



Andrew Crawford Statement
[FTC Commercial Surveillance and Data Security Public Forum](#)
9/8/22

Thank you Chair Khan and Commissioners Bedoya, Phillips, Slaughter, and Wilson. My name is Andrew Crawford. I'm a senior counsel on the privacy and data project at the Center for Democracy and Technology.

CDT commends the Commission for highlighting the importance of protecting the public from harmful commercial surveillance and data security practices.

My remarks today will focus on harmful uses of consumer's sensitive information - data that can reveal our location and data that can be used to make insights into our physical and mental health. Unfortunately, there are numerous examples of inappropriate collection, sharing, and use of sensitive personal information. The Commission is well-aware of these practices and has taken action.

Mobile apps, including reproductive health apps have been found to violate their own policies when sharing sensitive health information of millions of users with third parties, including advertisers. Just last month, the Commission brought an action against a data-broker for alledgeling collecting and then selling location data that reveals peoples' movements to and from sensitive locations.

The harms associated with the misuse of sensitive personal data can have lasting emotional and physical effects. And the burden of protecting sensitive data falls almost entirely on consumers.

In the face of persistent harmful data practices, it is time to place real limits on how sensitive information is collected, shared, and used. To that end, the Commission should embrace the following priorities in any subsequent rulemaking regarding sensitive personal information:

1. Limit sensitive data collection, sharing and use practices to only what is necessary to provide the product, service, or specific feature a person has requested.
2. Continue and expand the use of existing unfairness and deceptive practice enforcement authorities. These critical tools can prohibit inappropriate data practices and address misleading statements and material omissions in stated policies.



3. Addresses data brokers and transparency. Brokers acquire sensitive data and compile complex profiles without having any direct relationship with the individuals whose data they profit from.

Thank you for the opportunity to speak today.