

August 2022

This survey relates to your company's collection and use of sensitive data that may be used to restrict access to abortion and the exercise of reproductive rights.

Assessing & Mitigating Risks

Q. What action has your company taken, or intends to take, to evaluate and respond to the implications of the recent U.S. Supreme Court's decision restricting access to abortion and reproductive rights?

Flo believes that now more than ever, everyone deserves to access, track, and gain insight into their personal health information without fearing for their safety. Flo already employs many data privacy and security best practices including: the encryption of all data, engaging in independent privacy audits, and recently becoming ISO 27001 certified, making Flo the first period and ovulation tracker to achieve this milestone.

In the wake of the Roe v Wade overturn, Flo wanted to offer even further protection. We stand behind the principle that our users should feel empowered to access medically credible information to help them make informed decisions about their health.

Because of this, Flo released its new Anonymous Mode feature, which is a vital step to allowing our users to securely and privately access medically credible information without fearing government prosecution. Enabling Anonymous Mode allows any Flo user the option to access the app without name, email address, and technical identifiers being associated with the health data in their Anonymous Mode account. Flo is the first female health app to take this level of precaution in terms of privacy and security.

Flo has partnered with [Cloudflare](#) to integrate an Oblivious HTTP system, App Relay Gateway, which ensures that no single party (that processes user data for Anonymous Mode accounts) has complete information on both who the user is and what they are trying to access. This means that the Cloudflare relay sees user IP addresses but not user data, whereas the Flo service sees user data but not user IP addresses. If either Flo or Cloudflare receives a request from law enforcement obliging them to identify a Flo Health Anonymous Mode user, they would be unable to satisfy the request.

Flo's Anonymous Mode introduces an even deeper layer of privacy for reproductive health data. By using Cloudflare's App Relay, Flo takes user privacy to a deeper level than simply removing the connection between IP addresses and users' health data. The new feature ensures its users' privacy on various levels, from logged symptoms on the device through the data transfer over the network to the server side. This groundbreaking approach allows users to continue tracking their health and benefit from the information logged before, but with as much privacy as possible. In effect, the user leaves significantly reduced digital footprints when communicating with Flo.

Flo will continue to implement data privacy and security best practices and will continue to keep these at the forefront of its new and existing product features.

Q. Does your company carry out due diligence to identify, prevent, and mitigate human rights risks associated with data collected from users of your products and services that could be used to restrict access to abortion and reproductive rights? If so, what risks have you identified?

Flo Health is aware of the significant human rights risks that may be posed to individuals who choose to share their abortion and reproductive health information with digital services and other organisations.

Flo believes that privacy is a human right. Flo does not sell data and we do not share health data with any company but Flo. Flo believes that now more than ever, everyone deserves to access, track, and gain insight into their personal health information without fearing for their safety.

Our new 'Anonymous Mode' feature is an expression of our commitments towards our users' safety, security and privacy. Flo's Anonymous Mode is based on the principle that users should feel empowered to access their Flo app without offering personally identifiable information. In the event that Flo receives an official request to identify a user by name or email, Anonymous Mode will prevent Flo from being able to connect data to an individual, meaning Flo would not be able to satisfy the request.

Follow-up Q: What steps is your company taking to protect users' rights to freedom of expression and data privacy?

We always inform users about how we intend to use their data at the moment of data collection and we only use personal data that users choose to share with us in a way that they expect. Our [Privacy Policy](#) informs app users about what data we collect, how it is used and shared, and how you users can control it. Flo will always stand up for the health of women and people who menstruate, and we will do everything in our power to protect the data and privacy of our users.

Regardless of where in the world our users are, Flo Health ensures that their privacy rights and freedoms are respected.

Users can exercise their rights in relation to their data at any time. Users can place their request directly via the Flo Health application. Flo also has a dedicated Support team (support@flo.health) which fulfills any requests we may receive from users in relation to their privacy rights.

Flo has an online [Privacy Portal](#) which provides further privacy and data protection information to our users. Through this portal, users have access to clear information about how we use and protect their personal data. The portal also has guidance and instructions to help our users control their data and exercise their rights in relation to it.

Follow-up Q: What policies or mechanisms does your company have in place for people to raise concerns or complaints on the use of their data?

As stated in [Flo's Privacy Policy](#), "we strongly encourage users to contact our Support Team at support@flo.health, our Data Protection Officer at dpo@flo.health or send a message via our dedicated email if you have questions about this Privacy Policy, how we collect or process your Personal Data, or anything else related to our privacy practices." Flo also created its Privacy Portal for its users to better understand their privacy rights and how Flo is committed to protecting these rights. Beyond this, users can raise any issues with relevant Data Protection Authorities.

Q. Has your company conducted an exercise to identify the types of data that could be used to target people seeking abortion care or restrict access to abortion and reproductive rights?

We understand that we handle very intimate data that can be misused if accessed by a third party. Therefore we implement robust privacy and security measures, including Anonymous Mode.

Follow-up Q: If so, what steps is your company taking to prevent and mitigate the identified risks?

Users entrust us with very intimate data about their health and wellbeing, and we fully understand the nature and sensitivity of the data. As a company, we are committed to ensuring the privacy and security of such data - including mitigating potential risks associated with the restriction of users' reproductive rights. You can read more about our position [here](#).

Q. Does your company carry out due diligence to identify, prevent, and mitigate human rights risks associated with allowing third-party access to user data?

To reduce the above mentioned risks, we introduced Anonymous Mode. In partnership with [Cloudflare](#), Anonymous Mode allows any Flo user the option to access the app without name, email address, and technical identifiers from being associated with the health data in their Anonymous Mode account.

Flo has partnered with Cloudflare to integrate an [Oblivious HTTP system, App Relay Gateway](#), which ensures that no single party processing user data in Anonymous Mode has complete information on both who the user is and what they are trying to access.

Flo's Anonymous Mode introduces an even deeper layer of privacy for reproductive health data to the company's already exhaustive data privacy and security practices:

- Flo offers encryption of all data
- Flo subjects its systems to regular third-party audits of its data privacy and security practices
- Flo encourages all users to implement password protection to reduce the risk that unauthorized users access the app on their personal device.
- Flo does not sell identifiable user health data with any other company
- Flo is the first period and ovulation tracker to receive the [ISO 27001 certification](#), the internationally recognized standard for information security.
 - Established by the International Organization for Standardization (ISO), the certification affirms that Flo's policies, processes, and procedures meet the world's most rigorous standards and attests that Flo protects users' data at the highest standard possible.

With Anonymous Mode, Flo is the first female health app to take this level of precaution in terms of privacy and security and is setting a new expectation for how companies protect their users' data.

Follow-up Q: If your company allows third-party access to user data or sells data to third parties, does your company conduct due diligence on the third parties' data privacy policies?

Yes. Please refer to our [Private Policy's "Third parties processing your Personal Data"](#) section for more information.

Follow-up Q: What steps is your company taking to restrict the sale or disclosure of user data to third parties that could be used to target people seeking, offering, or facilitating abortion access and the exercise of reproductive rights?

Flo does not sell identifiable user health data with any company.

Responding to Government Requests

Q. What policies does your company have in place to respond to government requests for user data that could be used to restrict access to abortion and the exercise of reproductive rights?

Please refer to our dedicated FAQ on data requests, available [here](#).

Follow-up Q. Does your company publish information on government requests for user data, including information broken down by location, type of information requested, and reasons for the request?

We have not received any requests related to abortions, however we are considering launching transparency reports in the future for any incoming requests.

Follow-up Q: What policies does your company have in place to notify users when you disclose their data in response to government requests?

As stated in our [FAQ](#), " If we get a demand for your information, where feasible, we will notify you of the demand by sending you an email at the email address you provided to us, except in those instances where we are legally prohibited from doing so. "

Follow-up Q: What steps is your company taking to challenge unlawful government or law enforcement requests for user data?

Flo is committed to protecting our users' privacy. As stated in this [FAQ](#), Flo will review the request to ensure it is valid and Flo will reject requests that are overly broad or otherwise legally invalid.