

Feedback on Guidelines 02/2021 on Virtual Voice Assistants

By Tiina Härkönen, Finland. April 6, 2021

2. Technology background, Actors in the VVA ecosystem

After option **e. User** the “accidental/unwilling user” should be added. Persons visiting a home or other place are a stakeholder and should be considered actors, whether aware of a virtual voice assistant system on the premises or not.

3.4 Purpose limitation and legal basis

A person purchasing e.g. a smart TV may not wish to activate a VVA or a camera in the first place. As retail outlets – whether online or physical - do not have enough expertise to explain all features and functions of a device to consumers, people may not be aware they have a VVA in the device. Therefore, all similar devices should have the VVA off by default and should require activating the function separately.

Also, users should be able to switch off the VVA (device) permanently or temporarily (e.g. Smart speaker during a visit from friends) without losing the data. This feature should be obligatory in all applications and devices.

General comment

Though the guidelines do mention transparency and clarity of service providers, the accessibility of VVA providers’ customer service as well as their manner of communication should be emphasised more. The guidelines should also stipulate the service providers need to refrain from using difficult (overly professional) words and expressions. Furthermore, instead of excessive lists of links they should use concise and clear descriptions. Maximum word count of terms and conditions should maybe be considered. The tools provided for the users to control their data should be easy to use and enable data sovereignty.