RECOMMENDATIONS

1. **Clearly explain procedures used for de-identification of data used for research. Identifiable data should not be shared except at the consumer's direction.**

   We advocate for companies to improve clarity on research for data sharing especially around how they define "anonymized data." Companies should be explicit about what processes they use to de-identify data. We highlight this to help prevent people from being reidentified. Mental health applications collect sensitive information that can create damaging, irreversible impacts on individuals if shared with third parties, including social stigmatization and additional barriers to future opportunities.

2. **Provide clear and contextually-appropriate explanations of how user-provided data will be used, so users are aware of potential consequences before they share.**

   Companies should not overwhelm people with superfluous information or choices. Wherever possible, app default settings should be that your privacy is protected and users should not have to worry about managing this on their own. However, if there are choices to be made or information someone should be aware of, they should be presented in a clear and straightforward way.

3. **Adhere to platform guidelines that are in place to protect people's privacy.**

   App developers should ensure that their apps meet the guidelines laid out in Android developer documentation, such as *Best Practices for Unique Identifiers* which recommends avoiding the use of identifiers like the Android ID (SSAID). App developers should also make sure that the libraries (SDKs) they embed within their apps meet their own expectations for data collection, and that they are configured accordingly.

4. **Transparently disclose the service providers that receive data when people use your apps.**

   We recommend that companies are more transparent in their privacy policies about the service providers that receive data. Although it is not legally required or common practice in the U.S. to list every service provider or institution receiving data, we recommend companies proactively disclose this information.

FINDINGS

4.1 - Data testing

● 4.1.1 - In general, the applications we examined sent specific identifiers to multiple third parties. While this is not atypical of mobile apps, one would hope or expect that mental health apps would be especially protective of user privacy. Our testing showed nearly all apps sending the Advertising ID—which is used for advertising and analytics—with some apps pairing the Advertising ID with the Android ID.

● 4.1.2 - Privacy policy disclosures do not parallel the actions of these applications. This means if you want to know what is happening with your data, you will not be able to get that publicly.

4.2 - Design (UX + UI) analysis

● 4.2.1 - Companies may opt users into academic research by default or do it in a way that is not clearly outlined or articulated to the user.

● 4.2.2 - Some companies make elements of the user profile public by default.

● 4.2.3 - Several apps took different approaches to allowing users to delete their data easily through the mobile app interface.

● 4.2.4 - Companies may encourage mental health app users to share data in communities without clear disclosures in the app design and user interface that comments may be shared with the public.

4.3 - Policy review

● 4.3.1 - Does the app name any of the companies they share your data with?
  ○ Yes - (3 of 7 apps: MindDoc, Sanity & Self and Wysa)
  ○ No - (4 of 7 apps: 7 Cups, BetterHelp, Talkspace, and Youper)

● 4.3.2 - Did we see the app share data ONLY with companies named in the privacy policy?
  ○ Yes - (2 of 7 apps: 7 Cups and MindDoc)
  ○ No - (4 of 7 apps: BetterHelp, Sanity & Self, Talkspace, Wysa, and Youper)

● 4.3.3 - Does the privacy policy say the user can delete their data?
  ○ Yes - (3 of 7 apps: MindDoc, Wysa, and Youper)
  ○ No - (4 of 7 apps: 7 Cups, BetterHelp, Sanity & Self, Talkspace)

● 4.3.4 - Can you delete your data easily, right from the app?
  ○ Yes - (4 of 7 apps: BetterHelp, MindDoc, Sanity & Self, Youper)
  ○ No - (3 of 7 apps: 7 Cups, Sanity & Self, Wysa, and Talkspace)

● 4.3.5 - Does the app ask permission before using your data for research?
  ○ Yes - (1 of 7 apps: Youper)
  ○ No - (4 of 7 apps: 7 Cups, MindDoc, Sanity & Self, Talkspace, Wysa)
  ○ Unclear - (1 of 7 apps: BetterHelp)

● 4.3.6 - Can you opt-out of data research projects?
  ○ Yes - (1 of 7 apps: Youper)
  ○ No - (3 of 7 apps: 7cups, MindDoc, and Talkspace)
  ○ Unclear - (3 of 7 apps: BetterHelp, Sanity & Self, and Wysa)