

*This is a comparison of the old and new privacy policies of Aarogya Setu. The old policy is in this format, additions to it in **this format**, and deletions have been struck through.*

The archived copy of the old Privacy Policy, released on April 2, is available here:

<https://web.archive.org/web/20200411075844/https://web.swaraksha.gov.in/ncv19/privacy/>

The archived copy of the new Privacy Policy, updated after April 11, is available here:

<https://web.archive.org/web/20200414082653/https://web.swaraksha.gov.in/ncv19/privacy/>

Privacy Policy

When you use Aarogya Setu (App), some personal information is collected from and about you. We are committed to protecting the security of this information and safeguarding your privacy. This privacy policy sets out the details of the personal information collected, the manner in which it collected, by whom as well as the purposes for which it is used. At registration you accepted the terms of this Privacy Policy and your use of the App signifies your continued acceptance thereof. This Privacy Policy may be revised from time to time and you will be notified of all such changes. In order to use the App, you will be required to consent to the terms of the Privacy Policy as revised from time to time.

1. INFORMATION COLLECTED AND MANNER OF COLLECTION

- a. When you register on the App, the following information is collected from you and stored securely on the cloud **securely on a server operated and managed by the Government of India (Server)** – (i) name; (ii) phone number; (iii) age; (iv) sex; (v) profession; (vi) countries visited in the last 30 days; and (vii) whether or not you are a smoker. **This information stored on the Server will be hashed with a unique digital id (DiD) that is pushed to your App. The DiD will thereafter be used to identify you in all subsequent App related transactions and will be associated with any data or information uploaded from the App to the Server. At registration, your location details are also captured and uploaded to the Server.**
- b. When your mobile or handheld device on which the App is active with mobile, Bluetooth and GPS services turned on, comes within range of another such mobile or handheld device, the App collects from such other device the personal information of the registered user of that device along with the time and your exact GPS location where you came in contact with that person. The App continuously collects your location data and maintains a record of the places where you have come in contact with other registered users. **When two registered users come within Bluetooth range of each other, their Apps will automatically exchange DiDs and record the time and GPS location at which the contact took place. The information that is collected from your App will be securely stored on the mobile device of the other registered user and will not be accessible by such other user. In the event such other registered user tests positive for COVID-19, this information will be securely uploaded from his/her mobile device and stored on the Server.**

- c. **Each time you complete a self-assessment test the App will collect your location data and upload it along with your DiD to the Server.**
- d. **The App continuously collects your location data and stores securely on your mobile device, a record of all the places you have been at 15 minute intervals. This information will only be uploaded to the Server along with your DiD, (i) if you test positive for COVID-19; and/or (ii) if your self-declared symptoms indicate that you are likely to be infected with COVID-19; and/or (iii) if the result of your self-assessment test is either YELLOW or ORANGE. For the avoidance of doubt, this information will NOT be uploaded to the Server if you are not unwell or if the result of your self-assessment test is GREEN.**

2. USE OF INFORMATION

- a. The personal information collected from or about you under Clause 1(a) above, will be stored locally in the App on your device **on the Server** and will only be uploaded to and used by the Government of India (i) in anonymized, aggregated datasets for the purpose of generating reports, heat maps and other statistical visualisations for the purpose of the management of COVID-19 in the country **or to provide you general notifications pertaining to COVID-19 as may be required. Your DiD will only be co-related with your personal information in order to communicate to you the probability that you have been infected with COVID-19 and/or to provide persons carrying out medical and administrative interventions necessary in relation to COVID-19, the information they might need about you in order to be able to do their job.** and/or (ii) in the event you have tested positive for COVID-19 or have come in close contact with any person who has tested COVID-19 positive. Any personal information uploaded to the cloud will only be used for the purpose of informing you, or those you have come in contact with, of possible infection. Such personal information may also be shared with such other necessary and relevant persons as may be required in order to carry out necessary medical and administrative interventions.
- b. The mobile number that you provide at the time of registration may be used to communicate with you through SMS, IVR, push notifications or other such means to inform you that you have come in close contact with someone who has tested positive for COVID-19 and to provide you such other notifications pertaining to COVID-19 as may be required. **The information collected from any other user's mobile device and uploaded and stored on the Server in accordance with Clause 1(b) will be used to calculate your probability of having been infected with COVID-19.**
- c. The personal information collected will not be used for any purpose other than those mentioned in this Clause 2 save as required in order to comply with a legal requirement. **The information collected under Clause 1(c) will be used by the Government of India to evaluate, based on the self-assessment tests and the GPS locations from where they are being uploaded, whether a disease cluster is developing at any geographic location.**
- d. **The information collected under Clause 1(d) and securely uploaded and stored on the Server will, in the event you have tested positive for COVID-19, be used to map**

the places you visited over the past 14 days in order to identify the locations that need to be sanitised and where people need to be more deeply tested and identify emerging areas where infection outbreaks are likely to occur. Where, in order to more accurately map the places you visited and/or the persons who need to be deeply tested, your personal information is required, the DiD associated with the information collected under Clause 1(d) will be co-related with your personal information collected under Clause 1(a).

- e. **The information collected under Clause 1 will not be used for any purpose other than those mentioned in this Clause 2.**

3. RETENTION

- a. All **personal information collected from you under Clause 1(a)** provided at the time of registration will be retained for as long as your account remains in existence and for such period thereafter as required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force.
- b. **All personal information collected under Clauses 1(b), 1(c) and 1(d) will be retained on the mobile device for a period of 30 days from the date of collection after which, if it has not already been uploaded to the Server, will be purged from the App. All information collected under Clauses 1(b), 1(c) and 1(d) and uploaded to the Server will, to the extent that such information relates to people who have not tested positive for COVID-19, will be purged from the Server 45 days after being uploaded. All information collected under Clauses 1(b), 1(c) and 1(d) of persons who have tested positive for COVID-19 will be purged from the Server 60 days after such persons have been declared cured of COVID-19.** Location information of registered users with whom you have come in contact will be retained for a period of 30 days from the date of such contact after which, if neither you nor such other registered user has tested positive for COVID-19 during such 30 day period, shall be purged from the App.
- c. Nothing set out herein shall apply to the anonymized, aggregated datasets generated by the personal data of registered users of the App or any reports, heat maps or other visualization created using such datasets. **Nothing set out herein shall apply to medical reports, diagnoses or other medical information generated by medical professionals in the course of treatment.**

4. RIGHTS

- a. As a registered user, you have the right to access your profile at any time to add, remove or modify any information that you have supplied.
- b. You cannot manage the communications that you receive from us or how you receive them. If you no longer wish to receive communications from us, you may cancel your registration. If you cancel your registration, all the information you had provided to us will be deleted after the expiry of 30 days from the date of such termination.

5. DATA SECURITY

The App is equipped with standard security features to protect the confidentiality and security of your information. Data is encrypted in transit as well as at rest. Personal information provided at the time of registration is encrypted before being uploaded to the cloud where it is stored in a secure encrypted server. Personal information that is stored in the Apps of other registered users that you come in contact with is securely encrypted and are incapable of being accessed by such user.

6. DISCLOSURES AND TRANSFER

Save as otherwise set out in Clause 2(a) in order to carry out necessary medical and administrative interventions, no personal information collected by the App will disclosed or transferred to any third party.

7. GRIEVANCES

If you have any concerns or questions in relation to this Privacy Policy, you may address them to the Grievance Officer whose name and address are as follows: Mr. R S Mani, Deputy Director General (DDG) NIC (support.aarogyasetu@gov.in)