



APPA Technology Working Group

Checklist of Good Data Protection Practices for COVID-19 Management

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Background

This checklist is a consolidation of the common baseline data protection best practices relating to technologies used to manage the COVID-19 situation. It seeks to enable app developers in the APAC region to develop apps that comply with the majority of the data protection best practices in the region. The document is a collation of advisories issued by the Asia Pacific Privacy Authorities (APPA) Technology Working Group (TWG) members in relation to:

1. **Safe Management** (e.g. contact tracing, monitoring of social distancing, enforcement of stay-home quarantines, or any other form of technology developed for the purposes of safe management); and
2. **Remote Working/Living** (e.g. video conferencing, e-commerce, and other digital transactions)

App developers wishing to develop apps for use in the APAC region may refer to the following checklist as a common baseline of best practices. However, should they be developing apps for a specific jurisdiction, they should consult the rules or advisories published by the relevant jurisdiction.

General Guiding Principles



Adopting privacy/data protection by design

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|---|--|--------------------------|
| 1 | Have you ensured that only personal data that is necessary and proportional to its purpose is collected? | <input type="checkbox"/> |
| 2 | Have you ensured that personal data is only used or disclosed either with consent or under specific situations provided for by law? | <input type="checkbox"/> |
| 3 | Have you defined a strict limitation of purpose for the use of personal data? | <input type="checkbox"/> |
| 4 | Have you specified a retention period for the personal data collected, especially where sensitive data (e.g. proximity data) has been collected? | <input type="checkbox"/> |
| 5 | Have you ensured that the personal data will be secure? | <input type="checkbox"/> |



Ensuring transparency and explainability of collection, use, and disclosure

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|---|---|--------------------------|
| 6 | Does the individual know what personal data is being collected? | <input type="checkbox"/> |
| 7 | Does the individual know how their personal data will be used and what it will be used for? | <input type="checkbox"/> |
| 8 | Does the individual know how their personal data will be stored? | <input type="checkbox"/> |
| 9 | Are individuals aware if their personal data will be shared with third parties? | <input type="checkbox"/> |



Putting in place legal and technical safeguards

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|----|--|--------------------------|
| 10 | Have you put in place legal safeguards to ensure that the data collected (e.g. contractual clauses) is only accessed by authorised parties and used for its intended purposes? | <input type="checkbox"/> |
| 11 | Have you put in place legal safeguards to ensure that the data collected (e.g. code reviews, access controls) is only accessed by authorised parties and used for its intended purposes? | <input type="checkbox"/> |

Safe Management for Contact Tracing



Data collection

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|----|--|--------------------------|
| 12 | Have you ensured minimal collection of sensitive data (e.g. collecting proximity data instead of location data)? | <input type="checkbox"/> |
|----|--|--------------------------|



Data protection

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|----|--|--------------------------|
| 13 | Have you anonymised or pseudonymised data where possible? | <input type="checkbox"/> |
| 14 | Have you ensured that only authorised parties (e.g. health authorities) are in possession of re-identification keys? | <input type="checkbox"/> |
| 15 | Have you ensured IDs for pseudonyms are regularly refreshed? | <input type="checkbox"/> |
| 16 | Have you ensured the data is encrypted? | <input type="checkbox"/> |



Data use

- | | | |
|----|---|--------------------------|
| 17 | Have you ensured that the data is stored only on individual's devices and only to be uploaded to the relevant authorities in event they test positive for COVID-19? | <input type="checkbox"/> |
|----|---|--------------------------|



Data disposal

- | | | |
|----|--|--------------------------|
| 18 | Have you ensured that the data is automatically deleted or destroyed after a pre-determined period of time? | <input type="checkbox"/> |
| 19 | Have you ensured that the monitoring measures are only in place for as long as necessary to address the COVID-19 pandemic? | <input type="checkbox"/> |

Safe Management at Business Premises



Data collection

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|----|--|--------------------------|
| 20 | Have you notified individuals that their data is being collected? | <input type="checkbox"/> |
| 21 | Have you ensured that the data collected is used by your organisation only for safe management purposes? | <input type="checkbox"/> |
| 22 | Where cameras are used for thermal imaging, have you ensured that facial images are not saved, used, or disclosed? | <input type="checkbox"/> |



Data security and protection

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|----|--|--------------------------|
| 23 | Have you ensured that devices for safe management are not used for other purposes? | <input type="checkbox"/> |
| 24 | Have you ensured that devices for safe management can only be accessed by authorised staff? | <input type="checkbox"/> |
| 25 | Have you ensured that devices for safe management have antivirus software installed? | <input type="checkbox"/> |
| 26 | Have you ensured that the autofill feature where customers are to fill in personal data is disabled? | <input type="checkbox"/> |

The following checklist is a consolidation of recommended best practices for remote living.

Remote Working



For organisations

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|---|---|--------------------------|
| 1 | Have you minimised the transfer of personal data (e.g. a local database) out from the workplace's premises and information systems? | <input type="checkbox"/> |
| 2 | Have you ensured employees connect to company networks via a Virtual Private Network (VPN)? | <input type="checkbox"/> |
| 3 | Have you redacted or encrypted personal data that is transferred? | <input type="checkbox"/> |
| 4 | Have you ensured that personal data is only transferred overseas in accordance with privacy/data protection rules of the relevant jurisdiction? | <input type="checkbox"/> |
| 5 | Have you ensured security systems and measures are kept up to date? | <input type="checkbox"/> |



For employees

- | | | |
|---|---|--------------------------|
| 6 | Have you set up a private workspace (e.g. where screens are not visible to others)? | <input type="checkbox"/> |
| 7 | Have you ensured that you are using secured Wi-Fi networks or an ethernet connection? | <input type="checkbox"/> |
| 8 | Have you ensured that you only use workplace-approved devices, accounts, and collaboration tools for work-related purposes? | <input type="checkbox"/> |

Remote Living: Videoconferencing



Before a meeting

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|----|--|--------------------------|
| 9 | Have you ensured that the videoconferencing software is updated to the latest version? | <input type="checkbox"/> |
| 10 | Have you set restrictions to only allow entry for the relevant invited participants? | <input type="checkbox"/> |
| 11 | Have you ensured that a password has been set for entry into the meeting? | <input type="checkbox"/> |
| 12 | Have you enabled the waiting room feature to ensure that only authorised participants can enter the meeting? | <input type="checkbox"/> |



During a meeting

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|----|---|--------------------------|
| 13 | For cases where a recording is required, have you notified participants that the meeting will be recorded? | <input type="checkbox"/> |
| 14 | Have you disabled recording functions for participants? | <input type="checkbox"/> |
| 15 | Have you checked your surroundings when in a videoconference (e.g. what is visible in your background, who may overhear your call)? | <input type="checkbox"/> |

Remote Living: E-Learning



For schools

- 16 Where third-party software is used, have you ensured that you have a clear understanding of privacy policies and security measures (e.g. where the data is stored)? ☐
- 17 Have you disabled online tracking and recording functions of third-party software by default? ☐



For parents

- 18 Have you enabled parental controls in order to manage your children's internet usage and filter out inappropriate content? ☐
- 19 Have you communicated good practices on phishing and online tracking to your children? ☐
- 20 Have you turned off cameras and microphones when online tools for e-learning are no longer in use? ☐

ANNEX A

Consolidated List of Advisories by APPA TWG Members

Jurisdiction	Advisory
Australia	Guidance on the COVIDSafe app and individuals' privacy rights
	Guidance on the COVIDSafe app and COVID app data
	Draft guidance on the harmonisation of requirements to support a nationally consistent approach to collection of contact information from individuals
	Guidelines for businesses collecting the personal information of individuals for contact tracing
	Draft guidance for digital check-in providers collecting personal information for contact tracing
	Step-by-step guide to Privacy Impact Assessment
	Dedicated page to guidance on good privacy practices in the COVID-19 context
	Privacy guidance for keeping workplaces safe and handling personal information appropriately
	Detailed advice for regulated entities to assess privacy risks involved in changed working environments and remote working arrangements

Australia (Victoria)	Guidance on protecting personal information and health information during COVID-19
	Guidance for Victorian public sector employees on protecting privacy while working remotely
	Guidance on privacy risks arising from implementing collaboration tools
Canada	A Framework for the Government of Canada to Assess Privacy-Impactful Initiatives in Response to COVID-19
	Privacy review of the COVID Alert exposure notification application
	Privacy and the COVID-19 outbreak
	Privacy tips for using videoconferencing services
Canada (British Columbia)	Joint statement on COVID-19 contact tracing apps and privacy
	Guidance for those subject to two orders issued by BC's Public Health Officer
	Infographic on collecting personal information and food and drink establishments
	Guidance on security measures for protecting personal information
	Guidance on setting up remote workspaces
	Guidance for online learning during the COVID-19 pandemic
	Privacy Awareness Week 2020: COVID concerns and protecting personal information
Hong Kong	Guidelines on remote working
	Guidelines on use of videoconferencing software
	Guidelines on remote learning
	Guidance for Schools on the Collection and Use of Personal Data of Teachers, Staff and Students during COVID-19 Pandemic
Japan	Guidance on use of contact tracing apps
	Contract Confirmation Application Terms and Conditions of Use
	Contract Confirmation Application Privacy Policy
	Guidance on use of My Number for contact tracing
	Guidance on handling of personal information to a third party
Korea	Campaign for active management and protection of one's own personal information in daily life
	COVID-19 Cybersecurity Information
Mexico	Microsite on COVID-19 secure Personal Data
	Infographics on protection of personal data in the context of health emergencies
	Recommendations for controllers dealing with COVID-19 related personal data
	Recommendations for controllers of specific sectors
	Recommendations on remote working
Singapore	Guidance on collection of personal data for COVID-19 contact tracing
	Guidance on virtual meetings

