

PRIVO – submission on the ICO’s draft Age Appropriate Design Code

May 29, 2019

Cover letter

PRIVO welcomes the Information Commissioner’s draft Code and believes it will play a key role in changing the way that Information Society Services engage with children in the future. The fast-evolving world of technology including connected devices and AI can have a positive impact on a child’s development and wellbeing, but they can also have a hugely negative impact if regulation is not in place or is not enforced to protect the child’s privacy and safety. Regulators are inevitably forced to play catch up with not just the big tech platforms but the smaller developer’s in this space. Developments and innovation have come at a cost to children and minor’s and until now the only regulation that has had any impact in this area has been the US Children’s Online Privacy Protection Act (COPPA). See supporting document on COPPA Lessons Learned.

PRIVO has already included much of the Code in its **GDPRkids™** Privacy Assured Program, launched at the start of 2018 and will be updating it regularly in line with guidance and the final published Code. The program has been well received and members include The Roald Dahl Estate, the Beano and Marco Polo Learning to name just a few. We will also be submitting the program to the certification scheme process as soon as it opens.

We hope the information and responses we have provided will be of interest and demonstrate our commitment to the Code.

Yours sincerely,

Claire Quinn
VP Compliance
PRIVO



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Kids Privacy Assured by PRIVO

[GDPRkids™](#) - [COPPA](#) - [Student Digital Privacy](#)

About PRIVO:

Founded in 2001, Privacy Vaults Online, Inc., is an FTC-approved, neutral third-party Children’s Online Privacy Protection Act (COPPA) Safe Harbor and identity & consent service provider. PRIVO enables websites, apps, games and other online services and connected devices to comply with the Children’s Online Privacy Protection Act (COPPA) when they interact with and market to children online under the age of 13 (“U13”). PRIVO also offers a **GDPRkids™** Privacy Assured program and a Student Digital Privacy Program and is co-author and an assessor of the Minor’s Trust Framework (<http://www.oixnet.org/>).

PRIVO’s core business is to deliver easy to use, safe management of parental consent for children. This core service enables companies with the knowledge, resources and tools necessary to initiate and manage responsible and effective youth and parent relationships online. PRIVO is a women-owned small business located in the Washington DC metro area, with satellite offices throughout the US, Canada and the UK.