

Objet: Questions related to data shared by Care19 to Google, Foursquare & Bugfunder

Date: jeudi 21 mai 2020 à 08:34:54 heure d'été d'Europe centrale

De: Zoe Vilain

À: tim.brookins@proudcrowd.com

Cc: Pierre Valade

Hello,

I write to you as Chief Privacy Officer of [Jumbo Privacy](#). We are a company that is premised on the philosophy that privacy of our mobile app users, and users we represent as authorized agent, is paramount.

It has come to our attention that the mobile application developed by your company entitled "[Care19](#)" shares data of its users to third parties, notably to Google, Foursquare and Bugfender. We have noticed that such data sharing is not entirely or explicitly disclosed in your [privacy policy](#).

In particular, it seems that Care19 shares data of its users as follows:

- Google: IDFA.
- Foursquare: IDFA, Lat (long to reverse geolocation), "a userId" (which matches the app anonymous ID)
- Bugfender: Phone's name (that can include the user's name), Device ID and Citizen ID.

We are concerned for the privacy of users that might be using Care 19, this is why we would like to understand the following:

- Why is such data shared to such third parties?
- In particular why Care19 is sharing the IDFA of its users to Foursquare and Google?
- What are Google, Foursquare and Bugfender doing with such data, notably are they using it for advertising purposes ?
- For what duration is such data stored by Google, Foursquare and Bugfender?

It seems your privacy policy does not indicate how a user can make a privacy request to Care19 if a user wishes to opt-out of sale (if relevant) or request for Care19 to erase its data. Do you have a process in place for such requests?

Finally, we would like to know if Care19 intends to disclose explicitly above mentioned data sharing in its privacy policy in the future, and to limit unnecessary data sharing to third parties?

Please note that we have contacted Google, Bugfender and Foursquare to ask them what they are doing with information shared by Care19, and that we will publicly disclose such communication to our users.

Thank you,
Sincerely,
Zoé

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Zoé Vilain
Chief Privacy Officer
[Jumbo Privacy](#)