

Response from Preglife AB to Business & Human Rights Resource Centre

September 25, 2022

Assessing & Mitigating Risks

1. 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?

We have a user agreement and privacy policy that clearly states our intentions and willingness to keep our users' data private and secure. For more information, please read these documents available on our website; <https://www.preglife.com>. However, in the lights of what is happening in the US as well as in Poland that may not be enough. In the very unlikely event that a court of law orders us to hand-over some specific user data, and if such court of law has jurisdiction in Sweden, we would need to follow those instructions. Because if this unlikely scenario we have made Preglife available without creating an account. This means that our users have the option to use Preglife without passing along any personal information to Preglife. All information is stored locally on the user's handset. The negative aspect of this is that users may lose data stored in the app if their phone breaks or if they lose it. But that may be a small price to pay for ease of mind.

We are also increasing the apps security by requiring a stronger password for the users who creates an account. This update will be rolled out soon.

2. 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?

- a. What steps is your company taking to protect users' rights to freedom of expression and data privacy?

We have an organization built around data security. We have an unbiased / neutral DPO (data protection officer) on the payroll, he is our main contact with any governmental body in case we discover any data loss of any kind (never happened to date). We have a CISO employed to make sure we have top notch data security and that we verify all sub-contractors and enter DPAs when needed. We perform audits on ourselves and subcontractors frequently. We perform pen-tests regularly. All in all, we handle data in a way that most organizations of our size don't. We go above and beyond legal requirements.

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

We have a consent management platform in place meaning that all users need to consent before they enter any data in Preglife. We have two types of consent, core consent and health consent which both can be given and revoked. For more information, please see our privacy policy.

3. 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?

No – not for that specific purpose.

- a. If so, what steps is your company taking to prevent and mitigate the identified risks?
4. Does your company carry out due diligence to identify, prevent, and mitigate human rights risks associated with allowing third-party access to user data?

- a. 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?

We don't sell data to any third party. Yes – that is part of our evaluation process before entering into any agreement where data may be available to third parties (as described above with the CISO)

- b. 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?

We don't sell data to any third party.

Responding to Government Requests

5. 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?
 - a. 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?

No we do not. Only if ordered to by a court of law that has jurisdiction in Sweden.

- b. What policies does your company have in place to notify users when you disclose their data in response to government requests?

In our 12-year company history, this has never happened, so we don't have a policy in place for this. However, we would inform all users whose data would be disclosed to governmental body.

- 6. What steps is your company taking to challenge unlawful government or law enforcement requests for user data?

Being incorporated in Sweden and acting under Swedish law we have deemed this risk to be small. We handle requests on a case by case and with our users' best intention in mind.

Please reach out again if you need any further clarifications.

Tobias Meschke
CEO