



## Short Public Report Recertification No. 1

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:

April 28th 2016 to June 26th 2016

4. EuroPriSe Experts who evaluated the IT product:

Name of the Legal Expert:

Stephan Hansen-Oest

Address of the Legal Expert:

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Name of the Technical Expert:

Andreas Bethke

Address of the Technical Expert:

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5. Certification Authority:

Name: EuroPriSe Certification Authority

Address: Joseph-Schumpeter-Allee 25

53227 Bonn

Germany

eMail: [contact@european-privacy-seal.eu](mailto:contact@european-privacy-seal.eu)

6. Specification of Target of Evaluation (ToE):

The ToE is an "Adult-Verification-Product" containing an optical card reader and hardware 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 system 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 over 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-Utills 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 evaluation:

EuroPriSe Criteria May 2011

11. Modifications / Amendments of the IT product since the last (re)certification

The French National ID card is now implemented for adult verification services in one region of Germany.

Update (July 2017): AVS-EU does not support age verification by means of the French National ID card (anymore).

12. Changes in the legal and/or technical situation

- none –

13. Evaluation results:

Set 1: Overview on fundamental issues

By using the ToE a very small amount of personal data are 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 lawful pursuant to Art. 7 (b) of the Directive 95/46/EC.

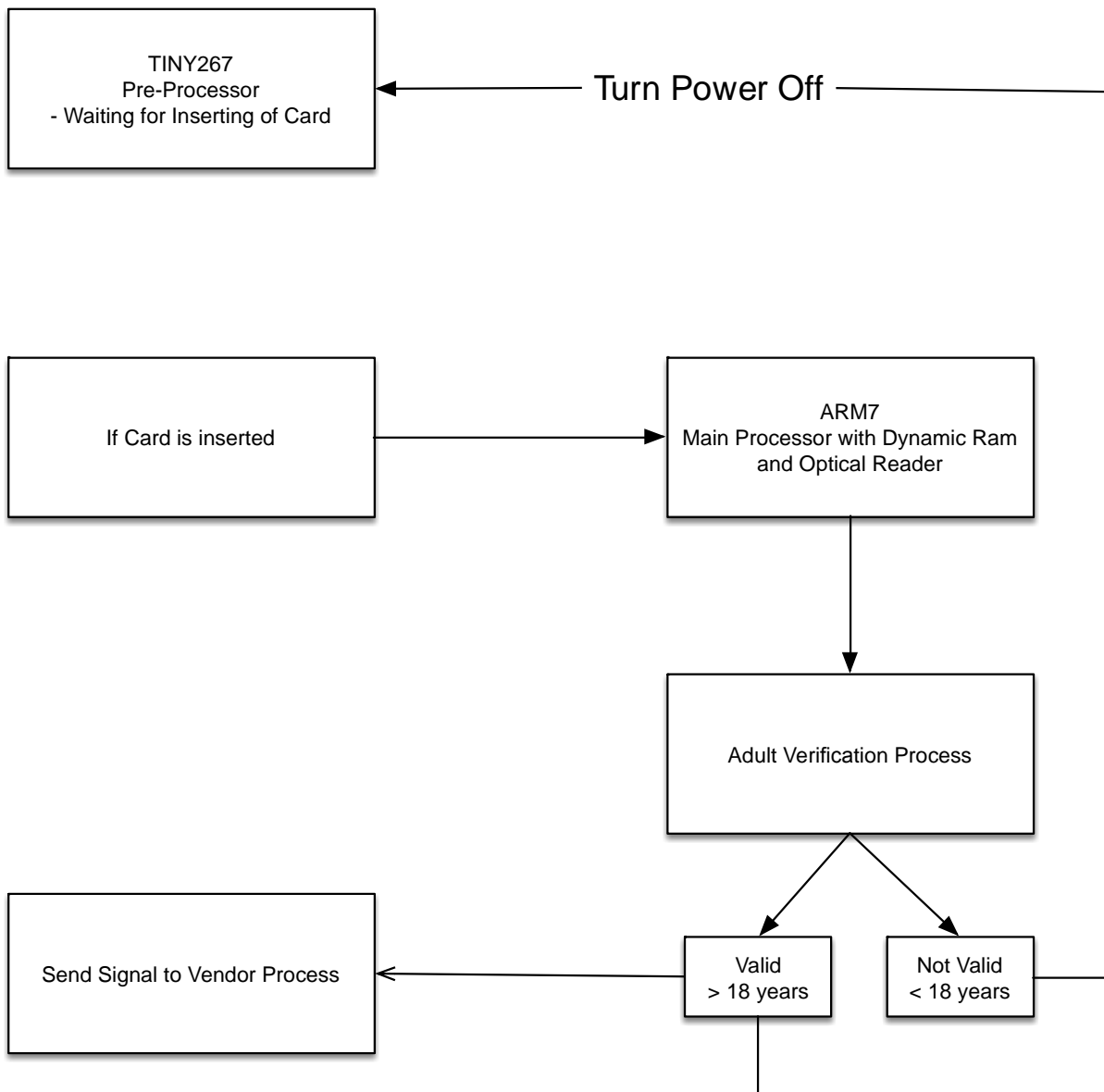
Set 3: Technical-Organisational Measures: Accompanying Measures for Protection of the Data Subject

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, the provisions for the Data Subject Rights can not be applied

14. Data flow:



15. 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.

16. Issues demanding special user attention:

- none –

17. Compensation of weaknesses:

- does not apply –

18. Decision table on relevant requirements:

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

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## 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.

Flensburg, 26.06.2016

Stephan Hansen-Oest



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Place, Date

Name of Legal Expert

Signature of Legal Expert

Kellinghusen, 26.06.2016

Andreas Bethke



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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.

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Place, Date

Name of Certification Authority

Signature