

COVID Alert PA App Data and Privacy Policy

The COVID Alert PA App (App) is made available by the Pennsylvania Department of Health (DOH). The App is designed to assist in alerting individuals that came in close proximity with someone who later tests positive for COVID-19, and to provide information about the virus and steps for controlling the spread of the virus.

The use of this App is entirely voluntary, and it is available to download for free from the Apple App Store and the Google Play Store. The App runs on iPhones that support iOS 13.5 and higher, and Android phones running Android 6.0 and higher. The App is not intended for use by persons under 18 years of age. Users will be asked to confirm that they are 18 years or older the first time the App is opened.

COVID Alert PA App features

The App gives users the option to use some or all of the features, and users can enable or disable each of the features separately within the App settings. App settings also give users the ability to remove or update any information provided to the App, at any time.

Exposure alert

The main purpose of this App is to alert people if they may have been in close contact with another App user who is later diagnosed for COVID-19. When the App makes this notification, no personal information is shared among users or with DOH. The identity of the positive COVID-19 individual is not shared with the other users. And, the identity of the person who is notified of the contact will not be shared with the person who tests positive. After notification by the App, the user may choose to be in contact with DOH, but that is entirely optional.

The App detects if users are in close contact with another App user, using Bluetooth Low Energy (BLE) technology. If a user tests positive for COVID-19 and provides their consent in the App, the App will notify other users who have been in close contact with the user that tested positive, that the other users were in close contact with an individual that tested positive for COVID-19. Close contact is defined as being within six feet (6-feet) for more than fifteen minutes (15 minutes). Once a user receives an exposure alert, they can read and follow the public health advice or they have the option to share their phone number with DOH, at which point a public health representative will attempt to call them within 24 hours to conduct a close contact tracing interview and inform them as to what they need to do to keep themselves and others safe.

The App uses an Exposure Notification Service developed by Apple and Google that only government entities, such as DOH or a country public health department, can utilize. As the App will need to use the most current version of the phone's operating system, users may be asked to update their operating system, if they have not done so already, before they download and use the App. None of the information in the App is ever shared with Apple or Google.

Optional follow-up call service

If someone gets an Exposure Alert because they have been in close contact with someone who later tested positive for COVID-19, the App provides an option for the user to share their phone number and request a call back from a public health representative.

Symptom tracking: Daily health check-in

App users can help fight COVID-19 by opting to tell DOH through the App how they are feeling every day and whether they have any COVID-19 symptoms. If users do have symptoms, the App will give them information on what to do. This tool also helps users to track their own symptoms within the App. Public health information is provided based on users' responses.

Pennsylvania Updates & information

The App gives users easy access to the latest facts and figures about COVID-19 in Pennsylvania.

How the COVID Alert PA App works

As opposed to the traditional contact tracing process where a positive COVID-19 individual may not even remember who they have been in contact with recently and for how long (for example, if the contact happened on a bus or a train, at a check-out line in a grocery store, or at a restaurant or some other public venue), the App uses technology developed by Apple and Google whereby anonymous Random IDs (pseudo random alpha numeric values) are exchanged between mobile phones. A Random ID is generated by the phone every 10 to 20 minutes to maintain privacy and security. If you are close to someone who also uses the App on their phone, your Random ID will be saved on that person's phone and their Random ID will be saved on your phone. All Random IDs collected will remain on your mobile device, but neither you, nor anyone else, will be able to see them. These anonymous Random IDs cannot reveal your identity to other users, DOH, Apple, Google or anyone else.

If an individual receives a positive COVID-19 diagnosis, they will receive a call from DOH or their local County or Municipal Health Department within 24-72 hours for case investigation and contact tracing purposes. If that individual has the App downloaded, a public health representative will ask the individual if they are willing to accept a 6-digit validation code. If they agree, a 6-digit validation code will be sent to them via SMS/text message to be entered into the App, which then gives the individual the option to upload their Random IDs to a DOH diagnosis keys server.

Users who were in close contact with a positive COVID-19 individual who submitted their 6-digit code in the App will receive an Exposure Alert. The App knows when to provide the user with an Exposure Alert by downloading the latest diagnosis keys from the server every four hours and checking for matches. These diagnosis keys are checked for matches against the Random IDs of the contacts that have been collected by your phone. If there is a match, you will be notified in the App that you were in close contact with a person who was recently diagnosed with COVID-19. This is called an "Exposure Alert". To ensure that Exposure Alerts work properly, users must have COVID-19 Exposure Notification Services (ENS) enabled on their phone. Users have the option to enable the COVID-19 ENS and permit their phone to display notifications when they have been exposed to someone who has tested positive for COVID-19. Users can turn off this functionality in the Settings page of the App.

In the event you receive an Exposure Notification, you will be offered advice on the Exposure Notification Information screen. If you would like to speak with a public health representative, you can provide your phone number and someone from DOH will call you.

It is important to note that both traditional contact tracing and the App never reveal the identity of any person using the App to other App users, and never reveal who has been diagnosed as positive for COVID-19. Also, if you do not want a call from a public health representative and do not enter your phone number, DOH will not know whether you have received an Exposure Notification.

What data is collected and processed

Information processed in the App is collected in three different ways:

1. Provided by you as the user (if you choose to provide it);
2. Generated by services on the phone; and
3. Automatically collected from your phone.

1. Provided by you, if you wish to share:

When you get an Exposure Alert, you have an option to share your phone number to request a call back from a public health representative. Phone numbers are considered to be Personally Identifiable Information (PII). If you request a call-back, the App will send your number to DOH's contact tracing team. The App and the App servers will immediately delete your phone number once it is transferred to DOH. A public health representative will then call

your phone number to guide you as to what you need to do to keep yourself and others safe and answer any questions you may have.

If you choose to use the symptom check-in feature, you have the option of sharing the following information anonymously:

- i. COVID-19 symptoms such as fever, cough, shortness of breath;
- ii. Gender identity;
- iii. Sexual orientation;
- iv. Race;
- v. Age-range; and
- vi. County of residence.

App usage data do not identify you and are used to view trends on how the App is being used. Here is a list of the App metrics, which, with consent, are collected from the App:

- i. The type of operating system running on the device (iOS or Android);
- ii. Whether the App on your phone is in use;
- iii. Whether the App was deleted or dropped during the on-boarding screens;
- iv. Whether the App has exposure notification services switched on, if a permission is not provided during on-boarding;
- v. Whether the App has received an Exposure Alert Notification;
- vi. Whether the App has uploaded diagnosis keys;
- vii. The number of diagnosis key matches per exposure notification. (Note: Number of diagnosis key count does not equate to number of people); and
- viii. The ratio of exposure notifications to positive cases.

2. Generated by services on the phone:

The following data is generated by Exposure Notification Services (ENS) running on your phone if you choose to turn it on:

- i. Random IDs sent and received between phones that have ENS turned on;
- ii. Random IDs uploaded to DOH if you tested positive for COVID-19 and you agree to upload them; and
- iii. Random IDs downloaded from DOH to your phone for matching.

The above Random IDs cannot be used to identify you or anyone else. These are generated, collected and matched on your phone if you enable ENS.

3. Automatically collected from your phone:

After an Exposure Alert is sent out, the individual has an option to request a call-back from DOH. Your IP address is provided by your phone device automatically when it transmits your phone number to DOH. DOH does not need your IP address and this data is deleted as soon as your phone sends it to DOH. Your IP address is considered personal data.

Third-party companies

There are third-party companies that provide services to the App for DOH:

- i. NearForm is the App developer that will be providing technical support for the administration of the App as well as maintaining the server that generates and verifies the 6-digit validation codes;
- ii. Amazon Web Services (AWS) provides cloud storage and cloud services for the symptom check-in data submitted from your phone App; and
- iii. Association of Public Health Laboratories (APHL) provides a national server for seamless interstate data sharing of diagnosis keys. APHL uses Microsoft Azure for cloud storage.

Contact

- To learn more information about the App please visit: <https://www.health.pa.gov/COVIDAlert>.

- If you want to tell us about your experience with using the COVID Alert PA App or want to report any problems with the use of the App, please contact RA-DH-CovidApp@pa.gov.
- If a positive COVID-19 individual does not receive a call from DOH or their County or Municipal Health Department for investigation and contact tracing within 24-72 hours after they tested positive for COVID-19, they can call 1-877-PA-HEALTH [1-877-724-3258] from 8:00 a.m. to 8:00 p.m. on Monday to Saturday and 8:00 a.m. to 1:00 p.m. on Sunday to speak with a public health representative. In those circumstances, it is likely that the laboratory processed the COVID-19 test but did not report positive result to DOH. Reporting such issues early will help DOH ensure compliance from all laboratories that are required to report COVID-19 test results to DOH.

Google Play Store or Apple App Store's terms also apply

When you download the App, or when you access or use the App or services, you may also be subject to the terms of use and policies of the Google Play Store or Apple Store from which you download the App. Please review these terms of use and policies carefully.

Age restriction

You must be at least 18 years of age in order to accept these terms and use the App.

The right to use the App and services is personal, and you may not transfer or share the App to someone else

DOH is giving you personally the right to use the App and the services as described above. The use of the App by multiple individuals from the same device undermines the accuracy and effectiveness of the App's exposure alert function (if enabled). If you permit someone else to access your device and to use the App or services, then you do so at your own risk, and you are responsible for that person's use and you must ensure that the person knows about and complies with these terms. You should not use any other person's COVID Alert PA App. You may not transfer the App or the services to someone else. If you sell any device on which the App is installed, you should first remove the App from the device. DOH shall not be responsible if you share or transfer the App.

Changes to these terms

DOH may need to change these terms to reflect changes in law or best practices or to address new features.

DOH will give you notice of any material change by sending you an in-app notification and providing you with details of the change or notifying you of a change when you next start the App. DOH will promptly notify you of changes in the App and on <https://www.health.pa.gov/COVIDAlert> in advance.

Updates to the App and changes to the services

On occasion, DOH may automatically update the App and change the services to improve performance, enhance functionality, reflect changes to the operating system or address security issues. Alternatively, DOH may ask you to update the App for these reasons. If you choose not to install such updates, or if you opt out of automatic updates, you may not be able to continue using the App and the services and you may compromise the security of your data or device. If you choose to not install such updates, DOH shall not be responsible for the security of your data or device.

If someone else owns the phone or device, you are using

If you download the App onto any phone or other device not owned by you, you must have the owner's permission to do so. You will be responsible for complying with these terms whether or not you own the phone or device.

License restrictions

You agree that you will:

- not rent, lease, sub-license, loan, provide, or otherwise make available, the App or the services in any form, in whole or in part, to any person without prior written consent from DOH, nor will you infringe on DOH's rights (including intellectual property rights) in relation to your use of the App or services;
- not copy the App or services, except as part of the normal use of the App or if it is necessary for the purpose of back-up or operational security;
- not translate, merge, adapt, vary, alter or modify, any part of the App;
- not permit the App or the services or any part of them to be combined with, or become incorporated in, any other programs, except as necessary to use the App and the services on devices as permitted by these terms;
- not disassemble, de-compile, reverse engineer or create derivative works based on the whole or any part of the App or the services, nor attempt to do any such things; and
- comply with all applicable technology control or export laws and regulations that apply to the technology used or supported by the App or any services.

You must:

- ensure that all information that you provide to DOH via the App is accurate, complete, honest and not misleading, to the best of your knowledge, information and belief;
- comply with all applicable laws and regulations in using the App and the services;
- not use the App or services in any unlawful manner, for any unlawful purpose, or in any manner inconsistent with these terms, or act fraudulently or maliciously, for example, by hacking into or inserting malicious code, such as viruses, or harmful data, into the App, any service or any operating system;
- not infringe DOH's intellectual property rights or those of any third party in relation to your use of the App or any service, including by the submission of any material (to the extent that such use is not licensed by these terms);
- not transmit any material that is defamatory, offensive or otherwise objectionable in relation to your use of the App or any service;
- not use the App or any service in a way that could damage, disable, overburden, impair or compromise DOH's systems or security or interfere with other users; and
- not collect or harvest any information or data from any service or DOH systems. or attempt to decipher any transmissions to or from the servers running any service.

Limitations to the App and the services

While the App provides updates from Pennsylvania and links to helpful resources on COVID-19, and guidelines for those who self-report as having COVID-19 symptoms or who may have been exposed to someone who tested positive, the App is not and should never be used as a substitute for professional medical advice. Although DOH makes reasonable efforts to update the information provided by the App, DOH makes no representations, warranties or guarantees, whether express or implied, that such information is accurate, complete or up to date. Please always follow the advice of your health care provider and consult directly with them if you have any concerns about any medical condition or treatment.

Check that the App and the services are suitable for you

The App and the services have not been developed to meet individual requirements of everyone in Pennsylvania. Please check that the features and functions of the App and the services (as described on the App Store and in this policy) meet your requirements.

Deletion of the App

You can stop using the App at any time, and you can delete it at any time from your device. If you delete the App, you will not be able to access the Exposure Notification Service, symptoms check-in and updates from Pennsylvania about COVID-19. All the data from the App will be removed from your device. Exposure logging created by the

Exposure Notification Services cannot be removed by the COVID Alert PA App. If you wish to remove those logs, you can do that via your phone devices' Settings and searching "Exposure Checks".