

## **Massachusetts General Hospital (“MGH”)**

### **Travel Healthy Application Privacy Policy (iOS)**

The Travel Healthy Application Privacy Policy, along with the Travel Healthy Application Terms of Use will tell you what information we collect through the Travel Healthy application and how it is used. By using the Travel Healthy application, you agree to acceptance of this Application Privacy Policy.

**Please read the following carefully before using the application.**

**Information that you may provide in connection with the use of this application is considered “Protected Health Information” as defined under the Health Insurance Portability & Accountability Act and related regulations (collectively referred to as “HIPAA”) and is subject to the Mass General Brigham (formerly known as Partners HealthCare) [Notice of Privacy Practices](#).**

**In hosting the app for download, Apple (through the App Store) may have access to a limited amount of the user’s information, provided directly by the user (including but not limited to name, email, IP address, and the app downloaded). However, Apple does not collect such information for or on behalf of MGH, and it will not be subject to the Mass General Brigham Notice of Privacy Practices or this Travel Healthy Application Privacy Policy. By agreeing to these terms, you acknowledge that such information provided to Apple by the user does not constitute protected health information under HIPAA.**

#### **Your Consent**

By using our application, you consent to the collection, use and sharing of information as described in this Application Privacy Policy.

#### **Information Collection and Use**

##### **Information That We Collect**

When you download and use our application, we need to collect personal information from you such as name, email address, phone number, dates of travel, travel destinations, and device information (device platform, operating system type and version) in connection with the registration download and use. In addition, we may need to collect additional information in connection with your use of certain features of the application. For example, we may collect or you may be asked to provide additional personal information, such as real-time behavioral and health-related information, if you choose to complete any of the daily surveys presented to you through the Travel Healthy application. We will also collect your precise or estimated geographic location in real-time through the application if you choose to enable the location tracking feature of the Travel Healthy application.

You may also upload personal information to the travel wallet feature of the application, including photos of travel documents like your flight itinerary or vaccine list. This feature is intended as a place to store important travel information for your convenience. The information you upload in the travel wallet feature of the Travel Healthy application will be saved locally to your mobile device and will not be accessible to MGH.

MGH will collect personal information and geographic location information through your use of the Travel Healthy application during your participation in the clinical research study titled: *A Mobile Application for Collecting Symptom and Geographic Data from U.S. International Travelers* (the “Study”). Upon your completion of the Study or earlier withdrawal from the Study, MGH will cease to collect personal information and geographic location information

from you even though your access to the Travel Healthy application may continue, subject to the Travel Healthy Terms of Use.

If you submit to MGH any personal information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Application Privacy Policy. By submitting personal information, you grant MGH the right to transmit, monitor, retrieve, store, share and use your information in connection with the ongoing operation, support, maintenance, and continued development of future versions of the application.

## How We Use This Information

We use the information you provide to operate and manage the Travel Healthy application as described in more detail below, respond to user inquiries, or in other ways as required by law.

We may use your information to:

- Help us improve the services and content we offer
- Conduct the clinical research study in which you have agreed to participate
- Improve our application offerings and send you information and updates
- Respond to your questions and requests and improve customer service
- Communicate changes to our Application Privacy Policy or Terms of Use
- For other purposes with your consent

In some cases, third party collaborators or service providers contracted by MGH may have access to your information to assist MGH in the conduct of the clinical research study or to perform a specific task, for example, tools used to monitor application use and performance.

## Deleting Your Account and Data

The Travel Healthy application gives you the ability to delete your Travel Healthy account at any time for any reason. You can delete your account and associated data using the functionality available in the Travel Healthy application. Specifically, you can navigate to the *Settings* section of the application, click *Delete Account*, and follow the confirmation prompts. Following such confirmation, account details and data associated with your account are deleted from our servers. When your Travel Healthy account is deleted, your details in the data associated with your account are deleted, subject to our legal records retention obligations under applicable law. If you delete your account, you will not be able to access any data, content or services that were associated with your account.

## Data Security

MGH seeks to prevent unauthorized access to your personal information by use of security technologies to protect the integrity and privacy of any personal information you provide.

Although we endeavor to protect your personal information, MGH cannot and does not warrant the security of any information you transmit to us through the Travel Healthy application, and you do so at your own risk. Depending on the manner in which you use Travel Healthy, your information may be discarded or archived.

## Login/Passwords

Some sections of the Travel Healthy application may require login identifiers and/or passwords. You are responsible for taking reasonable steps to ensure that no unauthorized person has access to your password or account login information. It is your sole responsibility to control the use of login information and passwords, to authorize, monitor

and control access to and use of your account and password and to inform MGH or the Travel Healthy team promptly of any need to deactivate a password.

### **Changes to This Policy**

MGH reserves the right to change or update this Application Privacy Policy from time to time without notice, so please review it periodically to keep informed of any changes.

If you have questions or comments regarding this Application Privacy Policy or about how we collect, use or protect your personal information, please contact the MGH Travel Healthy team by email to [rclarocque@mg.harvard.edu](mailto:rclarocque@mg.harvard.edu), or by calling (617) 543-5557.

### **Claims of Copyright Infringement. Digital Millennium Copyright Act Notice**

We respect the intellectual property rights of others and require that our users do the same. If you believe that any content available on our Site or other activity taking place on our Site constitutes infringement of a work protected by copyright (each, a "Work"), then please notify us as follows:

Mass General Brigham Incorporated (formerly Partners HealthCare System, Inc.)  
399 Revolution Drive  
Somerville, MA 02145  
Attn: William Glen Mitchell, Manager of Security Monitoring  
Email: [dmca-agent@partners.org](mailto:dmca-agent@partners.org)  
Tel: 857-282-3515

Your notice must comply with the Digital Millennium Copyright Act (17 U.S.C. §512) (the "**DMCA**"). Upon receipt of a compliant notice, we will respond and proceed in accordance with the DMCA.

We have implemented a repeat infringer policy to address instances in which a particular user is subject to multiple DMCA notifications (the "**Repeat Infringer Policy**"). If we determine that a user has violated our Repeat Infringer Policy, then we may take, in our sole discretion, any number of steps including, but not limited to, issuing warnings to the applicable user.

Last updated: March 17, 2023