

The Commissioner  
Commissioner for Data Protection  
Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2, D02 RD28

6 May 2022

### Further information regarding An Post GeoDirectory (C -22-5-3)

Dear Commissioner,

1. We write with additional information further to our complaint (C -22-5-3).

#### An Post delivery staff

2. According to GeoDirectory's statements, An Post's delivery staff conduct an "inspection" of homes across Ireland, and An Post reports this information to GeoDirectory. Technical material from GeoDirectory describe this variously as "An Post inspection"<sup>1</sup> and "An Post ground validation".<sup>2</sup> GeoDirectory's website provides the following descriptions:

"With 5,600 delivery staff on the ground, An Post has an intimate knowledge of every building in every village, town and city in the Republic of Ireland" (emphasis added).<sup>3</sup>

And

"Every quarter, An Post's delivery staff is debriefed for 'on the ground intelligence'. This is fed into a database by a dedicated team of support staff..."<sup>4</sup>

3. This inspection by An Post appears to include people's homes. GeoDirectory says the resulting database provides "instant access to in-depth building data of residential and commercial access in Ireland" (emphasis added).<sup>5</sup>
4. Statements from a GeoDirectory executive indicate what that inspection by An Post delivery staff may entail: "**we're standing in front of it, we're counting the windows**".<sup>6</sup> This appears to be undertaken in order to estimate how many floors a property has.

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<sup>1</sup> In "DATA\_SOURCES", "DATA\_SRC\_ID" (originally at URL: <https://www.geodirectory.ie/products-services/tech-specs-sample-data> Note this URL is no longer available (as of 5 May 2022) but please find file in Enclosure 1 of our complaint of 29 April.

<sup>2</sup> "GeoDirectory Metadata", GeoDirectory (original URL: <https://www.geodirectory.ie/about-us/legal/metadata.pdf>, now offline. See file preserved here <https://web.archive.org/web/20211006100313/https://www.geodirectory.ie/about-us/legal/metadata.pdf>).

<sup>3</sup> *ibid.*

<sup>4</sup> "Frequently Asked Questions: How is GeoDirectory updated?" (URL: <https://www.geodirectory.ie/knowledge-centre/faqs>)

<sup>5</sup> "GeoDirectory Webinar Showcases Exciting New Products", GeoDirectory (URL: <https://www.geodirectory.ie/news/geodirectory-webinar-showcases-exciting-new-product>)

<sup>6</sup> *ibid.*

5. GeoDirectory technical documentation also refers to other An Post data sources: “feedback from An Post usage” and “automated mail sorting”.<sup>7</sup>
6. It is unclear what happens to this information after An Post’s delivery staff collect it. In our letter of 5 October 2021 to An Post’s Data Protection Officer, we asked An Post to confirm that its delivery personnel reported information about people’s homes. However, An Post refused to answer.
7. GeoDirectory advertises this data as useful to “determine the possible financial risk posed by offering insurance cover for properties.”<sup>8</sup> We are therefore concerned that in addition to the issues raised in our complaint to you of 29 April, GeoDirectory is selling the data it receives from An Post’s delivery staff to insurance firms who use it to assess risks associated with individual properties.
8. We remain concerned that we have no transparency about the collection and processing of these data, including sale to other parties.

## Profiling

9. We also write with additional information about GeoDirectory’s social demographic data. GeoDirectory says these data allow purchasers to “**make inferences** about the preferences of people” and that it is “very useful for **predicting behaviour**” (emphasis added).<sup>9</sup> This appears to be profiling in the meaning of Article 4(4) of the GDPR.<sup>10</sup>
10. According to GeoDirectory, this profiling enables applications such as:
  - a. “Targeted health advice”:
 

“Identify addresses for targeting, targeting marketing, targeted health advice, public messages. . . based on the profiles, we can design those campaigns and messages to achieve the best possible results.”<sup>11</sup>
  - b. Loyalty schemes:
 

“The classification can be incorporated into big datasets, like the consumer datasets from, for example, loyalty cards. . . It can be used as a proxy measure to gain insight into the behaviour of clients.”<sup>12</sup>
  - c. Insurance:
 

“In terms of the insurance sector, using these kinds of categories, it’s possible to identify new types of risk.”<sup>13</sup>
11. GeoDirectory envisages that the data it sells will and should be combined with other data already held by a purchaser, and says that its data is “value for money” because “the resulting classification

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<sup>7</sup> “GeoDirectory Metadata”, GeoDirectory (original URL: <https://www.geodirectory.ie/about-us/legal/metadata.pdf>, now offline. See file preserved here <https://web.archive.org/web/20211006100313/https://www.geodirectory.ie/about-us/legal/metadata.pdf>).

<sup>8</sup> “GeoBuilding Intel”, GeoDirectory (URL: <https://www.geodirectory.ie/products-services/geobuilding-intel>)

<sup>9</sup> “Welcome to ‘We are surrounded by data but starved for insights’”, GeoDirectory (URL: [GeoDirectory video “4660317836876302080” preserved on Vimeo](https://www.geodirectory.ie/geo-directory-video-4660317836876302080))

<sup>10</sup> Article 4(4) of the General Data Protection Regulation (URL: <https://eur-lex.europa.eu/eli/reg/2016/679/oj>)

<sup>11</sup> “Welcome to ‘We are surrounded by data but starved for insights’”, GeoDirectory (URL: [GeoDirectory video “4660317836876302080” preserved on Vimeo](https://www.geodirectory.ie/geo-directory-video-4660317836876302080))

<sup>12</sup> *ibid.*

<sup>13</sup> *ibid.*

can be incorporated into in-house decision-making systems and algorithms.”<sup>14</sup>

12. We therefore remain extremely concerned that GeoDirectory’s tools continue to expose the residents of Ireland, especially those deemed deprived, to risk.

Yours faithfully,

Irish Council for Civil Liberties

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<sup>14</sup> *ibid.*