Diploma OR Certificate OR Bachelor's OR ELS	62,335	24,373	Y	Y	N/A
Previous Fairs Registrations	Latest Fair Registered attribute is populated	79	79	N	N	N/A
Priority Market Visitors	Consent to Display Ads = TRUE AND Priority Market Badge is assigned (Priority Markets are: China, South Korea, Japan, Thailand, Vietnam, India, Brazil, Colombia, USA, Chile, Germany Philippines, Malaysia, France, Indonesia)	131,689	55,902	Y	Y	N/A
University Fans	Consent to Display Ads = TRUE AND Education provider type inferred (Favourite) = University OR Education provider type declared = University	158,054	53,845	Y	Y	N/A
Te Pukenga Fans	Consent to Display Ads = TRUE AND Education provider type inferred (Favourite) = Institute of Technology or Polytechnic OR Education provider type declared = Institute of Technology or Polytechnic	46,807	17,537	Y	Y	N/A
School Fans	Consent to Display Ads = TRUE AND Education provider type inferred (Favourite) contains Primary OR Education provider type declared contains Primary OR Education provider type inferred (Favourite) contains Intermediate OR Education provider type declared contains Intermediate OR Education provider type inferred (Favourite) contains Secondary OR Education provider type declared contains Secondary	17,597	6409	Y	Y	N/A

Meta audiences

Audience Name	Estimated Audience Size	Date Created
Tealium - Course Researcher Retarget Audience	Below 1,000	25/09/2024, 13:14
Lookalike (PH, 1%) - Tealium - Recent DB Signups for Lookalikes	1,100,000 - 1,200,000	18/07/2024, 14:11
Engagers (FB & IG) & Lookalike Parents (excl. NZ)	1,500,000 - 1,700,000	24/06/2024, 11:59
Engagers, Lookalike & Likely to enquire	4,100,000 - 4,800,000	10/11/2023, 14:19
Tealium: High Likelihood of Enquiring	Below 1,000	30/10/2023, 10:23
Engagers (FB & IG) excl. NZ	1,800,000 - 2,100,000	29/05/2023, 15:04
Lookalike (TH, 1%) - Tealium - Recent DB Signups for Lookalikes	570,400 - 671,000	02/12/2022, 17:03
Lookalike (KR, 1%) - Tealium - Recent DB Signups for Lookalikes	160,500 - 188,900	02/12/2022, 17:03
Lookalike (JP, 1%) - Tealium - Recent DB Signups for Lookalikes	426,700 - 502,000	02/12/2022, 17:02
Lookalike (IN, 1%) - Tealium - Recent DB Signups for Lookalikes	4,700,000 - 5,500,000	02/12/2022, 17:02
Lookalike (DE, 1%) - Tealium - Recent DB Signups for Lookalikes	318,200 - 374,300	02/12/2022, 17:01
Lookalike (VN, 1%) - Tealium - Recent DB Signups for Lookalikes	863,000 - 1,000,000	02/12/2022, 17:00
Lookalike (US, 1%) - Tealium - Recent DB Signups for Lookalikes	2,200,000 - 2,600,000	02/12/2022, 17:00
Lookalike (BR, 1%) - Tealium - Recent DB Signups for Lookalikes	1,300,000 - 1,600,000	02/12/2022, 16:59
Tealium - Recent DB Signups for Lookalikes	26,000 - 30,600	17/11/2022, 10:52
Lookalike, global markets 2%, SpeakData student database	23,300,000 - 27,400,000	30/08/2022, 14:53
Tealium lookalikes - SwNZ enquirers	8,800 - 10,400	02/08/2022, 12:37

Legend:

BR: Brazil

DB: Database

DE: Germany

FB: Facebook

IG: Instagram

IN: India

JP: Japan

KR: South Korea

TH: Thailand

PH: Philippines

SwNZ: Study with New Zealand

US: United States

VN: Viet Nam

Appendix Two: Meta – Tealium Lookalike audiences by market – Question R

	Name	Estimated audience size	Availability	
☐	Lookalike (TH, 1%) - Tealium - Recent DB Signups for Lookalikes	570,800 - 671,500	● Ready Last edited 12/02/2022	❶
☐	Lookalike (KR, 1%) - Tealium - Recent DB Signups for Lookalikes	160,100 - 188,300	● Ready Last edited 12/02/2022	❶
☐	Lookalike (JP, 1%) - Tealium - Recent DB Signups for Lookalikes	425,100 - 500,100	● Ready Last edited 12/02/2022	❶
☐	Lookalike (IN, 1%) - Tealium - Recent DB Signups for Lookalikes	4,700,000 - 5,500,000	● Ready Last edited 12/02/2022	❶
☐	Lookalike (DE, 1%) - Tealium - Recent DB Signups for Lookalikes	317,000 - 372,900	● Ready Last edited 12/02/2022	❶
☐	Lookalike (VN, 1%) - Tealium - Recent DB Signups for Lookalikes	867,500 - 1,000,000	● Ready Last edited 12/02/2022	❶
☐	Lookalike (US, 1%) - Tealium - Recent DB Signups for Lookalikes	2,200,000 - 2,600,000	● Ready Last edited 12/02/2022	❶
☐	Lookalike (BR, 1%) - Tealium - Recent DB Signups for Lookalikes	1,300,000 - 1,600,000	● Ready Last edited 12/02/2022	❶
☐	Tealium - Recent DB Signups for Lookalikes Recently signed up to ENZ database from SWNZ website	26,100 - 30,700	● Ready Last edited 10/03/2024	❶
☐	Tealium lookalikes - SwNZ enquirers Enquirers in the last 12 months	8,800 - 10,400	● Ready Last edited 10/03/2024	❶

Google (Search, Performance Max)

	A	B	C	D	E	F	G
1	Audience segment list report						
2	All time						
3	Segment name	Segment Type	Membership stat	Size: Search	Size: YouTube	Size: Display	Size: Gmail campaign
4	All Users of SwNZ GA4 - Tealium Implementation - Prod	Website visitors	Open	530,000	520,000	360,000	330,000
5	Prospect leads test (Tealium)	Customer segment	Open	<100	<100	<100	<100
6	Purchasers of SwNZ GA4 - Tealium Implementation - Prod	Website visitors	Open	0	0	0	0
7	Tealium - Active Researchers	Customer segment	Open	200,000	200,000	N/A	N/A
8	Tealium - Country Researchers	Customer segment	Open	6,100	6,100	N/A	N/A
9	Tealium - Course Researchers	Customer segment	Open	11,000	11,000	N/A	N/A
10	Tealium - Enquired in last 12 months	Customer segment	Open	3,200	3,200	N/A	N/A
11	Tealium - High Likelihood of Enquiring	Customer segment	Open	1,000	1,000	N/A	N/A
12	Tealium - High Likelihood of Signing Up	Customer segment	Open	1,100	1,100	N/A	N/A
13	Tealium - Inventory Deciders for building Lookalikes	Customer segment	Open	1,600	1,600	N/A	N/A
14	Tealium - Inventory Deciders for retargeting	Customer segment	Open	1,600	1,600	N/A	N/A
15	Tealium - Offshore Study Interest	Customer segment	Open	1,000	1,000	N/A	N/A
16	Tealium - Priority Market Visitors	Customer segment	Open	800-900	800-900	N/A	N/A
17	Tealium - Recent DB Signups	Customer segment	Open	400-500	400-500	N/A	N/A
18	Tealium - School Fans	Customer segment	Open	500-600	500-600	N/A	N/A
19	Tealium - Te Pukenga Fans	Customer segment	Open	1,900	2,000	N/A	N/A
20	Tealium - Undergrad Study In NZ Interest	Customer segment	Open	2,400	2,400	N/A	N/A
21	Tealium - University Fans	Customer segment	Open	4,400	4,400	N/A	N/A
22	Tealium All Visitors	Customer segment	Open	20,000	20,000	N/A	N/A
23	Tealium Suppression Audience	Customer segment	Open	46,000	46,000	N/A	N/A

Google (DV360)

Audience Lists		Details						Delivery	
Name		Type	Source	Display size		YouTube users	Mobile app	CTV devices	Display line items
Tealium Suppression Audience	8342814201	Unknown	Display & Video 360	66,000		< 1K	< 1K	6,900	54
Tealium - Te Pukenga Fans	8333886192	Unknown	Display & Video 360	8,000		< 1K	< 1K	< 1K	0
Tealium - Recent DB Signups - for building lookalikes	8333886189	Unknown	Display & Video 360	3,000		< 1K	< 1K	< 1K	5
Tealium - University Fans	8333215043	Unknown	Display & Video 360	18,000		< 1K	< 1K	1,700	0
Tealium - Inventory Deciders for Retargeting	8333149798	Unknown	Display & Video 360	7,000		< 1K	< 1K	< 1K	0
Tealium - School Fans	8333094859	Unknown	Display & Video 360	5,000		< 1K	< 1K	< 1K	0
Tealium - Undergrad Study In NZ Interest	8333094820	Unknown	Display & Video 360	10,000		< 1K	< 1K	< 1K	0
Tealium - Inventory Deciders - for building lookalikes	8333081536	Unknown	Display & Video 360	7,000		< 1K	< 1K	< 1K	0
Tealium - Priority Market Visitors	8330873387	Unknown	Display & Video 360	8,000		< 1K	< 1K	< 1K	0
Tealium High Likelihood of Signing up	8315404944	Unknown	Display & Video 360	5,000		< 1K	< 1K	< 1K	0
Tealium - High Likelihood of Enquiring	8315404941	Unknown	Display & Video 360	4,000		< 1K	< 1K	< 1K	1
Tealium - Enquired in last 12 months	8315346552	Unknown	Display & Video 360	4,000		< 1K	< 1K	< 1K	0
Tealium - Course Researchers	8315346549	Unknown	Display & Video 360	71,000		< 1K	< 1K	4,100	12
Tealium - High Likelihood of Returning	8314360019	Unknown	Display & Video 360	< 1K		< 1K	< 1K	< 1K	0
Tealium All Visitors	8274574628	Unknown	Display & Video 360	230,000		< 1K	< 1K	8,200	42
Tealium - Country Researchers	8274326617	Unknown	Display & Video 360	110,000		< 1K	< 1K	2,600	0
Tealium - Active Researchers	8091563194	Unknown	Display & Video 360	500,000		< 1K	< 1K	34,000	11

From: Priyanka Sachdev S 9 (2)(a) >
Sent: Tuesday, September 10, 2024 2:44 PM
To: Gerard Duignan <gerard.duignan@enz.govt.nz>
Cc: Withheld under section 9(2)(a) of the OIA

Subject: ENZ - First Party Data | Paid Advertising

Hello Gerard,

Hope all's well.

As discussed yesterday, we use first party audiences from Tealium and Ghost will be the best people to advise on how they create it at their end as we do not have visibility on it. In terms of the use of first party audiences, please see below where we have segregated its use based on channel and objective.

Pmax, Demand Gen
Use of Tealium, GA4 and Google Ads (e.g. in-market, affinity, etc) audiences on the campaigns are as "signals" rather than "targets" in Google Ads PMax and Demand Gen campaigns, as these campaigns use audiences to help Google AI's system to optimize for the conversion goals that we setup at a campaign level. Those audience signals can help to guide the machine learning models on the ideal way to optimize our campaigns. Therefore, we don't specifically target these audiences in Pmax and Demand Gen campaigns instead, the audience segments act as signals that inform the AI-powered bid strategies so they can understand how users on those lists interact with our ads & adjust the bids for searches from those users based on their interactions. The platform may also observe those lists & use

them to find other relevant audiences.

Search

For Search campaigns, where the targeting is focused on the keywords/terms these audiences are added in "Observation" mode. The "Observation" setting won't change who can see the ads or where they can show. Instead, this setting allows us to monitor how ads are performing for your selected placements, topics, or audiences while our campaigns are running, and serves more as a reference on how the campaigns are performing for those specific audiences.

Social & DV360

For these channels, below is our audience strategy and different ways we create them and use them across the campaigns based on the end goal.

Audiences created using Tealium

We use these audiences in our platform to:

- Create lookalikes in the markets outside NZ that we're targeting. One of the examples would be, we create lookalike of SwNZ signups in the platforms such as Google and Meta which are created within the platforms based on the behaviours.
- Exclusion: We remove these audiences (example: SwNZ sign ups) so retarget people who have not signed-up.
- Target audiences to retargeting (example: Course Researchers) to optimize towards main goal of the campaign.

Audiences created using Website Pixels and GA4

We use Floodlights / Meta pixels via CAPI or platform which are also created based on the events and flow in Tealium and these are non-PII (non – personally identifiable information) based on their consent on the host platform (i.e. Meta or Google). We use these audiences in our platform to:

- Create lookalikes in the markets outside NZ that we're targeting. One of the examples would be, we create lookalike of SwNZ signups in the platforms such as Google and Meta which are created within the platforms based on the behaviours.
- Exclusion: We remove these audiences (example: SwNZ sign ups) so retarget people who have not signed-up.
- Target audiences to retargeting (example: Course Researchers) to optimize towards main goal of the campaign.

Audiences created in Meta platform based on Lead gen Campaigns

We use in-platform tech of Meta to create audiences specifically for Fairs campaigns of people who have added in their leads last year for fairs registrations; this data is downloaded by EducationNZ. We use these audiences to:

- Create lookalikes in the markets outside NZ that we're targeting.

- As exclusions so that we do reach people who have already signed-up.

Additionally, we are also talking to Zalo for Vietnam Fairs campaigns where they collect leads in their platform, and we have reverted to them on how they will share these leads in a safe way without us being involved in it as there is a risk and the data is not flowing directly into your CRM. We will update you once we hear back from them on the same.

Hope this helps and please let us know if further information is needed.

Thanks,
Priyanka Sachdev (she/her)
Associate Digital Director

S 9 (2)(a)