



Competition and Markets Authority - Online platforms and digital advertising market study 2020 - Comment on Appendix L

About Yoti

1. This response is made on behalf of an organisation, Yoti.
2. Yoti owns and operates a free digital identity app and wider online identity platform that allows organisations to verify who people are, online and in person. This could be using the Yoti app, which allows individuals to share verified information about themselves on a granular basis or it could be using Yoti's 'embedded' services which allow organisations to add a white label identity verification flow into their website or app. It could also be using Yoti's authentication algorithms such as facial recognition, age estimation, voice recognition or lip reading.
3. Yoti has a team of over 250 based in London, with offices in Bangalore, Los Angeles, Melbourne and Vancouver. There have been over 6 million installs of the Yoti app globally, following our launch in November 2017. Similarly, over 150 million checks have been conducted using the Yoti age estimation algorithm since February 2019.
4. Yoti holds the ISO 27001 certification and continues to be audited every year. Further, in August 2019 Yoti was certified to SOC 2 Type 2 for its technical and organisational security controls by a top four auditing company. The SOC 2 standard is an internationally recognised security standard. Yoti also holds the Age Verification Certificate of Compliance, issued by the BBFC.
5. If there are any questions raised by this response, or additional information that would be of assistance, please do not hesitate to contact Yoti at:

Julie Dawson
Director of Regulatory & Policy
julie.dawson@yoti.com

Samuel Rowe
Research & Policy Executive
samuel.rowe@yoti.com

6. Yoti is happy for this response to be published.



QUESTIONS

L.10 Would the privacy-enhancing technologies we have discussed be practicable and technically feasible?

7. In Yoti's opinion, the privacy-enhancing technologies discussed would be practicable and technically feasible. In particular, privacy-enhancing technologies implemented as part of browser software.
8. In preparation for the implementation of the Digital Economy Act 2017, part 3, Yoti developed an Age Verification Portal.¹ The Portal was certified against the BBFC Age-verification Certificate.
9. Whilst Prove My Age was designed with age-restricted sites in mind. However, the Age Verification Portal and in-browser age token has broad application. It could help advertisers provide age-appropriate adverts without needing to know any biographic information about the user.
10. On that basis, it can be said that Yoti's Age Verification Portal and token service can be said to be privacy-enhancing, practicable and technically feasible.

L.23 What should the role of government regulation be in the adoption and maintenance of privacy-enhancing standards in digital advertising, especially considering the failure of past voluntary initiatives (like Do Not Track) to attain widespread adoption?

11. Yoti encourages the government to use the recent adoption of the ICO's Age-appropriate Design Code to persuade data brokers and digital advertising service providers to ensure that young Internet users are not presented with age-inappropriate adverts.²
12. Existing data protection regulations (GDPR and DPA 2018) already exist. Therefore, Yoti encourages the government to publish online advertising-specific guidance for data aggregators and data brokers who are: i) likely to serve adverts to children; or ii) likely to obtain data from children.
13. Yoti believes the guidance should aim to advise relevant companies as to how they can meet their obligations under the GDPR and DPA 2018 towards children. A government recommendation would provide assurance to businesses wishing to implement privacy-enhancing technologies in order to serve age-appropriate adverts.
14. The Committee of Advertising Practice would be the logical organisation to produce such guidance.

¹ <https://www.provemyage.com/>

² <https://ico.org.uk/for-organisations/guide-to-data-protection/key-data-protection-themes/age-appropriate-design-a-code-of-practice-for-online-services>