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IMPROVING THE COMMUNICATION OF ANZ'S DATA PRIVACY FOR CONSUMERS

BOOSTING TRANSPARENCY THROUGH VISUAL CUES



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1. EXECUTIVE SUMMARY

This report aims to investigate the opacity of privacy information by organisations, and provide recommendations for ANZ to more transparently communicate such information to consumers.

Currently, organisations are required to publish information pertaining to the use, collection, disclosure, and storage of consumer data. This report finds that many organisations publish this information only to satisfy regulatory requirements and therefore neglect transparent communication of this information to consumers.

Through case study analyses and literature reviews, this report finds that visual communication of privacy information is more transparent than textual information. After undertaking document analyses of ANZ's Privacy Policy PDF and Privacy Centre Webpage, we conclude that these sources of privacy information by ANZ are transparent as they effectively use visual cues to complement the simple language. We find that ANZ's 'Bluebook' terms and conditions lack these visual tools and involve heavy amounts of text. Despite these Bluebooks being highly accessible, as they are sent to consumers as they receive a new product or service, they are unlikely to engage consumers, which creates a transparency issue.

This report recommends that ANZ sends consumers a privacy information infographic alongside its Bluebooks, so that consumers can easily access, interpret, and retain information relating to their data. We conclude that this recommendation is feasible for ANZ, and will result in ANZ being an industry leader while forging stronger connections with consumers.

2. INTRODUCTION

2.1 THE COMPLEX NATURE OF DATA GOVERNANCE

Data collection by organisations has become increasingly prevalent (Defontaine, 2018). Technological advancements has created a lower cost to analyse consumer information, while potential revenues from consumer data analysis is rising, as organisations can use price discrimination and algorithm profiling to profit off user-provided information (Defontaine, 2018). Hence, the technological and economic context of data has created incentives for organisations to use and collect consumer information (OECD, 2019). In line with this trend, there have been growing social concerns surrounding the degree to which organisations' data governance frameworks are ethical and responsible (Defontaine, 2018). Consumers have developed a stronger desire for more transparent information from organisations regarding how their personal information is used and collected, and whether their data is secure (OECD, 2019).

To minimise these social and ethical concerns, regulators have established tighter political and legal regulations for organisational practices relating to data (OAIC, 2021). Australian law aims to "promote and protect the privacy of individuals" through the Privacy Act (1988) and the Consumer Data Right (OAIC, 2021). This regulation allows organisations to use and collect the information of consumers that is "directly related" to the provision of goods and services (OAIC, 2021). Organisations must disclose what data is collected, and how it is "used, stored, collected, and protected" so that consumers are well informed (OAIC, 2021).

2.2 CURRENT GAPS & PROBLEM STATEMENT

According to the GDPR, transparency is essential when forming a company's data governance framework (GDPR, n.d.). Strong transparency means that all information addressed to data subjects must be "concise, easily accessible, easy to understand, and that visualisation is used where appropriate" (GDPR, n.d.). Strong transparency has been found to result in less information asymmetries between organisations and consumers, as consumers are well informed (Vasquez, 2015). In turn, this creates a relationship of trust and loyalty between the organisation and its consumers (Vasquez, 2015).

Despite transparency being an increased focus by the GDPR, a staggering number of Australian consumers are not well informed when it comes to their data (Schaub, 2017). The Consumer Policy Research Centre (CPRC) has found that "88% of Australian consumers do not have a clear understanding of how their personal information is being collected and shared" (CPRC, 2020). This can be attributed to the fact that most organisations view the communication of privacy information as a compliance checkbox exercise (GDPR, n.d.). As organisations keep their focus on ensuring that they demonstrate obedience to privacy laws, meaningful communication of information to consumers is neglected (Schaub, 2017). This creates limited transparency for many companies' privacy information, which is often posted separately from a users' interaction with a system, text heavy, and lacking in engaging visual communication (Schaub, 2017). This creates a transparency issue.

2.3 AIMS & OBJECTIVES

AIMS

To use our individual disciplinary strengths to understand organisations' practices in communicating key privacy information to stakeholders. Use this research to determine how this information can be communicated more transparently by ANZ, through the use of visual information to complement existing textual information. Formulate a practical and feasible recommendation for ANZ, whereby the communication of privacy information is highly transparent, accessible, and visually appealing.

OBJECTIVES

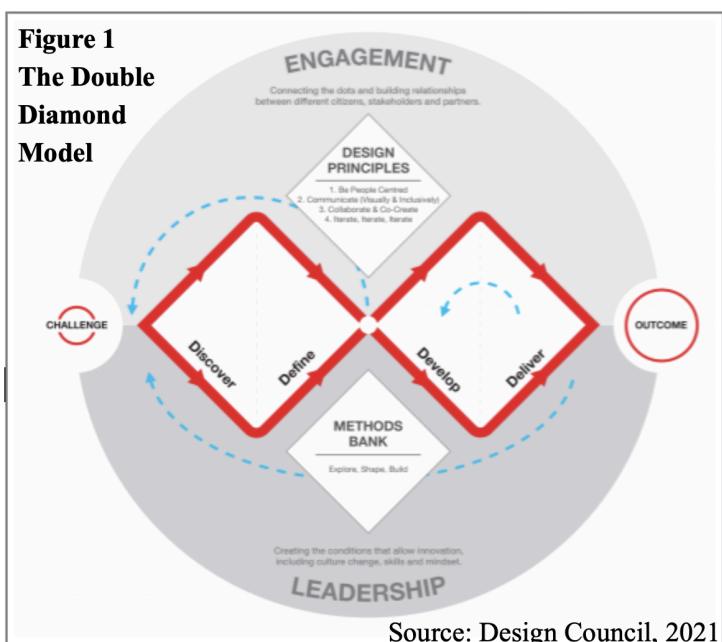
1. Examine the principle of transparency as a key feature of an organisations' data governance framework by analysing the GDPR definition of transparency and undertaking literature reviews to determine what factors create strong transparency.
2. Analyse market data to determine whether consumers feel that organisations' privacy policies or privacy information are transparent and accessible.
3. Use literature reviews to investigate the benefits of visual data in the communication of information for stakeholders and how it can be used to increase informational transparency.
4. Use case studies to identify the current use of visual data by organisations in their communication of information, and the outcomes of this.
5. Undertake a document analysis of ANZ's current Privacy Policy PDF and its Privacy Centre Webpage to determine whether visual techniques have been used to effectively complement the textual information, and if transparency is achieved.
6. Complete a document analysis of ANZ's 'Bluebook' terms and conditions to determine its strengths and weaknesses, and if transparency is achieved.
7. Synthesise all findings to craft a recommendation as to how ANZ can increase the transparency of its privacy information through the addition of visual cues.
8. Evaluate the effectiveness of the recommendations by examining its strengths and limitations, establish a timeframe for implementation, and determine whether they are feasible for ANZ

3. APPROACH & METHODS

3.1 OVERALL APPROACH – THE DOUBLE DIAMOND MODEL

Our group used the Double Diamond Model to guide our approach to completing this project.

The Double Diamond model involves undertaking in-depth research and background analysis, before using these findings to develop innovative solutions, evident through its four phases of examining a problem: discover, define, develop, and deliver (figure 1) (Design Council, 2021). This is an effective tool for solving complex problems as it provides a “visual representation of the design and innovation process” (Ball, n.d.).



However, it has been found that since the stages can be perceived as “anticipated steps”, this may present a “rather falsely clear linear project trajectory” (Gustafsson, 2019). To avoid ignoring potential “iterative loops” when adopting this model, we ensured to account for feedback from our peers, Industry Partners, and Project Supervisor, to ensure continuous refining and revaluation of our project. To better visualise the cyclical nature of our project, we established the following processes:

I) DISCOVER

In this phase, our group followed the guidelines of the Double Diamond Model to undertake evidence-based research to understand the problem's context and its degree of complexity (Gustafsson, 2019). Our group completed a PESTLE+ analysis. Robert, Weiling, and Sakura leveraged their disciplinary backgrounds in Computer and Data Science to examine the technological and ethical context of the problem, while Sue used her Economics background to analyse the economic ramifications of opaque data usage communication. Suzy and Simone's Commerce disciplines were used to analyse the legal, social, and political background of the complex problem.

II). DEFINE

After converging our initial research, our group developed a problem statement. The first draft of our problem statement was centred around the issue that a lack of transparency exists for most Privacy Policies, as many use “legalese”, require tertiary education reading levels, and are posted “separately from a users’ interaction with a system” (Schaub, 2017).

However, after pitching this to our Industry Partners and hearing their feedback, we realised that we did not complete enough market analysis on the Privacy Policies of other financial institutions. We realised that further research was needed, because ANZ’s Privacy Policy is quite transparent relative to its peers, invalidating our initial problem statement.

III) REVISITING ‘DISCOVER’

We decided to complete further research into the principle of transparency. To do this, we analysed the GDPR definition of transparency and undertook a broad range of research methods as per Section 3.2.

IV) REVISITING ‘DEFINE’

After completing more research to further understand the meaning of transparency, we realised that a key problem with many Privacy Policies is not the degree of transparency of the information itself, but the accessibility and engagement of such information for consumers.

V) DEVELOP

To develop our solutions to our chosen problem, our group drafted a list of potential solutions. We then evaluated which solutions were feasible for ANZ by comparing them to case studies and market data, while also weighing up the strengths and limitations of each to determine whether they met our aims and objectives.

VI) DELIVER

In this phase, we presented our draft recommendations to our Project Supervisor, Industry Partners, and peers during a mock presentation. After considering their feedback to create a physical draft of our recommended infographic, we started to finalise our recommendation, as in Section 5.

3.2 RESEARCH METHODS

3.2.1 LITERATURE REVIEW (QUALITATIVE)

Our group performed literature reviews, because this method provides a critical summary and evaluation that helps support our research problem (Rowley & Slack, 2004). This assisted our group develop a deeper understanding of transparency, while exploring the different approaches that have been undertaken to target similar informational transparency issues to our group's chosen problem (The University of Edinburgh, 2021). Simone and Suzy drew upon their Commerce backgrounds, whereby literature reviews provide a framework for analysing and solve problems, to obtain the following research:

- Analysis on the advantages and disadvantages of using textual and pictorial based information to transparently communicate information to stakeholders, and
- The effectiveness of infographics in improving transparency

This research helped our group determine the current effectiveness of ANZ's Privacy Policy (which uses visual and textual information) relative to ANZ's Bluebooks (which uses textual information only). Further, it helped to inform our recommendations for ANZ, as we determined that the use of infographics has been proven to be more effective in transparently conveying information for consumers (Dragana & Leo, 2014). This provided us with a solution to improve ANZ's informational transparency, which perfectly aligned with our aims and objectives.

However, one limitation of using literature review is that contents written in the article or any literature publications are potentially biased to the author's personal perspective on an issue (Corcoran, 2006). We mitigated this limitation by ensuring that all literature used was from reliable sources, and that most were peer-reviewed to ensure objectivity (Corcoran, 2006).

3.2.2. CASE STUDY ANALYSES (QUALITATIVE & QUANTITATIVE)

Using case studies provided real-life contextual insights into our chosen issue (Crowe et al, 2011). Studying case studies helped our group ensure that our chosen issue was properly justified, and assisted us in evaluating existing organisational solutions to boost informational transparency (Crowe et al, 2011). Sakura and Weiling undertook this research, drawing on their prior analysis of qualitative and quantitative datasets in Science, to identify possible case studies that could inform our recommendations:

- Bankwest's Visual Terms and Conditions
- Aurecon's Visual Contracts
- August's Visual Privacy Policy

One limitation of case studies is that not all solutions that we have seen in the case studies are suitable for us to implement into our recommendations, since some solutions are targeted at a different group of beneficiaries compared to our focus (Willis, 2014). Or in other cases, those solutions that were created were used in a different industry to ANZ (Willis, 2014). While not all case studies were compatible with ANZ's industry, they were still useful in informing our recommendations, and understanding how these can be practically implemented by organisations.

3.2.3. DOCUMENT ANALYSES (QUALITATIVE & QUANTITATIVE)

A document analysis involves extensive readings on a document to provide supplementary information on its context, purpose, and effectiveness in achieving its purpose (Triad 3, 2016). Our group's document analysis on ANZ's Privacy Policy and Bluebooks provided an insight into the strengths and weaknesses of each, which allowed us to generate our recommendation. Robert and Sakura leveraged their analytical skills provided by their Computer and Data Science disciplines to do extensive readings and provide detailed analysis of ANZ's Privacy Policy and Bluebooks to determine the overall attitude, purpose, tone, and summary of content.

One limitation of document analyses is that documents are sometimes not retrievable or accessible, which limits analysis (Bowen, 2009). In addition, there may be biased selectivity present, as available documents are likely to be aligned with the organisations' own agenda (Bowen, 2009). As the documents we used are legally required to be publicised, we did not encounter this issue.

4. RESEARCH & FINDINGS

4.1 BENEFITS OF VISUALISATION

It can be concluded that visual data information is more effective in communicating information to readers for two key reasons: (1) the human psychological makeup and (2) modern society.

OUR PSYCHOLOGICAL MAKEUP

It has been found that humans comprehend visual information “far better” than textual information, with an estimated 65% of the global population belonging to “the group that learns visually” (Smiciklas, 2012). The human psychological makeup means that humans can process images using less time and energy relative to textual data (Sheth, Sharma, Rao, & Sur, 1996; Smiciklas, 2012).

Other studies have also concluded that humans interpret visuals like graphs, maps, and diagrams in a timely and holistic manner, and have superior retention of such pictorial material compared to text (Nelson, Metzler, & Reed, 1974). For example, Nickerson (1965) found that humans can “successfully [recall] visual stimuli” even after “a great deal of time had passed since the initial exposure to the stimulus”.

MODERN SOCIETY

With the rise of technology a “rapid pace” environment has become the norm, where there is an “increasing need for short, clear, and concise communication” (Dragana & Leo, 2014). In line with this, skim reading is rising (Smiciklas, 2012). On average, individuals read only “a total of 20% of words from a webpage” or a “long article of text” (Smiciklas, 2012). Hence, many researchers have suggested that infographics, as a source of visual communication with “attractive colours and shapes, modern design and aesthetic appeal”, may be “the decisive element in winning over the audience’s attention” (Dragana & Leo, 2014).

4.2 CURRENT USE OF VISUALISATION BY ORGANISATIONS

Our case study analyses have further demonstrated the effectiveness of visualisation in the communication of information, while also highlighting current market uptake in the use of visual information.

1. BANKWEST'S VISUAL TERMS AND CONDITIONS

In 2021, Bankwest rolled out comic-style visual terms and conditions (figure 2).

Figure 2: Bankwest's Visual T&Cs



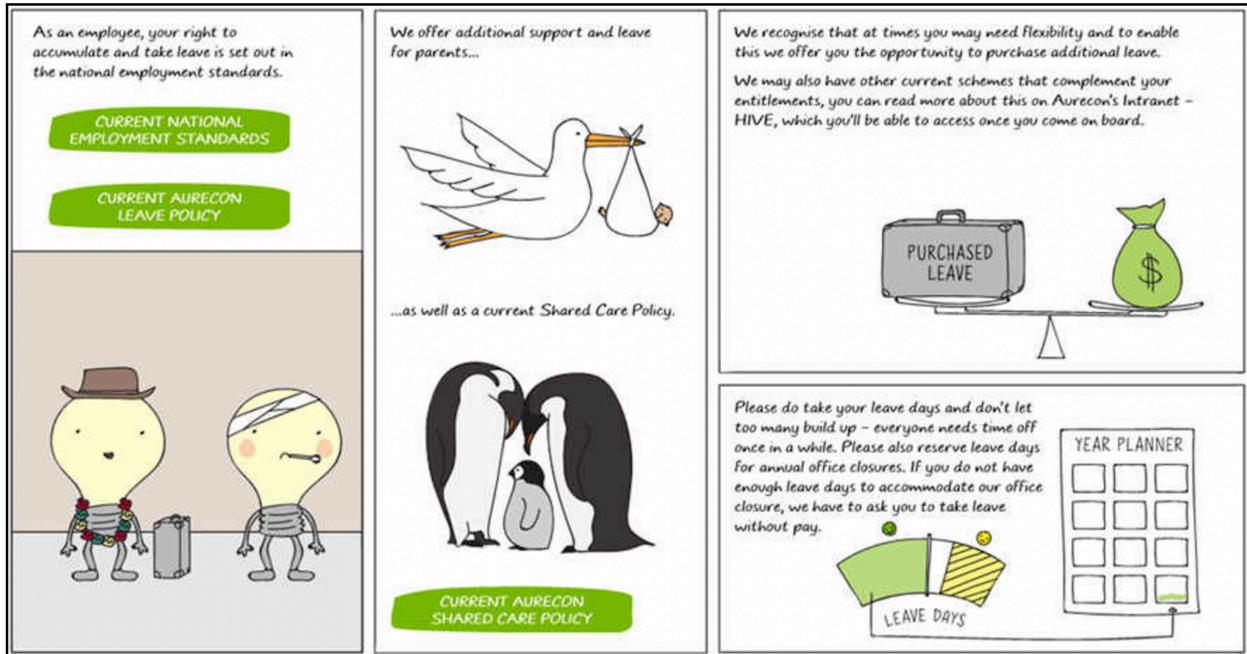
Source: Bankwest, 2021

Bankwest stated that the reimagining of traditional text based terms and conditions has enabled it to “present critical information to customers in a far more simple, friendly and engaging way” (Bankwest, 2021). Bankwest found that 69% of research participants preferred the new graphics format compared to text-heavy legal documents (Bankwest, 2021). Hence, the visual terms and conditions are likely to create more transparency between the bank and stakeholders (Cockburn, 2021). This is likely to lead to greater engagement and a higher chance of customers reading the terms and conditions, which would assist in “driving down the risk of potential conflicts and disputes between a customer and bank” (Cockburn, 2021).

2. AURECON'S VISUAL EMPLOYEE CONTRACTS

Like Bankwest, Aurecon switched to visual comic-strip style information for its employee contracts in 2018 (figure 3).

Figure 3: Aurecon's Visual Employee Contracts



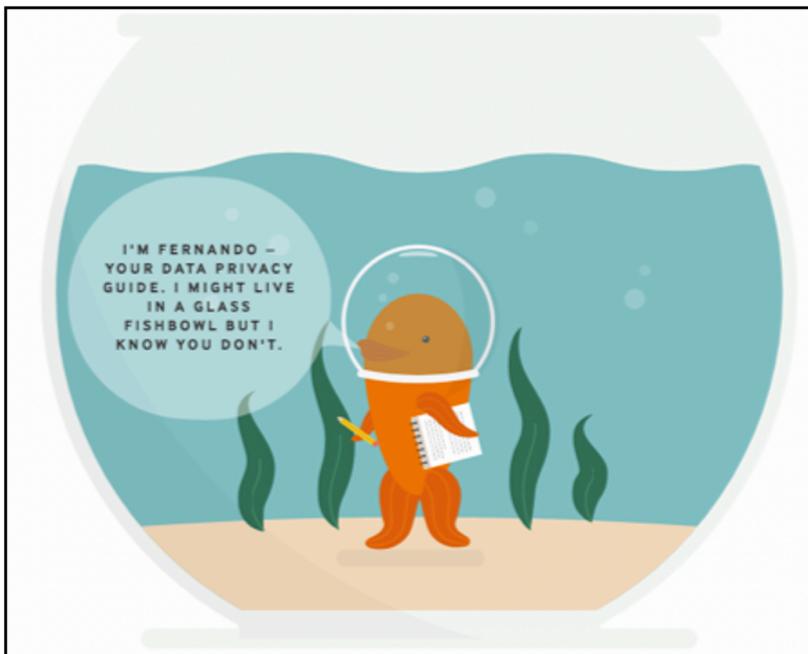
Source: Aurecon, 2018

Aurecon asserted that the switch to visual contracts will “lead to easier on-boarding, and a more open and transparent employee relationship” (Aurecon, 2018). The simplified, visual contracts are also more likely to engage all of Aurecon’s diverse talent pool, as they will provide greater transparency for employees where English is not their first language (Aurecon, 2018). Although the contracts use simple language rather than detailed legal terms, Aurecon’s visual contracts are still “equally enforceable” to traditional text-based contracts (Aurecon, 2018).

3. AUGUST'S VISUAL PRIVACY POLICY

In 2019, August collaborated with Hive Legal to convert its privacy policy into a visual story-like format that still meets all requirements set out by the Australian Privacy Act (figure 4) (InCounsel, 2019).

Figure 4: August's Visual Privacy Policy



Source: August, 2019

August has indicated that their visualised privacy policy goes beyond the common perception that an organisation's privacy policy is merely a compliance checkbox exercise, as it supports users through positive and simple engagement (August, 2019). The visual version of the privacy policy is August's "most visited page on their website", with users spending "four to six minutes" on the page, so August believes that the switch has resulted in greater transparency and engagement for consumers (August, 2019).

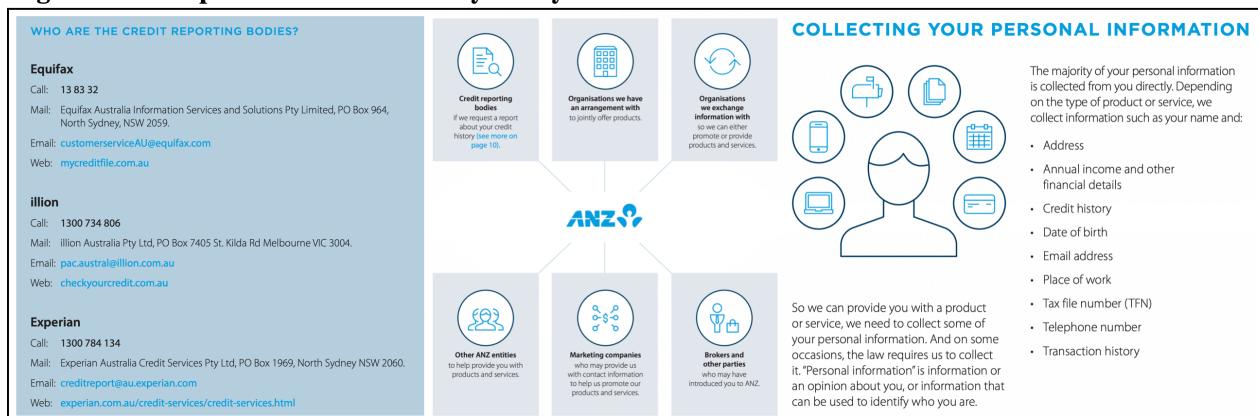
4.3 ANZ'S PRIVACY POLICY PDF & PRIVACY CENTRE WEBPAGE

After completing a document analysis of ANZ's Privacy Policy PDF and Privacy Centre Webpage, we have concluded that ANZ's current communication of data information is highly transparent.

DOCUMENT ANALYSIS OF ANZ'S PRIVACY POLICY PDF

ANZ's privacy policy is bound by The Privacy Act, and so the policy serves to show ANZ's compliance with legal requirements (ANZ, 2021). The tone of the policy is helpful and friendly, evident through its simple and plain language. It also appears to exist so that it best serves ANZ customers, as seen through its inclusion of contact details and hyperlinks to external sites containing further information, which are highly valuable in providing transparency for a privacy policy (Nagaraj & Bryant, 2016). The context of the policy covers all relevant aspects about customer data (including how and which data is collected, used, and protected, how to remedy data breaches, relevant entities, and cover range) (ANZ, 2021). In addition to using visual cues, the policy is also broken up into the form of sub-headings, bullet points and small paragraphs, which eases the reading pressure and increases the understandability of the policy for consumers (figure 5) (Nagaraj & Bryant, 2016).

Figure 5: Excerpts from ANZ's Privacy Policy PDF



Source: ANZ, 2021

DOCUMENT ANALYSIS OF ANZ'S PRIVACY CENTRE WEBPAGE

The ANZ website includes a dedicated privacy centre which clearly displays each category within ANZ's privacy policy (ANZ, 2021). These are ordered using relevant images and headings, and are therefore easy to follow for consumers (Nagaraj & Bryant, 2016). The site is easy to understand since plain and simple language is used, and there is a short video that visually illustrates the privacy policy to assist strong consumer understanding (figure 6) (Nagaraj & Bryant, 2016).

Figure 6: Excerpts from ANZ's Privacy Centre Webpage

The figure shows a screenshot of the ANZ Privacy Centre webpage. At the top left, there is a section titled 'ANZ Privacy Centre' with a brief description of how they manage personal information and a link to a 'Privacy Policy'. To the right of this is a video player titled 'AUSTRALIA PRIVACY POLICY SUMMARY' with a play button icon. Below the video player is a 'Privacy policy summary' link and a timestamp '01:59'. The main content area has a blue header with 'Contact us' and icons for a phone (labeled 'Call us 13 13 14') and an envelope (labeled 'Email us yourfeedback@anz.com'). Below the header are two images: one of a man reading a booklet and another of a couple smiling. The left image has a 'Privacy Policy' heading and text explaining their job to keep consumers up-to-date about managing personal information. The right image has a 'Collecting your personal information' heading and text explaining why they need to collect personal information. Both sections have a 'Learn more' link at the bottom.

Source: ANZ, 2021

4.4 WEAKNESSES OF ANZ'S BLUEBOOKS

The ANZ Bluebooks, which outline terms and conditions relevant to a particular ANZ product or service, have a subsection regarding data privacy (ANZ, 2021). The Bluebooks are sent to consumers both digitally and in the mail when they receive a new product or service, which makes this information very accessible (ANZ, 2021).

However, they are approximately 100 pages long, so the privacy subsection can be hard to find. Once consumers do find the privacy section, they will find blocks of text and no visual imagery (ANZ, 2021). If they manage to read this section, consumers will then be prompted to visit the privacy policy website or to contact ANZ for more information should they desire it (ANZ, 2021).

Therefore, we can conclude that the Bluebooks are (1) not very user friendly and (2) hard to read and retain due to the use of large slabs of text (Schaub, 2017). This creates a transparency issue for ANZ, because if consumers do not read the Bluebook terms and conditions, they unlikely to visit the Privacy Policy PDF or Privacy Centre Webpage for more information. This will result in consumers being misinformed.

Figure 7: The ‘Privacy and Confidentiality’ Section of ANZ’s Bluebooks

<p>2.21 PRIVACY AND CONFIDENTIALITY</p> <p>We will collect and use information about you during the course of your relationship with us. We explain below when and how we may collect, use and disclose this information.</p> <p>It is important that the information we hold about you is up to date. You must let us know when information you have provided us has changed.</p> <p>Collection, use and disclosure of information</p> <p>We may use and disclose the information we collect about you for the following purposes:</p> <ul style="list-style-type: none"> • to assist in providing information about a product or service; • to consider your request for a product or service; • to enable us to provide a product or service; • to tell you about other products or services that may be of interest to you; • to assist in arrangements with other organisations (such as loyalty partners) in relation to the promotion or provision of a product or service; • to manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring, staff training, collecting debts and market or customer satisfaction research); • to consider any concerns or complaints you raise against us and/or to manage any legal action involving us; • to identify, prevent or investigate any fraud, unlawful activity or misconduct (or suspected fraud, unlawful activity or misconduct); • to identify you or establish your tax status under any Australian or foreign legislation, regulation or treaty or pursuant to an agreement with any tax authority; and • as required by relevant laws, regulations, codes of practice and external payment systems. <p>Absence of relevant information</p> <p>If you do not provide some or all of the information requested, we may be unable to provide you with a product or service.</p> <p>Information required by law etc.</p> <p>We may be required by relevant laws to collect certain information from you. Details of laws that require us to collect information about individuals (personal information) and why these laws require us to collect personal information are contained in our Privacy Policy and at www.anz.com/privacy.</p>	<p>Providing your information to others</p> <p>We may provide your information to:</p> <ul style="list-style-type: none"> • any of our related entities which may use the information to: carry out our functions and activities; promote its own products and services; assess your application for one of its products or services; manage your product or service; perform administrative and operational tasks (including debt recovery); or comply with regulatory requirements and prudent standards; • an organisation that is in an arrangement with us to jointly offer products and/or has an alliance with us to share information for marketing purposes (and any of its outsourced service providers or agents), to enable them or us to: provide you with products or services; and/or promote a product or service; • any agent, contractor or service provider we engage to carry out or assist our functions and activities (for example, mailing houses or debt collection agencies); • an organisation that assists us to identify, prevent or investigate fraud, unlawful activity or misconduct; • regulatory bodies, government agencies, law enforcement bodies and courts; • other parties we are authorised or required by law or court/tribunal order to disclose information to; • participants in the payments system (including payment organisations and merchants) and other financial institutions (such as banks); • other credit providers; • mortgage insurers and any reinsurer of any such mortgage insurer; • your guarantors (and intending guarantors) and any person who has provided security for your loan; • any person who introduces you to us; • your referee(s); • your employer; • your joint borrower(s) or account holder(s); and • your adviser; your authorised agents; your executor, administrator or trustee in bankruptcy; your legal representative; your attorney; or anyone acting for you in connection with your account. <p>If you do not want us to tell you about products or services, phone our Contact Centre to withdraw your consent.</p>	<p>We may disclose information to recipients (including service providers and our related entities) which are (1) located outside Australia and/or (2) not established in or do not carry on business in Australia. You can find details about the location of these recipients in our Privacy Policy and at www.anz.com/privacy.</p> <p>Credit Reporting</p> <p>We may also disclose personal information, including information about your other credit liabilities, repayments and defaults, to credit reporting bodies. We may also collect this information from credit reporting bodies. Information about credit reporting, including the name and contact details of these credit reporting bodies, when we may disclose your personal information to them to include in a report about your credit worthiness, and how you can request credit reporting bodies not use your information in certain circumstances, is available at www.anz.com/privacy.</p> <p>If you would like a hard copy of this information, please call our Contact Centre or visit any ANZ branch for a copy of our Privacy Policy.</p> <p>Our Privacy Policy</p> <p>Our Privacy Policy (www.anz.com/privacy) contains information about:</p> <ul style="list-style-type: none"> • the circumstances in which we may collect personal information from other sources (including from a third party); • how to access personal information and seek correction of personal information; and • how you can raise concerns that we have breached the Privacy Act or an applicable code and how we will deal with those matters. <p>Collecting sensitive information</p> <p>We will not collect sensitive information about you, such as information about your health, without your consent.</p> <p>Personal information you provide about someone else</p> <p>If you give us personal information about someone else, please show them a copy of this section so that they may understand the manner in which their personal information may be used or disclosed by us in connection with your dealings with us.</p>
33		Source: ANZ, 2021

5. DISCUSSION

5.1 RECOMMENDATIONS

Given that ANZ's current privacy policy is very transparent and effectively uses visual cues to complement the text (see Section 4.3), we recommend that ANZ translate these features to its Bluebooks, where further transparency is needed (as per Section 4.4).

We suggest that when ANZ sends out its Bluebooks to consumers as they receive a new product or service, ANZ should send a separate infographic outlining key privacy information. We suggest the use of an infographic as a source of additional information because we found that visual data is a more efficient and transparent method of presenting stakeholder information (see Section 4.1). We have drafted a sample infographic, evident below (figure 8).

Figure 8: Sample Infographic



To craft our infographic, we followed information set out by literature. Research shows that an effective infographic should aim to increase reader awareness, while also being entertaining and generating stronger engagement (Kibar & Akkoyunlu, 2017).

Kibar and Akkoyunlu (2017) suggest that transparent infographics must have:

- Key information in a “striking size, colour, and location”,
- A well flowing structure,
- No repetition of information,
- An educational purpose,
- Consistent design elements,
 - Including typography, colours, and the alignment and location of shapes, and
- Thoughtfully considered colour association,
 - For example, colours linked to brand identity or moods.

In addition to following this design framework to create a transparent and clear infographic, we ensured to include only the key information on ANZ's privacy information, using the ANZ Bluebooks as a guide. We also took the strengths from ANZ's Privacy Policy and Privacy Centre Webpage and translated these into our infographic, including:

- The use of icons and diagrams,
- Eye-catching and bold fonts for titles and key information,
- ANZ's logo to establish its brand,
- Simple, plain language that flows from the top-down
- The colour blue (for ANZ's brand identity and to represent a calming mood), and
- Contact information and resources for further information being a salient feature of the infographic.

To further strengthen our recommendation, we suggest that ANZ collaborates with its existing Legal Counsel to ensure that the final infographic is compliant with Australia's data privacy legislation, just as August collaborated with Hive Legal to create legally binding visual privacy policy.

5.2 EFFECTIVENESS OF RECOMMENDATIONS

We analysed the potential strengths of our proposed infographic to determine its effectiveness. Our findings are presented in figure 9.

Figure 9: Strengths of Our Recommendation

STRENGTHS	RATIONALE
ACCESSIBILITY	<ul style="list-style-type: none"> Given that the infographic will be sent digitally and in the mail alongside ANZ's Bluebooks to consumers when they receive a new product or service, our infographic will be highly accessible.
ENGAGEMENT	<ul style="list-style-type: none"> Due to its eye-catching and engaging nature, our infographic is likely to capture the attention of consumers. This will result in higher engagement with, and more clicks on, ANZ's existing Privacy Policy PDF and Privacy Centre Webpage as the infographic prompts consumers to visit these information sources – rather than consumers reading through the entire Bluebook to find the link to ANZ's Privacy Website that is embedded within the heavy text.
KNOWLEDGE	<ul style="list-style-type: none"> Our recommendation saves consumers from having to skim read the Bluebook, and potentially miss any information within it. When consumers see the infographic, it is highly likely they will read it and visit the Privacy Policy PDF and Privacy Centre website. The combination of information from the infographic, and more clicks on ANZ's Privacy Sites, will lead to better consumer knowledge.
QUALITY	<ul style="list-style-type: none"> Given the benefits of visual communication, our infographic will create higher quality communication of information for consumers. Consumers are likely to read and retain the infographic's information.
HIGHER STAKEHOLDER TRUST AND CONFIDENCE	<ul style="list-style-type: none"> With data privacy being a highly topical issue, consumers are likely to view the infographic as a source of initiative by ANZ, and that data information is not just a checkbox initiative
ANZ AS AN INDUSTRY LEADER	<ul style="list-style-type: none"> While we have seen visual information within the banking industry, evident through our Bankwest case study, we have not yet seen it related to privacy by a financial institution We know that it is possible, as evident through August's visual privacy policy, and so this provides a gap in the market whereby ANZ can establish itself as an industry leader
FEASIBILITY	<ul style="list-style-type: none"> Our recommendation is highly feasible, and would not require significant financial, operational, or scheduling investments See section 5.2 for more information on feasibility

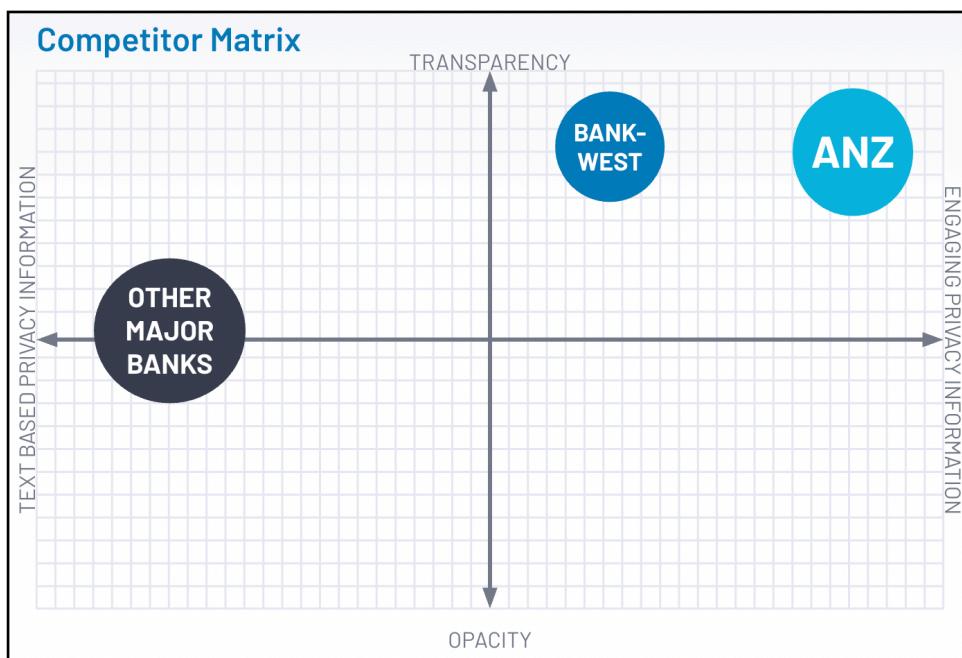
We analysed how our recommendation's limitations can be mitigated, as in figure 10, below:

Figure 10: Limitation Mitigation

LIMITATION	MITIGATION OF LIMITATION
MARKET OVERSATURATION	<ul style="list-style-type: none"> While the use of visual information is growing, uptake has been quite slow, especially for Australian data privacy information. This provides ANZ with an opportunity to be an industry leader.
LACK CONTEXT OR KEY BACKGROUND INFORMATION	<ul style="list-style-type: none"> This could be the case if ANZ's infographics were sent to consumers randomly and without any further information, or to those who were not anticipating to receive a new product or service. However, by sending the infographic with the ANZ Bluebooks and the customer's product or service, the infographic's context is clear.
SURFACE LEVEL THINKING	<ul style="list-style-type: none"> The purpose of our infographic is to inform and educate consumers. Since our infographic provides readers with key information, links to further information, and contact details for questions and queries, our infographic encourages deeper thinking for readers, and provides them with avenues to develop further knowledge.
TOO EXPENSIVE	<ul style="list-style-type: none"> We anticipate that the cost to print and distribute the infographics will be quite low if ANZ uses existing machinery and supply chains.
ENVIRONMENTAL DAMAGE	<ul style="list-style-type: none"> Environmental damage when printing and mailing additional hardcopy infographics is a valid risk, however, this can be mitigated by printing the infographics on recyclable paper. If this is not viable, the infographic will be emailed to consumers, so they will digitally receive the infographic instead.
LEGAL ISSUES	<ul style="list-style-type: none"> To ensure the infographic meets all legal requirements, we encourage the design team at ANZ to collaborate with its existing Legal Counsel to ensure that all regulatory requirements are met. This is a lower cost solution relative to hiring external legal parties.
'COPYCAT' INFOGRAPHICS	<ul style="list-style-type: none"> ANZ will still maintain its competitive edge and strong reputation by rolling out the infographics before its peers. We also welcome copycat infographics, because this will achieve the main purpose of our recommendation on a larger scale: to better inform consumers and provide greater transparency.

Overall, our proposed visual tool will enable more streamlined and transparent communication of ANZ's privacy policy to consumers. We anticipate that consumers will better understand and retain ANZ's data information due to its visual format. Our infographic is likely to lead to more clicks on ANZ's existing privacy policy PDF and privacy centre webpage, as it refers consumers to these sources for further information. Ultimately, our recommendation will set ANZ apart from its competitors, and improve ANZ's overall data governance (see figure 11 below).

Figure 11:



5.3 FEASIBILITY OF RECOMMENDATIONS

We examined our recommendation's feasibility for ANZ using a feasibility study, as in figure 12.

Figure 12: Feasibility Analysis

FEASIBILITY ANALYSIS		DEGREE OF FEASIBILITY AS A RANK FROM 1 TO 5
		WHERE: 1 = IMPOSSIBLE, 5 = CERTAINLY FEASIBLE
OPERATIONAL	<ul style="list-style-type: none"> No need to hire external parties – ANZ can use its existing Legal Counsel and Marketing Team for the infographic creation process. No need to invest in software or printing facilities – the infographics can be printed and distributed alongside that of ANZ's Bluebooks. 	4.5
SCHEDULE	<ul style="list-style-type: none"> The time frame for implementation is very flexible, given that ANZ's existing Privacy Policy PDF and Privacy Centre Webpage are already quite transparent – the infographic just aims to further strengthen the existing framework. 	5
FINANCIAL	<ul style="list-style-type: none"> ANZ can use its existing Legal Counsel and Marketing Team for the infographic creation process. Greater transparency will result in lower legal costs associated with potential conflicts or disputes between misinformed customers and the bank. Some costs for the printing and distribution of the infographics, but this process can occur alongside that of ANZ's Bluebooks to minimise additional costs. 	4
TOTAL = 4.5		

This gives an overall feasibility score of 4.5 out of 5, indicating that our recommendation is highly feasible.

Also, given that similar practices have been implemented by other organisations, as evident within our case studies, we can conclude that this recommendation is indeed feasible for ANZ and should be implemented under the timeline set out in figure 13.

Figure 13:



6. INTERDISCIPLINARY SYNTHESIS

Interdisciplinary research involves the consolidation of different disciplinary research methods, perspectives, and knowledge, to create solutions for a complex problem that cannot be solved by one discipline alone (Keestra, et al., 2016; Klein & Newell, 1997). The forging of our group's individual disciplines enabled our group to create an innovative and feasible recommendation, which aims to boost the transparency of ANZ's privacy information for consumers.

Simone and Suzy drew on their Commerce backgrounds to establish ANZ's wealth-maximising purpose as a financial institution, while analysing stakeholder needs for strong transparency (Kürthy, 2018). Sue's economics discipline further established our group's understanding of the problem's macroeconomic context, by identifying the negative externalities created by opaque privacy information (Hayes, 2020). Robert, Sakura, and Weiling drew on their Science backgrounds to analyse quantitative and qualitative data to determine the effectiveness of current organisational practices in fostering transparent information communication (David & Benjamin, 2019).

While interdisciplinary cooperation often brings challenges, such as communication barriers, resource allocation, and requires extra time to build consensus, if students can “absorb the essence of each person's point of view” then successful interdisciplinary teamwork will occur (Earnshaw, et al., 2020; Milani & Hashemi, 2021; Keestra, et al., 2016). Our group objectively faced interdisciplinary differences and maximised the strengths of each person's discipline, to optimise results (Klein & Newell, 1997).

7. CONCLUSION

Our recommendation is for ANZ to send consumers an infographic, which outlines key privacy information for consumers, alongside Bluebook's at the time of receiving a new product or service.

In forming our recommendation, we justified the benefits of using visual information compared to textual information before using this research to determine the design of our infographic and communicate key privacy information to consumers transparently, professionally, and engagingly. After crafting our sample infographic, we examined its effectiveness by considering the infographics' own quality, interaction with customers, and possible impact on ANZ and the banking industry. This analysis demonstrated the foreseeable benefits that the infographic can bring to ANZ, as ANZ can increase the transparency of its privacy information and prioritise consumer knowledge. To further analyse our recommendation's effectiveness, we outlined its possible limitations relating to ANZ's market, customers, financing, legislation, and industry, before providing solutions to mitigate each limitation. Finally, we conducted a feasibility analysis of the recommendation in terms of its operational, scheduling, and financial practicality. The result of this feasibility analysis indicates that our recommendation is highly feasible. Given its feasibility and potential benefits to ANZ, we then created a timeline for implementation, to ensure that the official roll out of our recommendation can commence in 2022.

Our recommendation is highly valuable for ANZ. The infographic will improve customers' understanding of the privacy sections in ANZ's Bluebooks, while also encouraging customers to visit ANZ's Privacy Centre website and Privacy Policy PDF. Thus, our recommendation is an innovative approach that will improve ANZ's informational transparency and boost customers' understanding of ANZ's privacy information, generating greater consumer-organisational trust and loyalty.

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