

Module 13 Assignment

Communicate Openly and Effectively

Considering this policy issue, the Meallogger privacy policy does a thorough job of explaining their data collection, sharing, and user practices. In the data collection section (shown below), the privacy policy does a great job of detailing what types of information the app collects, including clear definitions and easy to understand examples.

Type of Data Collected

We collect information from you in various ways when you use our Web sites and services. We may also supplement this information with information from other companies. We collect two general types of information, namely personal information and aggregate data. As used in this Policy, the term "personal information" means information that specifically identifies an individual and demographic and other information when directly linked to information that can identify an individual. Personal information includes your name and email address; your title, company and other profile information you provide; demographic information, etc. Our definition of personal information does not include "aggregate" data or information uploaded by you (including photos) that is not personally identifiable.

Certain other areas of the site or your Wellness Professional will ask for information on your habits or health (such as health history, health conditions, diet, height, weight, body mass index, test results) and activities (such as types and amount of exercise) to the extent required to provide the services to you, all of which is stored on our Site. In providing such information to the Wellness Professional you consent to the collection and disclosure of such information by and to Wellness Foundry.

Aggregate data is information we collect about a group or category of services or users from which individual user identities have been removed. In other words, no personal information is included in aggregate data. Aggregate data helps us understand trends in our users' needs so that we can better consider new features or otherwise tailor our services. This Policy in no way restricts or limits our collection and use of aggregate data, and we may share aggregate data about our users with third parties for various purposes, including to help us better understand our customer needs and improving our services and for advertising and marketing purposes.

Similarly, in the data sharing section (shown below), the privacy policy makes it clear what type of information is being shared to third parties, and how that information may be used. However, one important thing to note is that the privacy policy does not specify *which* third party services could be associated. Due to this relatively loose definition and lack of examples, their policies on third party data sharing is somewhat uncertain.

Wellness Foundry may provide you with opportunities to connect with third party services, through links to other sites. If you choose to use any such third party services, we may facilitate sharing of your information and documents you choose to use with those services. Your use of such services is not governed by Wellness Foundry's terms or privacy policy. Wellness Foundry does not control the services of those third parties or how they use your information and documents. Be sure to review the terms and the privacy policies of those third parties before using their services.

We may share personal information in connection with an acquisition, merger, or sale of all or a substantial portion of our business, with or to another company. In any such event, you will receive notice if your data is transferred and becomes subject to a substantially different privacy policy.

Make Your Privacy Policy Easily Accessible

Looking at this policy issue, the Meallogger application definitely makes it difficult to find its privacy policy. In fact, from the login page to the app menus, there is no way to access the privacy policy from within the app. However, by going to the “About” page under the account menu (shown below), we can navigate to their official website.



Version 4.7.2

Region US

www.meallogger.com

Credits

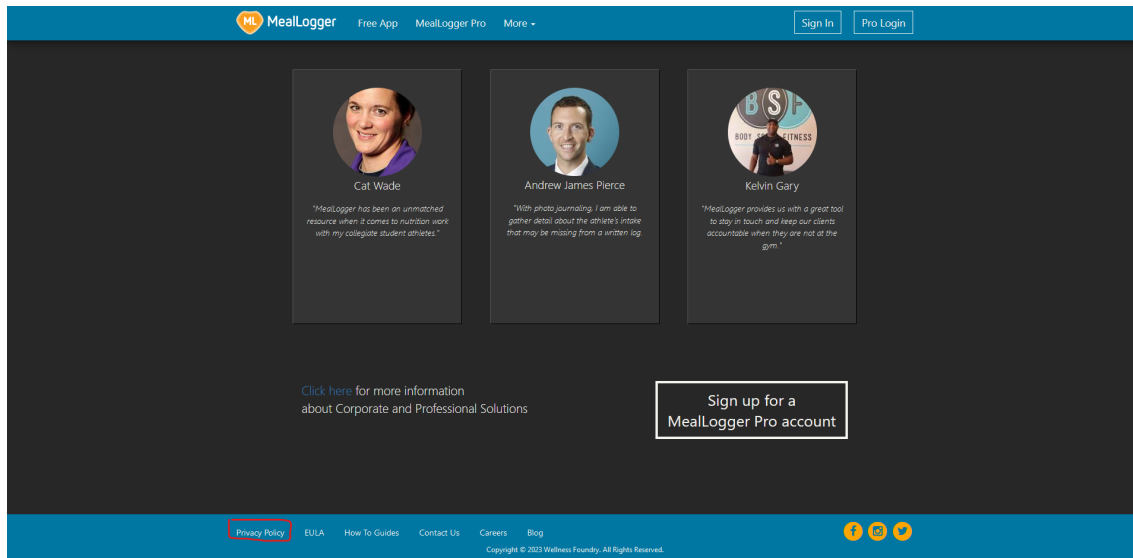
MealLogger uses icons from icons8.com

MealLogger uses icons designed by [Freepik](http://freepik.com) distributed by [Flaticon](http://flaticon.com)

Clipart images from [openclipart](http://openclipart.com)

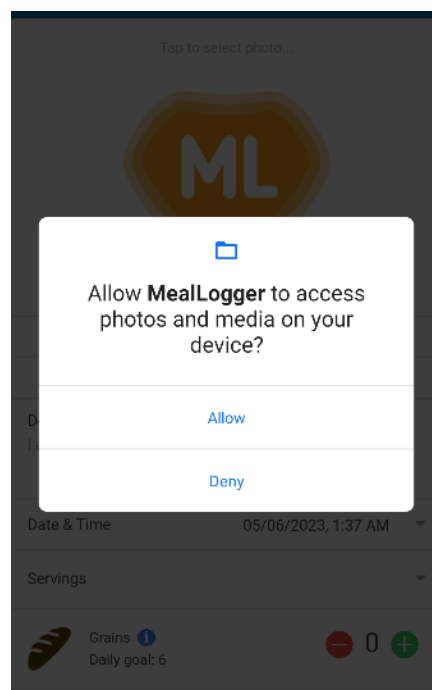
Serving size information graphics are derivatives of [Hands Vectors](http://handsvectors.com). Original images and new derivatives are licenced under [CC BY 3.0](http://creativecommons.org/licenses/by/3.0/)

On their official website (shown below, using the desktop version for visibility), if we scroll all the way to the bottom of the page, we can find the option to view their privacy policy.



Use Enhanced Notice

As mentioned in the last section, the Meallogger app has no instance of the privacy policy present within the app itself. For instance, when using the camera function, the app does ask for permissions (shown below). It is important to note that there is no descriptive message, and there is no indication that the images uploaded will be visible to other users. However, as these are within normal expectations and functionality for the app, this is still acceptable.



Provide Users with Choices and Controls

Interestingly, there are no in-app options for users to control how their data is collected/used. However, looking closely at their privacy policy, there seems to be some intentionally misleading information. Although it notes that you can change/access information, opt-in/out of promotional emails, and ask questions by contacting them (shown below), there is not any real indication that users can control their important data and how it is shared with third parties.

Updating and Accessing Personal Information

If your personal information changes in any way, we invite you to correct or update your information as soon as possible. You can make updates to your profile information by logging into your account on MealLogger™ at any time. You can also request changes or access to your information by contacting us through the [Contact Us](#) page.

Opt-In/Opt-Out

Upon registering with Wellness Foundry Web sites and services, you opt-in that Wellness Foundry may send you communications or data regarding our Web sites and services as well as targeted advertisements and other promotional communications, including but not limited to (i) notices about your use of our Web sites and services, including any notices concerning violations of use, (ii) updates, and (iii) promotional information and materials regarding our products and services or third party products and services. You may opt-out of receiving promotional emails from Wellness Foundry by following the opt-out instructions provided in those emails. You may also opt-out of receiving promotional emails and other promotional communications from us at any time by contacting us through the [Contact Us](#) page with your specific request. Opt-out requests will not apply to transactional service messages, such as security alerts and notices about your current account and services.

Contacting Us

If you have any questions about this Policy, please contact us through the [Contact Us](#) page.

Contact Us

MealLogger™
by Wellness Foundry

By phone
Office: (201) 228-0458

By email
To contact us via email, please fill out the form below:

Name

Email

Message

Secure Your Users' Data

Looking at this issue, the website page actually notes that the privacy policy can be updated over time. However, there are two apparent issues; first, while it notes that the “last updated” date is shown *above*, it is actually found at the very bottom of the page. The other, more glaring issue is that the policy has not been updated since October 2015, over 7 years ago. Thus, there is no indication that their security measures are appropriate or up-to-date.

Changes to This Policy

We may change this Policy from time to time. If we make any changes to this Policy, we will change the “last updated” date above. If there are material changes to this Policy, we will notify you more directly. We encourage you to check this Policy whenever you use our Web sites and services to understand how your personal information is used.

Contacting Us

If you have any questions about this Policy, please contact us through the [Contact Us](#) page.

Last Updated: October 16, 2015

Looking at the network security section, there is quite a significant finding. Interestingly, the privacy policy explicitly states there is no guarantee that a user’s personal information is adequately protected by their systems (shown below). While there are systems in place, the application itself is not confident in its protective capabilities.

Network and Information Security

Wellness Foundry takes reasonable steps to protect information we collect from you to prevent loss, misuse and unauthorized access, disclosure, alteration, and destruction.

The servers on which information is stored are kept in a controlled environment with limited access. While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable. In addition, we cannot guarantee that any passively- collected personal information you choose to include in documents you store on our systems are maintained at adequate levels of protection to meet specific needs or obligations you may have relating to that information.

Finally, considering external data sharing, the privacy policy is relatively clear about what types of information might be disclosed to third parties. However, as previously mentioned, the privacy policy does a poor job of giving examples of specific third parties it might communicate with. Within the app, it is clear that Meallogger can be connected to things like FitBit, so it seems somewhat suspicious that the privacy policy makes no mention of such instances.

that we sell or transfer all or a portion of our business or assets to a third party acquirer. We may disclose information to a third party to (a) comply with laws or respond to lawful requests and legal process, (b) to protect Wellness Foundry, agents, customers, and others including to enforce our agreements, policies and terms of use or (c) in the good faith belief that disclosure is needed to respond to an emergency, or protect the personal safety of any person. Of course, personally identifiable information is available to your Wellness Professional for use in connection with the services he or she provides.

Wellness Foundry may provide you with opportunities to connect with third party services, through links to other sites. If you choose to use any such third party services, we may facilitate sharing of your information and documents you choose to use with those services. Your use of such services is not governed by Wellness Foundry's terms or privacy policy. Wellness Foundry does not control the services of those third parties or how they use your information and documents. Be sure to review the terms and the privacy policies of those third parties before using their services.

We may share personal information in connection with an acquisition, merger, or sale of all or a substantial portion of our business, with or to another company. In any such event, you will receive notice if your data is transferred and becomes subject to a substantially different privacy policy.