GPA Global Privacy and Data Protection Awards 2023

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org **no later than 9 June 2023.**

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2[1] applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	CNIL	
Person completing this form:	Martin	Bieri
	First name	*Last name*
Job title:	Foresight at CNIL's digital innovation lab	
Email address:	mbieri@cnil.fr	

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm)*:

☒ The Authority is a member of the Global Privacy Assembly

☒ The initiative described in this entry was undertaken since January 2022.

☒ I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one;** please use a separate form for each category you wish to enter:*

☐ Education and Public Awareness

☐ Accountability

☐ Dispute Resolution and Enforcement

☒ Innovation

☐ People's Choice

4. DESCRIPTION OF THE INITIATIVE

[1] GPA Rules and Procedures, Rule 6.2 'Assembly documents':
Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

a. Please provide a brief summary of the initiative *(no more than 75 words)*

The CNIL developed a possible implementation of an age-verification system that allows accessing restricted websites without sharing other personally identifiable data. This demonstrator proves that it is possible, through a third-party system, to guarantee individual identity protection as well as the principle of data minimization.

b. Please provide a full description of the initiative *(no more than 350 words)*

In 2021 and 2022, headlines have redrawn attention to online age-verification, either related to renewing parental control or formal notices of pornographic sites. The CNIL had the opportunity to study those questions through 2021 and issued a set of recommendations about under-18 in the digital world and on opinion specifically about age verification to access pornographic websites.

This opinion included a recommendation to rely on a privacy-preserving system, set up by a third-party verifier during the age-verification process. The advantage of such a solution lies in particular in the implementation of mechanisms making it possible to prevent, on the one hand, that the trusted third party identifies the site or the application issuing the request for age verification and, on the other hand, to limit the capacity of the site issuing said request to identify the individual involved.

Two dimensions need to be considered in the practical application of such process: first, the creation of age information (or majority if, for example, the age-verification process only requires thresholds: “more than 18 years-old”) by an entity and secondly, the age-verification information transmission from this entity to a requesting service. Those two aspects inevitably raise issues relating to security, reliability and protection of the privacy of individuals (especially when it comes to information relating to a supposed sexual orientation). Obtaining age information (or proof of age) by the trusted third-party is not addressed explicitly here and may be subject to a latter publication.

Together with Olivier Blazy (professor in the Computer Science department of 'École Polytechnique) and the Pole of Expertise of Digital Regulation (PEReN), the LINC provided the demonstration of an “ideal” solution in this context of the development of age-verification tools. It relies on building blocks used in cryptology under the expression of “zero-knowledge proof”.

These blocks allow identified individuals to prove that a statement is true without revealing information relative to that statement. This demonstrator thus proves that it is possible, through a third-party system, to guarantee individual identity protection as well as the principle of data minimization.

c. Please explain why you think the initiative deserves to be recognised by an award *(no more than 200 words)*

Age verification is a very timely topic and we see many actors and institutions working on this topic. It is crucial to find an age verification system that could be deployed to ensure that minor do not get access to pornographic content while preserving the privacy of adult consuming adult content. Finding the right balance is a must if we don't want the initiative to fail as it has in other countries.

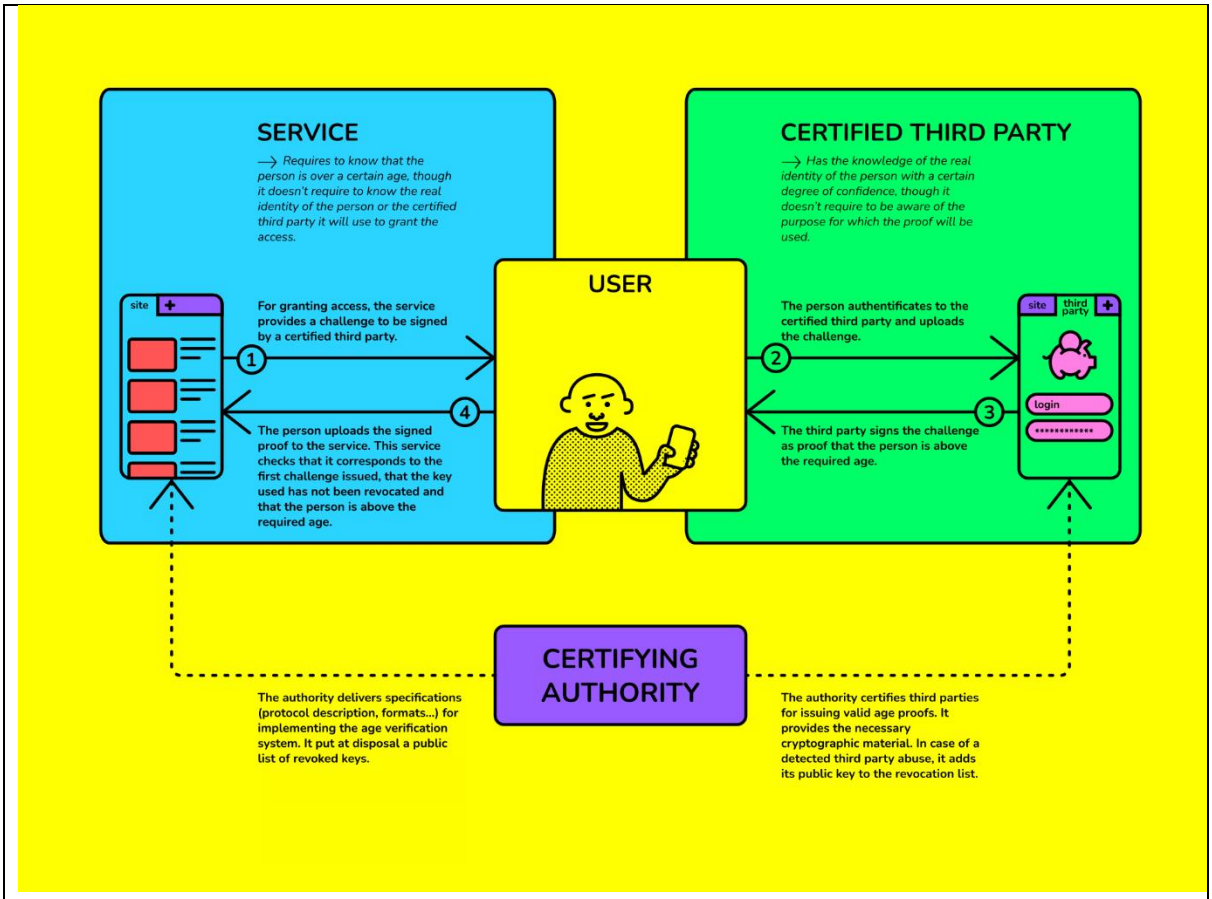
In this project, both the method and the results are innovative.

Indeed, to build this project, we gathered different expertise and quickly worked with a leading cryptographic expert from the scientific community. Involving another administration was also useful to be more effective and not being the only one carrying the project nationally. Obviously, the project is open-sourced and the community is welcomed to contribute.

In the end, we had to use an innovative approach combining different cryptographic tools to address a very specific problem. To the best of our knowledge, this project is the first to propose such solution to age verification systems. Thanks to the cryptographic mechanism at play, the privacy of the user is preserved: the adult website just knows that the visitor is 18, the third party does not know which website is visited.

This project was then picked by the government to push for privacy preserving age verification systems.

d. Please include a photograph or image, if you wish *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*



e. Please provide the most relevant link on the authority's website to the initiative, if applicable *(The website content does not need to be in English)*

The Linc website describing the project in English: https://linc.cnil.fr/fr/demonstration-privacy-preserving-age-verification-process

f. Please provide any other relevant links that help explain the initiative or its impact or success *(e.g. links to news reports or articles):*

We communicated ahead of the conference:

- The code was published: https://github.com/LINCnil/SigGroup
- CNIL relayed the initiative and the project in the updated communication: par https://www.cnil.fr/en/online-age-verification-balancing-privacy-and-protection-minors
- Speech of the digital minister pushing for anonymous solutions : https://www.vie-publique.fr/discours/288266-jean-noel-barrot-14022023-protection-des-mineurs-en-ligne