

22 August 2023

Digital Platform Inquiry Team
Australian Competition and Consumer Commission

via email: digitalmonitoring@accc.gov.au

ARA SUBMISSION TO THE DIGITAL PLATFORM SERVICES INQUIRY AND THE ROLE OF DATA BROKERS

The Australian Retailers Association (ARA) welcomes the opportunity to provide comments in relation to the role of data brokers, as part of the Australian Competition and Consumer Commission (ACCC) review into digital platform services.

The ARA is the oldest, largest, and most diverse national retail body, representing a \$420 billion sector that employs 1.4 million Australians – making retail the largest private sector employer in the country. We represent the full spectrum of Australian retail, from our largest national and international retailers to our small and medium sized members, who make up 95% of our membership.

The ARA recognises the importance of this matter, given the increasing reliance of retailers on data-driven insights for enhancing consumer experiences and business strategies.

Following consultation with members, the ARA recommends a watching brief on the outcomes of related government initiatives that could inform and influence the landscape for data brokers working with the retail sector.

Of particular importance, the Privacy Act Review is considering reforms that directly relate to the collection, processing and use of personal data, which are fundamental issues for data brokerage in the retail sector.

We appreciate the ACCC's initiative to scrutinise the role of data brokers but it is paramount that consideration be given to the outcomes of parallel reviews. These findings will shape the way data is used in retail and will impact the dynamics between retailers and data brokers.

We therefore suggest a coordinated and synchronised approach. Awaiting the outcomes and recommendations of other government initiatives, such as the Privacy Act Review, ensures that any future changes will be more effective and aligned with broader objectives.

Thank you again for the opportunity to provide a submission on this important issue. We remain committed to engaging constructively on this topic and advancing the interests of both consumers and the retail sector.

Any queries in relation to this submission can be directed to our policy team at policy@retail.org.au.