

DIN CEN/TR 18241:2026-08 (E)

Privacy management in products and services - Biometric access control products and services; English version CEN/TR 18241:2025

Contents	Page
European foreword	4
Introduction	5
1 Scope.....	6
2 Normative references.....	6
3 Terms and definitions.....	6
4 General.....	6
4.1 Preparing the grounds for data protection and privacy by design and by default	6
4.2 Structure for disassembling product and service into applicable categories	6
4.2.1 Introduction.....	6
4.2.2 Product layers.....	6
4.2.3 Service layers	7
4.3 Self-declaration and levels of achievement.....	7
5 Process for a privacy aware development of products and services	7
5.1 Leadership and market intelligence	7
5.2 Preparation	7
5.3 Design.....	7
5.3.1 Determination of DPbPP requirements.....	7
5.3.2 Development	7
5.3.3 Production and service provision.....	7
5.3.4 Release of products and services	7
5.4 Performance evaluation.....	7
5.5 Improvement.....	7
6 Basic requirements on the design of products and services.....	8
6.1 Access	8
6.1.1 Access to data	8
6.1.2 Copy of data.....	8
6.2 Accountability	8
6.3 Accuracy	8
6.4 Data de-identification	8
6.5 Data minimization	9
6.6 Data portability	9
6.7 Confidentiality	9
6.8 Erasure.....	9
6.9 Fairness.....	9
6.9.1 Determination of user age	9
6.9.2 Configurable children age threshold	9
6.10 Information security.....	9
6.10.1 Unauthorized or unlawful processing.....	9
6.10.2 Data loss	9
6.10.3 Information protection targets.....	9
6.10.4 Restore.....	10
6.11 Lawfulness.....	10
6.11.1 Data disclosure	10

6.11.2	Consent	10
6.12	Objection to processing.....	10
6.13	Automated decision making.....	10
6.14	Restriction of processing	10
6.15	Storage limitation.....	10
6.16	Transparency	10
6.16.1	Information.....	10
6.16.2	Record of processing activities.....	10
7	Requirements to the self-declaration of privacy aware design	11
7.1	Process requirements	11
7.2	Preparation based on the product and service layer requirements.....	11
7.3	Preparation additionally based on conduction of a DPIA.....	11
7.4	Determination of the level of achievement.....	11
7.5	Self-declaration statement.....	11
	Bibliography	12