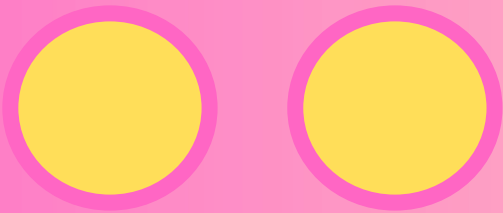




Bidding Farewell to Barbie – Welcoming Alexa, Siri and Google: Voice Assistants and Children’s Rights

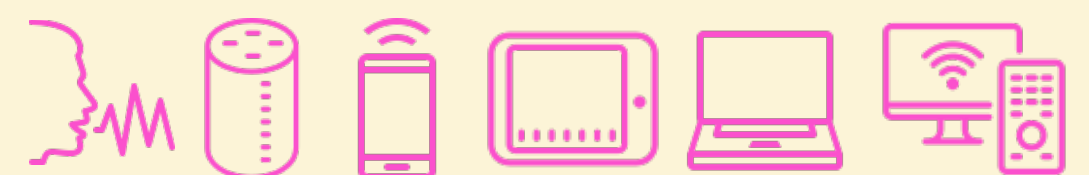


Context & introduction

Mattel’s ‘Hello Barbie’ doll, featuring voice-recognition technology, could converse with children. Concerns over recorded interactions shared with third parties and potential privacy violations led to calls for the doll’s ban, ultimately resulting in its **discontinuation**. Today, a growing number of European children engage with voice assistants through various devices.



Therefore, despite not being specifically designed for children, voice assistants are widely used by them. This context and related concerns have inspired the research into **Voice Assistants and Children’s Rights**.



Research in progress. Privacy policy analysis of Amazon’s Alexa, Apple’s Siri and Google Assistant



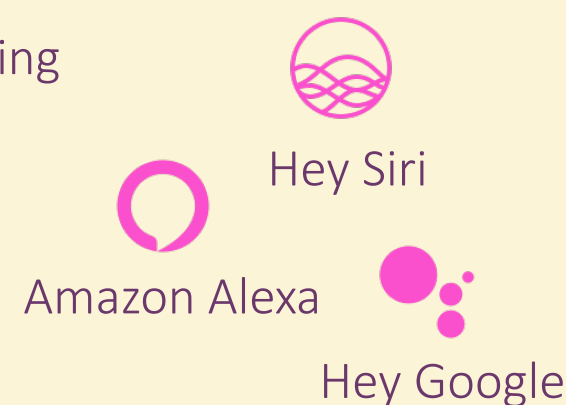
The study centers on the implementation of children’s rights to **privacy** and **data protection**, as well as other rights, provided by the UN Convention on the Rights of the Child. It involves a **compliance assessment**, evaluating the privacy policies of 3 most popular voice assistants in Europe (provided by Amazon, Apple and Google). The primary focus is on the **processing of children’s voice data** when they interact with voice assistants.

In this compliance-check exercise, special attention is paid to the implementation of the **transparency principle** under EU data protection law (Articles 12, 13, and 14 GDPR). These provisions require that **information directed at children** is presented in clear, plain language easily understood by children, given their need for **specific protection** (as outlined in recitals 38 and 58 GDPR).

Provisional findings

1. Policies **generally overlook child users**, but some begin including specific sections on the processing of children’s voice data
2. Privacy and data policies **lack clarity in disclosing**:
 - Recipients of personal data
 - Data storage duration and criteria
 - Existence of automated decision-making, including profiling
 - Explanation of decision-making logic and consequences
3. Voice assistant providers’ privacy and data policies often:
 - Are **lengthy** (averaging 10 pages of plain text)
 - Are **difficult to comprehend**
 - Contain 20-130 hyperlinks for users to follow

Future research



- Walkthrough method
- Participatory research with children on voice assistants
- Applicability of the EU DSA and the proposed AI Act

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