

Data Privacy Notice “COVID Trace” App

1. Introduction

The purpose of this privacy notice is to explain how the COVID Trace App (the ‘app’) works, what data is collected by the app, who has access to that data and the purposes for which the data is used.

The app is available to download for free from the Apple App Store and the Google Play Store. Use of the app by you is completely voluntary – it is your choice to download it, your choice to keep it on your device, your choice to opt-in to and use the different services that are available on the app, and your choice to delete it. You can withdraw your consent(s) at any time.

2. The Data Protection Officer

You can contact the State of Nevada Data Protection Officer for data protection information in relation to the app.

State of Nevada Data Protection Officer
Email:

3. What the app does

The app has the purpose of supporting the national public health response and members of the public during the COVID-19 crisis. The app has the following functions.

- . Exposure Notification – to notify you as quickly as possible should you have been in close and sustained contact with someone who has tested positive.
- . News and Information – to give you trusted and convenient facts and figures about coronavirus (COVID-19) in Nevada.
- . Other Functions – the app can collect anonymous metric data so that the State of Nevada and the Department of Health and Human Services (“DHHS”) public health teams can monitor how the app is contributing to the response efforts and get a better understanding of the spread of the virus. Removing the app from your phone will delete all data.

4. About the COVID Trace App

4.1 How Exposure Notification works

Existing manual contact tracing processes (i.e. where people tell us by phone or in person who they have been in contact with) rely on people being able to remember who they have been in contact with recently, and how long that contact lasted for. In many cases people do not know

who they have been in contact with (for example, if the contact occurred on a bus or train, at a concert, a restaurant or some other public venue).

The app uses technology developed by Apple and Google called COVID-19 Exposure Alerts where anonymous rolling identifiers are exchanged between mobile phones. Exposure Alerts enable your phone to generate a random, unique identifier every 10 to 20 minutes. If you are close to another phone that also has Exposure Alerts turned on, your identifier will be saved on that person's phone and your phone will record their identifier. All identifiers will remain on your phone, although neither you nor anyone else will be able to see them. These anonymous identifiers cannot identify you to other users or to the State of Nevada.

If you subsequently receive a positive COVID-19 diagnosis, you will receive a call from the Contact Tracing Center ('CTC') within the State of Nevada. You will be asked if you are using the Contact Tracing feature on the app and, if you are, you can choose to upload your own identifiers to assist the contact tracing process. To do this, the CTC will provide you a code over the phone, when entered into the app, unlocks an upload function. You can then choose to upload your identifiers to a State of Nevada Registry where the identifiers are published publicly and are referred to as Diagnosis Keys.

Every two (Android) to four hours (iPhone), the latest Diagnosis Keys from the State of Nevada Registry will be downloaded by every user's phone. These will be used to check for matches against the identifiers that have been collected by your phone. If there is a match indicating that you were in sustained close contact with a person who was diagnosed with COVID-19, you will be notified in the app . This is called a 'Potential Exposure Alert'.

For all this to work, you have to turn on the Apple/Google Exposure Alerts service on your phone. You will be presented with an option to allow the app to use this service and to turn this service on during the initial screens after you have installed the app. You can change your mind and turn this service on or off at any time through the app settings.

If you get a Potential Exposure Alert, a message will display prominently within the app. You can also choose to allow the app to display a phone notification in the event of a Potential Exposure Alert. You will be asked if you wish to allow Alerts during the initial screens after you have installed the app. You can change your mind and turn this service on or off at any time through the app settings.

In the event you receive a Potential Exposure Alert, you may want to speak to someone in the Department of Health. For this to happen you will can initiate a call to the Department of Health hotline from the app. This is optional.

It is important to note that the Contact Tracing feature never reveals the identity of any person using the app to other app users, and never reveals who has been diagnosed positive. Also, if you don't want to contact the State of Nevada, the State of Nevada will not know if you receive a Potential Exposure Alert.

4.3 What News and Information is

The app will provide you with the latest updates about coronavirus (COVID-19) in State of Nevada. While this information is already available on <https://nvhealthresponse.nv.gov>, the app might display the key numbers in an easily accessible way within the app. This includes statistics such as the total number of confirmed cases, number of deaths, numbers hospitalized, and the number of cases per county.

4.4 What app metrics are collected

Metrics can be collected and sent to the State of Nevada to enable the State of Nevada, DHHS and public health teams to understand your use of the app, its effectiveness as part of the pandemic response, and how to improve it. Metric data does not identify you and is used to create aggregate views of how the app is being used and the impact it is having on the virus. Here is a list of the app metrics which, if you consent, are collected from your app.

- . Whether the app on your phone is in use
- . Whether the app completed setup
- . Whether the app has received a Potential Exposure Alert
- . Whether the app has uploaded diagnosis keys
- . The number of diagnosis key matches per Potential Exposure Alert
- . Number of days between the app triggering a Potential Exposure Alert and the upload of diagnosis keys, if applicable
- . Whether a call was initiated to the Department of Health from the app

5. What data is collected and processed

The information processed by the app is anonymous data.

This information is processed in 3 different ways, depending whether the information has been provided by:

- . you the user (should you choose to provide it);
- . the Exposure Alert service;
- . your phone or the app.

5.1 Provided by you

If you wish, you can provide the following information.

- . Zip Code: This is only used when looking up a test facility. The zip code is never stored nor is it used for anything other than finding a test facility.

5.2 The Exposure Alerts service

In respect of the Contact Tracing function, the following data is processed for the operation of Exposure Alerts running on your phone if you turn it on.

- . Identifiers sent and received between phones that have the service turned on.
- . Identifiers (diagnosis keys) uploaded to the State of Nevada Registry if you are COVID-19 positive and you agree to upload them.
- . Identifiers (diagnosis keys) downloaded from the State of Nevada Registry to all apps for matching.

The above identifiers are pseudo-random alpha numeric values that cannot be used to identify you or anyone else. These are generated, collected and matched on your phone only if you enable Exposure Alerts.

5.3 Provided by your phone or the app

As a consequence of how network traffic passes across the Internet, your Internet Protocol (IP) address is also inevitably transferred to State of Nevada servers. An IP address is typically made up of 4 sets of numbers (e.g. 1.2.3.4) and is assigned to you by your mobile phone or Wi-Fi service provider. Under the data protection law your IP address is generally regarded as personal data.

During the initial screens after installation the app carries out tests to verify if the app is a valid State of Nevada app and the phone is a real device. On confirmation, the app connects to the State of Nevada servers and exchanges security tokens to protect the app backend from security attacks. The security tokens are not used to identify you, and are used to check that the Internet traffic coming from the app during its lifetime is from a real COVID Tracker App running on a real phone.

While your data transmitted between the app and the State of Nevada servers includes the IP address and it is considered personal data, the State of Nevada does not use your IP address to identify you. Your IP address is removed at the 'front door' of the State of Nevada servers and any information shared is stripped of the IP address and cannot be linked back to you using this address. Only a strong hash (SHA256) of the IP address is stored to help prevent abuse.

Metric data is collected by the app and is shared with the State of Nevada as described previously.

6. You Consent to the Collection of Data

The app is voluntary to use. Your use of the App means that you consent to the collection and use of the data collected by your use of the App. If you no longer consent, the app can be deleted removing the associated data.

7. Security measures

All data stored on your phone is encrypted by the app using the built-in encryption capability of your phone. Data is also encrypted when it is uploaded to our servers.

The Contact Tracing feature uses a fully 'decentralized' privacy model. This means that identifier and diagnosis key matches are made locally on your phone. Matches are not made externally by the State of Nevada. This ensures no tracking of people's movements or who they contact can be done.

There are a range of security processes and technologies in place to prevent unauthorized access to the data while it is stored on our servers, including data encryption, modern firewalls and intrusion prevention.

When information such as diagnosis keys and symptoms are uploaded to State of Nevada servers with your IP address, the IP address is stripped from the information at the earliest possible opportunity to ensure it cannot be used in any way to re-identify the person that uploaded the information.

8. Who processes your data

The State of Nevada is responsible for running the app and all infrastructure required to operate and maintain the app and backend servers.

8.1 Data Processors

There are a number of data processors who provide services to the app for the State of Nevada.

The following companies will have access to your information.

COVID Trace are the app developers who will provide technical support on the running of the app.

The following companies provide services to the State of Nevada but do not have access to your data.

Google Cloud Platform (GCP) provide cloud storage and cloud services for the data uploaded from your phone. This is processed in Ireland

Contracts are in place between the State of Nevada and each of these third-party processors which set out the processors' obligations and the State of Nevada's obligations and rights with regard to the personal data that is being processed.

Apple and Google - the app can be downloaded free of charge from the Apple App Store and the Google Play Store. In this regard they are independent controllers as they process account names in order to make the app available. This processing activity is separate to the processing of personal data on the app. Furthermore, although Apple and Google have developed a COVID-19 Exposure Alerts service, which is used in the app, neither company obtain any personal data from the app or the Exposure Alerts service itself.

8.2 Other recipients

The State of Nevada anonymizes any app metric data that it receives from app users. This anonymized data is shared with the Department of Health and Human Services ('DHHS').

The DHHS will carry out statistical analysis on the information shared with it, which it will publish in line with its remit Department of Health, the Health Response, the State of Nevada, and to the public as appropriate.

9. How long your personal data is held for

Exposure Alerts Service identifiers on your device (Contact Tracing function):

This information is retained on your phone for 14 days. 14 days is considered a window of epidemiological significance that generally covers the potential for viral transmission.

Diagnosis keys in State of Nevada registry (Contact Tracing function):

This information is retained for 14 days. As above, 14 days is considered a window of epidemiological significance that generally covers the potential for viral transmission.

Diagnosis keys on your device (Contact Tracing function):

This information is retained for as long as is necessary to perform a match check and is deleted thereafter.

App metrics:

This anonymous information is retained by the State of Nevada for a minimum of 7 years and is reviewed at that stage for extension or deletion depending on its health value. This data is retained for the purposes of monitoring the efficacy of the app and improving it.

10. Changes to this Data Privacy Notice

This Data Privacy Notice may change from time to time and you will receive notification of this update in the app.