Position Statement: Zero PII Architecture & Data Minimization Protocol

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Organization	KuroyukiDev Games
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Executive Summary

KuroyukiDev Games operates under a strict **Data Minimization and Privacy-by-Design Framework**. Our software products, video games, companion software, helper utilities, and web services are explicitly engineered to exclude real-money financial clearing, user-to-user cash transfers, and secondary asset trading. Consequently, implementing Know-Your-Customer (KYC) identity-verification architectures introduces severe, unnecessary cyber-risk exposure without providing any technical benefit.

1. Technical Justification for PII Exclusion

A. Absence of Financial & AML Risk Drivers

- **No Fiat/Crypto Out-Ramps:** Software products operate exclusively using local save files or one-way digital platform entitlement licenses. The software does not provide mechanisms to transfer real-world value between accounts, eliminating risk related to Anti-Money Laundering (AML) or financial fraud.
- **Delegated Transaction Settlement:** All monetary transactions are processed through primary platform storefronts (e.g., Steam, Google Play, itch.io). Merchant-of-Record

responsibilities—including payment security, tax reporting, and fraud handling—remain with those platforms.

B. Attack Surface Reduction & Honeypot Mitigation

- **Data Minimization Strategy:** Collecting PII (such as government IDs, legal names, physical addresses, or phone numbers) creates an unnecessary data target for cybercriminals.
- **Zero-Retention Model:** By declining to process or store PII, our architecture neutralizes exposure to database breaches, credential stuffing, and identity theft risks, protecting both the developer and end users.

2. Regulatory & Compliance Alignment

A. United States Data Privacy Acts & COPPA Compliance

- **COPPA & State Privacy Laws:** Under U.S. Federal Trade Commission (FTC) guidelines and state privacy frameworks (such as CCPA/CPRA), collecting sensitive personal data requires explicit disclosures, parental verification systems, and strict data retention controls.
- **Avoidance of Actual Knowledge:** By refusing to collect, transmit, or record personal data—including names, contact details, or persistent identifiers across non-owned properties—our software remains outside the scope of expanded PII compliance obligations.

B. International Standards (GDPR Article 25)

- **Privacy by Design & Default:** European Union Regulation (EU) 2016/679 (GDPR) Article 25 requires data controllers to limit processing to only data necessary for each specific purpose. Collecting identity data for offline or non-financial video games violates the principle of data minimization.

3. Formal Declaration of Architecture Non-Negotiability

1. **Mandate Refusal:** KuroyukiDev Games will not implement identity verification, government ID collection, biometric analysis, or real-name linking in any software product.
2. **Third-Party Boundary:** Any partner or third-party service requiring KYC integration as a prerequisite for integration will be excluded from the studio's technical stack.
3. **Liability Shift:** Demanding the collection of PII without a direct functional or financial requirement introduces avoidable cybersecurity and legal liabilities. KuroyukiDev Games maintains an architecture designed to prevent these risks.

4. Stance on Child Safety Regulations & PII Collection Risks

- **Inherent Flaws in PII-Based Child Safety Rules:** Legislative frameworks claiming to 'protect minors' via identity verification or age gating implicitly require the collection, processing, and retention of adult and minor PII. In practice, centralizing sensitive family identity data creates a massive cyber attack vector that exposes parents and guardians to identity theft, financial fraud, and data leaks—directly compromising household security and family safety.
- **Refusal to Expose Users to Structural Risk:** KuroyukiDev Games firmly rejects compliance mechanisms that substitute real safety with structural data hazards. Collecting parental or player identity documents under the guise of child safety increases vulnerability rather than reducing harm.
- **Principled Opposition to Data Honeypots:** KuroyukiDev Games will not participate in regulatory paradigms that endanger families through mandatory data aggregation. We maintain a zero-PII architecture as the primary defense for protecting all users, including minors.

5. Closing words directly from the Founding CEO and Owner of KuroyukiDev Games

WARNING: *Swear words are present in this section as a result of an absolutely livid software engineer being the one who wrote these closing words! If you can't handle a few swear words then please grow yourself a spine before proceeding.*

- If lawmakers wish to put the lives of their own families, and by extension the lives of their own children, in danger of identity theft and other cybercrimes... then my answer to that choice is simple:
  "You are free to screw over YOUR OWN families! But YOU have NO RIGHT to screw over OTHER households with your lack of comprehension of the Cyber Security industry."

- Furthermore, if ANYONE tries to force us (the KuroyukiDev Games game studio) to comply with these extremely dangerous, hazard-n-risk infested laws, then my answer to you is simple:
  *"No!! Not on **your** life!! You can kiss my ass you fucking stupid politicians!!! You should willingly choose to resign from your position immediately on grounds of both weaponized and general incompetence!! It doesn't matter how YOU feel about your policies, your incompetence in the field of Cyber Security is a threat to society's digital safety so I repeat, RESIGN FROM YOUR POSITION IMMEDIATELY!! You have NO choice but to comply with this demand lest you put the lives of the entire world's population in danger with your*

*foolish whims under the guise of 'Protecting Minors' which any worthwhile Cyber Security specialist would tell you... your way of 'protecting' is NOT going to actually result in anything other than widespread cyber crimes and countless instances of identity theft on a global scale. And yes, ALL these cyber crimes that are bound to happen will be ALL YOUR FAULT!! That is exactly why I called you 'fucking stupid politicians' in this answer... because you ARE fucking stupid and you're a politician AND you're making an incredibly foolish and poorly planned set of laws that is 100% guaranteed to ruin the lives of countless families worldwide. Protecting minors? No you're not... **your** laws are going to put minors in danger indirectly by putting their parents in danger and in doing so will cause massive damages to their family safety and all of that damage will 100% be YOUR fault as the foolish politicians who pushed for the laws that cause the damages to families worldwide. I WILL NOT PARTICIPATE IN YOUR FOOLISHNESS!! I WILL NOT COMPLY WITH THE LAWS THAT WILL PUT THE PUBLIC IN DANGER ON A GLOBAL SCALE!! YOU FOOLISH POLITICIANS CAN ALL FACE YOUR OWN DOWNFALL AS A GROUP OF FOOLS AND YOU CAN ALL DO SO WITHOUT INCLUDING ME IN YOUR COLLECTIVE DOWNFALL!!"*

Long live the gamers!🎮

~ Kurochan

The Founding CEO, Lead Software Engineer and Owner of KuroyukiDev Games