

k-ID Practice Statement

ISO 27566-1

Executive Summary

Navigating the complex and ever-changing landscape of global legal requirements for online safety and privacy is a significant hurdle for businesses. k-ID addresses this challenge with its comprehensive Age Assurance System. The System is designed to empower and protect users of all ages by providing online services - such as social media, gaming, and e-commerce platforms - with the tools to comply with these regulations and deliver age-appropriate and age-adaptive digital experiences.

The k-ID System acts as a bridge between four key groups:

1. **Online Services (Relying Parties)**: The apps, games, and websites that need to verify their users' ages.
2. **Users**: The individuals seeking access to these Online Services.
3. **Age Assurance Providers**: The independent, third-party companies that perform the actual age check (e.g. facial age estimation, ID scan, credit card checks, etc.).
4. **Parents and Guardians (Trusted Adults)**: The adults who provide consent and manage the online settings for their children.

When a user signs up for a service that uses k-ID, the Age Assurance System orchestrates a seamless process to manage the age check process. It determines the specific legal requirements (e.g. minimum age required to access the service) based on the user's location and age, coordinates age checks through a menu of Age Assurance Providers, and, if necessary, manages the process of obtaining parental consent.

The k-ID Age Assurance System utilizes a flexible, scalable, and privacy-focused modular architecture. Currently, the System comprises of the following key components:

- **Neimo**: A comprehensive legal database that tells online services what privacy and safety rules apply in different parts of the world.
- **Compliance Development Kit (CDK)**: The core engine that uses the information in Neimo to allow Online Services to make real-time decisions about user access based on their age, location, and, where required, parental consent.
- **AgeKit+**: A privacy-preserving solution that manages the age assurance process by connecting the user to a network of third-party Age Assurance Providers.
- **Compliance Studio**: A dashboard where online services can configure their compliance strategy and customize their users' experiences.
- **Family Connect**: A dedicated portal for parents and guardians to manage their consents, permissions, and preferences for their children across multiple online services.

k-ID's Age Assurance System is designed and engineered to meet high regulatory and

international standards across different areas of assessment:

- **Functionality**: the System offers a scalable and adaptable framework, covering Online Services' initial age checks to ongoing parental consent, permissions and preferences management (e.g., chat access, time limits, spending preferences). It provides granular controls for both online services and parents, ensuring flexibility to meet their diverse needs. It also supports parents when they exercise of privacy-related rights (i.e. Data Subject Rights).

- **Performance**: Users can expect to complete the age assurance process from start to confirmation of their age group within a few seconds to a couple of minutes max.

- **Privacy**: We adopt a privacy-by-design and by-default approach. The System processes only the minimum personal information necessary to operate the service. Neither k-ID nor the online service receive information provided by users to prove their age (e.g. face scan, passport, bank details) when using an Age Assurance Provider. The personal information used to prove age is immediately deleted by each Age Assurance Provider once the age group is confirmed. k-ID and the online service simply receive the result of that process (e.g. pass/fail). Our privacy practices are regularly audited and have been recognised by international certifications such as ISO/IEC 27701, ACCS 3:2021, and the ESRB Privacy Certified program.

- **Security**: We adopt a security-by-design and by-default approach and have multiple safeguards in place including end-to-end encryption, penetration testing, and vulnerability management. Our security practices are regularly audited and have been recognised by international certifications such as ISO/IEC 27001, and SOC 2 Type II.

- **Accessibility and Inclusion**: our network of Age Assurance Providers offers a wide range of methods, accommodating the needs and preferences of the different users and online services. The System is designed to be user-friendly and intuitive, and is supported by various publicly available resources to ensure transparency.

The secure operation of the k-ID Age Assurance System relies on the assumption that (i) online services correctly configure their products for compliance; (ii) Age Assurance Providers supply accurate age signals as per industry standards; (iii) users maintain the security of their devices/accounts; (iv) a stable internet connection is present for all parties. These factors are outside the certified scope of k-ID System, which focuses on the secure orchestration of the compliance workflow. The System has been tested in the Australian Age Assurance Technology Trial (AATT) and achieved a Technology Readiness Level (TRL) of 9, indicating a high level of maturity and correctness in real-world operation.

On this basis, k-ID Age Assurance System operates as a rule-based, deterministic orchestration layer, technology and demographic-neutral by design, granting effectiveness classification: Strict.

Further details about k-ID Age Assurance System are accessible within the k-ID integration documentation available at https://docs.k-id.com/, on Family Connect at https://family.k-id.com/, and on our Privacy and Security Center at security.k-id.com.