



Yoti Guardian Council Meeting Minutes

Attendance: See Table at end

Location: Yoti Office & VC

Date: 27 May 2021, 1700-1930 GMT

Recorder: Eric Levine

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| Agenda | <ol style="list-style-type: none"> 1. Introducing Yoti's new Data Protection Officer. 2. Analytics and Cookies update 3. UK Voter ID 4. #Share2Protect campaign and data gathering | <ol style="list-style-type: none"> 5. Marketing activities in the Yoti/EasyID app 6. Age estimation update 7. Emerging issues with Trust Frameworks AOB |
| Actions from Previous Meeting: | | Status Update |
| <ul style="list-style-type: none"> ○ New Guardians Recruitment | | Ongoing |
| <ul style="list-style-type: none"> ○ Increase the diversity of channels and partners to feedback on and share the education material re facial age estimation | | Ongoing |
| Actions from this Meeting: | | Status Update |
| <ul style="list-style-type: none"> ○ Share notes from Yoti internal Trust & Ethics Committee re emerging social media platforms and risk assessment | | Shared via Yoti newsletter on 1 November. |
| <ul style="list-style-type: none"> ○ Publish blog post re cookies and analytics | | Blog post published June 2021 |
| <ul style="list-style-type: none"> ○ Next steps re Yoti Explore to be brought back to Guardians Council when it progresses | | Est 2022 |
| Next Council Meeting | 1-9-2020 | |

Summary notes from the meeting are provided below, with points of agreement and actions clearly noted.

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| Welcome | Meeting began at 1700. |
| <i>Introducing new DPO</i> | Yoti's new Data Protection Officer (DPO), joined the Guardian Council meeting for the first time. The new DPO has specialised in Data Privacy for the last 7 years and brings wide ranging experience in the application and implementation of the GDPR and other Global Data Privacy Laws, across Aviation/Travel, Fintech, Retail and Utility Services The new DPO is experienced in handling Data Privacy Impact Assessments (DPIA) and managing stakeholder engagement and interacting with regulators, all highly relevant for Yoti as we move forward. We welcome the new DPO given the regular recurrence of topics at Council meetings that will benefit from the DPO's experience and expertise. |



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| <p><i>Facial Age Estimation Update</i></p> | <p>Topic: Information update to Guardians. An increasing number of large companies are interested in our facial age estimation and parental consent solutions.</p> <p>As an example of the sort of increasing interest we are receiving, certain established global social media platforms have approached us about providing AV solutions, namely age estimation, initially for a proof of concept, for 13+ and 18+ age checking. We know that some social media platforms are considering the idea of creating 'Kids' social media versions for the 7-12 age group. These proposals have been met by widespread condemnation from childrens' groups around the world, given their track record with childrens' data, and concerns about health/mental health consequences.</p> <p>We will review this in the Yoti Ethics & Trust Committee and will revert to the Guardians if there are complex topics that would benefit from input and discussion.</p> |
| <p><i>Analytics and Cookies Update</i></p> | <p>Topic: Informational update on the status of our analytics and cookies.</p> <p>Summary: This has been a frequent topic of conversation with Guardians and we strive to be transparent with any changes on our policy regarding analytics and cookies.</p> <p>We amended our cookie banner on 20th April to remove button nudging techniques, giving each consent option equal weighting. As a result, we've seen our cookie opt-in rates fall by 10% from 20th Jan 21 - 20th April 21 to 25 April - 24 May 21. We will continue to be transparent with what we track and why we track and share any new update on the topic with the Guardian Council.</p> <p>To this end, Yoti teams will draft a blog post on the subject, in keeping with encouragement from Guardians to be proactive and public in communicating how Yoti is making decisions in these areas.</p> |
| <p><i>#share2protect campaign and data gathering</i></p> | <p>Topic: Informational update on the development of Yoti Age estimation technology</p> <p>Summary: Given the sensitive nature of age estimation and biometric image gathering, Yoti's team are keen to render the Guardians aware of what Yoti is doing to develop its groundbreaking technology on Facial Age Estimation and how this is being communicated to the public.</p> <p>Discussion: In order to increase the range and accuracy of Yotis existing facial age-estimation technology, Yoti has partnered with a digital wellness company, to support our education campaign and the #Share2Protect campaign, to gather a diverse range of images, collected in accordance with GDPR, of children between ages 5-13. This effort is supported by our work in the ICO Sandbox. Yoti is aiming to replace an unverified date of birth or tick box with a ground-breaking photo-based age-estimation technology. In addition to working with a network of state schools, a local media and education NGO.</p> <p>We are aiming to be able to offer photo-based age-estimation technology as a ground-breaking alternative to the most common means of online access control for kids (an unverified date of birth or a tick box). Once the age-estimation technology is trained to accurately identify the ages of under 13's, the technology can be made available for integration into a range of platforms, looking to follow the Childrens' Code, provide age restricted goods or services, deter grooming, avoid age inappropriate contact, conduct, content.</p> <p>Discussion:</p> |



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| | <p>Guardians support Yoti in the public education aims of the campaign, to make people more aware of the nuanced issues surrounding age estimation. The Guardians urged caution for Yoti in being part of any services offered by social media platforms that are being critiqued for detrimental impacts on the mental health and well being of children and young people.</p> |
| <p><i>Discussion Topics</i></p> | <p>The following points were tabled for input and advice from Guardians.</p> |
| <p>UK VoterID</p> | <p>Summary:</p> <p>The UK government has recently announced its plans to put in place voter identification measures. Consequently, individuals may in future be required to present some form of identification before they can vote.</p> <p>The Internal Ethics and Trust Committee has considered whether this is in the public good. First, because the number of UK citizens who have access to an acceptable form of identification is not 100%, voter identification is a measure that de facto causes disenfranchisement. Secondly, there are concerns that voter identification measures will have a chilling effect on the willingness of some demographics to vote, which would also lead to disenfranchisement. Both of these issues go to the heart of our democracy, and are therefore very emotive.</p> <p>At the Council meeting, the discussion focused on the hypothetical question: if voter ID is made mandatory, should Yoti support publicly some inclusive measures that could be used as part of voter identification, such as the use of digital identity (which may include Good Practise Guide 45 measures for vouching) at polling stations or free voter eligibility cards (as are available in Northern Ireland) or (lower cost) PASS cards. Summary document capturing the Committee's thoughts was circulated.</p> <p>Discussion:</p> <p>As the government have announced plans to put in place voter identity measures, the Internal Ethics and Trust committee has considered whether Yoti should publicly support measures ahead of time that could be inclusive and used as part of voter identification, such as digital identity (linked to PASS card) at polling stations.</p> <ul style="list-style-type: none"> • The Guardians encouraged Yoti to keep a close eye on announcements and the inclusion angle, but to avoid weighing in publicly on this topic before new policy is determined. • If VoterID becomes a requirement in the UK as Yoti's 'home market,' then Yoti should at that point consider how its offerings can support wider inclusion. |
| <p><i>Marketing activities in the Yoti/EasyID app</i></p> | <p>Summary:</p> <p>Yoti plans to develop the Explore section of the Yoti app. It will feature updates, advice on where to use it and how to keep your data secure. Yoti is doing this to offer greater benefit to our community. This will show up in the Tiles that are part of the Explore section of the Yoti App – broadly divided into 'where to use (utility)' and 'offers.'</p> <ul style="list-style-type: none"> • The tiles that show 'where to use' will be a 'statement of fact'. E.g. 'Verify with Yoti to set up a new bank account' or 'Use Yoti to prove your age at self checkout when buying a beer'. We will be able to communicate to the user that because they 'pre-verified' they can access these utilities in the most secure way. • The tiles that show the 'offers' to our users will need to be navigated towards. In other words, they will not be front and centre on the homepage of the app. The user will see a tile saying 'offers' that they could choose to navigate to. (The user will be able to easily choose not to see business promoted tiles on the Home Page). We are doing this |



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| | <p>to offer greater benefit to our community and to generate revenue for the business through affiliate marketing. These tiles will have an incentive for the user and the intention is that the user will be required to use Yoti to access these offers. E.g. Get 25% of your Deliveroo order - use Yoti to claim your special offer.'</p> <p>Discussion:</p> <ul style="list-style-type: none"> • Guardians asked Yoti to consider carefully the language employed, to make it clear that behaviour would only be analysed anonymously and no surveillance of individuals would be undertaken. • The word 'coupon' was suggested for consideration. • The Guardians asked Yoti to consider the impact on Yoti users, the brand dilution or impact on understanding of the core premise and promise of the organisation and the potential for wider confusion, misunderstanding, mistrust by users. They suggested that we engage with a focus group of existing Yoti community users to test our assumptions. • The Guardians asked for more clarity on the future direction and to understand if users would have a choice to navigate to this area and or to request not to receive offers. • Specifically, Yoti should consider the criteria and what offers are not acceptable on what basis to which users. |
| <p><i>Emerging issues with Trust Frameworks</i></p> | <p>Topic: Informational update on emerging issues with Trust Frameworks.</p> <p>Action from past council discussions:</p> <p>Continuing to keep Guardians abreast of any issues that Yoti is encountering in complying to Trust Frameworks in the UK and in other markets which could impel Yoti to adopt practices that are not fully aligned with its principles.</p> <p>Summary:</p> <p>As set out at the last Guardian Council meeting, there are a number of trust frameworks and trust schemes that are currently in development by government and industry bodies. Common to all of the trust frameworks and trust schemes that are subject to the UK GDPR are three data protection issues:</p> <ol style="list-style-type: none"> 1. The potential use of digital identity platforms as a source of fraud identification data (irrespective of the type of fraud being carried out). Since some digital identity platforms can maintain a list of transactions, it is being suggested that digital identity platforms could or should support the identification of potential fraud. This may lead to excessive or onerous data retention obligations. 2. Many individuals involved in drafting the trust frameworks and trust schemes come from a credit reference agency background. As such, they are predisposed to thinking that digital identity verification is or should be done by triangulating data across very large datasets. <p>Discussion centred on how Yoti should intervene and contribute to these processes to ensure the right outcomes and policies for individuals, and to avoid compromising Yoti's principled approach to digital identity.</p> |
| <p><i>Documenting the story/learnings of our Founding Guardians</i></p> | <p>Two of the Yoti Guardians will complete six years of service on the Guardian Council in October 2021, the maximum tenure for Guardians. This will mark the close of one chapter for the Guardian Council as our Founding Guardians who have been involved with Yoti since the very early days (and the creation of the Council) step down from their formal roles. We want to ensure that we harvest the rich experience of these six years of service.</p> <p>There was a warm response to a proposal from one of the Guardians to document the story and journey of our Founding Guardians after six years of involvement in the founding and</p> |



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| | development of the Council, and an agreement to share those learnings publicly to make it easier for other organisations to consider and evolve similar structures and ways of working. |
| AOB | <p>As a final item to share, we have our 1st replication of the Guardian Council model, taken up by Together All, a global digital mental health business. The Chairman of Together All (and a social purpose business entrepreneur and investor), and a contact of the Council, was the driving force behind setting it up. We provided advice, template documentation, etc. in their set-up process, and they are thrilled with the incorporation of this additional pillar of their business.</p> <p>This was noted as relevant for the retrospective learning piece about the founding years of the Yoti Guardian Council.</p> |
| <i>Adjournment</i> | The meeting was called to a close at 1930. |

| 2021 Meeting Attendance | | | | | | | | | | | | | |
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| Meeting Dates | 1/3 | 27/5 | | | | | Yoti Staff | 1/3 | 27/5 | | | | |
| Seyi Akiwowo | ● | ● | | | | | Robin Tombs | ● | ○ | | | | |
| Renata Avila | ● | ● | | | | | Julie Dawson | ● | ● | | | | |
| Doc Searls | ● | ● | | | | | John Abbott | ☒ | ● | | | | |
| Joyce Searls | ● | ● | | | | | Eric Levine | ● | ● | | | | |
| Gavin Starks | ● | ● | | | | | Cassandra Stobbs | ☒ | ● | | | | |
| | | | | | | | Samuel Rowe | ● | ● | | | | |

● = in attendance ○ = absent/ apologies ☒ = Not scheduled to attend