

1
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3 Information and Privacy Commission NSW (IPC)
4 New South Wales
5
6
7 **Fact Sheet: Consent / Information and Privacy Commission NSW (IPC)**
8
9

10 First of all, a lot of thanks to the Information and Privacy Commission NSW (IPC) for organising
11 this important consultation.

12
13 This opinion represents an opinion of an individual citizen, not any legal entity.

14
15 This opinion does not contain:

- 16 – any business secrets
- 17 – any trade secrets
- 18 – any confidential information.

19
20 This opinion is public.

21 Information and Privacy Commission NSW (IPC) can add the PDF file of this opinion to a relevant
22 web page.

23
24 Annex 1 holds information about previous opinions related to information technology.

25 Annex 2 holds information about disclaimers and copyright.

26
27
28 Best Regards,

29
30
31 Jukka S. Rannila
32 citizen of Finland

33
34 signed electronically
35

36
37
38 [Continues on the next page]
39

40

41 **Previous consultations about information systems / Annex 1**

42

43 Annex 1 holds a list of previous consultations about information systems.

44

45 Based on previous opinions I have explained several issues in detailed way. It can be noted that
46 some issues are repeated since many consultations concentrated on information technology.

47

48 This opinion does not repeat all previous issues (mainly information technology) mentioned on the
49 previous opinion documents.

50

51 **Email / Opt out / Simple and effective solutions?**

52

53 Email is still in use even though different social media (no email) solutions are used extensively.

54

55 In many cases email is used for official communications between two stakeholders – e.g. in many
56 cases a shipping confirmation (letter) are sent as an email message.

57

58 Here we can note that in many cases email messages are still used for informing consent.

59

60 **Proposal: Providers of different information systems can collect email addresses of**
61 **users if an user gives consent for this.**

62

63 **Proposal: Providers of different information systems can send regular email messages**
64 **if an user gives consent for this.**

65

66 **Proposal: There should always be an opt-out in all email messages which are sent by**
67 **providers of different information systems.**

68

69 In reality many providers of different information systems have already opt-out information in all
70 email messages which they send to different stakeholders.

71

72 **Possible central register of information systems**

73

74 **Proposal: Possibly there could be a central register where information of different**
75 **registers (public and/or private) can be added.**

76

77 Naturally this proposal can add some bureaucracy since there are several public and/or private
78 registers. On the other hand this central register can just be a simple web page without functions.

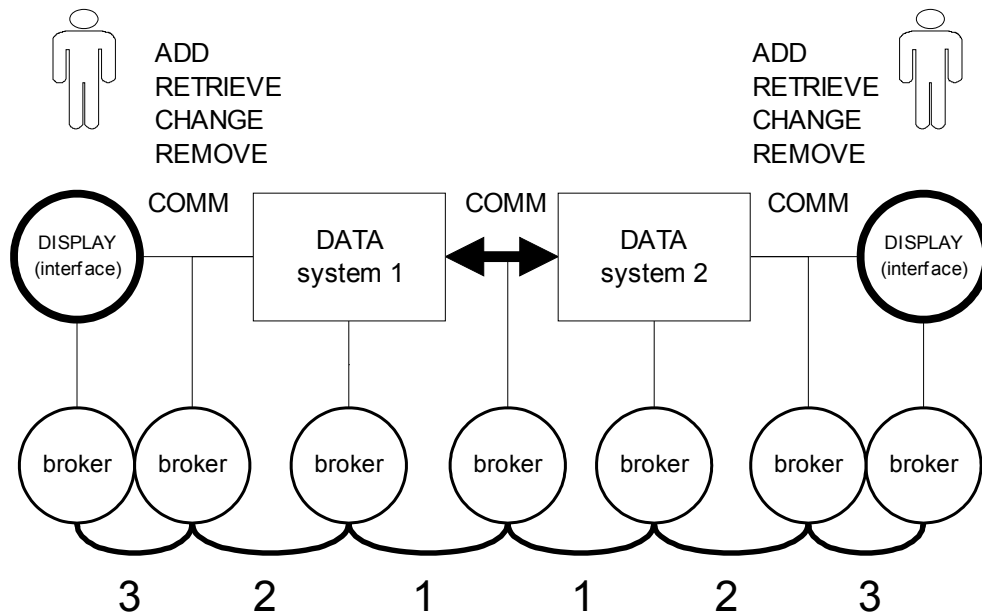
79

80 Possible central register could collect information about consent in different information systems..

81

82 **Personal information with brokered systems / Identifiers (ID)**

83



84
85

86 In reality information from one information system can be used in several other information
87 systems. Also there can be several brokers which can transmit information. Different broker
88 systems usually have internal identifier (ID). Added value can be based on combination of different
89 identifiers (ID).

90

91 Here we can note possible cooperation between different systems and usually cooperation between
92 different systems means using different identifiers (ID). There can be some central (S1 ↔ S2)
93 systems which collect information from other systems which have own identifiers (ID).

94

95 **Proposal: Different identifiers (ID) could be assessed carefully.**

96

97 **Proposal: Proposed central register could collect information about different broker**
98 **systems which transmit data between several information systems – in many cases**
99 **using different identifiers (ID).**

100

101 **Proposal: Information about user consent (in a possible central system) should be**
102 **transmitted to other other information systems – e.g. brokered systems.**

103

104

105 **Good luck!**

106

107 This opinion is quite limited and probably other opinions will result some constructive ideas.

108

109 [Continues on the next page]

110

111

ANNEX 1

112

I have constructed different opinions about different issues, and on the following web page
are all written (PDF files) opinions:

115

<http://www.jukkarannila.fi/lausunnot.html>

116

**I have constructed specifically opinions related to information systems – both in English and
in Finnish.**

119

Here is the list of opinions related to information systems.

121

EN: Opinion 8: European Interoperability Framework, version 2, draft

http://www.jukkarannila.fi/lausunnot.html#nro_8

124

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
proposal for comments

http://www.jukkarannila.fi/lausunnot.html#nro_9

128

EN:Opinion 13: Final Committee Draft ISO/IEC FCD3 19763-2

http://www.jukkarannila.fi/lausunnot.html#nro_13

131

EN: Opinion 14: SFS discussion paper / SFS:n keskusteluasiakirja

http://www.jukkarannila.fi/lausunnot.html#nro_14

134

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

http://www.jukkarannila.fi/lausunnot.html#nro_17

137

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

http://www.jukkarannila.fi/lausunnot.html#nro_18

140

EN: Opinion 19: Official Acknowledgement by the Commission

http://www.jukkarannila.fi/lausunnot.html#nro_19

143

EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft

http://www.jukkarannila.fi/lausunnot.html#nro_20

146

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal

http://www.jukkarannila.fi/lausunnot.html#nro_21

149

EN: Opinion 23: Public consultation on the review of the European Standardisation System

http://www.jukkarannila.fi/lausunnot.html#nro_23

152

EN: Opinion 24: ISO/IEC JTC 1 / SC 34 / WGs 1, 4 and 5 in Helsinki 14-17 June 2010

http://www.jukkarannila.fi/lausunnot.html#nro_24

154

155 FI: Lausunto 29: Avoimen demokratian avoimen datan avaamisen detaljit (ADADAD)

156 http://www.jukkarannila.fi/lausunnot.html#nro_29

157

158 EN: Opinion 30: Internet Filtering

159 http://www.jukkarannila.fi/lausunnot.html#nro_30

160

161 FI: Lausunto 31: Terveystieteiden tietotekniikasta

162 http://www.jukkarannila.fi/lausunnot.html#nro_31

163

164 EN: Opinion 32: COMP/C-3/39.692/IBM - Maintenance services

165 http://www.jukkarannila.fi/lausunnot.html#nro_32

166

167 FI: Lausunto 33: Julkishallinnon tietoluovutusten periaatteet ja käytännöt

168 http://www.jukkarannila.fi/lausunnot.html#nro_33

169

170 EN: Opinion 34: REMIT Registration Format

171 http://www.jukkarannila.fi/lausunnot.html#nro_34

172

173 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes

174 http://www.jukkarannila.fi/lausunnot.html#nro_37

175

176 FI: Lausunto 38: SADe-ohjelman avoimen lähdekoodin toimintamallin luonnos

177 http://www.jukkarannila.fi/lausunnot.html#nro_38

178

179 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems

180 http://www.jukkarannila.fi/lausunnot.html#nro_39

181

182 EN: Opinion 41: AT.39398: observations on the proposed commitments

183 http://www.jukkarannila.fi/lausunnot.html#nro_41

184

185 EN: Opinion 43: Publication of extracts of the European register of market participants

186 http://www.jukkarannila.fi/lausunnot.html#nro_43

187

188 EN: Opinion 45: About ICT standardisation

189 http://www.jukkarannila.fi/lausunnot.html#nro_45

190

191 EN: Opinion 46: Review of the EU copyright rules

192 http://www.jukkarannila.fi/lausunnot.html#nro_46

193

194 EN: Opinion 47: Sharing or collaborating with government documents

195 http://www.jukkarannila.fi/lausunnot.html#nro_47

196

197 FI: Lausunto 49: JSH 166 -suosituksen päivitys

198 http://www.jukkarannila.fi/lausunnot.html#nro_49

199

- 200 EN: Opinion 52: Trusted Cloud Europe Survey
201 http://www.jukkarannila.fi/lausunnot.html#nro_52
202
- 203 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
204 http://www.jukkarannila.fi/lausunnot.html#nro_53
205
- 206 EN: Opinion 54: Government Content Management System
207 http://www.jukkarannila.fi/lausunnot.html#nro_54
208
- 209 EN: Opinion 55: European Energy Regulation
210 http://www.jukkarannila.fi/lausunnot.html#nro_55
211
- 212 EN: Opinion 56: National Identity Proofing Guidelines
213 http://www.jukkarannila.fi/lausunnot.html#nro_56
214
- 215 FI: Lausunto 58: Puoluekokousaloitteet / 2010 ja 2014
216 http://www.jukkarannila.fi/lausunnot.html#nro_58
217
- 218 EN: Opinion 59: Green paper on mobile Health
219 http://www.jukkarannila.fi/lausunnot.html#nro_59
220
- 221 EN: Opinion 60: Cross-border inheritance tax problems within the EU
222 http://www.jukkarannila.fi/lausunnot.html#nro_60
223
- 224 EN: Opinion 61: European Register of Products Containing Nanomaterials
225 http://www.jukkarannila.fi/lausunnot.html#nro_61
226
- 227 FI: Lausunto 65: Lausuntopyyntö nettiäänestystyöryhmän väliraportista
228 http://www.jukkarannila.fi/lausunnot.html#nro_65
229
- 230 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
231 http://www.jukkarannila.fi/lausunnot.html#nro_66
232
- 233 FI: Lausunto 67: Valtioneuvoston hanketiedon esiselvityksestä
234 http://www.jukkarannila.fi/lausunnot.html#nro_67
235
- 236 EN: Opinion 68: European Network Code Stakeholder Committees
237 http://www.jukkarannila.fi/lausunnot.html#nro_68
238
- 239 FI: Lausunto 69: Hallituksen esitys (luonnos 16.4.2015) vieraslajeista
240 http://www.jukkarannila.fi/lausunnot.html#nro_69
241
- 242 EN: Opinion 70: Providing better APIs in New Zealand
243 http://www.jukkarannila.fi/lausunnot.html#nro_70
244

- 245 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
246 http://www.jukkarannila.fi/lausunnot.html#nro_71
247
- 248 EN: Opinion 72: Queensland biofuel mandate
249 http://www.jukkarannila.fi/lausunnot.html#nro_72
250
- 251 EN: Opinion 73: Financial / Conceptual Frameworks
252 http://www.jukkarannila.fi/lausunnot.html#nro_73
253
- 254 EN: Opinion 74: Enabling the Internet of Things
255 http://www.jukkarannila.fi/lausunnot.html#nro_74
256
- 257 EN: Opinion 78: Consumer Complaints Register (NSW)
258 http://www.jukkarannila.fi/lausunnot.html#nro_78
259
- 260 EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015
261 http://www.jukkarannila.fi/lausunnot.html#nro_79
262
- 263 EN: Opinion 80: Mandatory Transparency Register
264 http://www.jukkarannila.fi/lausunnot.html#nro_80
265
- 266 EN: Opinion 81: Records and Information Management Standard
267 http://www.jukkarannila.fi/lausunnot.html#nro_81
268
- 269 EN: Opinion 84: Revision of the European Interoperability Framework
270 http://www.jukkarannila.fi/lausunnot.html#nro_84
271
- 272 EN: Opinion 85: Regulatory options for automated vehicles
273 http://www.jukkarannila.fi/lausunnot.html#nro_85
274
- 275 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
276 http://www.jukkarannila.fi/lausunnot.html#nro_86
277
- 278 EN: Opinion 87: Assessing privacy and big data on the Internet
279 http://www.jukkarannila.fi/lausunnot.html#nro_87
280
- 281 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
282 http://www.jukkarannila.fi/lausunnot.html#nro_88
283
- 284 EN: Opinion 89: BEREC Guidelines for net neutrality rules
285 http://www.jukkarannila.fi/lausunnot.html#nro_89
286

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331

332



1 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three “old” parties were not traditionally as the three largest parties. On 2015 this “new” party is part of the current Finnish Government. We all must be interested about this new development in Finland.