

# Kids and Apps

How to deal with kids worldwide

Session 717

Chris Espinosa

Internet Software and Services

# Kids and Apps

## What we'll cover today

Apple and Kids

Recent Regulatory Activity

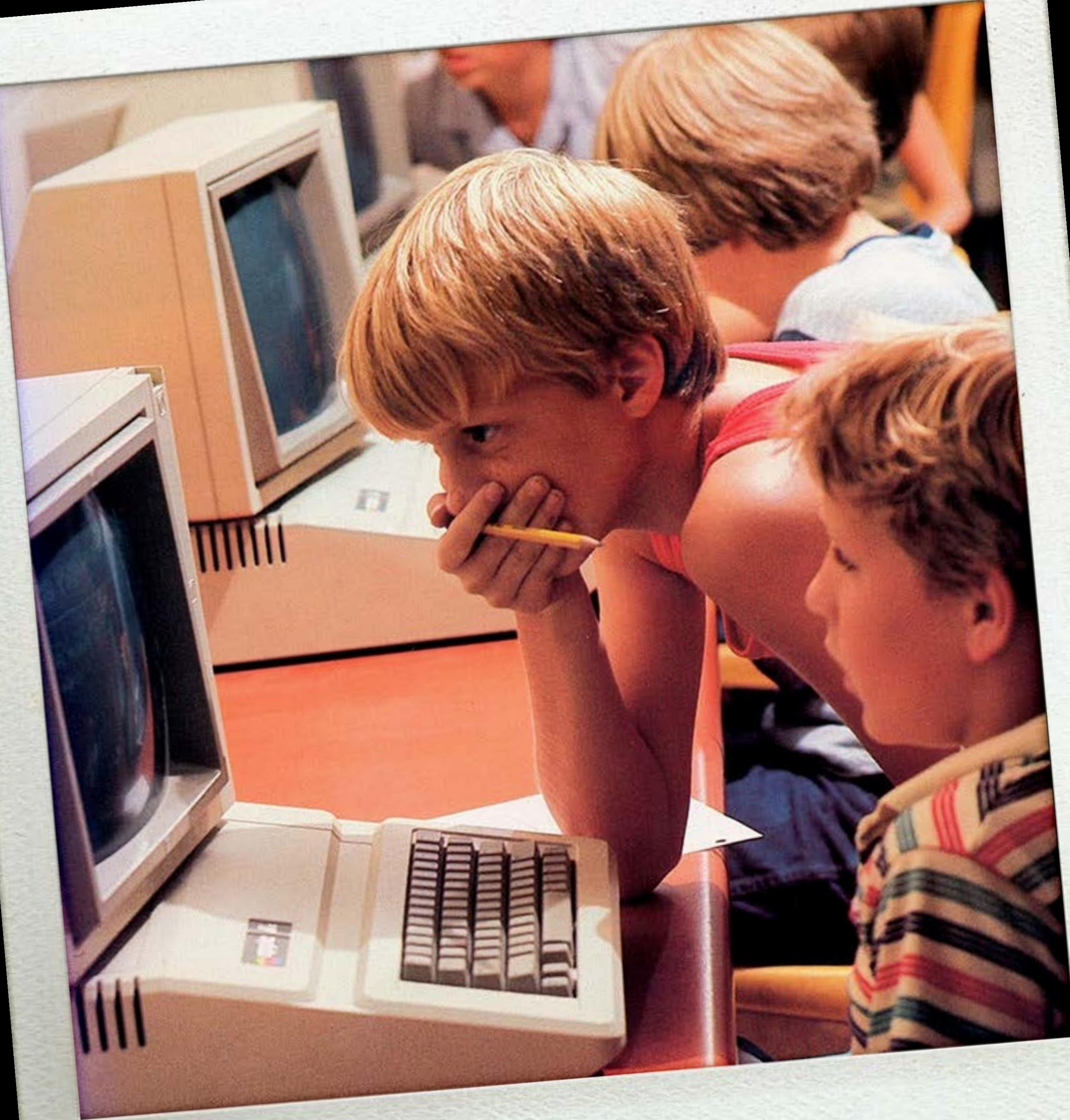
Apple IDs for Kids Under 13

Your Responsibilities

Best Practices

Other Countries

# Apple and Kids









# It's Different for Kids Now

And for parents

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And for parents



# It's Different for Kids Now

And for parents

Millions of strangers



# It's Different for Kids Now

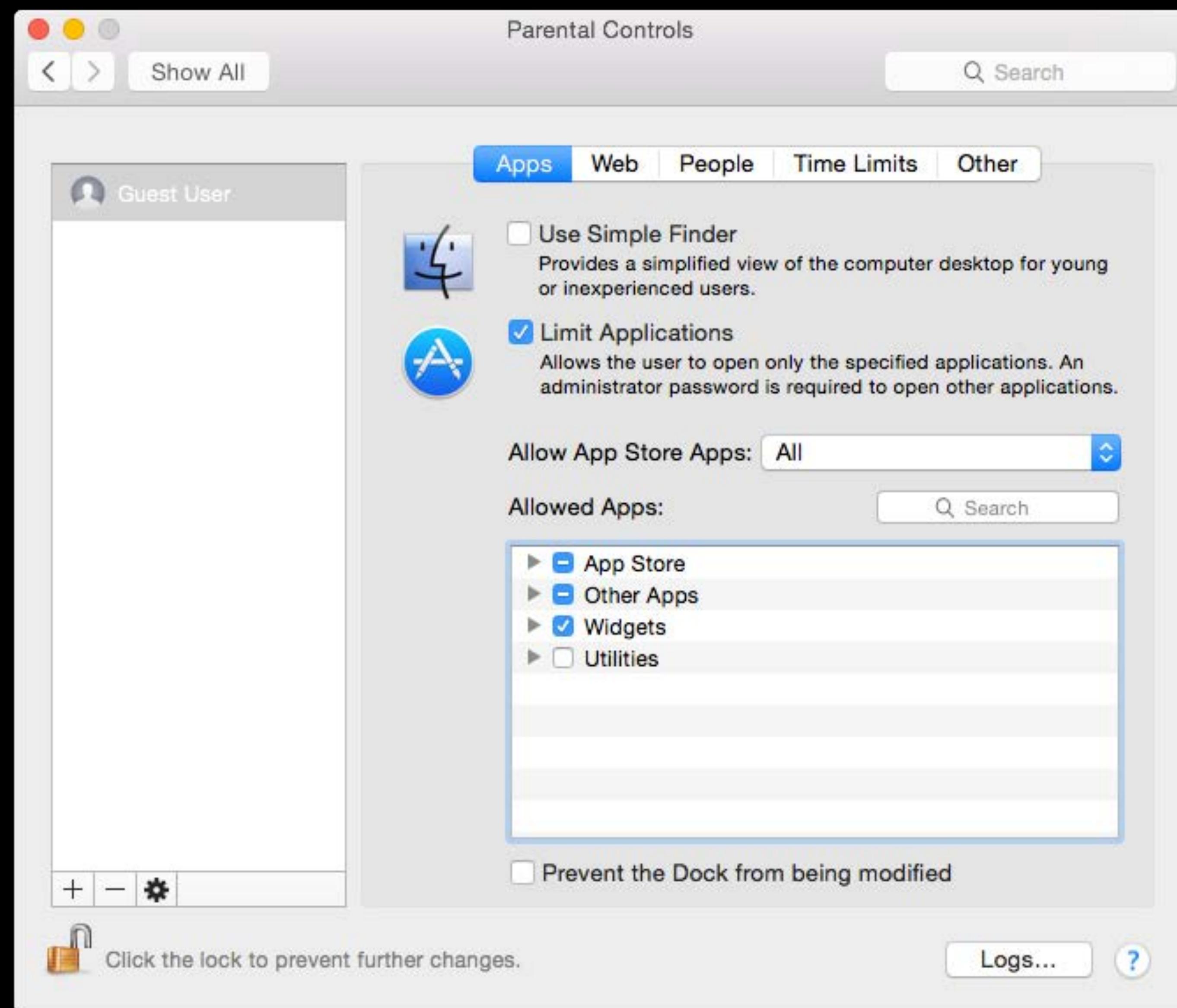
And for parents

Millions of strangers

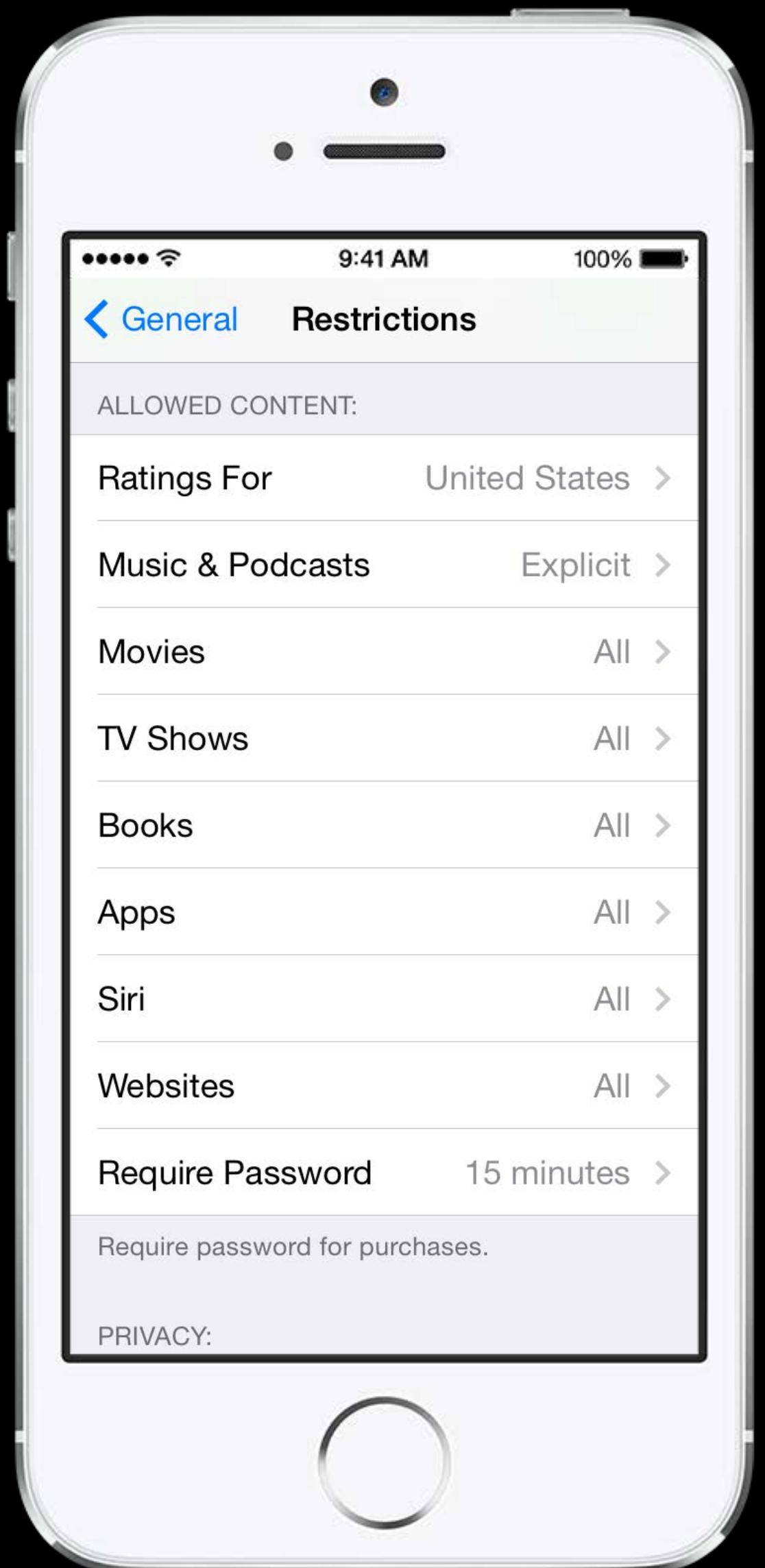
Billions of dollars of marketing  
and merchandizing



# Parental Controls and Restrictions



# Parental Controls and Restrictions



# Game Center

Game Center handles available to kids under 13

- No chat
- No ads
- Generic screen names
- No image sharing
- Canned chat messages only—no free-form chat

General Apple IDs unavailable to children under 13

Parents buy apps and install on their children's devices



# Kids Category

Must link your product page to a Privacy Policy

No behavioral advertising

Contextual ads must be appropriate for kids

Parental Gate before link out of app or engage in commerce



Parents' Guide to iTunes

# Recent Regulatory Activity

# Children's Online Privacy Protection Act

Original statute effective April 2000

Focused on websites and online services

Applies to all sites directed at or with actual knowledge of use by children under 13

Restricts collection of identifying information without parental consent

- First and last name, email address, or phone number
- Any physical address, street name, or name of a city or town
- SSN, User identifier, or screen name that reveals email
- Any persistent identifier or photograph that permits contacting
- Information combined with any of the above

Defines acceptable parental consent mechanisms

# COPPA Rules Revision of 2013

Discuss this with your lawyer

Clarified that it applies to mobile too

Expanded definition of personal information that requires parental consent

- Any photo, video, or sound recordings of the child's image or voice
- Geolocation that can identify a street in a city or town
- Any screen name or identifier that can be used for contact
- Any persistent identifier that can be used across sites or services

Information solely for app or website internal use is OK

Advertising that is contextual but not personally targeted is OK

# Apple IDs for Kids



# Apple ID for Students

Verified parental consent through schools

A program that allows schools to request Apple IDs for students under 13

Rolled out in several large school districts in February 2014

Full-fledged Apple IDs for iCloud and iTunes

- Students don't receive marketing materials from Apple
- Limit Ad Tracking automatically on



# Family Sharing

Verifiable parental consent through iCloud



A process for parental creation of Apple IDs for kids

Integrates with Ask To Buy so parents can manage kids' purchases

Full-fledged Apple IDs for iCloud and iTunes

Verified parental consent via setting up account and credit card security code

# Family Formation



Derek

# Family Formation

Meg



Derek



Emily



# Family Formation

Jimmy



Meg

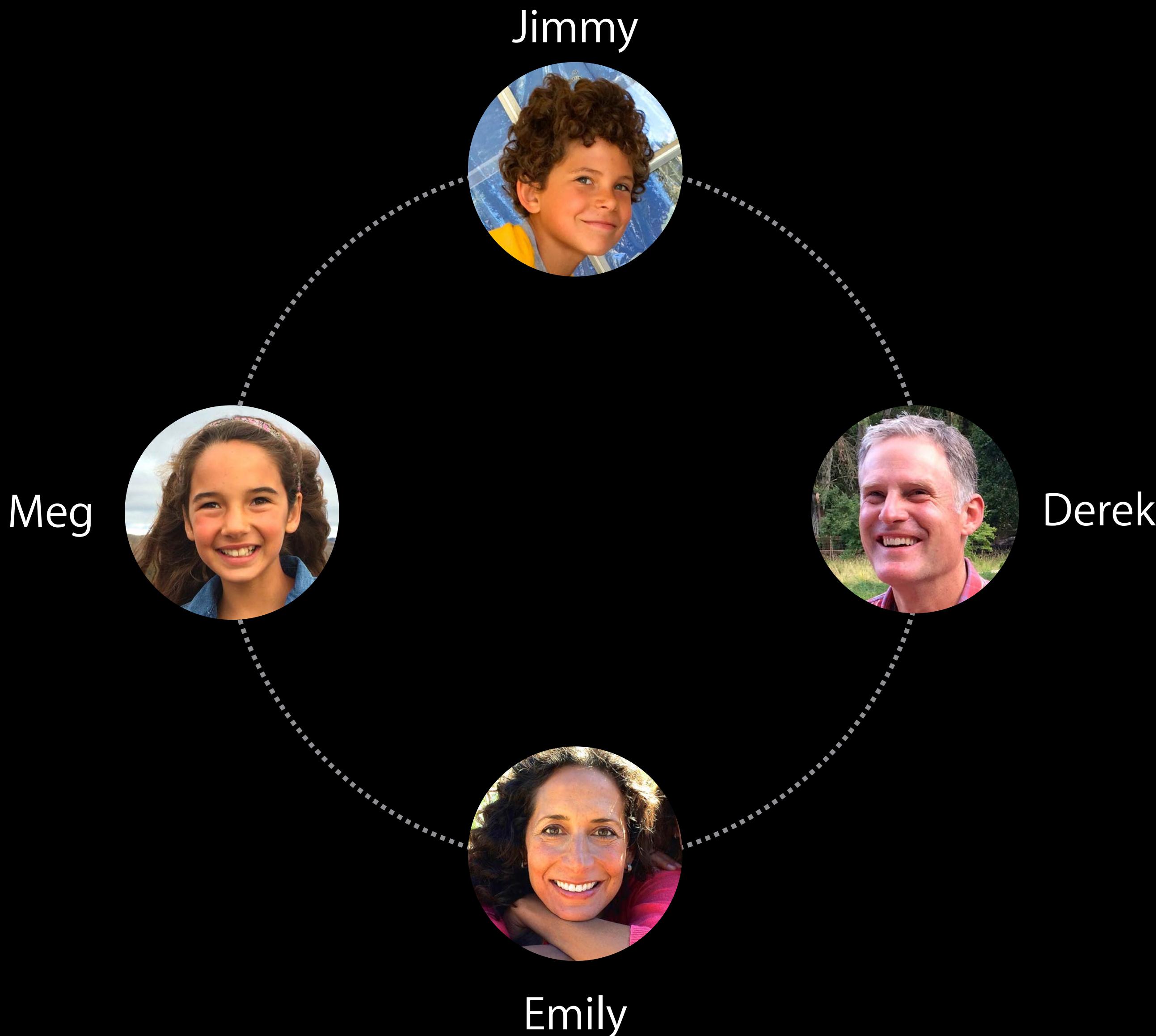


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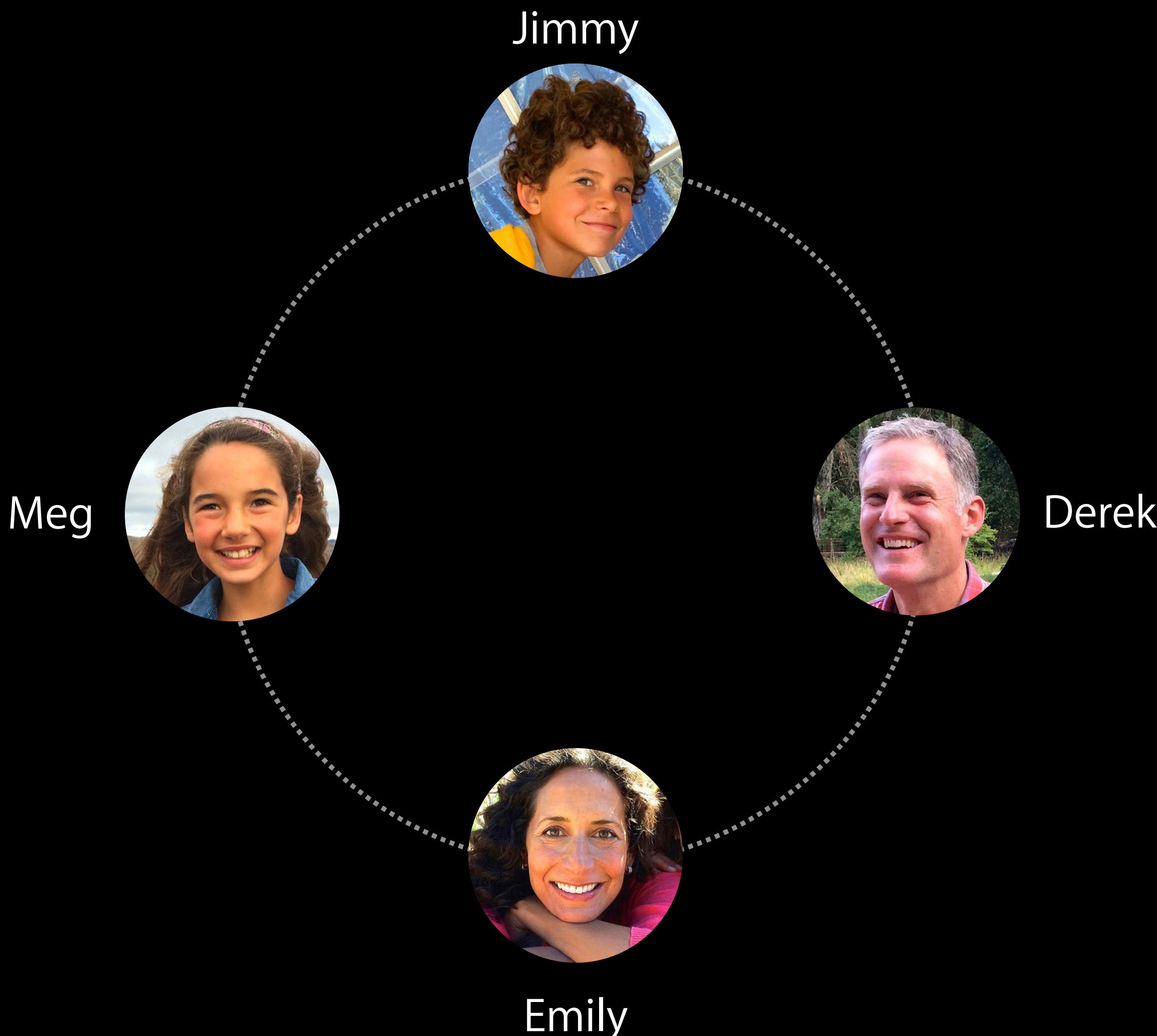


Emily

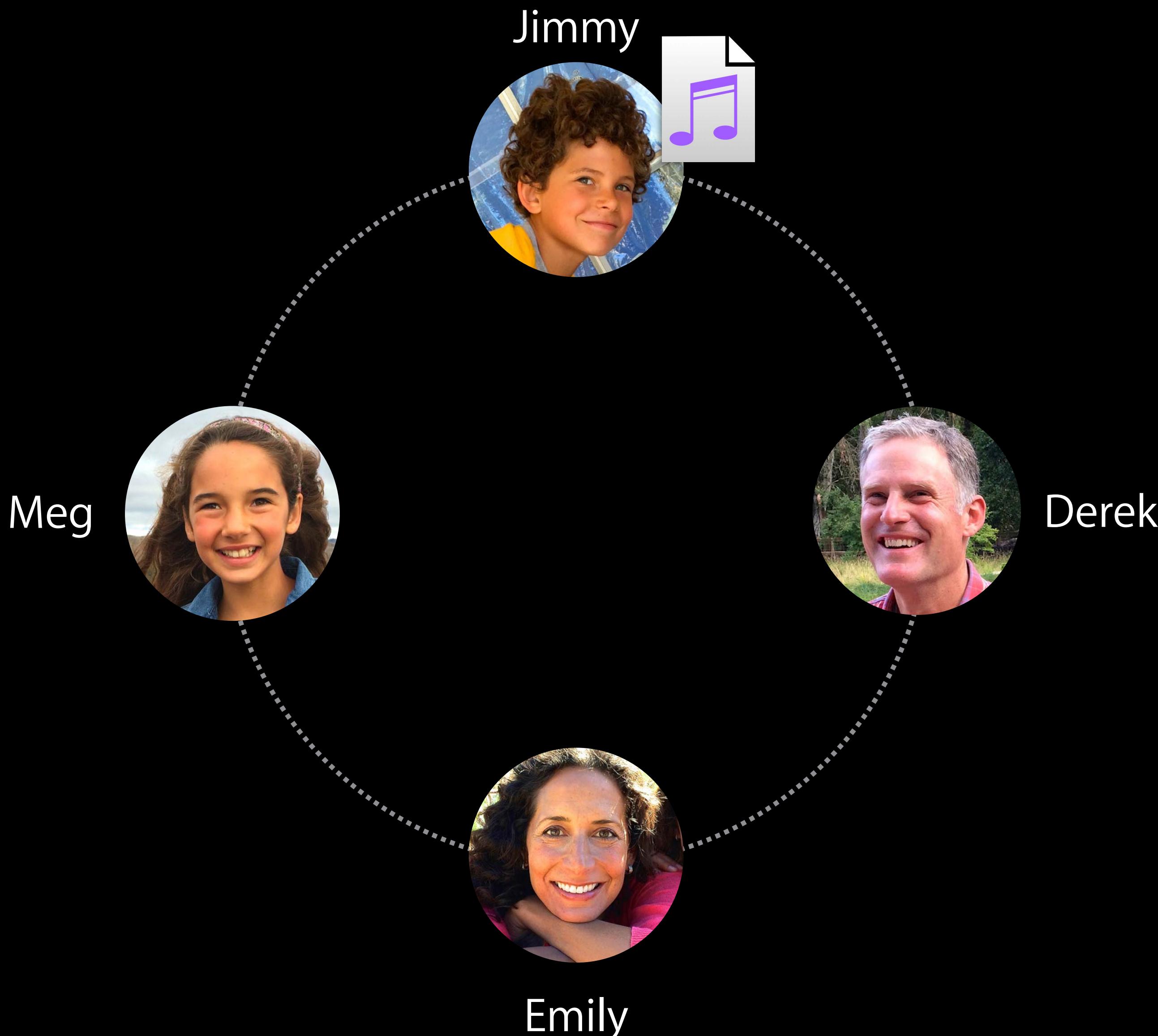
# Family Formation



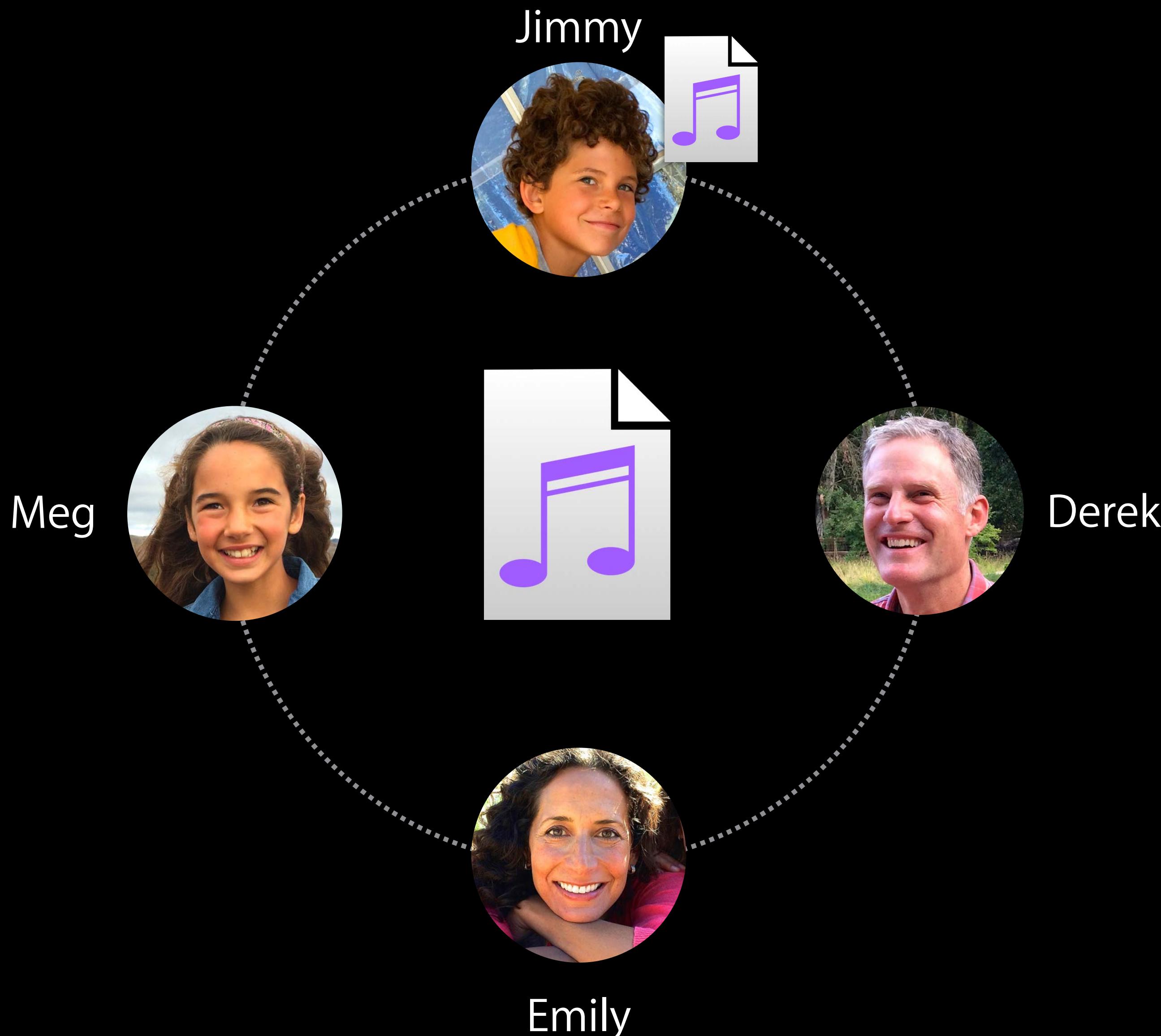
# Purchase Sharing



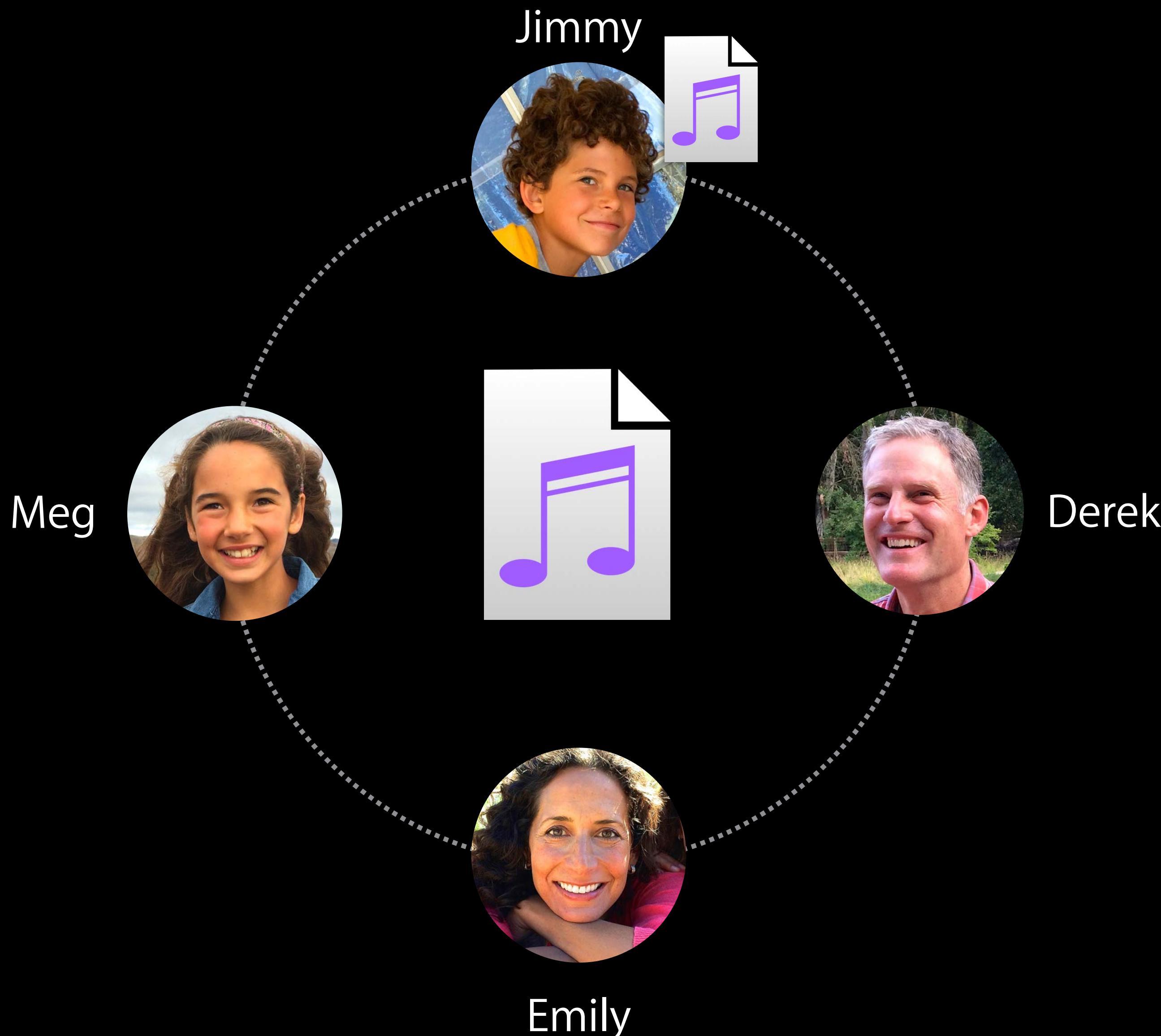
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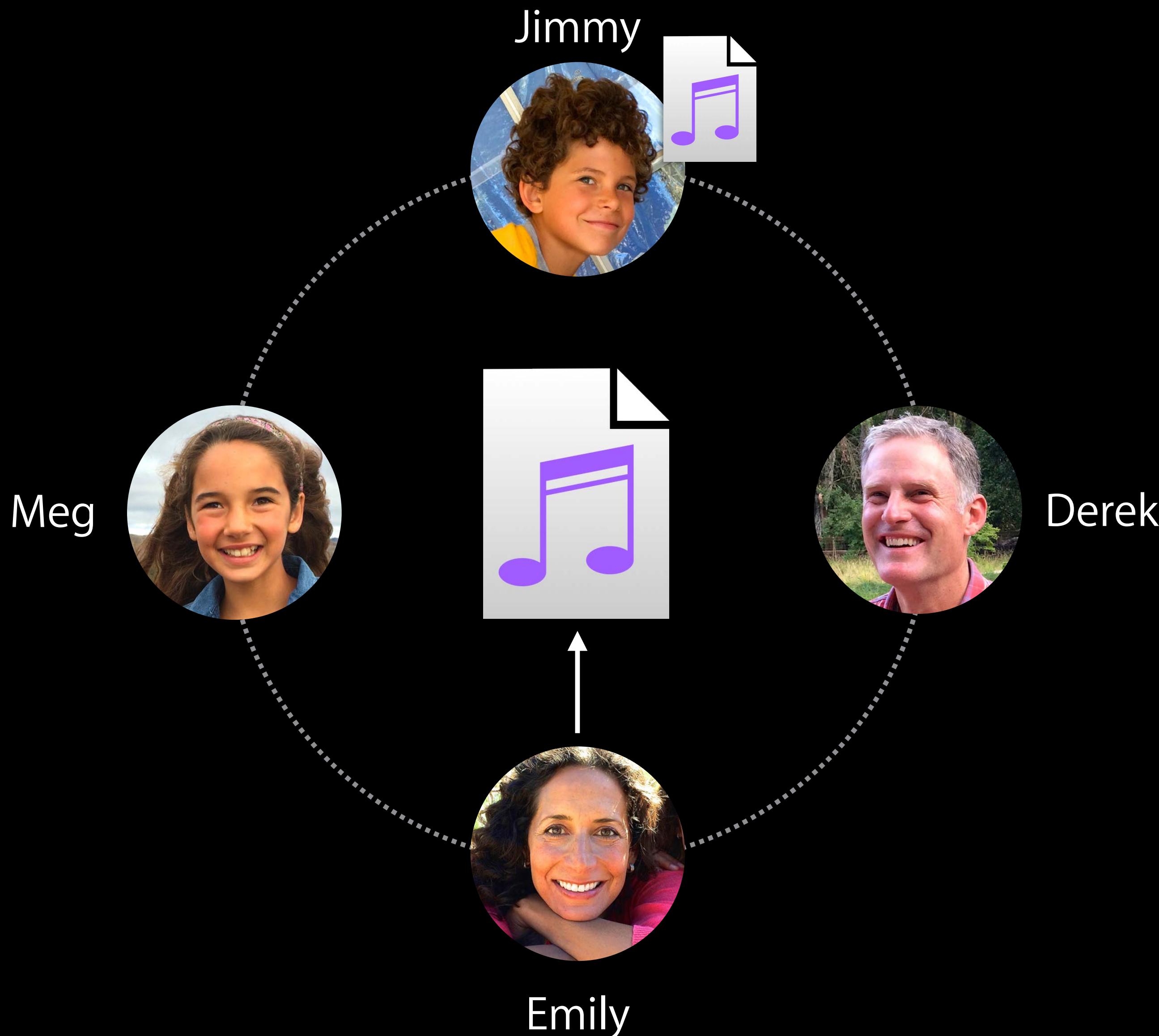
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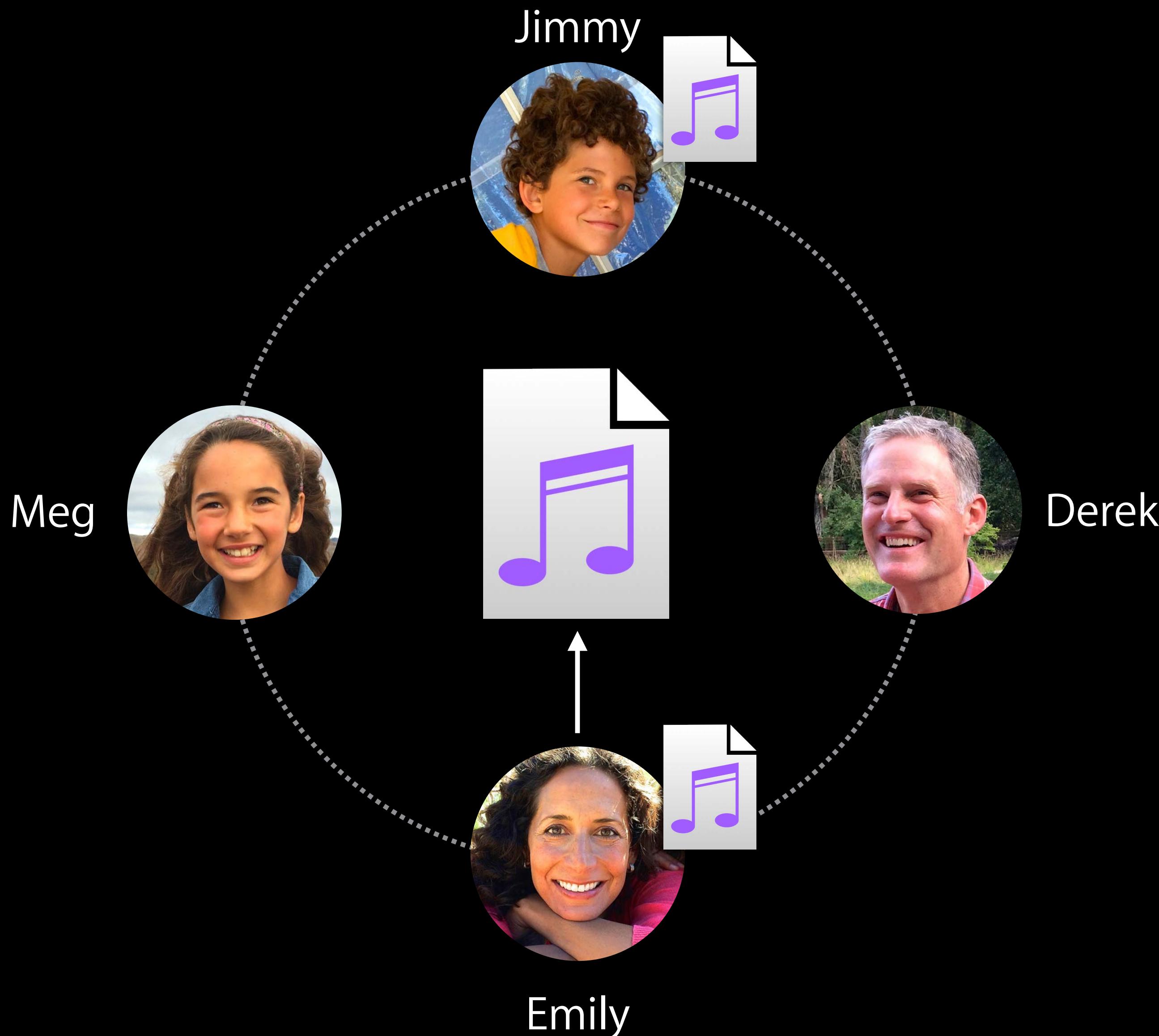
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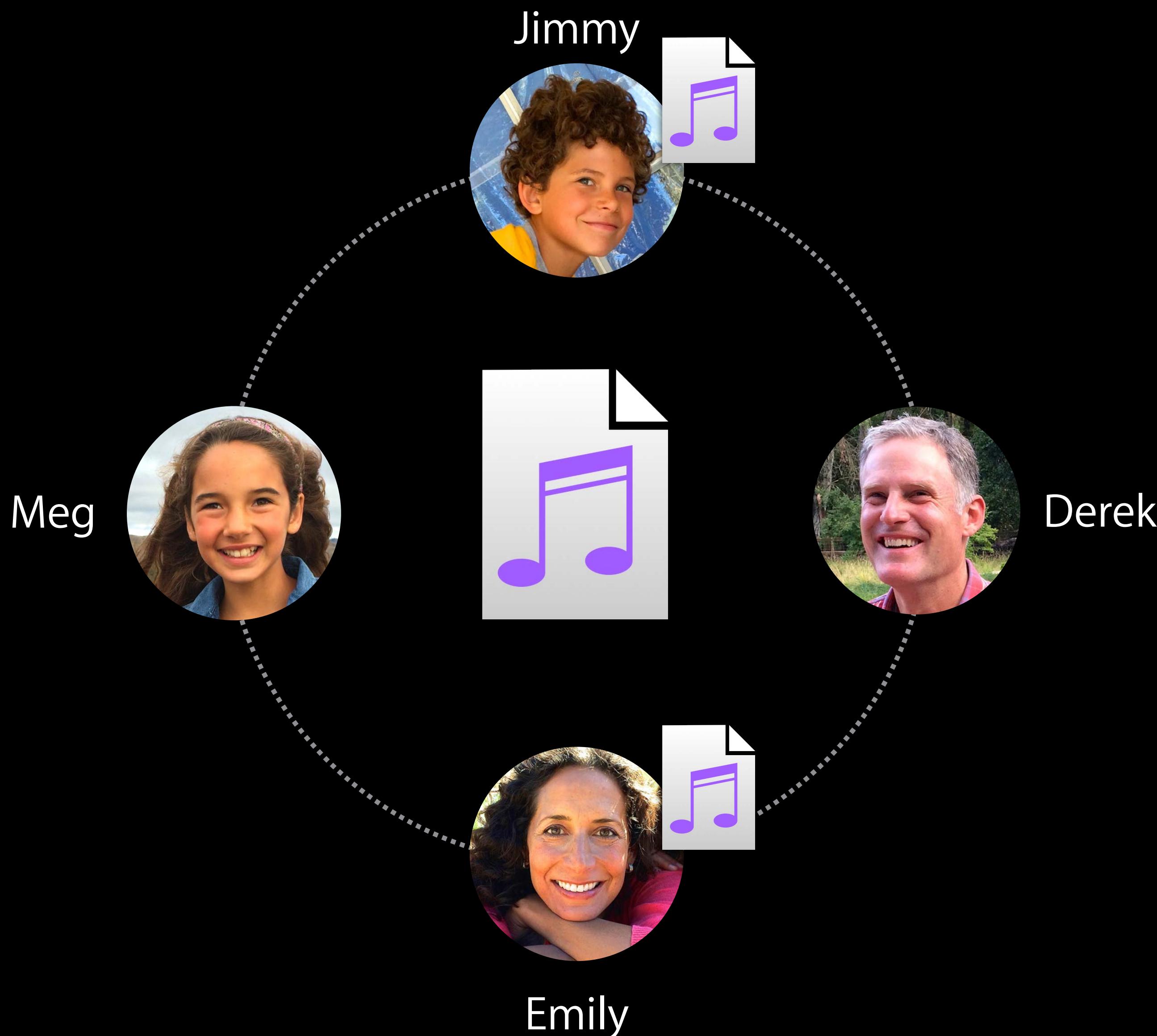
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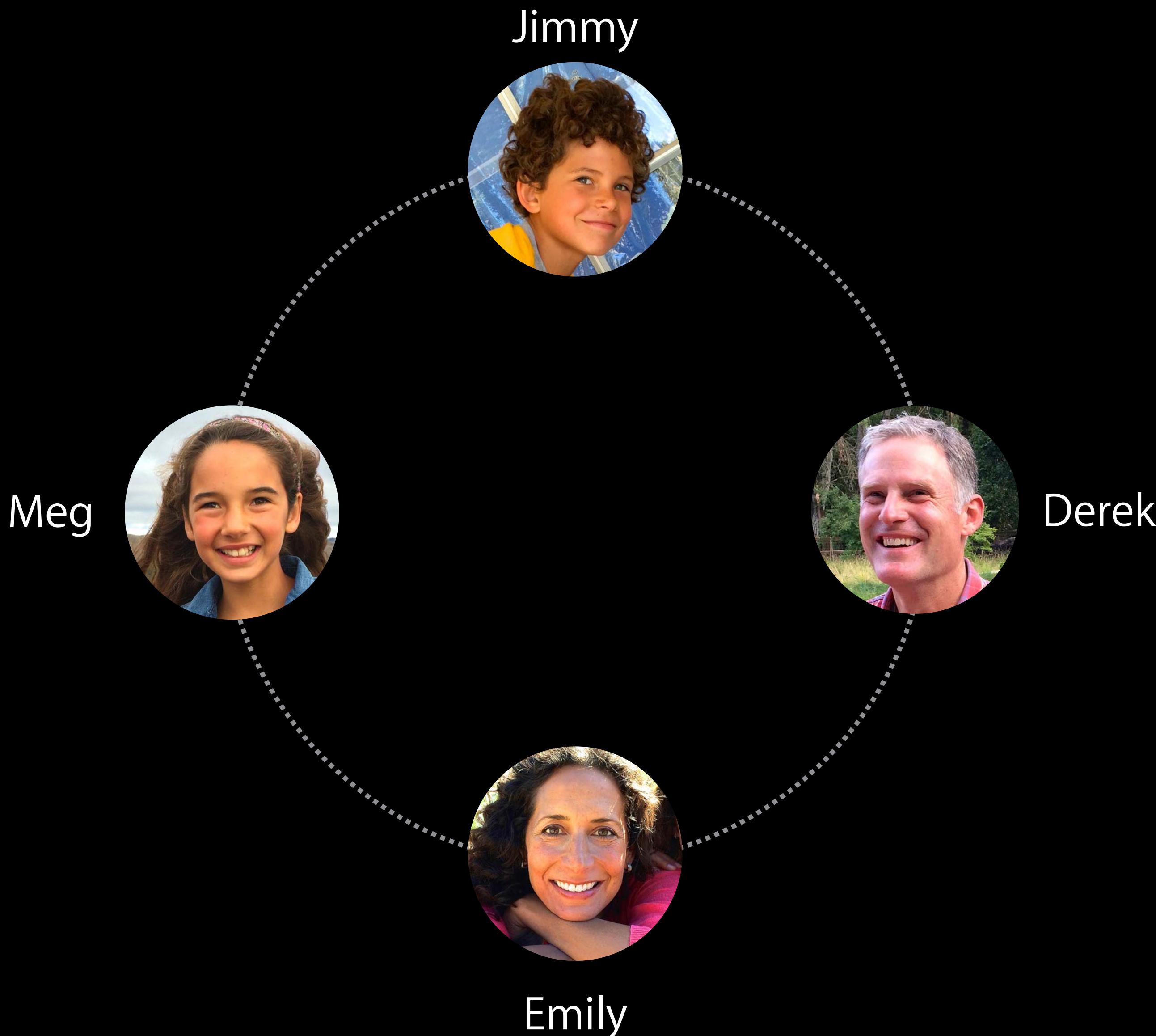
# Purchase Sharing



# Purchase Sharing



# Ask To Buy



# Ask To Buy



Meg



Jimmy

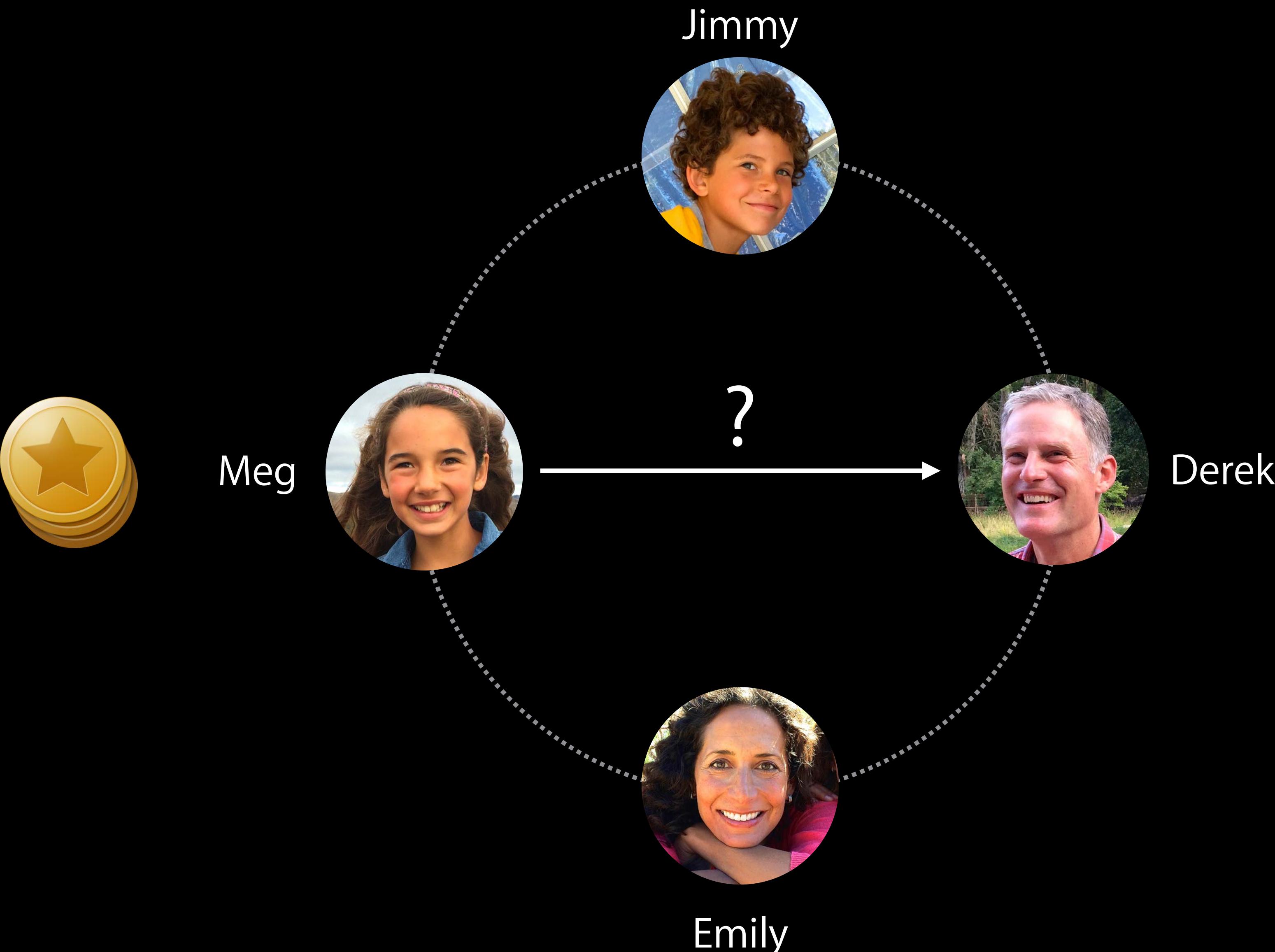


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Emily

# Ask To Buy



# Ask To Buy



Meg



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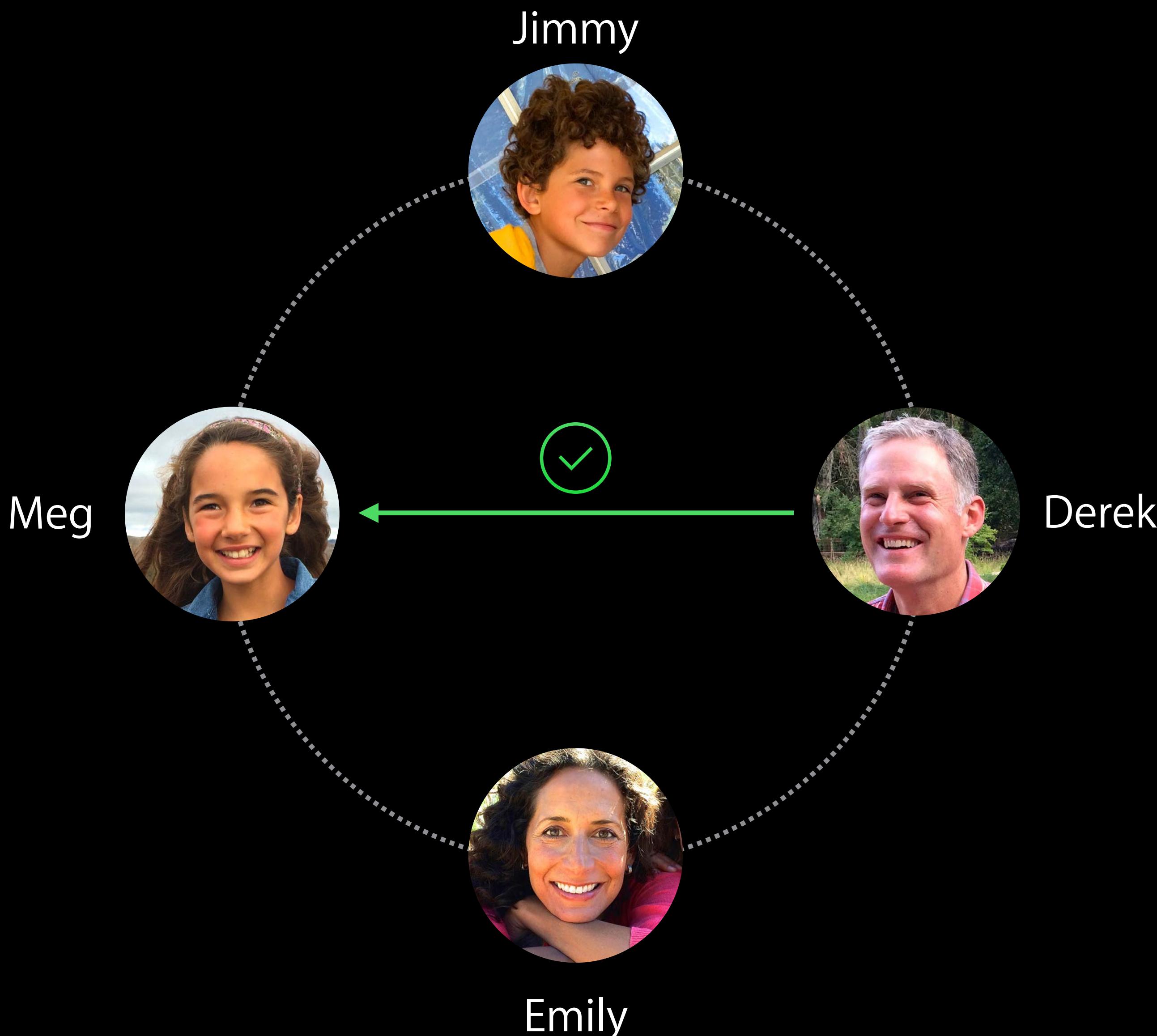


Derek



Emily

# Ask To Buy



# What Does This Mean for You?

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Only your lawyer can tell you for sure

Kids under 13 may be buying, sharing, and using your apps

Are your apps “directed at” kids under 13?

Do you have specific knowledge that kids under 13 are using your apps?

Consult with your lawyers to determine whether your app is subject to COPPA

Typically, if you have a general-purpose app and you do not specifically market to kids, and don't know the user is under 13, you don't have to worry about COPPA

# If Your App Is Directed at Kids

## Implementation choices

Do not do things subject to COPPA at all

Have a different experience for kids under 13

Obtain verified parental consent for kids under 13

# Approach 1—Avoid PII

This is not a comprehensive list—consult counsel

Don't collect PII

Don't show behaviorally targeted ads

Don't support photos, voice recording, social networking, location, push notifications, or any other COPPA-regulated functionality

Ask To Buy doesn't make you compliant

Using Game Center doesn't make you compliant

# Avoiding PII

## Regulated data classes

Data Class	Status
Location	Do not use
Contacts	Do not use
Calendars	
Reminders	
Photos	Do not use
Bluetooth	Do not use
Microphone	Do not use
Camera (worldwide)	Do not use
Motion Activity	
HealthKit	Do not use
Social (Facebook, Twitter, etc.)	Do not use

# *Demo*

Examples of PII-free child-targeted apps

# Approach 2—Establish an Age Screen

Ask for birthdate on **first** launch

You can record age screen result in prefs—but not the age itself

If under 13

- App Store guidelines say you must include useful functionality regardless of user's age
- Turn off non-COPPA-compliant features
- Ask your lawyer

You might want a Parental Gate, too

<https://developer.apple.com/app-store/parental-gates/>

*Demo*

Examples of age screens

# Approach 3—Verifiable Parental Consent

## Responsibility of each developer

Parent's consent to Apple does not extend to you

Same rules as verifiable parental consent for websites

Several ways to do this, choose what's right for you

A Parental Gate is not verifiable parental consent

# Request Verifiable Parental Consent

## Ongoing responsibilities after consent

Parents must be able to review or delete collected information

Parents must be able to stop collection going forward

You have to keep the information secure

You need to delete the information when you no longer need it

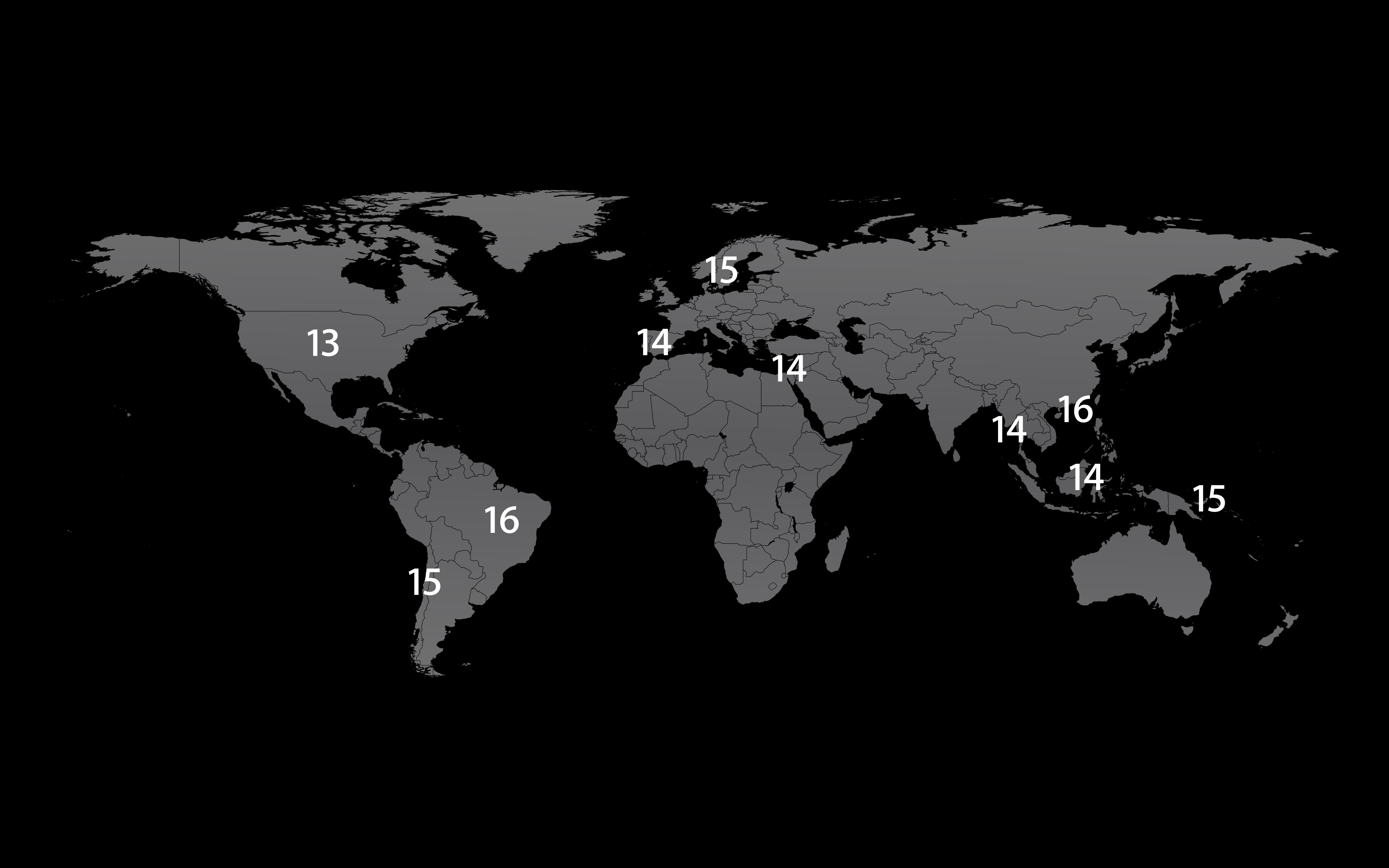
*Demo*

Disclosure and verifiable parental consent

# Other Countries



13





18



# Other Countries

Other countries may follow US law

Don't hardcode "13" or "18"

Check your region at runtime:

```
var product = theSKProductsResponse.products[0] as SKProduct  
var locale = product.priceLocale
```

# Summary

# Summary

## Talk to your lawyer

If your apps are targeted at a general audience, you may not have to worry

If they're 4+ and for kids, then you should comply with all applicable laws governing children's privacy, including COPPA

Don't collect personal information, ID, pictures, sounds, or locations at all

If you want to collect PII

- Require every user to self-declare their age and use an age gate
- Get verified parental consent beforehand

Do the same thing worldwide to make things simple, respect your customers, and be ready when other countries adopt COPPA-like rules

# Resources

COPPA Safe Harbor program

<http://www.business.ftc.gov/content/safe-harbor-program>

Moms with Apps

<http://momswithapps.com>

# More Information

Paul Danbold  
Core OS Technologies Evangelist  
[danbold@apple.com](mailto:danbold@apple.com)

Apple Developer Forums  
<http://devforums.apple.com>

# Related Sessions

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● The New iTunes Connect	Presidio	Wednesday 10:15AM
● Designing a Great In-App Purchase Experience	Nob Hill	Wednesday 11:30AM
● Optimizing In-App Purchases	Nob Hill	Wednesday 3:15PM
● User Privacy in iOS and OS X	Nob Hill	Thursday 2:00PM
● Apps for Kids Get Together	Lombard	Thursday 4:30PM

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# Labs

- Security and Privacy Lab      Core OS Lab B      Thursday 3:15PM
  - StoreKit and Receipts Lab      Services Lab A      Friday 10:15AM
  - Open Hours      Services Lab A      Friday 2:00PM

