

CONTACT TRACING AND WELLNESS APPS GUIDELINES

Before an organization selects a contact tracing or wellness app, consider the following:

DATA COLLECTED



- ▶ What types of data will be collected?
- ▶ Does the app collect geolocation data?
- ▶ Will healthcare information be collected?
- ▶ Does the app require that the user enter information like passports, social security numbers, driver's, license numbers, or national identification numbers?
- ▶ If the app collects information about daily symptoms, how will that information be used?

ANONYMIZATION



- ▶ If this is an app that collects information about my customers, is data anonymized?
- ▶ If the company is required to share this data, will they?

APP DESIGN



- ▶ Was the app designed with privacy in mind?
- ▶ Was the app design to prevent privacy invasive events before they happen? In other words, was there privacy risks before they materialize?
- ▶ Was the system designed to protect the data from the onset of collection?
- ▶ Was privacy embedded into the design and architecture of IT systems and business practices?
- ▶ Was the app designed to accommodate for legitimate interests and objectives in a win-win manner and avoids false dichotomies? Did the app consider privacy and security?
- ▶ Was end-to-end security lifecycle embedded in the design of the app?
- ▶ Does the app provide visibility and transparency for the user?
- ▶ Does the architecture and its operators design or train to protect the interests of the individual – privacy defaults, appropriate notice, and user-friendly options?

Contact tracing and wellness apps are becoming the new norm. As establishments reopen and others return to the office, certain regions will mandate that they have a method for monitoring the health and wellbeing of your employees.



DATA STORAGE

- ▶ Where is the data stored?
- ▶ Who has access to the data?



RETENTION

- ▶ How long is data retained?
- ▶ If the app collects geolocation data, how long is that data retained?



SECURITY

- ▶ Is data transmission encrypted?
- ▶ Is data-at-rest encrypted?
- ▶ Are there access controls in place to limit the amount of information that is shared?



POLICIES

- ▶ Is there a way to opt-out of the app if the user decides that they no longer wish to use it?
- ▶ Is there an opt-in policy?



REGULATIONS

- ▶ Does the app account for specific country or regional laws?



RETURN-TO-WORK CERTIFICATION

- ▶ Will you allow employees to opt-out of collecting personal information for them to return to work?
- ▶ Will employers use the data for retribution if a user opts-out?



DATA ANALYSIS, METRICS & REPORTING

- ▶ What types of reports will be generated by the data collected?
- ▶ Who will the reports be shared with and will data be anonymized and/or protected?
- ▶ If data is analyzed for trends, will it be anonymized?
- ▶ Will metrics and trends be shared with authorities?

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