

## Privacy Sweep of COVID-19 Contact Tracing Smart Apps in ASEAN

*Singapore's TraceTogether contact tracing app comes out as least intrusive in privacy communication permissions, tops overall privacy marks*

Singapore, 28 May 2020 – The Data Protection Excellence (DPEX) Centre, the learning and research arm of Straits Interactive, today announced the results of its Privacy Sweep of contact tracing smart mobile applications (“apps”) issued by governments from six ASEAN countries.

Singapore’s TraceTogether contact tracing app came up as least intrusive in terms of privacy communication permissions and topped overall privacy marks.

The Privacy Sweep benchmarked the contact tracing apps against the survey parameters used by the Global Privacy Enforcement Network (GPEN), which conducted a global privacy sweep of mobile apps back in 2014. It assessed the following on the Android mobile operating system (OS):

- the types of permissions sought by a surveyed App
- whether those permissions exceeded what would be expected based on the App’s functionality
- most importantly, how the App explained to consumers why it wanted the personal data and what it planned to do with it

The following apps were reviewed:

<b>Malaysia</b>	MyTrace
<b>Singapore</b>	TraceTogether
<b>Thailand</b>	MorChana - หมอชนะ
<b>Indonesia</b>	PeduliLindungi
<b>The Philippines</b>	StaySafe PH
<b>Vietnam</b>	Blue Zone

Said Kevin Shepherdson, CEO, Straits interactive, “As ASEAN countries start to relax lockdown restrictions, the objective of our privacy sweep was to determine how privacy-invasive these apps are and to address privacy and surveillance concerns of users in the region. We took into account where each app apparently used ‘privacy by design’ principles, in addition to scrutinising the privacy notices and the functionalities of each app against the permissions that it required.”

### Dangerous Permissions used by the Apps

Country	Malaysia	Singapore	Thailand	Indonesia	Vietnam	Philippines
App Name	MyTrace	TraceTogether	MorChana - หมอชนะ	PeduliLindungi	Blue Zone	StaySafe PH
Camera			Yes	Yes		Yes
Contacts						
Device & app history	Yes		Yes			
Device ID & call information						
Identity						
Location	Yes	Yes	Yes	Yes	Yes	Yes
Microphone			Yes			
Phone						
Photos/Media/Files	Yes	Yes	Yes	Yes	Yes	Yes
Storage	Yes	Yes	Yes	Yes	Yes	Yes
Wi-Fi connection information			Yes			
Number of dangerous permissions	7	6	11	7	6	7

In the Android OS, dangerous permissions are used to access the user’s personal data on their mobile phone. If a dangerous permission is requested, privacy laws/data protection principles do not allow the relevant personal data to be collected, used or disclosed unless the user gives explicit consent by ‘accepting’ the request for permission to do so. Data protection principles restrict smart apps from the “excessive” use of permissions that are proportionate to the apps’ purposes and functions.

Based on the abovementioned, we concluded that Singapore’s TraceTogether and Vietnam’s Blue Zone use the least permissions to perform its contact tracing functions while Thailand’s MorChana uses the most permissions to perform its contact tracing function.

The following tables summarise our findings. The ‘sweeper’ is a local reviewer with a qualification in data protection from the International Association of Privacy Professionals (IAPP).

	Malaysia	Singapore	Thailand	Indonesia	Vietnam	Philippines
<b>PRIVACY COMMUNICATIONS</b>	MyTrace	TraceTogether	MorChana - หมอชนะ	PeduliLindungi	Blue Zone	StaySafe PH
installation privacy communications	Yes					Yes
Apps with excessive permissions based on sweeper’s understanding of app’s	Yes		Yes	Yes		Yes
communications not well tailored to small screen				Yes		

	Malaysia	Singapore	Thailand	Indonesia	Vietnam	Philippines
<b>OVERALL PRIVACY MARKS</b>	MyTrace	TraceTogether	MorChana - หมอ	Pedulilindungi	Blue Zone	StaySafe PH
0 = No privacy information, other than permissions						
1 = Privacy information not adequate; sweeper does not know how information will be collected, used and disclosed	Yes					
2 = Privacy information somewhat explains the app's collection, use and disclosure of personal information; however, sweeper still had questions about certain permissions			Yes	Yes	Yes	Yes
3 = Privacy information clearly explains how app collects/uses/discloses personal information; sweeper is confident in his/her knowledge of app's practices		Yes				

Except for Singapore's TraceTogether, most of the apps reviewed require excessive permissions based on the reviewer's understanding of the purposes of the application. Half of the number of apps do not satisfactorily explain how personal data is being used or shared with the government agency if and when an individual is infected.

Singapore's TraceTogether comes up tops in terms of privacy communications and overall marks, demonstrating clear evidence of privacy by design. Here are our reasons for drawing these conclusions:

The privacy statement and accompanying documents explain clearly and in simple words, (that is, not in legalese) what the TraceTogether app does, what type of personal data is collected and how it may be used or disclosed. Our review shows that the permissions the app seeks do not exceed its functionality and declared purposes.

While the TraceTogether app does not comply with all of the nine obligations under Singapore's Personal Data Protection Act (PDPA) or all of the six processing principles under the General Data Protection Regulation (GDPR), it is generally consistent with those obligations and principles. The few areas where it falls short tend to reflect the nature of an app such as the TraceTogether app rather than an inadvertent or careless departure from an obligation or principle.

A FaceBook live stream webinar to discuss the detailed findings of our Privacy Sweep will be held on the 28th of May through the link [bit.ly/LiveFBSI](https://bit.ly/LiveFBSI).



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## **Data Protection Excellence (DPEX) Network**

The Data Protection Excellence (DPEX) Centre is the research and education arm of the DPEX Network, a first of its kind facility in the ASEAN region whose aim is to provide leadership, best practices, training, research and support for all things surrounding data privacy from an operational perspective. This collaboration of partnerships comprises certification bodies, law firms, universities and organisations who provide professional services and technologies relating to data privacy. An ever-growing network, members currently include Straits Interactive, Singapore Management University, International Islamic University Malaysia, De LaSalle University, Philippines, IAPP, EXIN, OCEG and Lexxion amongst others. More information about DPEX Network can be found at [www.dpexnetwork.org](http://www.dpexnetwork.org)

## **About Straits Interactive**

Straits Interactive delivers end-to-end governance, risk and compliance solutions that enable trusted business and responsible marketing, especially in the area of data privacy and protection. Recently Data Protection Trustmark (DPTM) certified, we help businesses achieve operational compliance and manage risks through a combination of cloud technology and professional services. Our quest for innovation has led to us being recognised and awarded Intercon's Top 50 Tech Companies (in recognition of the company's contribution to technology) and APAC Business Headlines' Company of the Year, 2019. Our software-as-a-service solutions include DPOinBox and Governance, Risk & Compliance System (GRACIAS), all of which are supported by professional services that include advisory services, audits, and training. More information about the company can be found on [www.straitsinteractive.com](http://www.straitsinteractive.com).

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