“Won’t Somebody Think of the Children?”
Examining COPPA Compliance at Scale

Irwin Reyes, Primal Wijesekera, Joel Reardon, Amit Elazari Bar On, Abbas Razaghpanah, Narseo Vallina-Rodriguez, and Serge Egelman
COPPA?

- Age 13 and under
- Bans collecting certain data
- Some (verifiable) parental consent required
How would you “Solve” COPPA?

be able to ensure that the person giving consent is the child’s parent. **Acceptable methods of verifiable parental consent:**

- sign a consent form and send it back to you via fax, mail, or electronic scan;
- use a credit card, debit card, or other online payment system that provides notification of each separate transaction to the account holder;
- call a toll-free number staffed by trained personnel;
- connect to trained personnel via a video conference; or
- provide a copy of a form of government issued ID that you check against a database, as long as you delete the identification from your records when you finish the verification process.

https://www.iubenda.com/blog/guide-coppa-mobile-apps/
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GDPR for lazy people: Block all European users with Cloudflare Workers

By Diego Parrilla — On May 25, 2018
Problems
Analysis Environment
Charles Proxy is now available on iOS. Read the release announcement: [charlesproxy.com/documentation/…](https://charlesproxy.com/documentation/…)

Or visit the App Store:

[Charles Proxy](https://itunes.apple.com/au/app/charles-proxy/id677147718?mt=8)  
Charles Proxy for iOS lets you capture and inspect network requests and responses on your iOS device. You can view metadata, headers and bodies in the app, so you can finally debug 4.5/5.0 stars – 54 ratings

7:02 PM - 27 Mar 2018

384 Retweets  579 Likes
Overall Results

- 28% of 5,855 apps
- 73% transmitted sensitive data
- **None** attained parental consent - let alone verifiable
Location Data

• 706 apps had fine or coarse location permissions
• 235 used system location API
• 184 shared location data
• 101 apps shared Wi-Fi MAC address
Other data, such as Wi-Fi network information that is not user information, was for a short period available on the Reveal SDK, but was unused by AccuWeather. In fact, AccuWeather was unaware the data was available to it. Accordingly, at no point was the data used by AccuWeather for any purpose.
Transmission Analysis

- COPPA - need to use TLS for all data transmissions
- 2,344 “designed for families” apps did not use TLS in at least one transmission
- So… 3,511 apps are good?
SDKs

“…&coppa=true…”
Daniel McGee @danielmcgee134 - 29 May 2017
@OvercastFM just curious why Chromecast isn’t supported in the app? Would use it, even if it couldn’t cast smart speed and is only audio.

Overcast @OvercastFM

Replying to @danielmcgee134

Chromecast requires including a closed-source Google library in my app that could do anything. I don’t want to risk my users’ privacy.

9:20 AM - 30 May 2017

1 Retweet 11 Likes

Daniel McGee @danielmcgee134 - 30 May 2017
Replying to @OvercastFM

That’s a pity because I would use it all the time. However, I respect your decision from a developer’s point of view and 4 security as well.

Chris Benard @cbenard - May 4
Replying to @OvercastFM @danielmcgee134

Could you revisit this now that VLC supports it without including the closed bits? They reimplemented the protocol in an open source manner.

Chris Benard @cbenard - May 10
Ping again @marcoarment Chromecast code exists open source due to VLC 3’s additions.

Brad Joe @txchou - May 29
“...we suspect that many privacy violations are unintentional and caused by misunderstandings of third-party SDKs.”

–Reyes et al.
Unfortunately, our website is currently unavailable in most European countries. We are engaged on the issue and committed to looking at options that support our full range of digital offerings to the EU market. We continue to identify technical compliance solutions that will provide all readers with our award-winning journalism.

The home page of the Chicago Tribune on Friday, as viewed from Europe.

By Adam Satariano

May 25, 2018

LONDON — American news outlets including The Chicago Tribune, The Los Angeles Times and The Arizona Daily Star abruptly blocked access to their websites from Europe on Friday, choosing to black out readers rather than comply with a strict new data privacy law in the European Union that limits what information can be collected about people online.
Paul Calvano
@paulcalvano

@USATODAY launched a lightweight version of their site for the EU to comply with #GDPR. The US site is 5.5MB and contains 835 requests loaded from 188 hosts. When loaded from France it’s 297KB, 36 requests and contains no 3rd party content. And it’s a lot faster!

#perfmatters

USAToday: US vs EU

2:20 PM - 25 May 2018

494 Retweets 725 Likes
module.exports = leftpad;

function leftpad(str, len, ch) {
    str = String(str);
    var i = -1;
    if (!ch && ch !== 0) ch = ' ';
    len = len - str.length;
    while (++i < len) {
        str = ch + str;
    }
    return str;
}