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| --- | --- | --- | --- | --- | --- | --- | --- |
| MK | 38 | 7.1.6 |  | te | User, should refer to PII Principal Awareness,  The term User is unclear and inaccurate publication of practice statement is insufficient to ensure awareness. Due to the highly technical nature and nuances which present high privacy risk, it is recommended that a | A notice Must be presented before or at the time of age verification use, although due to the sensitivity of the data collection and |  |
|  | 1 | 7.1.6 |  | te | Line Number resets to 1, should be line #44 | update line # to #44 and continue |  |
|  | 1 | 7.1.6 |  | te | Due to the risk, sensitivity, and nuances involved in the use of this technology for governance, recommend updating to a level of transparency that is proportionate, mitigates privacy risks and enables transparency after age verification technology is used – Referring to “If this objective is supported, the solution shall identify how user awareness is being achieved. “  Recommend: A Consent Notice Record and Receipt ISO/IEC 29184 Appendix B, be required, in order to ensure a record of the use of the technology in accordance with Article 30 Convention 108+; Records of Processing Activities, demonstrating, compliance with Article 14, transparency modalities to mitigate risks of Age Assurance technologies by recording the transference of privacy risk. | Recommend: “Must provide, in addition to privacy statement. A separate and explicit Notification before use along with a Consent Notice Receipt, provided upon acceptance of notice”, to include a corresponding consent record, specifying the type of age verification, the party conducing the verification as well as the explicit purpose to which permission to age verify is bound. To be provided signed by the Controller as a general use privacy proof of notice. Provided directly by the notice provider to the PII Principle and Parent/Guardian. to evidence the legal justification if not consent. |  |
|  | 2 | 7.1.6 |  | te | “Where a relying party is seeking to deploy measures to prevent and detect child sexual exploitation and  abuse, a policy maker may determine that user awareness of the technique(s) used to achieve that objective 4  would be counter-productive “  First and foremost, policy makers do not have the authority to determine if privacy policy and statement is required.   If the requirement to provide notice is derogated in law, there is still a requirement to publish when regulation derogates what the PII Principal or delegate might expect.  Transparency in all transborder data transfers, including age verification data require that a log of the use of the technology. In compliance with Article 88, Logging of the Convention 108+.  Recommend, in abscense of consent receipt, that a log be required, in conformance with ISO/IEC 27560 Consent Record Information Structure. Ensuring data governance interoperability, transparency, and compliance. | Recommend: Where a relying party is seeking to deploy measures to prevent and detect child sexual exploitation, to  1. inform the Data Protection Authority of the policy and jurisdictional PII Controller representatives, ensuring the correct legal justification and derogation is used in this notice  2. Keep a log of when the technology is used, in addition to a record of the processing activity, to ensure an evidential chain for audits as may be required by a Data Protection Authority . |  |