



August 2, 2022

Caitlin Seeley George
Director of Campaigns and
Operations
Fight for the Future

Jennifer Brody
U.S. Policy and Advocacy
Manager
Access Now

Michael Kleinman
Director of the Silicon Valley
Initiative
Amnesty International USA

Dear Ms. George, Ms. Brody and Mr. Kleinman,

I am Mobilewalla's founder and CEO, and I write to respond to the questions about Mobilewalla's data practices and policies raised in your July 20, 2022 letter. Mobilewalla is a commercial data provider that enables other businesses gain insights into their customers. Mobilewalla does not sell data to law enforcement agencies, and it has never received a law enforcement request for individuals' mobile location or usage data. Furthermore, Mobilewalla does not sell data identifying points of interest (such as store names or hospitals) visited by individuals, nor does it identify family planning clinics.

Mobilewalla maintains safeguards designed to protect the privacy and honor the consent of the consumers whose mobile device information is provided to Mobilewalla by its suppliers. Mobilewalla also takes steps to ensure that its customers do not use Mobilewalla data for discrimination or other detrimental purposes. For example, Mobilewalla's master license expressly prohibits customers from using the (1) using the data to discriminate against, harass, or otherwise harm any person or third party, (2) combining the data with any information to identify a natural person, and (3) using the data to determine eligibility for healthcare. As part of Mobilewalla's contracting process with data purchasers, customers must complete a data usage questionnaire. Mobilewalla adapts these safeguards to promote trust in the mobile advertising ecosystem.

The responses to your specific questions are as follows:

1. Has your company conducted a human rights impact assessment or other due diligence to identify and address human rights risks associated with collecting data that can be used to prosecute people seeking to exercise their reproductive rights?

Mobilewalla does not correlate our data with sensitive locations or other named points of interest. Mobilewalla does not sell data to law enforcement agencies that would potentially carry out such prosecutions.

2. What steps, if any, has your company taken to protect the privacy rights of those seeking to exercise their reproductive rights in the context of the Supreme Court decision to overturn Roe v. Wade and the ensuing criminalization of abortion in a number of states?

Mobilewalla's database does not contain names, address, or social security numbers of individuals. As noted above, Mobilewalla does not sell data to law enforcement agencies that would potentially carry out such prosecutions.



3. *Has your company adopted any policies to restrict the sale and disclosure of data that could be used to prosecute or otherwise harass those seeking to exercise their reproductive rights to law enforcement or private actors?*

Along with the privacy safeguards discussed in response to questions 1 and 2, Mobilewalla prohibits use of its data to harass any person. Mobilewalla also restricts its customers from using data for law enforcement purposes or to resell to law enforcement. Mobilewalla requires new customers to identify their intended data uses as part of Mobilewalla's onboarding diligence. These surveys describe the data elements customers will be receiving and the use cases they will be implementing with the data. Since Mobilewalla began using these questionnaires in 2021, no customer has described the location of family planning clinics as a data element they seek to identify or use.

4. *Who is authorized or can be authorized to access the data you collect? Are there any limits on who can purchase or acquire access to data that can be used to prosecute people seeking to exercise their reproductive rights?*

Mobilewalla contracts directly with its customers through individually negotiated agreements. As outlined in our previous answers, Mobilewalla contractually limits customers' data usage, and it does not permit sale to state law enforcement agencies that would enforce these state laws. Mobilewalla data is non-transferrable beyond the terms each customer establishes in its master license.

5. *What additional measures, if any, have you taken to limit the ability of state or private actors to use the data you collect to prosecute or harass those seeking to exercise their reproductive rights?*

As discussed above, Mobilewalla prohibits its customers from using data to harass individuals.

6. *Does your company plan to comment publicly on any mitigation measures you may adopt in response to the risks outlined in this letter?*

We understand the responsibilities that go along with being a trusted steward of consumer data and are confident that our practices comply with state, national and international regulations, and industry standards. We have provided information to many sources including media outlets upon request and will continue to do so.

Sincerely,

Anindya Datta, Ph.D



Founder, CEO, Chairman
Mobilewalla, Inc.