

# Contact tracing apps in Thailand

## A new world for data privacy

As of May 11, 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)?**

The technologies being used in Thailand for tracking COVID-19 are mostly contact tracing applications used together with the cell phone location data of the user. The Thai Government authorities (e.g. Department of Disease Control (DDC), Office of The National Broadcasting and Telecommunications Commission (NBTC) etc.) are currently using these applications to monitor and track individuals who have been infected or classified as being in a “high risk cluster” (including the individuals who may have been infected) with support from the private entities and state enterprise (e.g. Airport of Thailand (AOT), mobile service providers and digital start-ups). The apps in use are:

- DDC-Care – this contact tracing application will require the user (those who have been diagnosed by the hospital or the disease screening point in Thailand, including the airport, that they are at risk of being infected) to submit a self-assessment report directly to DDC during the 14-day detention period. Also the user will be required to report all of their travel history, including the people who have been in contact with them. The general public is allowed to install and register this application;
- AOT Airport Application – the application is required to be installed before passing through immigration points for those who have travelled to, or returned from, contagious areas outside Thailand. This application will track tourists and returnees by using the mobile phone location data and will notify the NBTC, and the mobile phone service provider, if the user is infected after entry into Thailand. If the tourists, returnees or any person is diagnosed as infected, such persons will then be required to install the application in item (1);

- MorChana application – the application offers a contact tracing solution that enables smartphone device users to perform self-assessment and determine the risk level of infection based on exposure and travel history. It is designed to track the spread of the novel coronavirus, prompt quick and accurate public health responses, and ensure effective and measurable social distancing measures; and
- Sydekick for THAIFIGHT COVID-19 – the application, developed by a Thai start-up, was previously developed for the purpose of emergency care. People who have been discharged from detention at a quarantine centre and who have returned home to self-quarantine will be required to install and register the application before leaving the quarantine centre. As a result of the registration, such persons will be monitored by the DDC officer and required to submit the self-assessment reports on a daily basis.

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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)?**

Excessive data collection which may be used for other purposes such as tracking individual after the spreading of COVID-19 has ended.

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## App details

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### 1. What is the name of app

DDC-Care, AOT Airport Application, MorChana application and Sydekick for THAIFIGHT COVID-19

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### 2. Is the app voluntary?

No

AOT Airport application is a compulsory application that has to be downloaded by individuals who travelled or returned from contagious areas outside Thailand before passing through immigration point.

DDC-Care is a compulsory application that has to be downloaded by the individuals who have travelled or returned from contagious areas outside Thailand and are diagnosed as infected.

Sydekick for THAIFIGHT COVID-19 is a compulsory application that has to be downloaded by individuals who have been discharged from detention at the quarantine centre and returned to their domicile for self-quarantine.

MorChana application is voluntary.

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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

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

Yes

Identification card or passport number, photo, mobile phone number, email and name.

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### 5. Is GPS or Bluetooth used?

Bluetooth and Geolocation

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

Unclear

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

Unclear

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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?

Yes

The identity of an infected user will be disclosed to proximate users, public health authorities, NBTC and mobile phone service providers.

Mobile phone number registered in Thailand are regulated by NBTC, which will cooperate with DDC and mobile service providers in order to track down the current location of infected users and their travel history.

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

Unclear

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

Yes

It will be disclosed to public health authorities, NBTC and mobile phone service providers.

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### 11. Does the app incorporate "privacy by design" and was a privacy risk assessment completed?

N/A

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

No

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

Unclear

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

Yes

Only public health authorities, NBTC and mobile phone service providers may access such data.

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

N/A

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

Yes

The Personal Data Protection Act B.E. 2562 (2019) (PDPA) will be effective on 27 May 2020.

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

Yes

Each application contains its own guidance which is issued by the relevant authority/application developer.

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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)?**

No

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## Contacts



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