



Shannon Edwards | AI For Families | shannon@aiforfamilies.com

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Dear Chair Lee, Chair Joseph, and the additional members of the Committee on Mental Health, Disabilities and Addiction.

My name is Shannon Edwards. I am a mother of two teenagers and a digital marketing consultant with a focus on data privacy, cybersecurity, and responsible AI. I've spent more than two decades in the consumer technology industry, with extensive experience on the commercial side of data-driven businesses. Additionally, I am a Certified Ethical Emerging Technologist (CEET) and hold a number of certifications related to cybersecurity and AI governance.

On Sept. 10, I joined the Parent Coalition for Student Privacy and the NY Civil Liberties Union in sending a letter to the Mayor, the Department of Education Chancellor, and the Commissioner of Health, expressing our deep concerns with the way in which Talkspace allows for sharing users' personal information with third parties for marketing purposes in a manner that would be illegal if the contract was signed by the Department of Education rather than the Dept. of Health.¹

This letter followed months of requests that I had made to the DOE imploring them to consider the role the department was playing in the promotion of a partnership that was not only legally dubious but entered into with a company known for its aggressive data collection practices.²

Data is in demand today like never before, creating a serious data privacy risk for our children.

While addressing the mental health of our teens is a valid and welcomed endeavor, the type of data these interactions generate is of grave risk for misuse, theft, and future damage to our children.³

Talkspace clearly states in its privacy policy that every piece of information collected during the platform's registration process is available for marketing purposes.⁴ As it relates to the Teenspace partnership this includes: name, address, date-of-birth, school, and a set of personal and invasive questions related to why a child is considering the service. Additionally, an October 2024 audit we had conducted of the ad marketing tools embedded on the NYC-specific registration pages found more than 60 cookies and trackers including Snapchat, Meta, TikTok, LinkedIn, Google and more.

The data shared with social media companies was recently exposed by the Federal Trade Commission⁵ as 'vast' in scope and without the safeguards required to protect consumers, and in particular, kids:

¹ <https://studentprivacymatters.org/privacy-concerns-about-nycs-promotion-of-the-teenspace-online-counseling-service/>

² <https://foundation.mozilla.org/en/privacynotincluded/talkspace/>

³ <https://pmc.ncbi.nlm.nih.gov/articles/PMC9643945/>

⁴ <https://www.talkspace.com/public/privacy-policy>

⁵ <https://www.ftc.gov/news-events/news/press-releases/2024/09/ftc-staff-report-finds-large-social-media-video-streaming-companies-have-engaged-vast-surveillance>



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“A new Federal Trade Commission staff report that examines the data collection and use practices of major social media and video streaming services shows they engaged in vast surveillance of consumers in order to monetize their personal information while failing to adequately protect users online, especially children and teens.”

A privacy disaster is a looming that should be addressed with urgency before moving forward with any similar partnership.

Unfortunately, the fact that the Teenspace partnership has continued as is for twelve months despite my initial outreach in the Spring, and the subsequent well-referenced and substantiated concerns delivered in two letters with the Parent Coalition for Student Privacy and NYCLU since September, makes it difficult to see how families could have confidence in the city pursuing any additional mental health partnerships.

It’s a widespread and largely unaddressed issue that is surely to get worse in the years to come.

In 2023, Internet Safety labs looked at 1,357 apps used in schools, including many of those available and required in New York City Schools. The organization found that a ***staggering 96% were deemed “unsafe”*** because they shared information with third parties and/or contained ads.

The organization’s founder, Lisa LeVasseur, said: *“It’s like pulling a thread” ... “Even data that may seem innocuous can be used maliciously, potentially—certainly in ways unanticipated and undesired. These kids are not signing up for data broker profiles. None of us are, actually.”*⁶

Commercial entities will continue to exploit their relationship with the “nation’s largest public school system” for investor appeasement, venture funding, and ultimate financial gain.

Just six months after the partnership’s launch, Talkspace touted in their investor transcript call the benefits of working with the nation’s largest cohort of teens: *“Moving to our Direct to Enterprise segment. We grew revenue in the quarter 20% year-over-year to \$9.6 million, driven by our team’s initiatives, including New York City.”*⁷

These high-stakes financial dynamics will continue to put pressure on schools trying to determine the appropriateness of apps and platforms to introduce to their classrooms. And when we layer on the additional risks inherent with mental health data, this issue should be considered with urgency.

With my fellow privacy advocate Leonie Haimson, I also ask that this partnership is halted until a proper review can be conducted and changes made, and that this is completed before any additional endeavors are explored in this space.

Thank you for this opportunity to share my written testimony.

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⁶ “Districts, Take Note: Privacy Is Rare in Apps Used in Schools,” Education Week, July 2023, <https://www.edweek.org/technology/districts-take-note-privacy-is-rare-in-apps-used-in-schools/2023/07>

⁷ <https://investors.talkspace.com/news-and-events/events-and-presentations>