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Apps which Google rates as safe for kids violate their privacy and expose them to other harms

Advocates, lawmakers call on FTC to address how Google's Play Store promotes children's games which violate kids' privacy law, feature inappropriate content, and lure kids to watch ads and make in-app purchases

BOSTON, MA and WASHINGTON, DC — December 19, 2018 — Today, a coalition of 22 consumer and public health advocacy groups led by Campaign for a Commercial-Free Childhood (CCFC) and Center for Digital Democracy (CDD) [called on the Federal Trade Commission](#) (“FTC”) to investigate and sanction Google for the deceptive marketing of apps for young children. Google represents that the apps in the “Family” section of the Google Play Store are safe for children, but the apps often violate federal children’s privacy law, expose children to inappropriate content, and disregard Google’s own policies by manipulating children into watching ads and making in-app purchases.

The Play Store is Google’s one-stop shop for Android apps, games, and entertainment. Apps in the “Family” section are promoted with a green star and, in some cases, a recommended age, like “Ages 5 & Under,” or “Ages 6-8.” Google is aware from several recent academic studies that many of the apps in this section are a threat to children’s privacy and wellbeing, yet it continues to promote them with these kid-friendly ratings.

“The business model for the Play Store’s Family section benefits advertisers, developers, and Google at the expense of children and parents,” said CCFC’s Executive Director Josh Golin. “Google puts its seal of approval on apps that break the law, manipulate kids into watching ads and making purchases, and feature content like kids cleaning their eyes with sharp objects. Given Google’s long history of targeting children with unfair marketing and inappropriate content, including on YouTube, it is imperative that the FTC take swift action.”

Lawmakers echoed the call for FTC action. “We’re repeatedly confronted with examples of tech companies that are just not doing enough to protect consumer privacy – and I’m particularly concerned about what this failure means for our children,” said U.S. Senator Tom Udall (D-NM) regarding today’s action by the advocates. “When real-world products are dangerous or violate the law, we expect retailers to pull them off the shelves. Google’s refusal to take responsibility for privacy issues in their Play Store allows for app developers to violate COPPA, all while Google cashes in on our children’s activity. It is past time for the Federal Trade Commission to crack down to protect children’s privacy.”

“Google’s dominance in the app market cannot come at the expense of its clear legal obligations to protect kids that use its products.” said David N. Cicilline (RI-01), the top Democrat on the House Antitrust Subcommittee, who raised his concerns about this issue when the Chairman of the FTC testified last week. “I am pleased that this coalition of consumer and children’s advocacy groups are urging the FTC to scrutinize whether Google is improperly tracking children and selling their data.”

Google policies require apps in the Kids and Family section of its Play Store to be compliant with the Children's Online Privacy Protection Act (COPPA). But, Google doesn't verify compliance, so Play Store apps for children consistently violate COPPA. Many apps send children's data unencrypted, while others access children's locations or transmit persistent identifiers without notice or verifiable parental consent. Google has known about these COPPA violations since at least July 2017, when they were publicly reported by Serge Egelman, a researcher at the University of California, Berkeley Center for Long-Term Cybersecurity. Yet Google continues to promote such apps as COPPA-compliant.

"Our research revealed a surprising number of privacy violations on Android apps for children, including sharing geolocation with third parties," said Serge Egelman, a researcher at the University of California, Berkeley. "Given Google's assertion that Designed for Families apps must be COPPA compliant, it's disappointing these violations still abound, even after Google was alerted to the scale of the problem."

Google's policies also require apps for children to avoid "overly aggressive" commercial tactics, but the advocates' FTC complaint reveals that many popular apps feature ads that interrupt gameplay, are difficult to click out of, or are required to watch in order to advance in a game. In addition, games represented to parents as free often pressure children to make in-app purchases, sometimes going so far as to show characters crying if kids don't buy locked items. The complaint also offers examples of multiple children's apps that serve ads for alcohol and gambling, despite those ads being barred by Google's Ad Policy.

Other apps designated as appropriate for children are clearly not. Some contain graphic, sexualized images, like TutoTOONS *Sweet Baby Girl Daycare 4 – Babysitting Fun*, which has over 10 million downloads. Others model actively harmful behavior, like TabTale's *Crazy Eye Clinic*, which teaches children to clean their eyes with a sharp instrument, and has over one million downloads.

"Parents who download apps recommended for ages 8 and under don't expect their child to see ads which promote gambling, alcoholic beverages, or violent video games," said Angela Campbell, Director of the Communications and Technology Clinic at Georgetown Law, which drafted the complaint. "But Google falsely claims that apps listed in the Family section only have ads which are appropriate for children. It's important for the FTC to act quickly to protect children, especially in light of Google's dominance in the app market."

The coalition has previously asked the FTC to investigate developers of children's apps, citing research from the University of Michigan that revealed manipulative advertising is rampant in apps popular with preschoolers. Today's complaint focuses on Google, whose misrepresentation and promotion of those apps has led to hundreds of millions of downloads.

"Google (Alphabet, Inc.) has long engaged in unethical and harmful business practices, especially when it comes to children," explained Jeff Chester, executive director of the Center for Digital Democracy (CDD). "And the Federal Trade Commission has for too long ignored this problem, placing both children and their parents at risk over their loss of privacy, and exposing them to a powerful and manipulative marketing apparatus. As one of the world's leading providers of content for kids online, Google continues to put the enormous profits they make from kids

ahead of any concern for their welfare," Chester noted. "It's time federal and state regulators acted to control Google's 'wild west' Play Store App activities."

Joining the Campaign for a Commercial-Free Childhood and the Center for Digital Democracy in signing today's complaint to the FTC are Badass Teachers Association, Berkeley Media Studies Group, Color of Change, Consumer Action, Consumer Federation of America, Consumer Watchdog, Defending the Early Years, Electronic Privacy Information Center, Media Education Foundation, New Dream, Open MIC (Open Media and Information Companies Initiative), Parents Across America, Parent Coalition for Student Privacy, Parents Television Council, Peace Educators Allied for Children Everywhere (P.E.A.C.E.), Privacy Rights Clearinghouse, Public Citizen, the Story of Stuff, TRUCE (Teachers Resisting Unhealthy Childhood Entertainment), and USPIRG.

In addition to filing an FTC complaint, CCFC has launched a [petition](#) asking Google to adopt the Kids' Safer App Store Standards, which would bar advertising in apps for kids under 5, limit ads in apps for kids 6 -12, bar in-app purchases, and require apps to be reviewed by a human before being included in the Kids and Family section of the Play Store.

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