



Australian Government
Australian Transaction Reports
and Analysis Centre

PIA Threshold Assessment

*PIAT-4404 – Data
Matching – Third
Party Cash Deposits*

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INTRODUCTION

This is a Threshold Assessment undertaken for the Induction Refresh Project proposed by the Organisational Development Team. It was undertaken by the Organisational Development Team (lead contact: s 22(1)(a)(ii)) and s 22(1)(a)(ii) of the Privacy and Information Access Team.

THE PROJECT

Through the Fintel Alliance public private partnership, AUSTRAC is working with government and industry partners to target the placement stage of money laundering.

A dedicated project has been established to analyse cash deposits into Australian bank accounts to identify indicators and target organised crime syndicates involved in money laundering.

CORE QUESTIONS

- Does the project propose to collect personal information? Yes
- Does the project propose to store personal information? Yes
- Does the project propose to use personal information? Yes
- Does the project propose to disclose personal information? Yes

PERSONAL INFORMATION

The project will collect the following information:

- Personal identification information of individuals conducting and receiving cash deposits across the counter and through automatic teller machines. Personal information will include name, date of birth, address and bank account information.
- There are no sensitive fields of personal information identified in the above information.

Authority

- The primary purpose of the project is to support the functions of the AUSTRAC CEO under section 212 of the AML/CTF Act 2006, specifically to support domestic and international efforts to combat money laundering and terrorism financing and other serious crimes.

- Information will be obtained from reporting entities under section 167 of the AML/CTF Act 2006, with analysis of the information disseminated to law enforcement under section 121 of the AML/CTF Act.
- There is no intention to undertake secondary use of the information.
- Information collected will be stored securely on AUSTRAC systems and only made available to project members holding an appropriate Australian Government security clearance for the purpose of identifying money laundering and other serious crimes.
- Information collected is proposed to be stored for a period of 12 months before being deleted from AUSTRAC systems.

Modification of Existing Programs

- No modification proposed

Who is to be consulted

- During the course of the project, AUSTRAC will engage with major financial institutions and law enforcement as the primary stakeholders.
- Financial institutions will provide the data to AUSTRAC and receive insights following the analysis of the data.
- Law enforcement partners at the Commonwealth and State level will receive referrals and insights following analysis of the data. It is expected law enforcement will investigate the referrals and undertake operational activity.

THRESHOLD ASSESSMENT

- This project is an extension of the Third party cash deposits project, a PIA of which can be found here: [Document Overview: Third Party Cash Deposits - PRIVACY IMPACT ASSESSMENT.docx - AUSTRAC - s 22\(1\)\(a\)\(ii\)](#)
- That project was held to be low risk.
- I note that the collection of personal information in this extension of the project is slightly different, being, as I understand it, collection relating to cash transactions between \$2000-\$9,999. This is below the TTR limit expressly set out in s 43 of the AML/CTF Act.
- The risk factor relating to this project is that the increased number of individuals affected. A breach
- This risk is mitigated by the following factors:
 - the fact that the information being collected is limited in scope, being limited to the terms of a s 167 notice. This does not appear to be an ongoing collection of information;

- the information to be collected is within the bounds of the previous PIA;
- The use of a s 167 notice is an established collection activity, and the collection is governed by a established processes;
- the information to be collected is authorised by the AML/CTF Act, being a collection under s 167 of the AML/CTF Act.
- There are proposed limits to the use of the information and the length of time the information will be kept by AUSTRAC.
- On the basis of the above, This collection does not raise serious privacy concerns, so long as it continues within the established communicated boundaries. No PIA is required for this project.

FUTURE ACTIONS

- PIAT officer to set out any future actions to be undertaken which run counter to the information provided in relation to this collection.

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