

ISSN 2704-8012

European Journal of Privacy Law & Technologies

2019/2



G. Giappichelli Editore

European Journal of Privacy Law & Technologies

Directed by Lucilla Gatt

2019/2



G. Giappichelli Editore

European Journal of Privacy Law & Technologies

On line journal

Italian R.O.C. n. 25223

G. GIAPPICHELLI EDITORE - TORINO

VIA PO, 21 - TEL. 011-81.53.111 - FAX 011-81.25.100

<http://www.giappichelli.it>



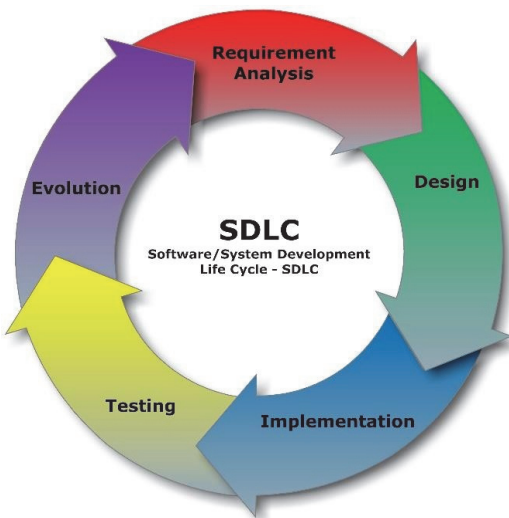
Co-funded by the Rights,
Equality and Citizenship (REC)
Programme
of the European Union

The Journal is one of the results of the European project TAtODPR (Training Activities to Implement the Data Protection Reform) that has received funding from the European Union's within the REC (Rights, Equality and Citizenship) Programme, under Grant Agreement No. 769191.

The contents of this Journal represent the views of the author only and are his/her sole responsibility. The European Commission does not accept any responsibility for use that may be made of the information it contains.

Published Online by G. Giappichelli in December 2019

www.ejplt.tatodpr.eu

Challenge Title: Enhancing Children’s Privacy Awareness	
Use Case Author	<i>Roberto Montanari, Elisa Landini, Aura Tardia, RE:Lab</i>
Topic	<i>Privacy in Minors</i>
Overview	<i>The Italian SME Game&Learn s.r.l. develops apps and software addressed at children and teenagers. Their products allow children to play games while also learning new things. In order to design the software effectively, the company usually carries out tests with users to validate or improve the product throughout the software development cycle.</i>
1. Engage	
Big idea	<i>Children and technology development.</i>
Essential Question	<i>How to ensure that children are fully aware of the data they provide.</i>
Initial resources	<p><i>The Software Development Life Cycle entails a phase of testing with real users. The testing phase is extremely important for designers to understand the reactions of users to the software, evaluate its usability, and to devise any fixes or improvements based on test results</i></p>  <p><i>An introduction reading to user testing with children: https://www.nngroup.com/articles/childrens-websites-usability-issues/</i></p>

Guiding Questions	<p><i>You are Game&Learn’s newly appointed DPO. While collecting information from the company’s management and employees to define the processes you will follow and the potential risks and vulnerabilities, you also speak with the User Testing team.</i></p> <p><i>They explain that they believe to have always been very conscious about the privacy of the children/teenagers and have always asked for the written consent of the parents before performing the tests.</i></p> <p><i>They are unsure whether they now need to also provide information on the type and purposes of the data processing directly to the children, and in that case, they would like to draft a general document to use to that end, to be adapted to specific cases.</i></p> <p>---</p> <p><i>Use this space to show how you will do this. And Leave space for the students to complete the questions. This box should be completed as a team by the students</i></p> <p><i>What questions should you ask the User Testing team to start to frame the task?</i></p> <p><i>Brainstorm a list of questions you should ask in order to get a clearer picture of the activity and of the role you could play.</i></p> <p><i>Draft a complete list of questions and put them in an order, prioritizing the ones you believe are more important.</i></p>
Reflections	<p><i>1. Once the students have done this. Encourage them to reflect on how well this exercise worked. How well do the questions reflect the challenge?</i></p> <p><i>2. How could a similar situation be tackled more effectively in the future? Use this space to record individual reflections on the process.</i></p> <p><i>3. Reflect on the Guiding Questions process and results:</i></p> <p><i>4. How did you feel about the initial brainstorming exercise?</i></p> <p><i>5. Were you happy with the list of questions you put together? Why/why not?</i></p>
Other notes	
2. Investigate	
Activity Description	<p><i>Now that you have identified the information you need from User Testing team, collect the resources that can help you develop a good solution.</i></p> <p><i>The Investigation phase should lead you to the answers to your Guiding Questions.</i></p>
Resources	<i>Some resources to get you going:</i>

	<p>https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/applications/children/ https://www.unicef.org/rightsite/files/uncrcchildfriendlylanguage.pdf http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=622227</p> <p>----</p> <p><i>Encourage students to collect and use resources to help them to address the question.</i></p> <p><i>Try and gather more resources that might help you address the challenge more effectively.</i></p>
Synthesis	<p><i>Develop a short document (2 pages max.) containing Guidelines for the drafting of child-friendly privacy information. This should also contain an introductory part where you can try to explain the process you followed to develop the Guidelines to your colleagues in the User Testing team.</i></p> <p>---</p> <p><i>Encourage students to summarise their answer.</i></p>
Reflections	<ol style="list-style-type: none"> <i>1. Students to provide a reflection on the process. Reflect on the Investigation phase:</i> <i>2. What are the key problems to be overcome in this challenge?</i> <i>3. How did you organize the work for the development of the Guidelines?</i> <i>4. How did you collect additional information and resources?</i> <i>5. How successful was the investigation process? How would you organize the work differently if you did it again?</i>
Other notes	
3. Act	
Solution Prototypes	<p><i>Design an “Information on the Processing of Personal Data” document that can be used to effectively communicate with children in compliance with the principle of transparency.</i></p> <p><i>You can experiment different formats for this Privacy Notice, which may include images, icons or other elements that might facilitate their understanding.</i></p>
Solution	<p><i>Students to provide a solution or options for different solutions in the format suggested above.</i></p> <p><i>Please insert the final version of the Information on the Processing of Personal Data here:</i></p>
Implementation plan	<p><i>Students also to provide a plan for how at least one of the solutions should be delivered.</i></p>

	<i>Develop a procedure to help the Game&Learn employees to use the document you've created in the right way (e.g. in terms of timing, modalities, and so on)</i>
Evaluate	<p><i>Students to develop a journal entry to evaluate the different solutions, and how they might go about the exercise differently in future. Students might also be asked how the exercise itself could be further developed as a pedagogical process.</i></p> <p><i>Develop a journal entry evaluating the solution you identified:</i></p> <ol style="list-style-type: none"> <i>1. What are the key challenges that the User Testing team may encounter in following the procedures?</i> <i>2. What were the strengths and weaknesses of your overall approach?</i> <i>3. What changes would you make to your Guidelines and to your Privacy Notice?</i> <i>4. What did you learn from this process?</i>
Other notes	
4. Reflection and documentation	
Case notes	