

OFFICIAL

Data Legislation Team,
Office of the National Data Commissioner,
Department of the Prime Minister and Cabinet
Delivered electronically,

9 October 2019

Regarding: Data Sharing and Release Legislative Reforms Discussion Paper

Dear Data Legislation Team

Thank for the opportunity to make submissions and comments on the Data Sharing and Release Legislative Reforms Discussion Paper and Privacy Impact Assessment.

Vault's submissions and comments are as follows:

1. Where the the Level of Control required is indicated as High or Very High for the Data Sharing Principles of People, Setting and Data, then the underlying data should only be shared, processed and stored on fully sovereign IT systems that are assessed or certified to handle PROTECTED workloads.
2. The emphasis should be on full sovereignty. There are 3 components that work together to achieve full sovereignty, namely the legislative, operational and physical settings that apply. Each of these must be fully sovereign to Australia.
3. If this is not the case it creates material and insurmountable deficiencies in the Governments intent and objectives underlying the Data Sharing Legislative Reforms. Non-sovereign multinational organisations on a daily basis are allowed to collect any types of information from Austalian citizens in the most private of locations, such as the family home or car.
4. There are very few controls over these organisations and their services are also used by Australian citizens to provide the Government with these citizens' personal data. In fact, in many cases the Government insists on Australian citizens having an email capability, which they can obtain for free with one of these organisations.
5. The submissions in 1 and 2 above will provide clear guidance to Government agencies in their adoption of Cloud services as part of the Whole-of-Government Hosting Strategy.

Kind regards
Vault Systems Pty Ltd