

# Contact tracing apps in United Arab Emirates

## A new world for data privacy

As of June 17, 2020

**The COVID-19 pandemic has seen governments across the world restricting civil liberties and movement to new levels. To aid the safe lifting of current public health restrictions, new technologies are being developed – contact tracing apps – and rolled out to automate labour intensive tasks critical to containing the spread of the virus. Our contact tracing survey summarises the principal regulatory and policy issues applicable to contact tracing across a range of key jurisdictions in real time.**

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### **Is technology being used by the government to monitor and control the spread of COVID-19 (e.g. contact tracing app, CCTV, cell phone location data, credit-card history)?**

So far the UAE has developed three COVID-19 tracing apps. The Abu Dhabi Department of Health first launched StayHome, which was then followed by TraceCovid. The UAE has now recently launched a new tracing app, ALHOSN. All three apps are designed to identify people who have been in close contact with infected individuals, allowing authorities to immediately reach out to possibly infected individuals and provide them with the necessary healthcare treatments.

From the information publicly available, ALHOSN was jointly launched by the Ministry of Health and Prevention, Abu Dhabi Health Authority and Dubai Health Authority to serve as the official digital tracing app for COVID 19. The new app combines the features of the two previous apps, StayHome and TraceCovid. The new app also provides additional features such as access to user test results, and a health colour coding system that identifies the status of the users' health.

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### **What are considered to be the major privacy concerns in relation to the app in your jurisdiction (in relation to its use (a) by the government; and (b) by private sector organisations)?**

There is no Federal data privacy regulator or regulations/laws in the UAE so no comments from any such authority exist. The Government has not provided too much information on what measures and actions it is using to ensure data privacy. The Department of Health Abu Dhabi only said that privacy of personal information will be protected - there is therefore a concern that personal data collected may not be properly protected during the pandemic and may be used for further processing that was not anticipated.

## App details

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### 1. What is the name of app

#### StayHome, TraceCovid and ALHOSN

Although the StayHome and TraceCovid apps are accessible for use and download, the UAE Government is encouraging residents to download and use the newly launched app, ALHOSN.

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### 2. Is the app voluntary?

#### Yes

It is important to note that the ALHOSN website provides that the app has "a health colour coding system that identifies the status of the users' health, and allows users that are free from the virus to access public spaces." As far as we are aware, it is not mandatory to download the app to be able to access public spaces. This may change, and a unilateral decision may be imposed by the UAE Government overnight to make it mandatory to download the app to access certain places.

A recent announcement by the UAE Government has also noted that individuals who contract the virus and fail to download the app while in quarantine are now at risk of an AED 10,000 fine. It is unclear how this penalty has been implemented in practice, or whether it has been implemented at all.

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### 3. Is there any suggestion that use of the app and a clean result may be necessary to enter workplaces or any commercial or public buildings (or is this explicitly or implicitly prohibited)?

#### No

So far no but things are changing every day in the UAE and unilateral decisions such as these can be taken and imposed overnight by way of ministerial decision. Please also see response to question 2 above.

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### 4. What information is required to register for the app? Is the information collected considered excessive?

To register on the app, the user is required to provide their Emirates ID and phone number.

The requirement to provide the user's phone number can be considered excessive.

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### 5. Is GPS or Bluetooth used?

#### Bluetooth and Geolocation

Bluetooth and location service access (GPS) need to be activated for the app to function effectively.

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### 6. Is data stored on a centralised server?

The only information provided by the UAE's Department of Health is that "data is only used to retrieve COVID-19 test results", and it does not "collect data relating to personal information or store any test results relating to an individual on its servers." The information provided is vague, and the process on data collection and storage has not been properly addressed.

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### 7. Does the identity of the infected user get captured centrally?

#### This is not clear.

Authorities say that "the app works by exchanging a Secure Tracing Identifier (STI) to track people's movements anonymously," and "no personally identifiable information is collected throughout the entire process," but no further details or information have been provided. Please also see response to question 6 above.

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### 8. Is the identity of the infected user disclosed to proximate users or public health authorities? Is it disclosed to anyone else?

#### No

Similarly to StayHome and TraceCovid, ALHOSN is a mobile app that uses Bluetooth to pick up signals from nearby mobile phones that also have the app installed, through a process called contact tracing. The app on both the devices will exchange an encrypted Secure Tracing Identifier (STI) and store it on the devices. The STI in each device will, therefore, be a list of all persons in close contact with the user. When one of the users is infected with the virus, the authorities will request the infected user to upload the list of STI stored on his or her device. Also, a user who has tested positive can contact the authorities to share details of STI.

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### 9. Is consent needed to share data with other users/upload the data to a centralised system?

#### Unclear

According to the description provided by the authorities no consent is required but there is an understanding that by downloading the app the relevant person understands that her/his data may be disclosed to the authorities as explained in response to question 8 above.

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### 10. Is the identity of the proximate users disclosed to public health authorities? Is it disclosed to anyone else?

#### No

The app on both the devices will exchange an encrypted Secure Tracing Identifier (STI) and store it on the devices. The STI in each device will, therefore, be a list of all persons in close contact with the user.

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**11. Does the app incorporate “privacy by design” and was a privacy risk assessment completed?**

Unclear

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**12. How long will the data be kept for, are there clear lines around timing?**

Unclear

The relevant authorities have only provided a brief note on storage of data in relation to the user’s phone. The ALHOSN website notes that “the anonymized STI is stored in encrypted form temporarily for 3 weeks on the phone”. No further details or information have been provided.

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**13. Has data security been addressed expressly (e.g. encryption)?**

Unclear

The relevant authorities have only stated that the privacy of personal data will be protected. Encryption has also been referred to briefly in relation to storage of data in the user’s phone. The ALHOSN website notes that “the anonymized STI is stored in encrypted form temporarily for 3 weeks on the phone”. No further details have been provided.

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**14. Are there clear limitations regarding who may have access to the data?**

Unclear

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**15. Are there clear limitations on the purposes for which the government may use the data?**

Unclear

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**16. Is the government of your country bound by privacy laws in respect of the contact tracing data?**

N/A

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**17. Has the regulator commented/ provided guidance on the technology?**

Yes

There has been a press release and there is a dedicated website for all three apps in the UAE. Please see dedicated website for ALHOSN: <https://www.ncema.gov.ae/alhosn/index.html>

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**18. Are there any private sector initiatives you are aware of to use/ integrate the app or the information from the app (e.g. to reflect the results back to workforces)?**

Not that we are aware of.

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## Contacts



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