August 31, 2020

SENT VIA EMAIL

Sherry Liu
Chief Executive Officer
Easy Healthcare Corporation
360 Shore Drive
Burr Ridge, IL 60527

Re: Premom

Dear Ms. Liu:

Our offices have become aware of reports that your company's fertility mobile application ("app")— Premom— has shared sensitive user data with third party advertising and analytics firms without disclosing that fact to your users and obtaining their consent.[1] According to the reports, the information shared by Premom includes location data and persistent device identifiers, as well as inventories of all applications installed on users' phones. Further, the reports indicate that Premom engaged in ID bridging, allowing third parties to assemble comprehensive advertising profiles of users through tracking actions across apps and physical locations.

This account, if true, is deeply disturbing given that users rely on Premom to privately track details of a highly intimate and personal nature. So that we can better understand the nature and extent of Premom's third-party information sharing practices and their impact on the privacy of our states' residents, we request that you provide the following information:

1. Please provide the total number of Premom users, as well as the specific number of users that are Connecticut and District of Columbia residents.

2. Please detail the specific categories of information that Premom collects from users, including location data, device identifiers, and lists of user apps. For each category, please explain whether and how Premom obtains users' consent for collection and provide documentation corroborating any such efforts.

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[1] https://digitalwatchdog.org/wp-content/uploads/2020/08/IDAC-Federal-Trade-Commission-Letter.pdf

3. Please detail the specific categories of user information that Premom has shared with the third parties Jiguang, Umeng, and UMSNS, and the purpose(s) for which such information was shared. Please also state the specific number of users in Connecticut and the District of Columbia that had their information shared with these third parties.

4. Please explain whether Premom has shared user information with other third parties in addition to Jiguang, Umeng, and UMSNS. If so, please provide a list of such third parties, the specific categories of user information provided to them, and the purpose(s) for which such information was shared.

5. For each category of information shared with third parties, please explain whether and how Premom obtains users' consent for such third-party sharing. Please provide documentation corroborating any such efforts.

6. Please explain whether Premom offered users the option to opt out of third-party data sharing. If so, please provide documentation corroborating any such efforts. If not, please explain why not.

7. Please explain whether Premom evaluates third parties' privacy and information security practices prior to sharing user information with those entities. In particular, please explain any such efforts with respect to Jiguang, Umeng, and UMSNS.

8. Please explain the extent to which user information was aggregated by Premom and/ or its third-party partners to build or augment unique advertising profiles.

9. Please explain Premom's in-app fertility consultation feature, described on Premom's website to include fertility doctors' analysis of home testing data, including ovulation tests, progesterone tests, basal temperatures, charts, and other ovulation symptoms. Describe any privacy or security safeguards specific to this feature.

10. To the extent not covered by your answers above, please explain the extent to which users' health or medical data is provided by Premom to third parties, and whether this health data has been used to distribute targeted advertising to Premom users.

11. Please describe the extent to which software development kits ("SDKs") have been employed on the Premom website or app, including by Jiguang, Umeng, and UMSNS.

12. Please describe the rationale behind Premom's claim that tracking of users' installed apps is done for app functionality purposes.[2]

13. Please provide all versions of Premom's Privacy Policies and Terms of Service from the last five (5) years, and explain any changes made to those policies/ terms of service.

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[2] https://premom.com/pages/privacy-policy.

14. Please explain the differences between Premom's website Privacy Policy (last updated May 2017) and Premom's in-app privacy policy (last updated in April 2019).

15. In addition to Premom's Privacy Policies and Terms of Services, please identify and provide any other user-facing representations, including any concerning the collection and sharing of user information and Premom's efforts to protect the privacy and confidentiality of such information.

16. Please explain what measures Premom has in place (e.g., encryption, deidentification) to protect user information collected through the Premom website or app from misuse or unauthorized access or acquisition, as well as any such measures that Premom requires third parties with which it shares user information to have in place.

17. Please identity any assessments or audits that have been conducted of Premom's privacy and information security practices in the last five (5) years.

18. Please describe Premom's 9-Cycle Pregnancy Guarantee.[3]

19. Please provide Premom's basis and support for the following statements:

    a. "Most likely you will just need 3 cycles commitment."
    b. "[A]ccording to CDC data, 'The percent of married women aged 15-44 that are infertile is 6.7%', which means over 93.3% of women are fertile and can get pregnant naturally. Interestingly we found from our study that over 93% of successfully pregnant women found their LH peak in 3 cycles."
    c. "We studied all recorded pregnant women's data at Premom and found that **over 90%** of them found LH peak by using ovulation tests. With this strong relevance between finding LH Peak (ovulation) and pregnancy, we further studied all women who have successfully found LH Peak and who haven't."
    d. "To our surprise, only 66% of the women studied found their LH peak, and the rest did not. We dug deeper into the data to find out what those women did differently. We will share the most important findings here with you."
    e. For those users who successfully found LH peak: "85% of them tested 5+ days each cycle until they found the LH peak."
    f. For those users who successfully found LH peak: "83% of them consistently uploaded ovulation tests to Premom and found peak in just 3 cycles."
    g. For those who haven't found LH peak: "94% tested only 3 days or less each cycle."
    h. For those who haven't found LH peak: "78% stopped uploading any tests to Premom shortly within one cycle."

    Please also provide any documentation supporting the above claims.

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[3] https://premom.com/pages/9-cycle-pregnancy-guarantee-program.

20. Please state the number of users that have sought refunds from Premom's 9-Cycle Guarantee Program, as well as the number of refunds that have been approved. For all denied refund requests, please provide a breakdown of the reason(s) such requests were denied. Please also provide samples of the forms or documentation required to support a refund request, and identify how consumers may obtain such forms.

Please provide the requested information no later than **September 18, 2020**. Thank you for your anticipated cooperation, and please do not hesitate to reach out with any questions.

Sincerely,

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