



By Email

July 10, 2020

The Honorable Ellen Rosenblum
Attorney General
State of Oregon
1162 Court Street NE
Salem, Oregon 97301

The Honorable Doug Peterson
Attorney General
State of Nebraska
2115 State Capitol
P.O. Box 98920
Lincoln, Nebraska 68509

Dear General Rosenblum and General Peterson:

Thank you for the letter dated June 16, 2020 regarding contact tracing apps on Google Play. We appreciate your concern about this important issue and welcome the opportunity to respond and collaborate.

Google and Apple aim to support public health authorities as they work to counter the pandemic by providing safe, reliable technology that public health authorities can use to build exposure notification apps. We believe the Exposure Notification API can be useful as one more tool in the public health authorities' fight against COVID-19. The design of the API and our associated terms of use reflect extensive feedback from the public health community. We also know that some governments have chosen not to use the Exposure Notification API, and the policies governing these other COVID-19 apps are designed to provide governments with enough flexibility to respond to citizens' needs while still adhering to strong privacy protections on Google Play.

Below please find additional information in response to your recommendations.

In anticipation of possible abuses, we [amended](#) our Google Play policies to account for new issues raised by contact tracing apps. The steps we have taken include the following.

- **Contact tracing apps directed to the general public must be approved by a government entity.** Contact tracing apps and apps that track infected or exposed individuals for the purpose of Coronavirus response or mitigation are required to have an endorsement from a governmental entity or authority.
 - We ask all developers of publicly available contact tracing apps on Google Play, to provide a proof of permission from a government entity and to notify Google via the [Advanced Notice form](#). A proof of permission should have clear language indicating that the developer has permission from a government or government agency to make apps on their behalf.
 - We check for this proof of permission before allowing these apps to be available to the public on Google Play.
- **Contact tracing apps must clearly disclose this functionality.** We updated our policy to require apps with contact tracing or exposure notification functionality to clearly disclose this functionality in their Google Play app listing. Apps that add contact tracing functionality to a preexisting app must meet the app requirements as explained above, including proof of eligibility, privacy features, and prominent disclosure of available contact tracing functionality to existing users. Apps using our Exposure Notification API must also meet additional safeguards, and we will differentiate these apps on Google Play.
- **We are adding a special “badge” for exposure notification applications that are developed by governments and are using the Exposure Notification API.** This badge will appear on the app’s Google Play listing and in other places on Google Play to indicate that the app has been developed by a government public health authority and uses the Exposure Notification API. This would make it easier for users to identify trusted and official apps using the API.
- **Google Play’s developer policies prohibit all contact tracing apps from showing ads or offering in-app sales.**
- **We will disable the Exposure Notifications System on a regional basis when it is no longer needed.** Google maintains the ability to disable the Exposure Notification API on a regional basis when contact tracing is no longer necessary. We are committed to engaging collaboratively with relevant public health authorities to make these decisions based on public health considerations. Additionally, state departments of public health are able to remove their exposure notification apps from Google Play at any time.

We hope this information is helpful and we are happy to address any further questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Pantazis". The signature is written in a cursive style with a large initial "C" and "P".

Cynthia Pantazis
Director, State Policy
Google LLC