Policy Making for Protecting the Privacy of Children in Online Services
Raising public awareness by education and training

• Apps, gaming, Voip, IM, websites
• Smart phones, tablets, PC, Smart TV
• Entertainment, interacting with friends and unknown parties, school tasks, VOD, social networks
• Services collect: contact information, location data, pictures, videos, text, usage habits, search words, contact list
Data Protection: Main principles

- Legality of data collection (informed consent)
- Transparency (privacy policy)
- Purpose limitation
- Data minimization
- Access rights
- Data Security
- Deletion/the right to be forgotten
- Data Portability
- Profiling and automated decision making
Privacy Risks to Justify Enhanced Protection for Children

- Lack of awareness to privacy risks
- Complicated privacy policies
- Lack ability to manage privacy settings
- Data transferred to third parties for illegal purposes sometime not intentionally (data breach)
- Long term/irreversible
- Authentication of age and parental consent may cause further privacy violations
Age Definition

➢ Coppa

➢ GDPR
Recommendations for Policy Makers

- Subjecting activity to parental control

- Deletion rights:
  - For children
  - For adults whose data was collected during childhood
Recommendations for Industry: Consent

➢ Receiving parental consent

➢ Services intended for general public:
  reasonable efforts to verify if user is a child

➢ Verify that the consent was given by
  bearer of parental responsibility

➢ Develop new mechanisms to verify age
  and parental consent in a proportional
  manner

➢ Obtaining new consent upon adulthood
  when appropriate
Recommendations for Industry: Ensuring Compatibility for Children

➢ Data Protection Impact Assessment
➢ Data minimization
➢ Sensitive data
➢ Purpose limitations
➢ Limit transfers to third parties
➢ Encryption
➢ Anonymization
Recommendations for Industry: enhanced transparency

• Inform users about: parental consent, type of data, level of sensitivity, possible risks of transferring data to third parties,
• Inform users using child appropriate means: visuals, videos, graphics, etc
Recommendations for Industry: PBDD

• Appropriate age PBDD mechanisms
• The younger the users the more stringent PBDD mechanisms
• Changing defaults to decrease privacy subject to parental control
Recommendations for Industry: additional privacy enhancing mechanisms

- Predefined sentences
- Restricting adults from participating (age verifying mechanisms)
- Closed garden mechanism to prevent data sharing with other networks
- Interception of specific words
Additional rights to ensure privacy

- Access rights and data portability – who exercises these rights?
- Profiling and automated decision making – right to be forgotten? New consent?
Recommendations for DPAs

- Raising Public Awareness
- Audits, generating data
- International cooperation
  - share best practices
  - harmonize legal frameworks
  - Joint enforcement actions