

Recommendations / Input

Exemption from Article 5(3) e-Privacy Directive should also apply when voice is collected with purpose of improve the service such as testing speech-to-text functionalities (tests not require the original voice, should of course be not exempted).

Please take into consideration that being forced to create distortion of a voice, before further processing makes is harder to achieve a high quality translation from speech to text. It should be possible to take a balanced approach when the intended purpose of the conversation does not include sensitive data. Also please see this in the light of that VVA is a way to comply with various Disability Acts globally and also THE CHARTER OF FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION Article 21 (disability). Therefor please consider also make exemptions when a service is made available with the only purpose to serve a disability tool.

In general matter, it would be great if there could be a clear distinguish in technical and profit-related activities, in the burden of regulatory compliance arising from GDPR. So when VVA is used as a pure technical mean to process an activity or when VVA obtained data is not stored with the purpose of identifying a person uniquely, and also taking the intended purpose of the conversation into account, making it possible to process some type of commands or conversations without taking Article 9 (biometric data) into consideration.