



## Yoti Guardians Council Meeting 16 April 2018

**Attendance:** See Table at end  
**Date:** 16 April 2018, 1700-1930 GMT

**Location:** Yoti Office & VC  
**Recorder:** Eric Levine

<b>Agenda</b>	1. Facebook/Cambridge Analytica situation and opportunity to promote Yoti principles 2. GDPR update on plans and progress at Yoti	3. Serving as a compulsory state identity provider 4. Change of role for Ken Banks, and recruitment plans for the Guardian Council
<b>Actions from this Meeting:</b>		<b>Status Update</b>
<ul style="list-style-type: none"> <li>o GDPR implementation progress to be reviewed with Guardians</li> <li>o Clarity to be sought on definitions of specific clauses in the Principles for Identification for Sustainable Development for discussion at a future meeting.</li> <li>o Yoti Guardian Role and Code of Conduct to be revised to incorporate mitigation steps for managing early departures by a Guardian.</li> </ul>		January 2019  Done  Done
<b>Next Council Meeting</b>	<b>Next Council meeting: proposed for 23 July 2018, 1700-1930 UK time</b>	

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

<i>Welcome</i>	Meeting began at 1700.
<i>1. Facebook/ Cambridge Analytica situation and opportunity to promote Yoti principles</i>	<p><b>Issue:</b> Implications of the recent revelations about Facebook and Cambridge Analytica, and the way that issues of privacy and data security have become a significantly more prominent part of public debate as a result.</p> <p><b>Discussion</b> on how Yoti could/should approach the current shifting climate around privacy and data security, and best articulate the value of our principled approach and business model in an increasingly competitive market. Input from Guardians included:</p> <ul style="list-style-type: none"> <li>• Encouragement from the Guardians to identify and work with allies who share similar values and approaches to personal data. Specific mention of the Sovrin ID for all, and offer of introduction from Doc and Joyce to Brian Pon at Sovrin if at any stage Yoti would like to connect with them.</li> <li>• Caution from the Guardians to consider how Yoti's entire footprint extends across different networks, as Yoti marketing via Facebook channels (or another network that suffers a loss of public confidence due to data breach or other confidence harming event) could result in damage by association to Yoti's reputation.</li> <li>• Recommendation that Yoti stay clear of any direct criticism of Facebook (in this case, or others in similar cases), and instead focus on showing the world a different business model and the benefits that come from that. Encouragement for Yoti to steer clear of trying to make noise in current (or other short-term) news cycles and focus on enduring principles and actions that matter.</li> </ul> <p>Specific offers from Guardians in areas where their non-Yoti roles cross over with this subject:</p> <ul style="list-style-type: none"> <li>• Doc Searls offered to be referred to journalists if they wish to speak to someone about the revelations and alternative business models for personal data.</li> </ul>



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	<ul style="list-style-type: none"> <li>Ken Banks offered to follow-up with digital civic action organisations (like Avvaz.org, Change.org, ONE, etc.) to see if they are interested in Yoti helping provide ID verification for individuals active in their online petitions.</li> </ul>
<p>2. <i>GDPR update on plans and progress at Yoti</i></p>	<p><b>Issue:</b> From our last meeting, follow-up to Guardians' inquiry about our status with GDPR preparation for Yoti as an organization as well as Yoti's ability to help organisations be GDPR compliant.</p> <p><b>Discussion:</b> Guardians were fully informed of Yoti's GDPR preparatory steps by Yoti's Data Protection Officer and lead on GDPR preparation and implementation, including adding in new consent steps for onboarding biometrics, and increasing transparency in privacy notices on the Yoti website and in app. One area that remains a work in progress is data portability, which will return for discussion with Guardians when it becomes clear what the industry standards are likely to be.</p> <p>Guardians confirmed that they are satisfied with the steps that Yoti is taking for GDPR compliance at present and pleased to see that Yoti is ahead of the curve for the new era given that Yoti's core principles around privacy and security. One suggestion from Guardians as Yoti continues to evolve is to have product specific privacy term and notices.</p> <p>This was followed by a discussion with Guardians about how many large companies are not prepared for GDPR compliance, with Guardians expressing that this is an opportunity for Yoti to help companies get GDPR compliant. Among the ways in which Yoti is potentially able to help companies with GDPR compliance there are:</p> <ul style="list-style-type: none"> <li>Privacy by design: GDPR obliges organisations to design privacy into everything they do: products, services, systems, databases and processes. Yoti takes a privacy-by-design approach to the development of our products and services, so it will likely be more privacy friendly than any current systems and processes.</li> <li>You can use Yoti as an 'out-of-the-box' solution for identity verification, authentication and login safe in the knowledge that our services are compliant with the privacy-by-design principle. Yoti can help organisations improve on current practices as our service is a simple privacy-friendly solution - rather than a combination of processes, systems, access controls and data handling practices that may not be joined up.</li> <li>Data minimisation: GDPR requires you to only collect and use the minimum amount of data necessary for your purpose. Yoti allows you to request, and users to share, only the information that is relevant and necessary - so complying with the data minimisation principle. It can help organisations improve on current practices because they will no longer need to collect excessive information from their users.</li> <li>Information security: GDPR has more prescriptive requirements for keeping data secure. Yoti keeps user data secure so you don't have to store your user data and we follow security-by-design principles. Each class of data is held separately and encrypted in secure servers which means that even if our servers are hacked there is no way of combining the data to work out which data is about which user without that users' private key stored on their smartphone. Even Yoti has no access to the information an organisation's users add to their account or what they are sharing. Businesses carrying out identity verification and authentication no longer have to deal with insecure transfers of personal information and with managing, storing and retaining securely paper copies of documents or scanned copies in e-mails. Identity details are shared securely and stored securely in Yoti servers. Even where you extract and keep information in your own systems, organisations only have the minimum information necessary, reducing their security risk.</li> <li>Transparency and choice: GDPR requires organisations to provide extensive information about</li> </ul>



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	<p>their data collection and use practices. When they interact with your customers using Yoti, they are clearly presented with the details required, and get to choose whether to share them or not. Once shared, both organisations and their customers get a receipt showing what data has been shared, with whom and when. When organisations integrate with Yoti to allow their customers to log in, verify and authenticate themselves you have the option to present appropriate privacy notice information before any details are shared.</p> <ul style="list-style-type: none"> <li>• <b>Accountability:</b> GDPR requires organisations to be able to evidence and demonstrate compliance. Yoti provides an easy way for both individuals and organisations to have a record of what information was collected / shared. It can help organisations improve on current practices as the record of what information has been collected from users is stored securely and accessible in one place (such as dashboard).</li> <li>• <b>Identity verification aspect of individual rights:</b> GDPR requires organisations to confirm the identity of an individual before disclosing any personal data to them (such as following an access request), or acting on their rights requests (such as correction, deletion and so on). Yoti provides a quick, online, privacy-friendly and secure way to carry out this identity verification without having to collect and store copies of ID and other documents. It can help organisations improve on current practices by giving them the ability to quickly verify the identity of a consumer online, with a record of that verification, avoiding the need to deal with posted copies of documents or images scanned into e-mails.</li> </ul> <p>Yoti will also be writing a series of blog posts on the different GDPR rights for our users, which will be published the next couple of months.</p> <p>Guardians were supportive of Yoti's offer to organisations seeking to be more GDPR compliant, and all efforts to take advantage of the increased public awareness of key issues because of GDPR to showcase Yoti's principled approach.</p> <p>Request from Guardians for Yoti to keep them updated on GDPR implementation progress as we move forward.</p>
<p><i>3. Adapting Yoti for Humanitarian Purposes</i></p>	<p><b>Issue:</b> Guidance requested from Guardians' on how Yoti should approach the Principles for Identification for Sustainable Development, developed in a multi-year process led by the World Bank and focused on making sure that everyone in the world can prove who they are to participate in society and development – enrolling in school, opening a bank account, etc. Yoti was an active part of this process, especially in the early formulation and drafting. Many high profile, mission-driven organisations have publicly endorsed the Principles (e.g., Omidyar Network, Mastercard, the GSMA, several UN agencies, the Gates Foundation, etc.), and Yoti could consider doing the same.</p> <p><b>Discussion:</b> Input from Guardians was:</p> <ul style="list-style-type: none"> <li>• Lack of clarity about the value of public endorsement would be for Yoti or its user community, as well as what responsibilities (if any) Yoti would incur by endorsing.</li> <li>• Need for more detail on the meaning and interpretation of 'interoperability and open standards,' as well as on 'vendor and technology neutrality' before being able to form a view on whether endorsing the Principles would be beneficial for Yoti or its user community.</li> <li>• In the absence of clarity on those points, Guardians recommended not publicly endorsing the Principles at this stage, and instead focusing on establishing case studies and proof points of how Yoti's solutions are making the Principles a reality.</li> </ul>



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<p>4. <i>Serving as a compulsory state identity provider</i></p>	<p><b>Issue:</b> Discussion on the potential implications of Yoti serving as a state identity provider where it becomes compulsory for individual citizens to have a Yoti in order to access fundamental public services, information, etc.</p> <p><b>Discussion:</b> Guardians briefed on new government digital identity contracts and services that Yoti is being invited to bid for in addition to our existing role with the State of Jersey. Discussion centred on the possibility that at some point in the future, citizens of one or more States could be mandated to register a Yoti in order to access and receive public benefits, information, etc. – as has happened with Aadhaar in India. As Yoti has always been a voluntary service for individuals, guidance was requested and received from Guardians on how to approach this potential future situation, and how to frame any ethical challenges for Yoti (as we are not the party mandating use, it would be the government doing that). Input from Guardians included:</p> <ul style="list-style-type: none"> <li>• Multiple providers are required for a safe and sustainable digital identity ecosystem, providing choice and competition for users (citizens).</li> <li>• In the future, Yoti should consider its responsibility to actively make the case for multiple providers, rather than seeking to secure protected monopoly status in any state area.</li> <li>• Guardians see it as a responsibility of Yoti when providing any digital identity services that connect a citizen with public goods to ensure there is a reliable channel of customer/citizen redress for any complaints or issues that are related to denial of public goods.</li> <li>• As part of any contracts with government entities, Guardians recommend that Yoti undertake a simple human rights assessment process to consider the adherence to human rights of the government entity, as well as any human rights implications of the role that Yoti will play in providing access to essential public information, services, etc.</li> </ul>
<p>5. <i>Change of role for Ken Banks, and recruitment plans for the Guardian Council</i></p>	<p><b>Issue:</b> Discussion of transition of role for Ken Banks from being a member of the Guardian Council to being a full-time member of the Yoti staff team as the Head of Social Impact. Guardians requested to help clarify how to handle any related situations in the future.</p> <p><b>Discussion:</b> Guardians reviewed the circumstances that led to Ken Banks stepping off the Guardian Council and taking a full-time role as part of the Yoti team as the Head of Social Impact.</p> <ul style="list-style-type: none"> <li>• Guardians agreed that the circumstances had been handled in an appropriate way by all parties, and that Ken had been open about his desire to move into a new stage of his career back in the business sector – all available on Ken's <a href="#">blog</a>.</li> <li>• Guardians also agreed that this move will be great for Yoti, great for Yoti's users and the world. It was noted that over time, Ken will no doubt be present in some Council meetings as part of the Yoti team, talking about the Social Impact agenda, where topics merit that.</li> <li>• Guardians also expressed support for Yoti bringing on full-time, highly qualified expertise to drive forward the social impact agenda.</li> </ul> <p>In reviewing the situation, Guardians agreed that it would be advisable in the future to include in the Guardian role description and code of conduct:</p> <ul style="list-style-type: none"> <li>• That any Guardians immediately disclose any conflict of interest that arises, or any ethical issues that could damage Yoti's reputation.</li> <li>• Any Guardian in such a position should pro-actively offer to step down.</li> <li>• Any Guardian leaving their role outside of standard terms should be available to work with the Yoti Comms team on a comms plan and be available for any handover if needed.</li> <li>• Access to Yoti emails and documents should be revoked immediately in such circumstances.</li> </ul>



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	<p>Guardians agreed that in principle, serving Guardians cannot be paid for additional duties for Yoti; however, in the event of exceptional circumstances where a Guardian has the unique skill set required by Yoti for a specific task, this would be brought to the other Guardians on the Council for review (and if approved, recorded publicly in the minutes of a Guardian Council meeting for full transparency).</p> <p><b>Actions:</b></p> <ul style="list-style-type: none"> <li>• Yoti Guardian Role and Code of Conduct to be revised to incorporate the above requirements.</li> <li>• Involvement of Guardians in recruitment process for a new Guardian to fill the open seat.</li> </ul>
<i>Adjournment</i>	The meeting was called to a close at 1940.

### 2018 Meeting Attendance

Meeting Dates	22/1	16/4	23/7	15/10			Yoti Staff	22/1	16/4	23/7	15/10			
Renata Avila	•	•					Robin Tombs	•	•					
Doc Searls	•	•					Duncan Francis	•	•					
Joyce Searls	•	•					Julie Dawson	•	○					
							Eric Levine	•	•					
							Emma Butler	☒	•					
							John Abbott	•	☒					
							Madhu Nori	•	☒					

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