

# SafePassage Age Assurance — COPPA Compliance One-Pager

*Legal-readiness documentation for U.S. operators subject to the Children's Online Privacy Protection Act (COPPA)*

## Product Overview

**SafePassage** is a privacy-first, AI-powered age verification platform designed for regulated content platforms. It provides real-time facial estimation (L1) and document-plus-biometric verification (L2) while ensuring **full alignment with the Children's Online Privacy Protection Act (COPPA)** requirements for handling and verifying children's data in the United States.

## Key Features

- Dual verification modes: **L1** (facial estimation) and **L2** (ID + biometric match)
- **Zero PII retention** — all inputs deleted within milliseconds
- 99.7 % accuracy at 18+ threshold
- Full liveness detection and spoof prevention
- Compact size, installable in under 5 minutes
- Real-time audit trails and stateless API architecture

## Compliance Statement

SafePassage is designed to support operators in meeting their obligations under the **U.S. Children's Online Privacy Protection Act (COPPA), 15 U.S.C. §§ 6501–6506**. Its architecture and operational controls enable platforms to obtain **verifiable parental consent** and to comply with COPPA's requirements for the collection and processing of personal information from children under 13 years of age. Since SafePassage **never stores personal data or biometric templates**, many COPPA compliance burdens — such as breach notification and long-term parental consent record-keeping — are simplified or not triggered.

This document is provided for informational purposes only and does not constitute legal advice. Regulatory interpretations may evolve. SafePassage makes no representations or warranties regarding legal outcomes. Please consult your legal counsel or contact SafePassage for the latest compliance documentation.

## COPPA — SafePassage Compliance Summary

| COPPA Requirement                                                | Summary Description                                                                                    | SafePassage Implementation                                                                                                      |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>Notice &amp; Transparency (16 C.F.R. § 312.4)</b>             | Operators must provide clear notice of information practices and parental rights.                      | SafePassage provides transparent privacy notices to the platform and supports integration of required parental consent notices. |
| <b>Verifiable Parental Consent (16 C.F.R. § 312.5)</b>           | Must obtain verifiable parental consent before collecting personal information from children under 13. | SafePassage's L2 flow (ID + biometric) supports verifiable consent by securely authenticating parents/guardians in real time.   |
| <b>Data Minimization (16 C.F.R. § 312.4(b))</b>                  | Collect only information reasonably necessary to participate in the activity.                          | L1 requires only a live selfie; L2 requires ID and selfie only for instant parental consent verification.                       |
| <b>Security &amp; Confidentiality (16 C.F.R. § 312.8)</b>        | Maintain the confidentiality, security, and integrity of children's personal information.              | Ephemeral caches; all data deleted within milliseconds, no PII data retained at all.                                            |
| <b>Parental Access &amp; Deletion Rights (16 C.F.R. § 312.6)</b> | Parents must be able to review or request deletion of their child's personal information.              | No personal data retained; rights to access or deletion are satisfied by design.                                                |
| <b>Recordkeeping &amp; Accountability</b>                        | Operators should maintain evidence of consent and compliance efforts.                                  | Immutable, signed audit logs prove that parental consent checks occurred without retaining any PII or biometric templates.      |

## Regulatory Contact Readiness

Full documentation — including technical flow diagrams, parental consent verification procedures, and security architecture — is available to legal teams and regulatory agencies upon request. Materials are provided under NDA and include sample parental consent workflows and real-time audit log specifications.