Short Public Report
Recertification No. 2

1.   Name and version of the IT product:

AVS-EU (Version 2.1)

2.   Manufacturer or vendor of the IT product:

Company Name:

Scholz Systemprogrammierung GmbH

Address:

Bei den Rauhen Bergen 20

22927 Großhansdorf

Germany

Contact Person:

Wilhelm Scholz

3. Time frame of evaluation:

November 27th 2018 to April 8th 2020

4. EuroPriSe Experts who evaluated the IT product:

Name of the Legal Expert:

Olaf Lange

Address of the Legal Expert:

Rahlstedter Bahnhofstr. 12,22143 Hamburg

Germany

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Name of the Technical Expert:

Andreas Bethke

Address of the Technical Expert:

Papenbergallee 34

25448 Kellinghusen

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5. Certification Authority:

Name: EuroPriSe Certification Authority
Address: Joseph-Schumpeter-Allee 25
       53227 Bonn
       Germany
eMail: CA@european-privacy-seal.eu

6.   Specification of Target of Evaluation (ToE):

The ToE is an "Adult-Verification-Product" containing an optical card reader and hard- and software that performs OCR-scanning of specific cards (German ID-Card, German Drivers Licence (EU), Swiss ID-Card, Swiss Drivers Licence). In case of a "positive" adult verification the systems sends a signal that can be used by other hardware (not part of ToE) to release products (e.g. DVDs, Cigarettes etc.).

7.   General description of the IT product:

AVS-EU is an "Adult-Verification-Product". By using an optical card reader and OCR-Software AVS-EU can identify the data necessary for determining the age of the owner of the specific card (German ID-Card, German Drivers Licence (EU), Swiss ID-Card, Swiss Drivers Licence) and sends an electronic release signal if the card owner is at least 18 years old. The product can be attached to automatic vending machines in order to warrant the sale/delivery of products to customers who are at least 18 years old. Practical use cases are cigarette vending machines or DVD vending/rental machines.

8.   Transnational issues:

- none –

9.   Tools used by the manufacturer of the IT product:

- AVR- Studio 4 (ATMEL) Version 4.12.472 Service Pack 2
- GUI Version   4, 12, 0, 462
- arm-elf-gcc (GCC) 4.1.1 (WinARM)
- JTAG-ARM (STR912)
- Microsoft Visual Studio 2005 – Version 8.0.50727.42

- GNU-C/C++-Compiler (cross compiler/linker/assembler arm-elf-*) Version 4.1.1

- GNU-Binutils Version Version CVS 20060606 FSF-Sources

- newlib Version 1.14.0 (build for reentrant syscalls)

- newlib-lpc Rel.5a (reentrant syscalls for newlib and Philips LPCs)

- GNU-Utils to support the compiler/linker (make, sh etc. from the mingw-project)

- Programmers Notepad Editor Version 2.0.6.1

- The lpc21isp in-system-programming-software for Philips LPC2xxx and the Analog Devices ADUC 70xx family by Martin Maurer. Included Versions: 1.31

- and 1.37(BETA) Bray Terminal by Vlado Brajer

- Insight-GDB 6.5.50-20060517 - Win32-Native from devkitpro.org

- gdb (command-line without Insight) GNU gdb 6.4.50.20060226-cvs from Codesourcery

- Setup-Exe of Macraigor's OCDRemote (Wigger-gdb interface, Ver. 2.16)

- Open On-Chip debugger (OpenOCD, SVN Version 65) made by Dominic Rath

- H-JTAG (Ver. 0.2.1 beta 20060402) made by "twentyone"

- J-Link gdb-Server V1.0 from the gnuarm yahoo-group

10. Edition of EuroPriSe Criteria used for the re-evaluation:

    EuroPriSe Criteria (IT products and IT-based services) – January 2017
    EuroPriSe Commentary – May 2017.

11. Modifications / Amendments of the IT product since the last (re)certification
    - none -

12. Changes in the legal and/or technical situation

    In reference and in accordance with the amendments of EU data protection law the EuroPriSe criteria document is updated on demand. In particular, it is adapted to changes in EU privacy legislation as well as to developments in information technology. The last major update of the document took place due

to the passage of Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) which is applicable from 25 May 2018. For this reason, the recertification no. 2 is compliant with EuroPriSe Criteria for the certification of IT products and IT-based services published in January 2017 (v201701).

13. Re-Evaluation methods:

The legal evaluation consisted of a review of relevant documents provided by the manufacturer of the software. When assessing whether the ToE facilates its GDPR compliant use, the legal expert also took into account the results of the technical evaluation.

On the technical side, the same tests were performed as for the initial certification. In particular, the power shutdown of the board component was evaluated. In addition, a code inspection was carried out to confirm that the very few unnecessary types of data that are collected as an unavoidable by-catch during the scanning process of some of the identification documents eligible for the ToE are discarded immediately. More precisely, the code inspection related to the data type "sex" that forms part of the scanned image as produced from Swiss identity cards.

14. Evaluation results:

Set 1: Overview on fundamental issues

By using the ToE a very small amount of personal data is processed. A key feature of the product is that collection of personal data is restricted to a minimum. Furthermore, the collected (scanned) data are deleted immediately after processing an OCR-request that checks if the age on the id card is 18 years or older. Data is deleted by switching off power of the RAM memory chips in use.

Set 2: Legitimacy of Data Processing

The controller using the ToE usually is in charge of undertaking an age verification process before selling goods (e.g. DVDs, cigarettes etc.). The age verification is necessary for the performance of the contract or in order to take steps at the request of the data subject prior to entering into a contract. As a result the processing of data is in accordance with GDPR.

Set 3: Technical-Organisational Measures: Accompanying Measures for Protection of the Data Subject

The ToE uses hard- and software that limits the processing of personal data to the necessary extent. The immediate deletion of data of the age verification process after each scan of an id card is guaranteed.

Set 4: Data Subjects Rights

As all processing of personal data is non-permanent and data is deleted immediately after each scan, for this reason the provisions for the Data Subject Rights are not applicable.

15. Data flow:

Cf. the image on the following page of this document.

```
┌─────────────────────────────┐
│          TINY267            │
│       Pre-Processor         │ ◄──────── Turn Power Off ──────────┐
│ - Waiting for Inserting of Card │                                │
└─────────────────────────────┘                                    │
                                                                   │
┌─────────────────────────┐        ┌─────────────────────────────┐ │
│                         │        │           ARM7              │ │
│    If Card is inserted  │ ─────► │ Main Processor with Dynamic Ram │ │
│                         │        │     and Optical Reader      │ │
└─────────────────────────┘        └─────────────────────────────┘ │
                                              │                    │
                                              ▼                    │
                                   ┌─────────────────────────────┐ │
                                   │                             │ │
                                   │  Adult Verification Process │ │
                                   │                             │ │
                                   └─────────────────────────────┘ │
                                          │           │            │
                                          ▼           ▼            │
┌─────────────────────────┐        ┌─────────┐   ┌─────────┐       │
│                         │        │  Valid  │   │Not Valid│       │
│Send Signal to Vendor Process│ ◄── │> 18 years│   │< 18 years│ ─────┘
│                         │        └─────────┘   └─────────┘
└─────────────────────────┘            │
                                       └────────────────────────────┘
```
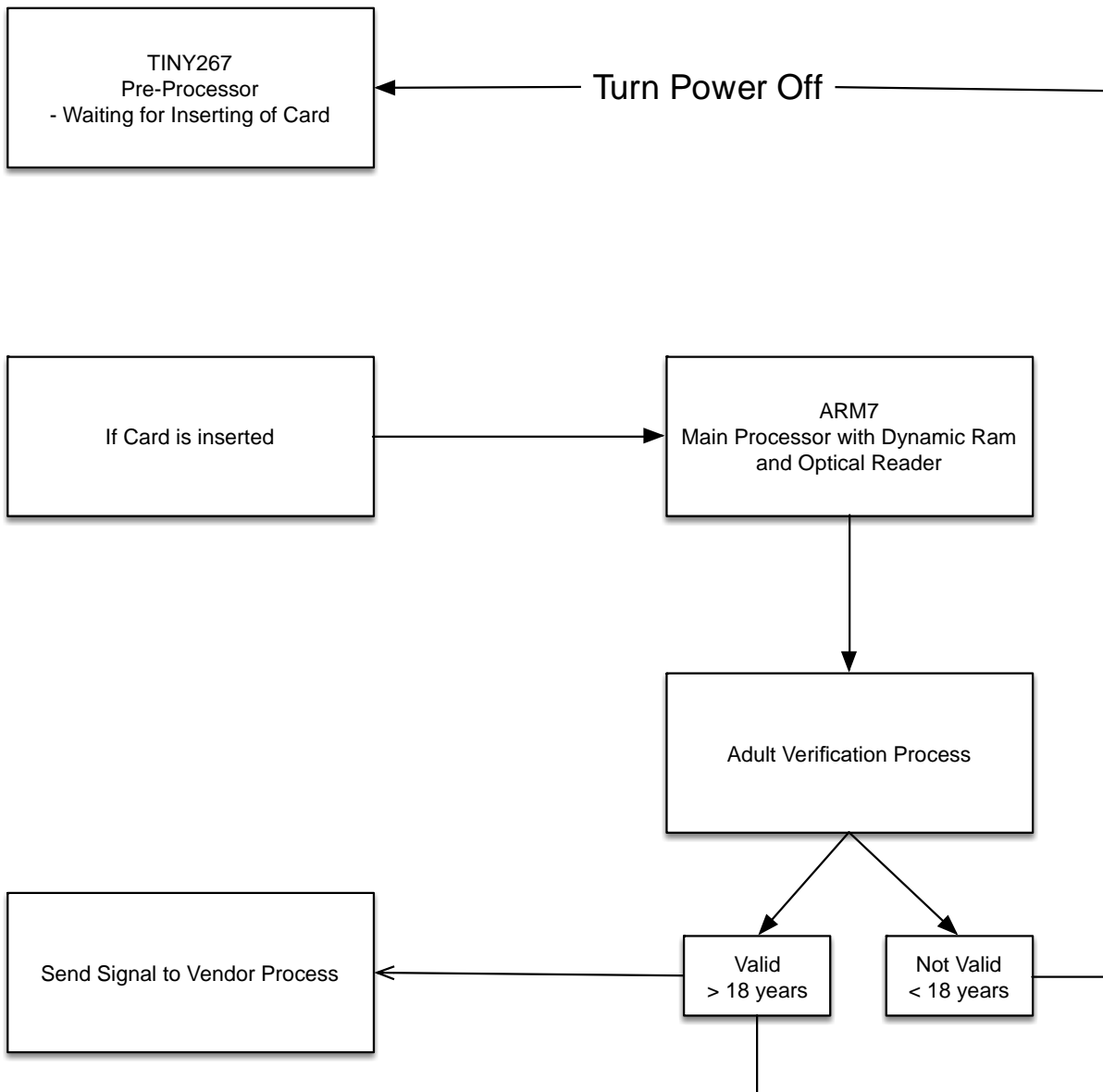
16. Privacy-enhancing functionalities:

The product limits the processing of data to the necessary extent. Data is collected by an optical reader. The data is processed by an OCR-unit that just identifies the characters necessary for fulfilling the adult verification procedure. All personal data is deleted immediately after the processing of the adult verification.

17. Issues demanding special user attention:

- none –

18. Compensation of weaknesses:

- does not apply –

19. Decision table on relevant requirements:

EuroPriSe Requirement	Decision	Remarks
Data Protection by Design and by Default	*excellent*	The processing of personal data is limited to the necessary extent. All personal data is deleted immediately after completion of the adult verification.
Transparency	*adequate*	The product comes along with a documentation, which includes hints for a lawful processing of personal data.
Technical-Organisational Measures	*adequate*	The technical-organisational measures taken by the manufacturer are adequate.
Data Subjects' Rights	*does not apply*	As personal data is processed just for a "logical" second, the provisions on Data Subjects' Rights are not applicable.

Experts' Statement

We affirm that the above-named IT product / IT-based service has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.
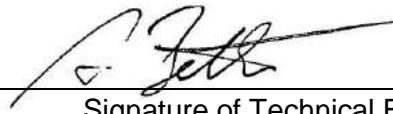
Hamburg, 08.04.2020   Olaf Lange

Place, Date	Name of Legal Expert	Signature of Legal Expert

Kellinghusen, 08.04.2020 Andreas Bethke

Place, Date	Name of Technical Expert	Signature of Technical Expert

Recertification Result

The above-named IT product / IT-based service passed the EuroPriSe evaluation.

It is certified that the above-named IT product / IT-based service facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Place, Date	Name of Certification Authority	Signature