



myID: notification of collection, use or disclosure of personal information



Summary

The Office of the Australian Information Commissioner (OAIC) assessed whether the ATO's myGovID application's privacy policy clearly explained how it handled personal information, and whether its privacy notice explained why it collected and disclosed personal information. This included explaining myGovID's handling of biometric information. (myGovID is now known as myID.)

As part of the assessment, we engaged CyberCX (a cybersecurity company) to review myGovID's source code and functionality. They then compared what the app actually did to its privacy policy and privacy notice.



Our findings

We found myGovID's privacy policy was up to date. Importantly, we found that myGovID handles personal information as described in its privacy policy, with one minor exception. If automated checks fail, UK-based staff from a third-party supplier view biometric information to verify it. The privacy policy states myGovID won't disclose personal information to overseas recipients, but does not clearly explain that in some situations personal information may be viewable overseas.

When collecting personal information, the myGovID app gives users the option to review a privacy notice explaining why the information was being collected and the circumstances in which it may be disclosed. We found myGovID meets the collection and disclosure requirements in the Australian Privacy Principles.



Recommendations

We recommended that the ATO amend myGovID's privacy policy to reflect the circumstances in which personal information may be viewable overseas. The ATO agreed to do this.

We suggested the ATO could ensure that, rather than just making the privacy notice available when myGovID was collecting data, it could better notify about the collection of personal information by incorporating a checkbox to confirm users have considered the notice. The ATO advised this feature will be incorporated into a future release.



Takeaways

We thoroughly reviewed myGovID personal information handling practices as of mid-2024, and found it essentially met its obligations about the open and transparent handling of personal information. Further, we found that when myGovID collected personal information, it made available a notice accurately explaining why it was collecting the information and the circumstances in which it would be disclosed.