# ECA DIGITAL
# COMPLIANCE CHECKLIST

Compliance with **Statue No. 15,211/2025** (ECA Digital) requirements is not a simple task. The new law introduced a series of rules and principles that demand close attention from institutions. We know that compliance with complex regulations requires several measures, such as well-defined internal policies, monitoring processes, team training, a consistent organizational culture, and solid legal support.

To assist in this process, we have prepared this checklist. It objectively organizes the main obligations and prohibitions established by ECA Digital and serves as a practical tool to support in adapting to the rules of the Statute.

## 1 General rules for in-scope providers

### 1.1. Parental controls

- ☐ Adopt adequate technical measures that allow families to prevent inappropriate access and use by children and adolescents (art. 5, paragraph 1);
- ☐ Provide accessible and easy-to-use settings and tools that support parental supervision (art. 17, I);
- ☐ Provide, in an easily accessible location, information for parents or legal guardians about the existing tools for exercising parental supervision (art. 17, II);
- ☐ Display a visible notice when parental supervision tools are active and inform which controls have been applied (art. 17, III);
- ☐ Offer functionalities to limit and monitor usage time (art. 17, IV).

### 1.2. Age assurance

- ☐ Adopt measures to receive age signals from app stores and operating systems (art. 14, head).

### 1.3. Safety measures

- ☐ Adopt reasonable measures from the design stage to prevent and mitigate risks of access, exposure, recommendation, or contact by minors with inappropriate content (art. 6, head);
- ☐ Prevent children and adolescents from accessing illegal, pornographic, or clearly inappropriate content (art. 8, III);
- ☐ Develop from the design stage and adopt by default settings that prevent the compulsive use by minors (art. 8, IV);
- ☐ Regardless of the measures adopted by app stores and operating systems, implement their own mechanisms to prevent improper access of minors to content inappropriate for their age group (art. 14, sole paragraph).

### 1.4. Policies and educational measures

- ☐ Create clear and effective policies against online harassment, with support mechanisms for victims (art. 6, paragraph 2) – ***pending regulation***;
- ☐ Offer educational programs to raise awareness about risks and ways to prevent online harassment (art. 6, paragraph 2) – ***pending regulation***.

This is a material prepared by Licks Attorneys on March 10, 2026. It aims to present a simplified checklist of the main obligations created by ECA Digital to serve as a resource for in-scope providers in their compliance efforts. The list herein presented is not exhaustive. Further regulation on the matter is expected, with implications on legal requirements. For more detailed guidance, please contact us.

## 1.5. Privacy obligations

- ☐ Adopt, by design and by default, the most protective configuration available regarding privacy and personal data protection (art. 7, head and paragraph 1);
- ☐ When processing children and adolescents' data, map risks, make efforts to mitigate them, and prepare a personal data protection impact, monitoring and evaluation report, to be shared upon request from the ANPD (art. 16, sole paragraph, I and II) – ***pending regulation***.

## 1.6. Transparency

- ☐ Provide clear information so that users can make informed choices when opting for less protective settings (art. 7, paragraph 1);
- ☐ Clearly inform the recommended age group at the time of access (art. 8, V);
- ☐ Make available information about the risks and the security measures adopted for minors, including privacy and data protection (art. 16, head).

## 1.7. Internal risk-management

- ☐ Conduct risk management of their resources, functionalities, and systems and their impacts on the safety and health of minors (art. 8, I);
- ☐ Conduct an assessment of the content made available to children and adolescents according to their age group, so that it is compatible with the respective indicative rating (art. 8, II).

## 1.8. Report to authorities

- ☐ Remove and report to national and international authorities content related to exploitation, sexual abuse, kidnapping, and grooming (art. 27, head) – ***pending regulation***;
- ☐ Preserve data associated with reports of sexual exploitation and abuse of children and adolescents (art. 27, paragraph 2);
- ☐ Notify competent authorities after receiving reports of violations of minors' rights (art. 28, sole paragraph) – ***pending regulation***.

## 1.9. Reporting channels

- ☐ Provide mechanisms for reporting violations of minors' rights (art. 28, head);
- ☐ Make publicly available and easily accessible a channel for receiving reports by the victim, representatives, Public Prosecutor's Office, or organizations requesting content removal (art. 29, paragraph 3);
- ☐ Adopt effective mechanisms to identify abusive use of reporting systems (art. 32);
- ☐ Inform users about cases of misuse of reporting mechanisms and applicable sanctions (art. 33, head);
- ☐ Establish and disclose transparent procedures to identify abuse of reporting mechanisms and apply sanctions (art. 33, paragraph 2);
- ☐ Keep detailed records of abuse of reporting mechanisms cases and sanctions applied (art. 33, paragraph 3) – ***pending regulation***.

## 1.10. Notice and takedown

- ☐ Remove content that violates minors' rights when reported by the victim, representatives, Public Prosecutor's Office, or organizations, regardless of a court order (art. 29, head).

## 1.11. Appeal process

- ☐ Respect the right to appeal the decision to remove content reported by the victim, representatives, Public Prosecutor's Office, or organizations (art. 30).

## 1.12. Local representation

- ☐ Maintain a legal representative in Brazil, with powers to receive communications and respond to judicial (art. 40).

## 2 Providers that make available content improper, inadequate, or prohibited for minors

- ☐ Adopt effective measures to prevent access by minors (art. 9, head);
- ☐ Implement reliable age verification mechanisms at each access, prohibiting self-declaration (art. 9, paragraph 1).

## 3 Providers of pornographic content

- ☐ Prevent the creation of accounts by minors (art. 9, paragraph 3).

## 4 App stores and operating systems

- ☐ Ascertain users' age or age range (art. 12, I);
- ☐ Allow parents or guardians to configure parental supervision mechanisms and monitor access (art. 12, II);
- ☐ Provide, via API, age signals to providers (art. 12, III);
- ☐ Obtain explicit, free, and informed parental or legal guardian consent before allowing minors to download apps (art. 12, paragraph 2).

## 5 Providers of child monitoring products

- ☐ Ensure the inviolability of images, sounds, and other information captured, stored, and transmitted to parents or guardians (art. 19, head);
- ☐ Inform children and adolescents, in appropriate language, about the monitoring being carried out (art. 19, paragraph 1).

## 6 Providers of electronic games

- ☐ By default, limit interaction functionalities, ensuring parental or legal guardian consent (art. 21, sole paragraph);
- ☐ Ensure compliance with specific legislation regulating e-games (art. 21, head).

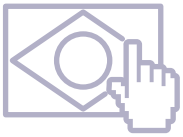
## 7 Providers of social media

- ☐ Ensure that accounts of users up to sixteen (16) years are linked to the account of one of their legal guardians (art. 24, head);
- ☐ If services are inappropriate for children and adolescents, adopt measures to:
  - inform all users in a clear, prominent, and accessible manner that their services are not appropriate (art. 24, paragraph 1, I)
  - monitor and restrict the display of content that has the evident objective of attracting children and adolescents (art. 24, paragraph 1, II)
  - continuously improve age verification mechanisms to identify accounts operated by minors (art. 24, paragraph 1, III)
- ☐ In case of evidence that an account is operated by a minor in non-compliance with the minimum age requirements, suspend access and initiate a swift procedure for appeal and age verification by the legal guardian (art. 24, §4) – ***pending regulation***;
- ☐ In the absence of a legal guardian account, prohibit the possibility of altering the account's parental supervision settings to a lower level of protection (art. 24, paragraph 5);
- ☐ Establish specific rules for processing children's and adolescents' data (art. 25).

## 8 Providers with more than 1,000,000 (one million) registered minor users

- ☐ Publish semiannual transparency reports in Portuguese (art. 31);
- ☐ Enable, free of charge, access to data necessary for researching the impacts of their products and services on the rights of minors and on their best interests (art. 31, sole paragraph) – ***pending regulation***.

## 9 Providers of personal electronic equipment that allow for internet access



- ☐ Include a sticker in the packaging informing parents of the need to protect children and adolescents from accessing websites with improper or inadequate content for this age group (art. 38).