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C19Oregon.com site Privacy policy revision

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Scope

This document provides a quick review of the changes to the c19Oregon.com privacy policy as last updated April 20, 2020

Introduction

C19oregon.com is a regional online triage tool that helps public health officials track COVID-19 cases. The tool allows community members to check their symptoms and receive guidance. This website is referenced in the City of Portland COVID-19 resources website (<https://beta.portland.gov/novel-coronavirus-covid-19>)

The privacy policy can be found at <https://c19oregon.com/privacy-policy>, the policy has been revised after a number of concerning privacy issues were identified. This document provides additional comments regarding these changes as updated by April 20, 2020.

Comments and recommendations

1. This policy is clearer and reduced in content.
2. Regarding the topic 'Confidentiality of Medical Information', provides information about who 'customers' of data collected and transferring responsibility to 'Customers' privacy policy. This statement provides information to users; however, it adds extra steps to understand how data is finally protected.
3. There is a better explanation of what gets collected before starting the process providing more information to users to decide whether to use this service.
4. Personal identifiable information and current health symptoms get collected, both groups are considered protected data
5. Children's data handling is properly informed.



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6. Collection of location data may be problematic. We recommend a clear opt-in or opt-out option to collect this information. Keeping location granularity to ZIP code is adequate for anonymizing location.

7. In point 6 'Use of Information', is there a possibility to describe clearly the purposes of information collection? What kind of algorithms and software are going to be developed?

8. Sharing of information described in point 7 looks acceptable.

9. Social media is addressed. The responsibility of sharing information in social media falls to the user.

10. Information protection measures in point 10 'Security' are reasonable.

11. Having contact information in the privacy policy brings a unique communication point for users.

