## Twitter Thread by Internet Freedom Foundation (IFF)



Internet Freedom Foundation (IFF) @internetfreedom

THREAD: We filed RTIs on behalf of <u>@no2uid</u> asking the Ministry of Health and Family Welfare questions about how your personal data will be protected while you're using CO-WIN, the COVID-19 vaccination registration platform.

We got answers... kind of. Here's the new info.

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## WE ASKED THE MINISTRY OF HEALTH AND FAMILY WELFARE WHAT THEY'LL DO WITH YOUR DATA WHILE YOU'RE GETTING VACCINATED.

We got answers...kind of.

Just like with Aarogya Setu, many Indians are worried that about the potential CO-WIN has to leak your data or threaten your privacy in the name of dealing with a pandemic. So, we asked the MOHFW some questions about data protection under the Right to Information Act.

Some questions on the CO-WIN vaccine registration app for the MOHFW

- WHAT PRIVACY ASSESSMENT WAS CARRIED OUT FOR COWIN?
- WHAT **DATA** ALREADY EXISTS ON THE APP, AND **WHAT ARE YOU SAVING** OUT OF IT?
- HOW LONG WILL COWIN STORE OUR DATA?
- WHICH DEPARTMENTS OR MINISTRIES GAVE PERMISSIONS FOR IT?
- HOW MANY OF THEM HAVE ACCESS TO THIS DATA?
- WHAT **DATA SECURITY PROTOCOLS** ARE YOU UNDERTAKING TO PROTECT PEOPLE'S PRIVACY?
- IS AADHAAR NECESSARY FOR REGISTRATION ON COWIN?
- CAN WE RECEIVE VACCINATION CERTIFICATES PHYSICALLY INSTEAD OF DIGITALLY, AND IF YES, HOW?

In the responses we received, MOHFW said that it cannot provide us with a privacy policy on CO-WIN (?!).

Thankfully it was clarified that Aadhaar is not mandatory for registration on Aarogya Setu or CO-WIN, and that physical vaccine certificates will be provided to everyone. 3/n

The data it says it will collect will be your name, gender, date of birth, photo ID, and number.

National, State, and District level admins will have access to use the app, but there is not much further clarity on this point.

But most importantly... 4/n

The responses (or rather lack of them) related to your data privacy and protection are completely vague. We received no clear answers on which Ministries/Depts will have access to your personal data, the permissions provided, etc. This is a failure in terms of transparency.

5/n

This lack of answerability leads us to believe that either the Ministry doesn't have the necessary info (which is problematic to say the least), or they are refusing to give us access to info - because that may open the doors to further questions.

Here are the documents.

6/n

Point No.	Applicant's Query	Reply
i	Please provide copies of the privacy assessment carried out for the CoWin app.	Privacy policy cannot be provided because the CoWin App is accessible only by National, State and District level Administrators. General public and only register themselves for vaccination.
ï	Please provide information on the kind of data which already exists, and which is being collected from vaccine beneficiaries and saved on the CoWin platform/ app.	The following data is being collected from vaccine beneficiaries. Name Gender DoB Type of photo ID proof Photo ID no Mobile No
iii	Please provide a list of the Government departments and ministries that gave permission for the CoWIN app?	CoWin App has been developed by Ministry of Health and Family Welfare with support from UNDP of m Incha.
iv	Please provide copies of the office memorandums, with file notings by officials from each Ministry which considered the proposal for the coWINapp, to grant it the necessary governmental approval.	
v	Please provide an estimate of how long the data collected and stored in the CoWin app/ platform will store and retain data?	The data is being managed as per the data extant policy of the Government of India.
vi	Please provide information on: a. The Ministries/Departments and governmental agencies which have access to the data on the CoWin app/platform	The CoWin App is for the use of National, State and District level administrators.
	b. The designation of the officials within then departments who have access to this data	

We're doing our best to be on top of things and will keep you updated with information as we receive it. In the meantime, please consider supporting us. We need help from regular Indians like you to continue advocating for your digital rights! <u>https://t.co/JSUSIbF1xH</u>