



# Age Assurance Technology Trial

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## Participant Interview - GeoComply

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This document forms part of the Age Assurance Technology Trial (AATT) and provides a consolidated summary of the interview conducted with an age assurance technology provider participating in the trial. The interview was conducted via a Microsoft Teams meeting and represents the agreed summary of the discussion with the vendor.

The questions for this interview were shared with the vendor in advance, ensuring a structured and transparent approach. However, the interview also flowed dynamically, allowing for exploration of specific aspects of the vendor's technology that were directly relevant to the Australian context. The primary purpose of this interview was to engage with the vendor on their submitted practice statement, delving deeper into their technology, policies and deployment approach, particularly in relation to the Australian regulatory, cultural and operational environment.

This document is intended to support transparency and consistency in the evaluation process by providing a structured record of the discussion. It helps ensure that insights gathered through this interview are available to policymakers, industry stakeholders and researchers as part of the AATT's broader methodology. This interview complements the vendor's practice statement, technical demonstration and structured system testing undertaken during the trial, providing a richer, multi-dimensional perspective on the readiness, privacy compliance and operational effectiveness of the age assurance system.

## Disclaimer

The inclusion of this interview summary does not constitute endorsement, certification or approval of any product, service, or provider. The interview captures the perspectives and claims of the vendor as discussed with the trial team, but they have not been independently verified in full. While the discussion has informed the trial's evaluation activities, it remains the responsibility of the provider who participated in the discussion.

No guarantee is given as to the completeness, accuracy or ongoing applicability of the information provided in this interview. The trial team has assessed this discussion within the scope of the AATT only and its inclusion here should not be interpreted as regulatory acceptance, market readiness or policy endorsement.



# Summary of GeoComply Participant Interview Responses

## Executive Summary

GeoComply provides advanced geolocation technology to help ensure regulatory compliance, detect spoofing, and support age assurance. Its secure, privacy-focused system is scalable, accurate and widely adopted across industries, playing a critical role in protecting users and enabling lawful digital access.

## Interview Responses

### Section 1 - Background and Overview

#### **Q1: Overview of the system and its primary functionality**

GeoComply provides geolocation-based compliance solutions for online platforms. Its core functionality is to determine a user's real-time location with high accuracy and identify attempts to spoof that location (e.g., via VPNs). It aggregates data like IP, Wi-Fi, GPS, and cell tower signals to validate geolocation, primarily to support compliance with jurisdictional regulations.

#### **Q2: What is done to ensure age assurance?**

While GeoComply does not perform age verification directly, it ensures users are routed through the correct age assurance flows by determining whether they are within a regulated jurisdiction. For example, if a particular online service is age-restricted in Australia, location tools must ensure that Australia-located users aren't spoofing their virtual location to appear as though they are in a country where the age restriction does not apply.

#### **Q3: Inspiration for development and key problems it aims to solve**

GeoComply was founded to support regulated online gambling in the U.S., where legal access had to be confined to state boundaries due to federal laws. At the time, no technology could provide precise enough geolocation for compliance. GeoComply's system was developed to fill this gap, evolving to detect spoofing attempts and support legal compliance in many sectors.



#### **Q4: Industries or use cases currently utilizing the system**

- Online gambling and betting (casino, horse racing)
- Financial services (AML compliance)
- Media and entertainment (e.g., content rights enforcement)
- Cryptocurrency platforms

GeoComply is also expanding into areas like social media age gating and compliance enforcement.

#### **Q5: Assessments of impact on fundamental rights, including children's rights**

GeoComply supports enforcement of age-gated content by determining location but does not directly address children's rights policies. Typically, responsibility for child safeguarding and age verification is held by the platform operator, though GeoComply indirectly supports these aims through its location verification services.

## **Section 2 - Privacy and Data Protection**

#### **Q6: Types of data collected, processed, and stored**

GeoComply processes anonymized location data points, including IP addresses, GPS, Wi-Fi, and cell tower data. It does not receive PII like names, DOB, or biometrics.

#### **Q7: How is data collection determined?**

Data collected depends on device permissions and availability. The system always seeks the most precise data available, prioritizing GPS over Wi-Fi, cell tower, and IP, respectively.

#### **Q8: Specific purposes of data collection**

Solely for determining user location to support regulatory compliance (e.g., gambling laws, age restrictions). Not used for marketing or other secondary purposes.

#### **Q9: Privacy Laws and Compliance**

GeoComply aligns with Australian Privacy Principles and tracks legislative changes. The system is designed to meet global standards, including GDPR and U.S. equivalents, ensuring compliance in Australia.

#### **Q10: Data Deletion**

Although not frequently encountered, GeoComply has processes in place to delete data upon lawful request. In regulated sectors like gambling, data retention (e.g., 5–10 years) is often legally mandated.

#### **Q11: Can GeoComply be hacked?**



- GeoComply pseudonymizes users via hashed user IDs provided by B2C partners, without access to identifiable personal data.
- GeoComply responds to new threats within minutes to hours. A team of experts continuously monitors fraud forums and data streams for emerging risks.

## Section 3 - System Security and Fraud Prevention

### Q12: How does the system ensure data minimization?

GeoComply only collects data during active user sessions and only when necessary. The app does not track users passively or outside of specific compliance functions.

### Q13: How does the system prevent fraud?

Protection against misuse and spoofing include core functionality centers around detecting and blocking spoofing attempts (e.g., via VPNs, GPS spoofing apps). The system evaluates data integrity and device-level risks in real time.

### Q14: What measures prevent unauthorized key use?

- Data is encrypted in transit and at rest. GeoComply is SOC 2 compliant and is pursuing ISO 27001 certification.
- If the system cannot verify a location, access is denied. Systems have high uptime >99.8% contractual availability and failover redundancy (e.g., alternative cloud infrastructure).

### Q15: How do you ensure that your system is fail safe?

- Systems have high uptime >99.8% contractual availability and failover redundancy (e.g., alternative cloud infrastructure).

### Q16: Has the system undergone external validation?

GeoComply undergoes regular SOC 2 audits and third-party penetration testing, especially for regulated U.S. gambling industries. These include evaluations like man-in-the-middle attack resistance.

## Section 4 - Accessibility and Inclusivity

### Q17: How does GeoComply accommodate users with disabilities or low digital literacy?

- Handled by B2C platforms. GeoComply's system integrates at the backend with no direct user interface.
- B2C partners are responsible. GeoComply supports low-friction processes and multilingual in-app troubleshooting guidance.

### Q18: Considerations for First Nations and Indigenous communities



No direct consultation with First Nations groups was mentioned, but GeoComply supports localized configurations when required.

**Q19: How does the system support children in government care?**

B2C responsibility. GeoComply's role is limited to verifying device location and does not process identity or family data.

**Section 5 - User Support and Adoption Challenges**

**Q20: How does GeoComply handle user feedback and complaints?**

Handled first by B2C partners. GeoComply trains support agents and offers backend access for technical logs. Escalation to GeoComply is possible.

**Q21: Key strengths of GeoComply compared to competitors**

GeoComply's strength lies in continuous threat detection updates and focus on real-time spoof detection. Its robustness and reliability in regulated industries set it apart.

**Q22: Biggest challenge in adoption**

Device and OS variation (e.g., across Android, iOS, desktop browsers), oceanic/remote location pinpointing, and ever-evolving spoofing methods are key challenges.

**Final Notes**

A key takeaway is that relying solely on IP geolocation is mostly inadequate for compliance purposes. GeoComply is committed to the continuous improvement of its technology, aiming to provide a comprehensive, resilient system to underpin regulatory enforcement where exact location is critical — notably for child protection and lawful content access.