

Mobile App Development Forum on Privacy and Security
The Office of the Privacy Commissioner for Personal Data, Hong Kong
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Mobile App Development Forum on Privacy and Security

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香港個人資料私隱專員公署
Privacy Commissioner
for Personal Data, Hong Kong

保障、尊重個人資料
Protect, Respect Personal Data

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Number of Active SIM Cards and Smartphones in Use

- 7 millions population
- 14.9 millions active SIM cards in use
- 5 millions smartphones in use

Month	Public Mobile Customers				
	Post-paid SIM	Pre-paid SIM	Total ¹	Activated Pre-paid SIM ²	2.5G + 3G + 4G Customers ^{3,4}
11/2015	7,965,302	8,619,576	16,584,878	6,241,233	14,187,136
10/2015	7,956,171	8,585,959	16,542,130	6,258,780	14,115,459
9/2015	7,940,477	8,689,966	16,630,443	6,180,365	14,223,157
8/2015	7,927,852	8,792,736	16,720,588	6,157,613	14,270,075 ⁸
7/2015	7,893,835	8,801,842	16,695,677	6,198,946	14,183,881 ⁸
6/2015	7,875,469	8,824,485	16,699,954	6,200,411	14,027,892 ⁸
5/2015	7,863,759	8,729,561	16,593,320	6,209,401	12,875,708 ⁸
4/2015	7,856,429	9,009,456	16,865,885	6,365,807	13,069,462 ⁸
3/2015	7,854,627	9,104,828 ⁸	16,959,455 ⁸	6,459,188 ⁸	13,166,436 ⁸
2/2015	7,841,065	9,413,754 ⁸	17,254,819 ⁸	6,648,817 ⁸	13,449,428 ⁸
1/2015	7,856,955	9,601,768 ⁸	17,458,723 ⁸	6,883,017 ⁸	13,598,092 ⁸
12/2014	7,851,393	9,520,606	17,371,999	6,996,924	12,765,744 ⁸



Low Privacy Awareness by the Public

- the public was not sensitised to the privacy issues in the use of smartphones and apps
- 57% did not know what data would be accessed by apps
- 51% did not know social network apps would read and upload contact lists



Media Statements

Date: 21 November 2012

A Survey Revealed Low Privacy Awareness among Smartphone Users Privacy Commissioner Advises Smartphone Users to Get Smarter about Privacy

1. The Privacy Commissioner for Personal Data (“the Commissioner”) Mr. Allan Chiang released today (21 November 2012) the findings of a survey¹ on the privacy awareness among smartphone users in Hong Kong.

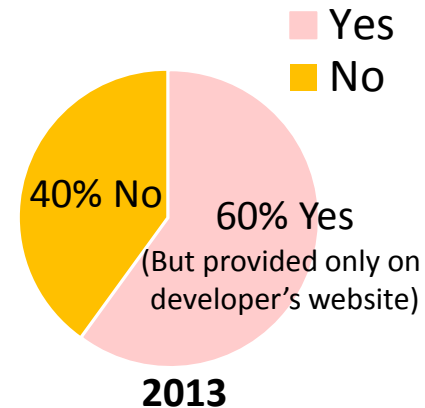
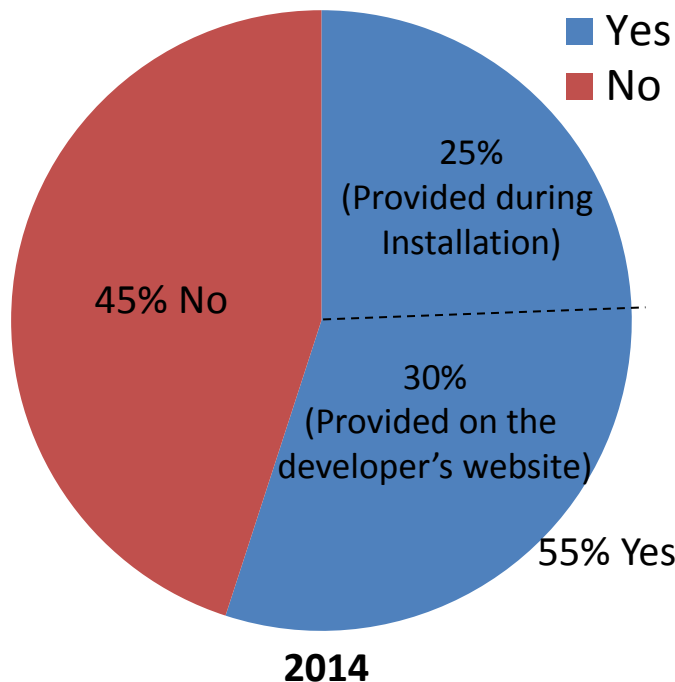
- Over 90% of users have installed apps but only 27% of them read and consider the apps privacy policy before installing the apps;
- 57% of apps users do not know what personal data on their phones are accessed by the apps installed;
- 51% of social apps users do not know that their contacts and social relationship data would be uploaded to a central server;
- Only 53% of users take steps to protect their phones and personal data by means such as screen lock and anti-virus software.



Sweep Exercise Revealed Low Awareness by Developers

Number of apps provided privacy policy statement

- nearly half of Hong Kong apps* surveyed in 2013 (40%) and 2014 (45%) did not provide privacy policy



- * only apps that read data from mobile devices were surveyed

Transparency of HK Apps Inadequate



Media Statements

Date: 15 December 2014

Privacy Commissioner Finds Transparency of Privacy Policies Wanting in Local Mobile Applications

(15 December 2014) The Office of the Privacy Commissioner for Personal Data ("PCPD") conducted a survey¹ of 60 popular mobile applications ("apps") developed by Hong Kong entities and found that their transparency in terms of privacy policy was clearly inadequate and there was no noticeable improvement compared with the results of a similar survey conducted in 2013.

- 72% did not explain whether, what and why data is accessed (compared to 59% worldwide)
- 85% suspected to over-collect personal data (compared to 31% worldwide)

	2014 Survey (Hong Kong)(total = 60 apps)	2014 Sweep (Global)(total = 1,211)
Unclear or missing information as regards whether data would be accessed, and if yes, what data and why	43 (72%)	715 (59%)
Permission of data access being sought went beyond user's expectation based on app's functionality ⁵	51 (85%)(total = 60 apps)	281 (31%)(total = 908)



Enforcement Actions Taken on Apps

- enforcement actions were taken in 2014 on two apps due to excessive collection of personal data and security flaw

Media Statements

Date: 15 December 2014



Excessive Collection of Personal Data through Mobile Application by Worldwide Package Travel Service Operating with No Privacy Policy

(15 December 2014) The Office of the Privacy Commissioner for Personal Data ("PCPD")

published an investigation report today concerning the excessive collection of personal data by Worldwide Package Travel Service ("WPT") through a mobile application ("app") that they enrolled their customers to use. In response to public enquiries about the app, the PCPD developed a privacy policy for the app.

Media Statements

Date: 15 December 2014



Personal Data Leaked through Inadvertent Use of Mobile Application "TravelBud" by HKA Holidays

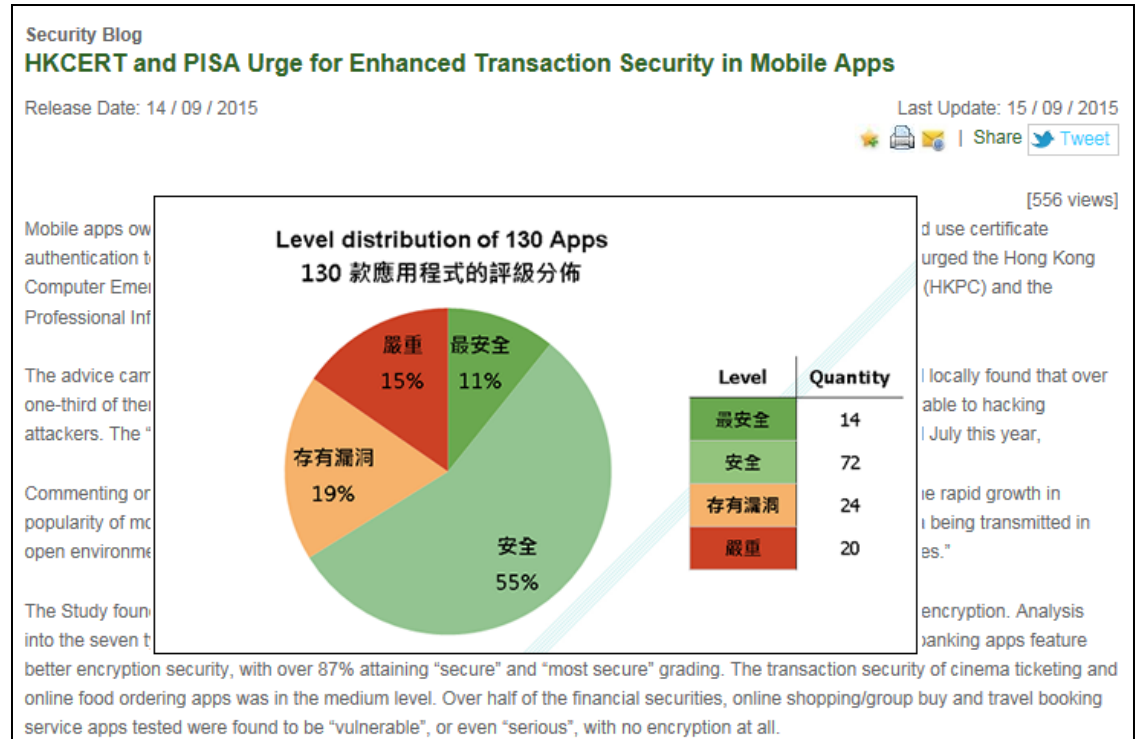
(15 December 2014) The Office of the Privacy Commissioner for Personal Data ("PCPD") published an investigation report today concerning the leakage of personal data of the customers of an airline services company, HKA Holidays Limited ("HKA Holidays") through "TravelBud", a mobile application ("app") running on iOS platform. This stems from the failure of the app maintenance contractor, BBDTEK Company ("BBDTek"), in responding to the new privacy protection feature of iOS7 which blocked the reading by apps of MAC address¹ as a device identifier. HKA Holidays as the data user has contravened Data Protection Principle ("DPP") 4(1) in Schedule 1 to the Personal Data (Privacy) Ordinance (the "Ordinance").

2. The two cases were referred to the Personal Data (Privacy) Ordinance.



HK Apps were Found to Have Inadequate Encryption

- one-third of apps were found to have encryption flaw – either not done or easily crackable



Best Practice Guide for Mobile App Development

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開發流動應用程式 最佳行事方式指引 Best Practice Guide for Mobile App Development



表 2 — 檢查表
TABLE 2 – Checklist

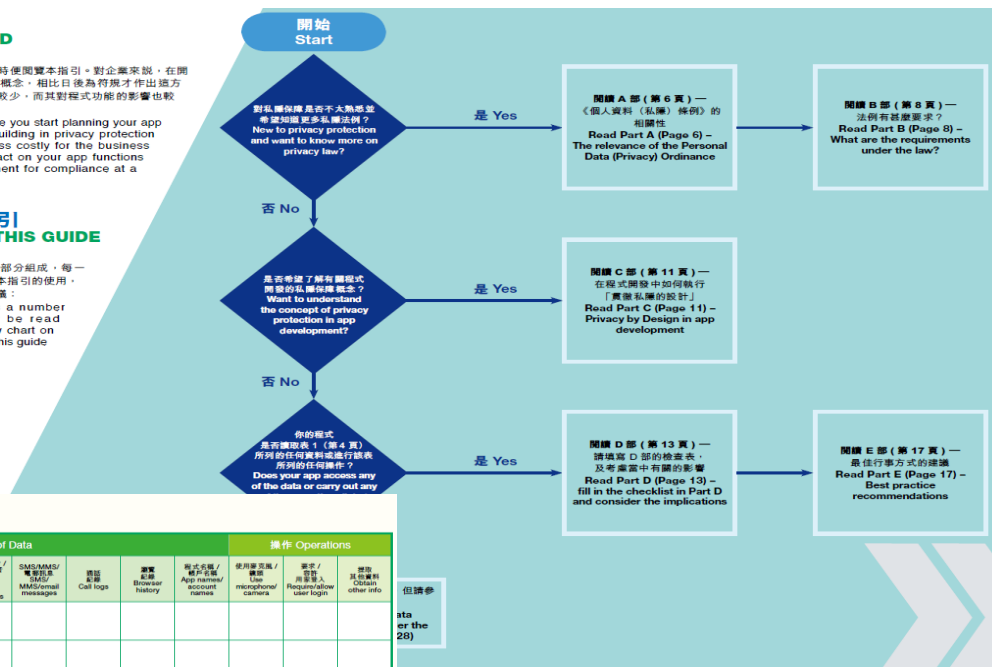
問題 Questions	資料類別 Types of Data											操作 Operations		
	裝置獨特 標識符 Unique device identifier	位置 Locations	流動電話 號碼 Mobile phone number	聯絡人/ 通訊錄 Contacts/ address book	行事曆/ 提醒 Calendar/ reminder	影片/照片/ 短片/錄音 video/ photos/ voice recordings	SMS/MMS/ 電郵或 MMS/email messages	通訊 紀錄 Call logs	瀏覽器 歷史 Browser history	程式名稱/ 帳戶名稱/ App names/ account names	使用聲紋或/ 指紋 Use microphone/ camera	登入/ 註冊/ 用戶登入 Registration/ user login	廣告 其他資料 Others other info	但請參 閱第 28 頁
1. 應用程式需要讀取/收集/使用資料以提供其運作？見 E1 Will the access/collection/use of the data absolutely necessary for the app's operation? See E1														
2. 會否從流動裝置上載/傳輸資料（或衍生資料）？見 E2 Will the data (or derived data) be uploaded/transmitted from the mobile device? See E2														
3. 會否儲存或保留流動裝置的資料（或衍生資料）在別處？見 E3 Will the data (or derived data) be stored or kept elsewhere from the mobile device? See E3														
4. 會否將資料（或衍生資料）與從別處取得的其他個人資料結合/串連？見 E4 Will the data (or derived data) be combined/correlated with other data of the individual obtained elsewhere? See E4														
5. 會否在你的業務內分享（例如跨程式整合）或與其他人士/機構分享資料（或衍生資料）？見 E5 Will the data (or derived data) be shared within your business (e.g. for cross-app integrations) or with other parties? See E5														
6. 會否將資料（或衍生資料）用作建立個人的資料檔案？見 E6 Will the data (or derived data) be used for profiling of individuals? See E6														
7. 會否將資料（或衍生資料）用於直接促銷？見 E7 Will the data (or derived data) be used for direct marketing? See E7														
8. 是否已製備涵蓋所有資料類別的《收集個人資料聲明》及/或《私隱政策聲明》？見 E8 Has a Personal Information Collection Statement and/or Privacy Policy Statement been prepared to cover all data types involved? See E8														
9. 你是否已考慮程式開發者在私隱上的期望？見 E9 Have you taken into account app users' privacy expectations? See E9														
10. 你的程式有否使用第三方工具（軟件庫、廣告網絡等）（或你是否使用這些工具的服務提供者）？見 E10 Do you use third-party tools (software library, ad networks etc.) in your app (or are you the provider of these tools)? See E10														

何時閱讀 WHEN TO READ

你應在開始計劃開發程式時便閱讀本指引。對企業來說，在開始階段便融入保障私隱的概念，相比日後為符合才作出這方面的調整，前者花費會較少，而其對程式功能的影響也較為輕微。
You should read it before you start planning your app development project. Building in privacy protection at the outset will be less costly for the business and will have less impact on your app functions compared with adjustment for compliance at a late stage of the project.

如何使用本指引 HOW TO USE THIS GUIDE

為方便參閱，本指引由幾部分組成，每一部分均可獨立閱讀。有關本指引的使用，可參考右面的流程表的建議：
This guide comprises a number of parts which may be read independently. The flow chart on the right suggests how this guide may be used.



Developing Mobile Apps: Privacy Matters

應用程式重私隱 創新科技贏信任



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Messages to Mobile Apps Developers

- individuals' personal data privacy must be respected (especially members of the young generation)
- provide transparent privacy policy to users on what information the app would access/use
- give users the choice to opt-out from such access/use as appropriate
- individuals can make decisions in exercising control over their own data



Privacy as a Competitive Advantage

- privacy and personal data protection can be an asset and a business edge



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спасибо
 danke 謝謝
 ngiyabonga
 teşekkür ederim
 tapadh leat
 dank je
 gracias
 mochchakkeram
 bedankt
 hvala
 maururu
 thank you
 go raibh maith agat
 dziekuje
 unjoges
 sukriya
 kop khun krap
 arigatō
 takk
 dakujem
 merси
 obrigado
 sagolun
 terima kasih
 감사합니다
 grazie
 ευχαριστώ
 merci

