

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

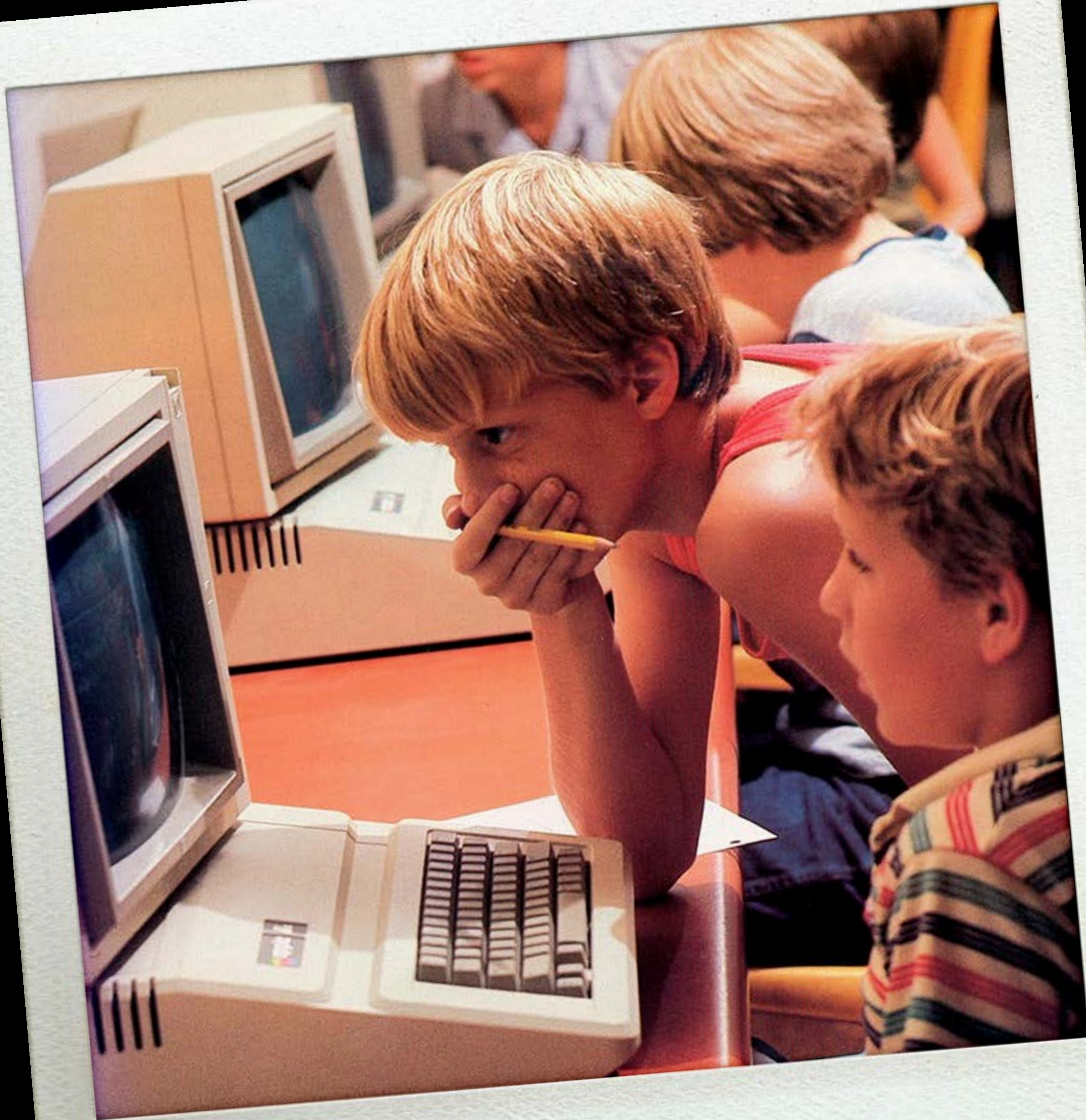
Apple IDs for Kids Under 13

Your Responsibilities

Best Practices

Other Countries

Apple and Kids









It's Different for Kids Now

And for parents

It's Different for Kids Now

And for parents



It's Different for Kids Now

And for parents

Millions of strangers

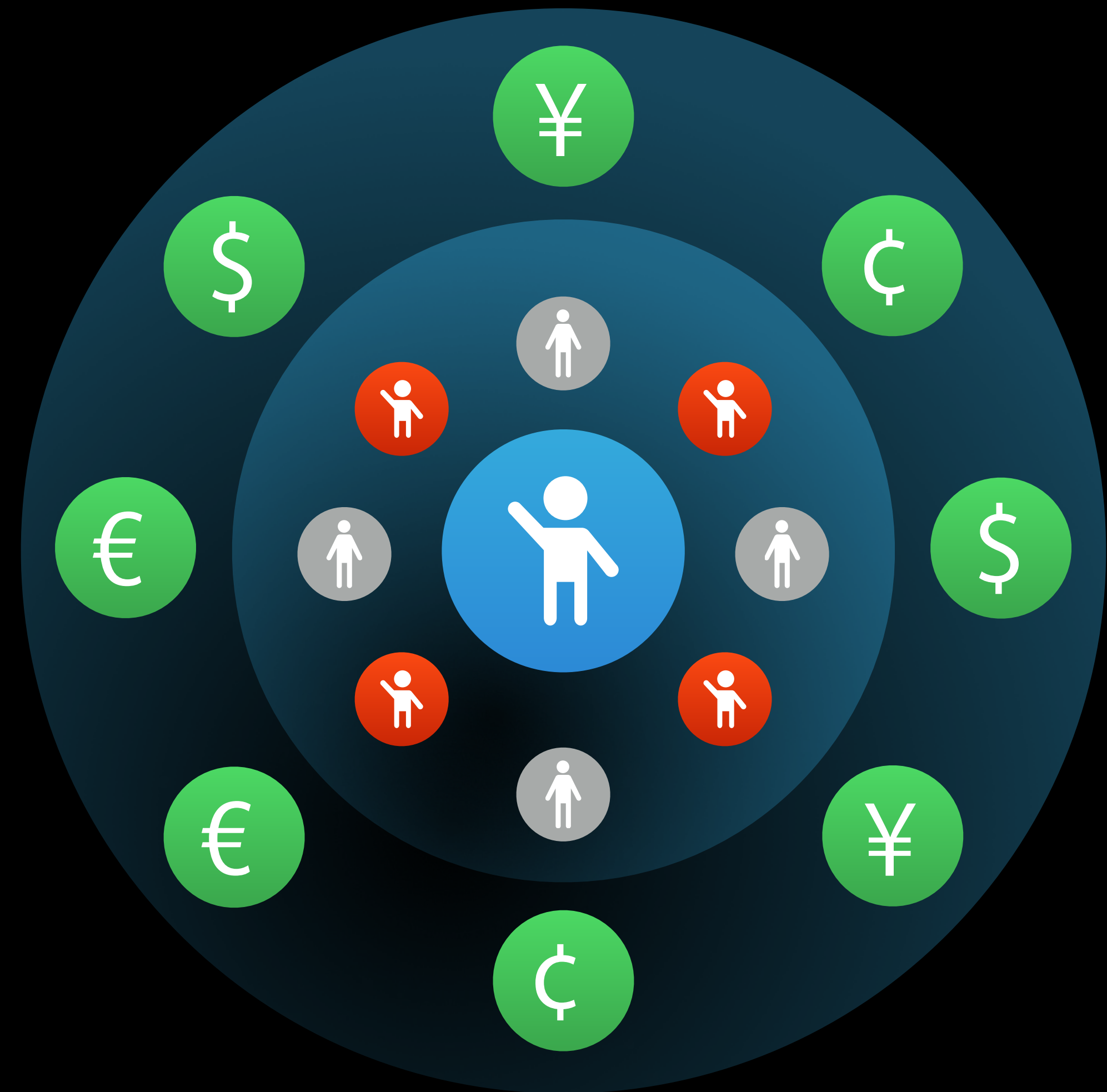


It's Different for Kids Now

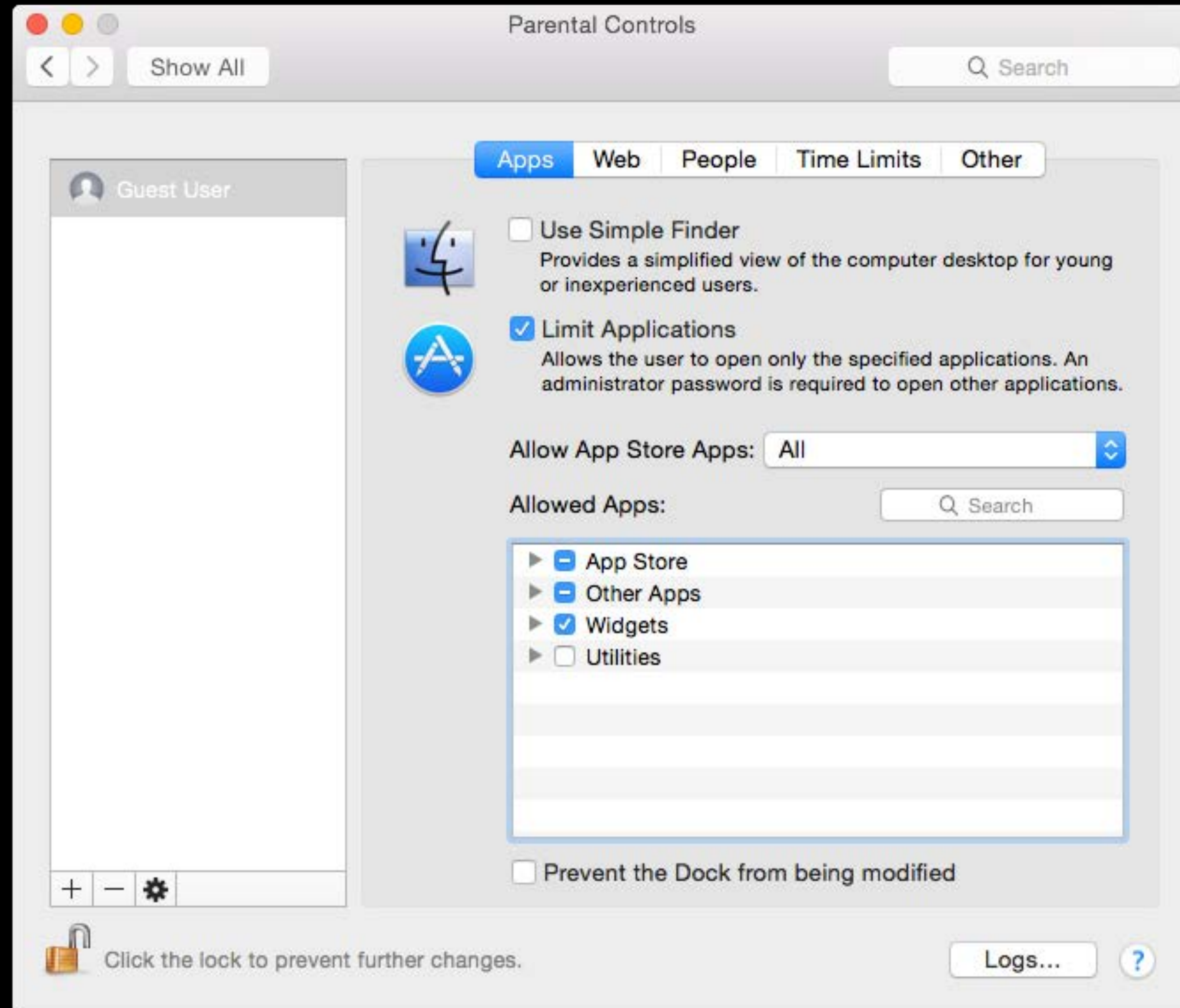
And for parents

Millions of strangers

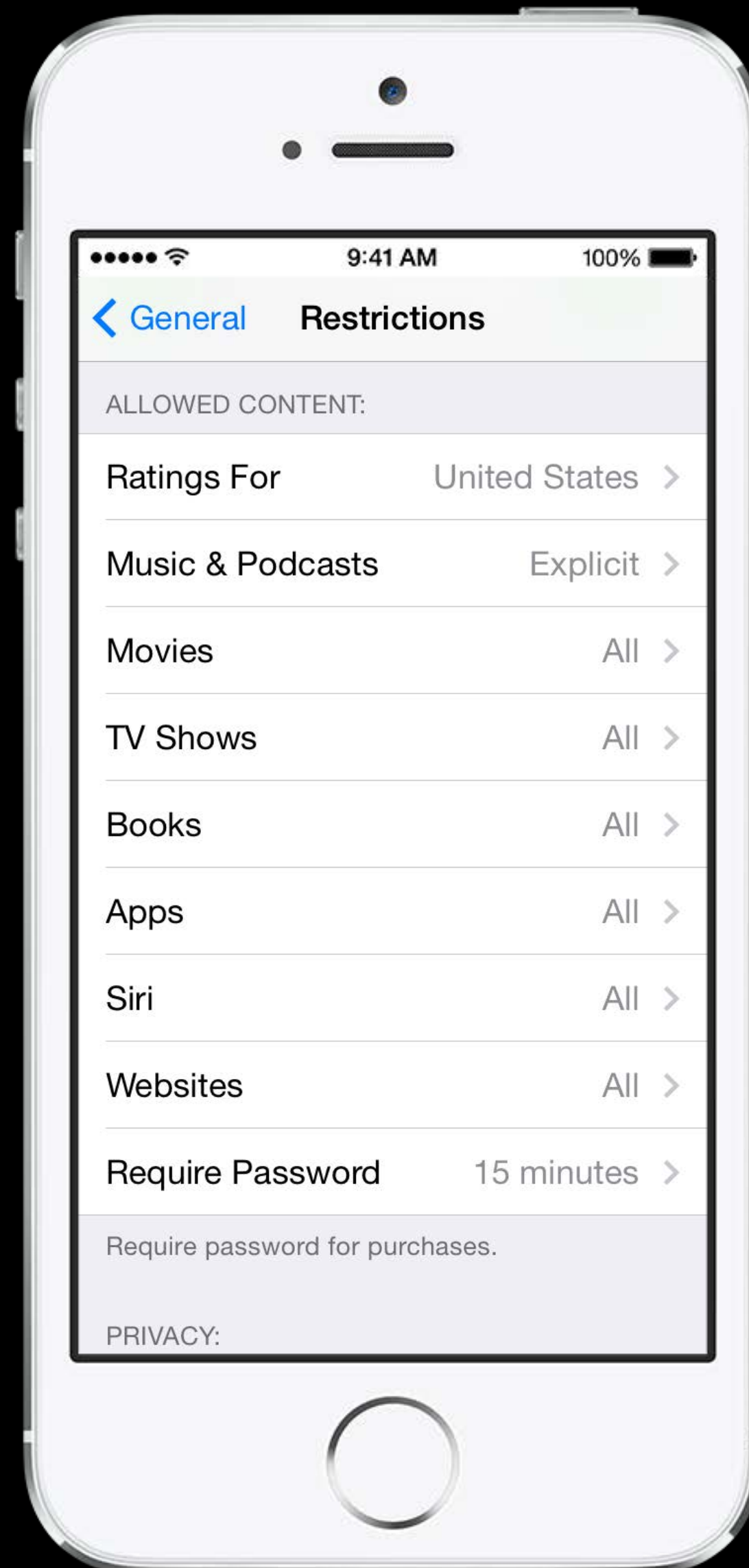
Billions of dollars of marketing
and merchandizing



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



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



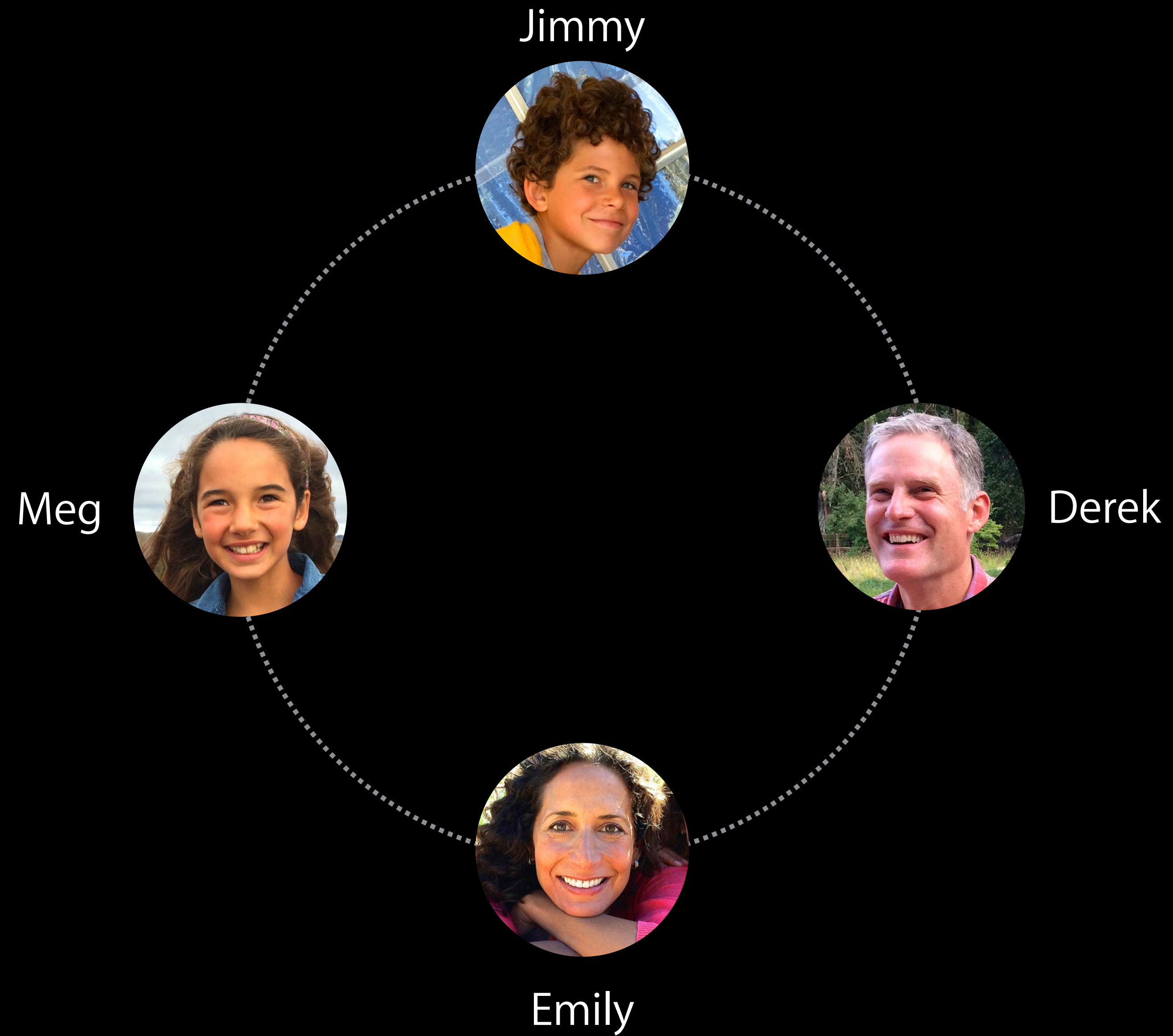
Derek



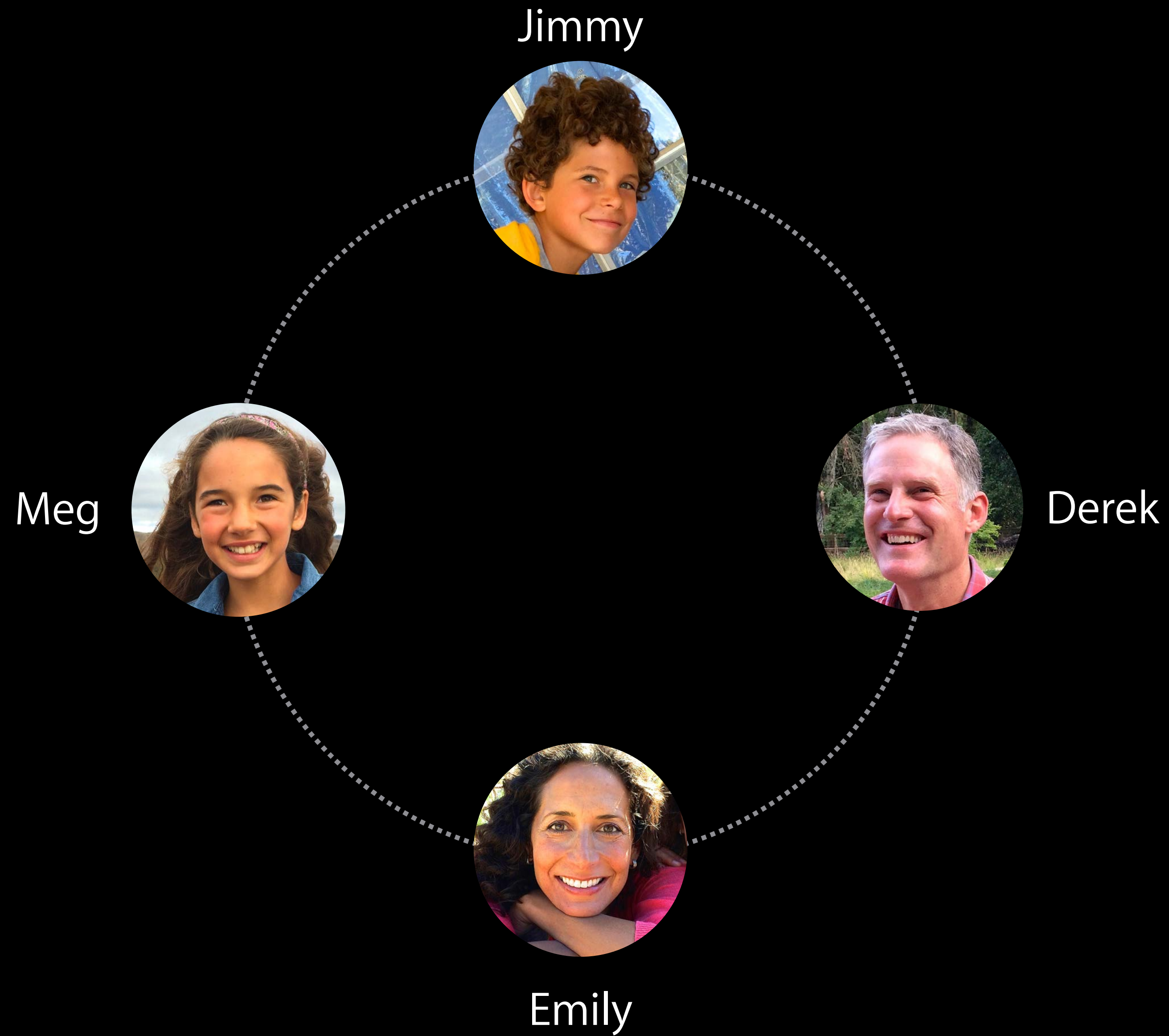
Emily



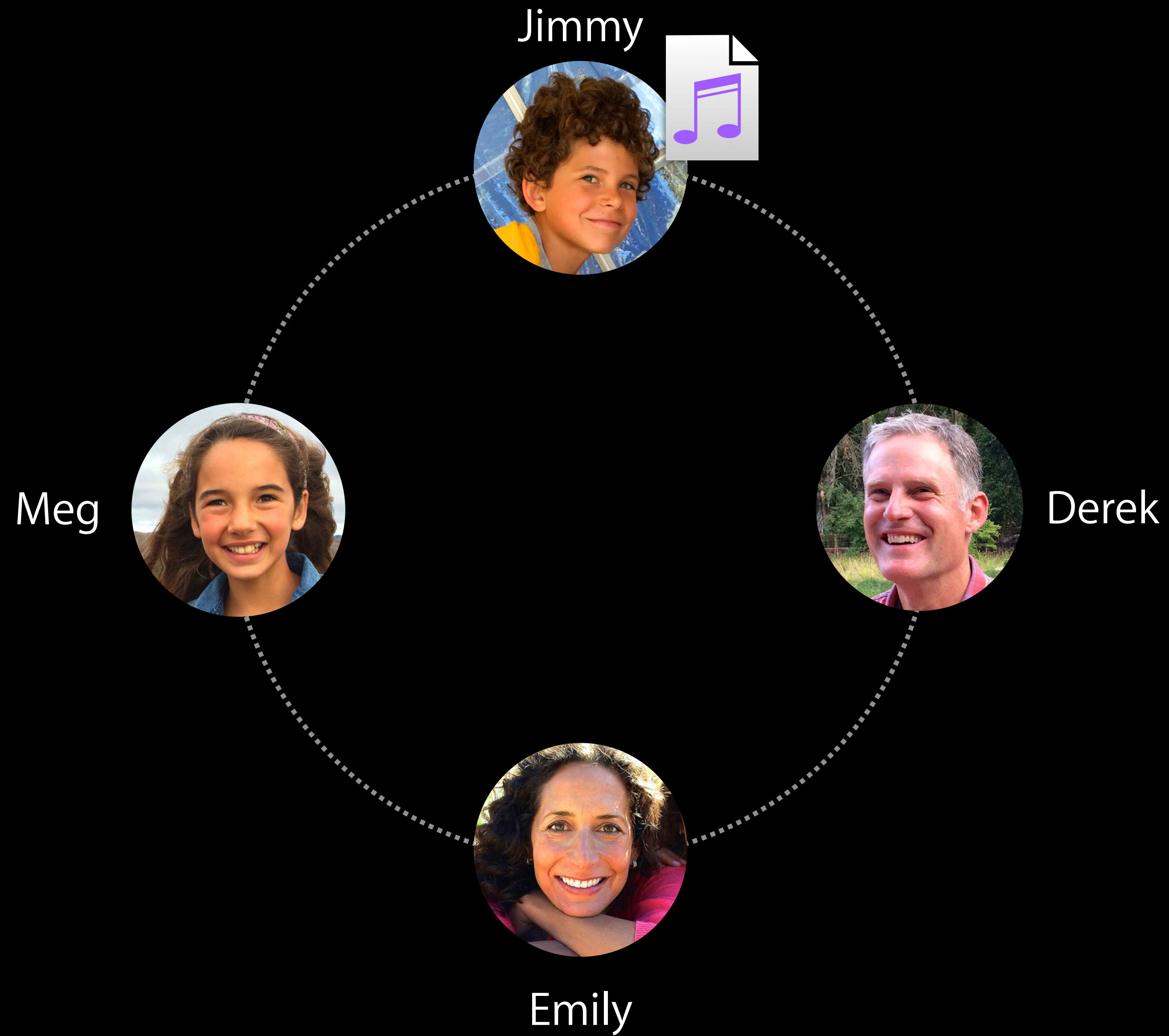
Family Formation



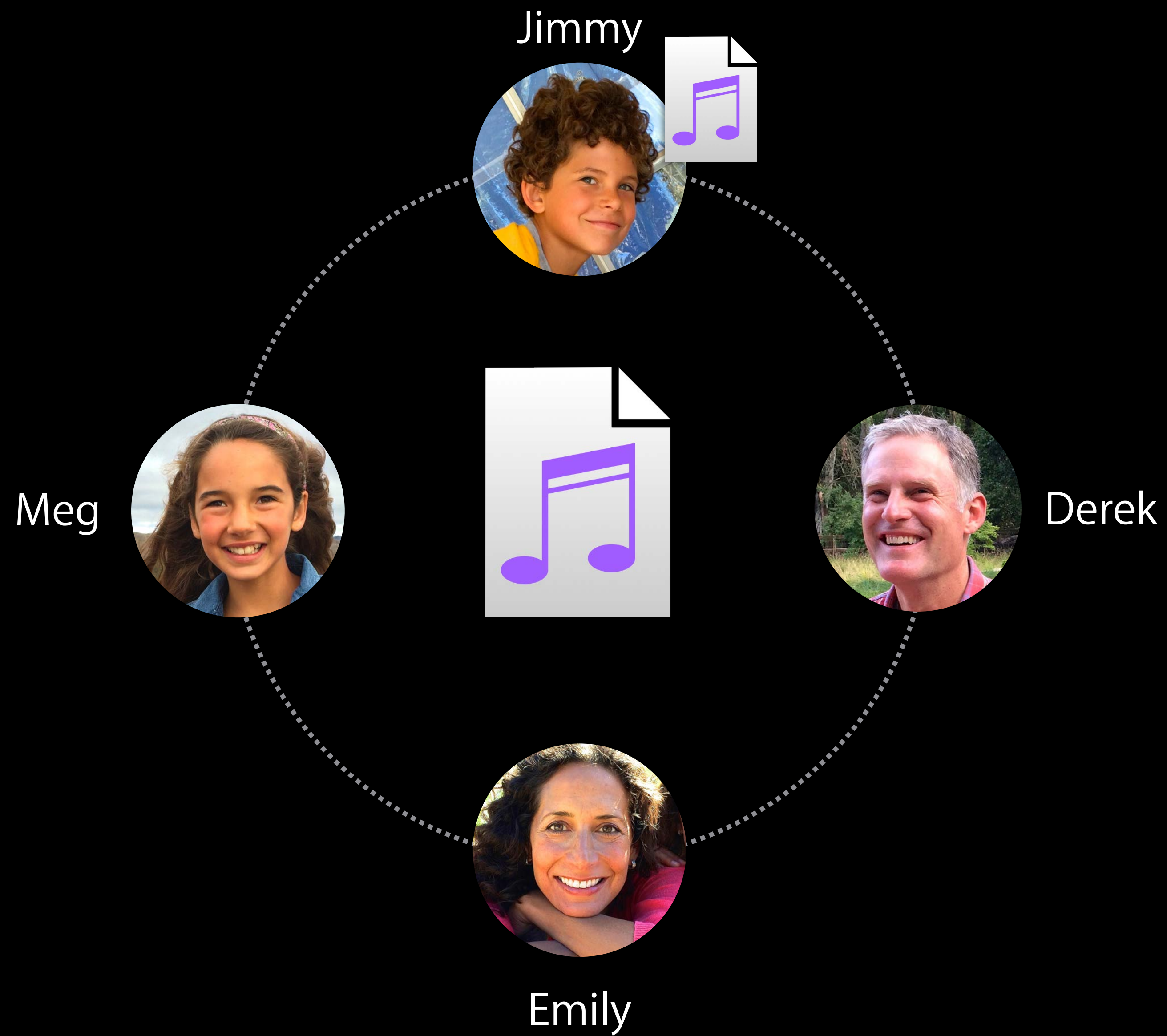
Purchase Sharing



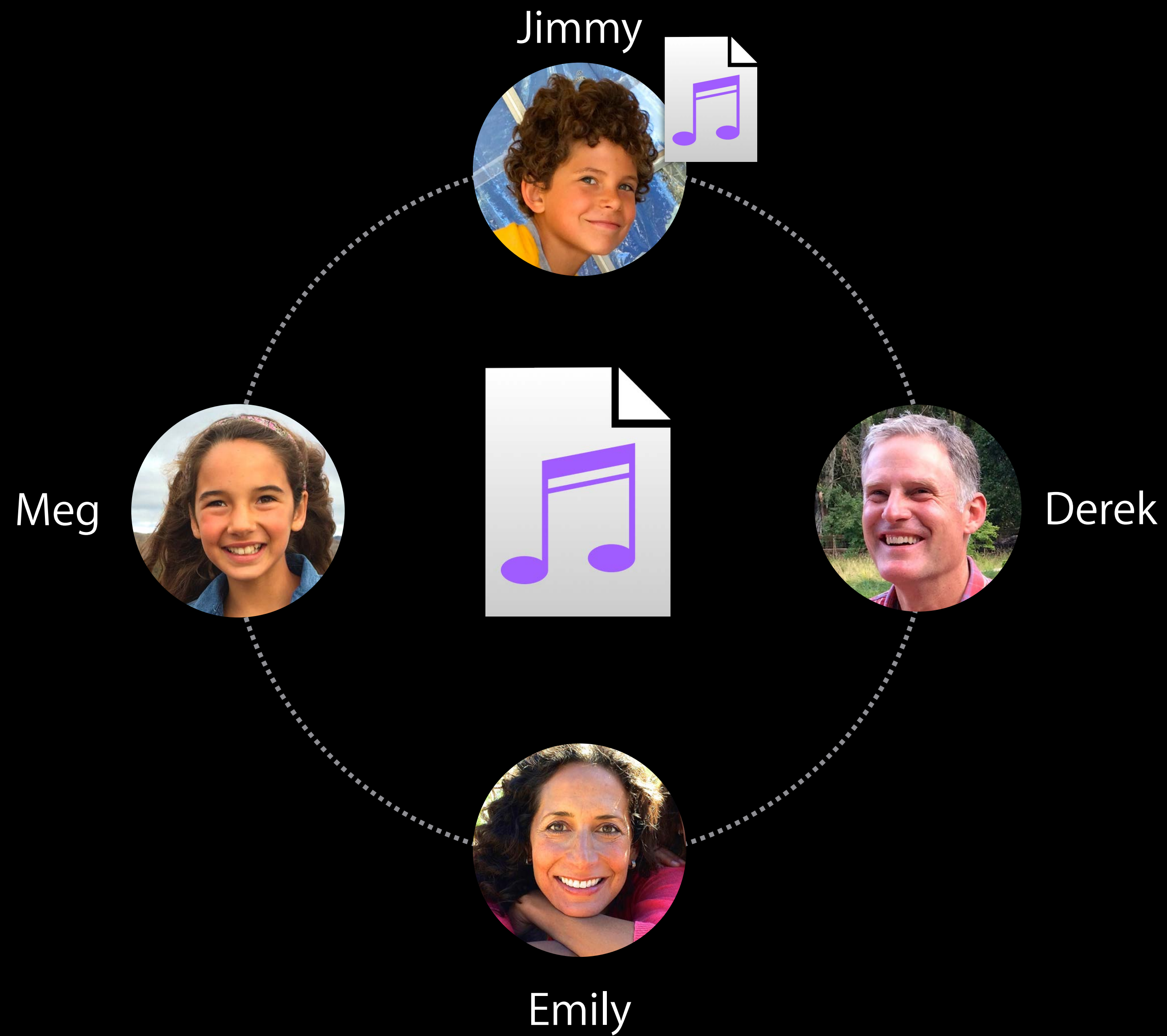
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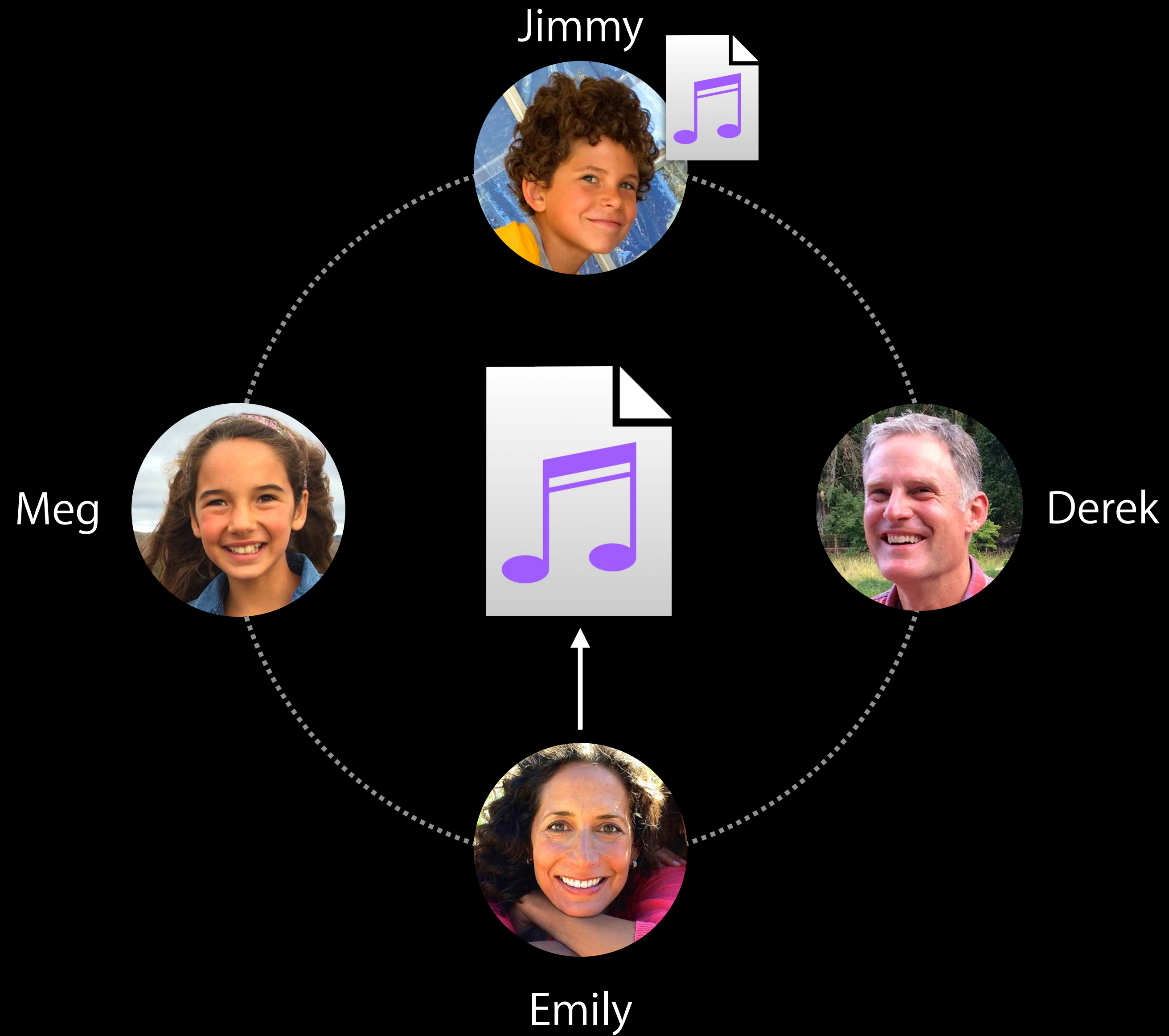
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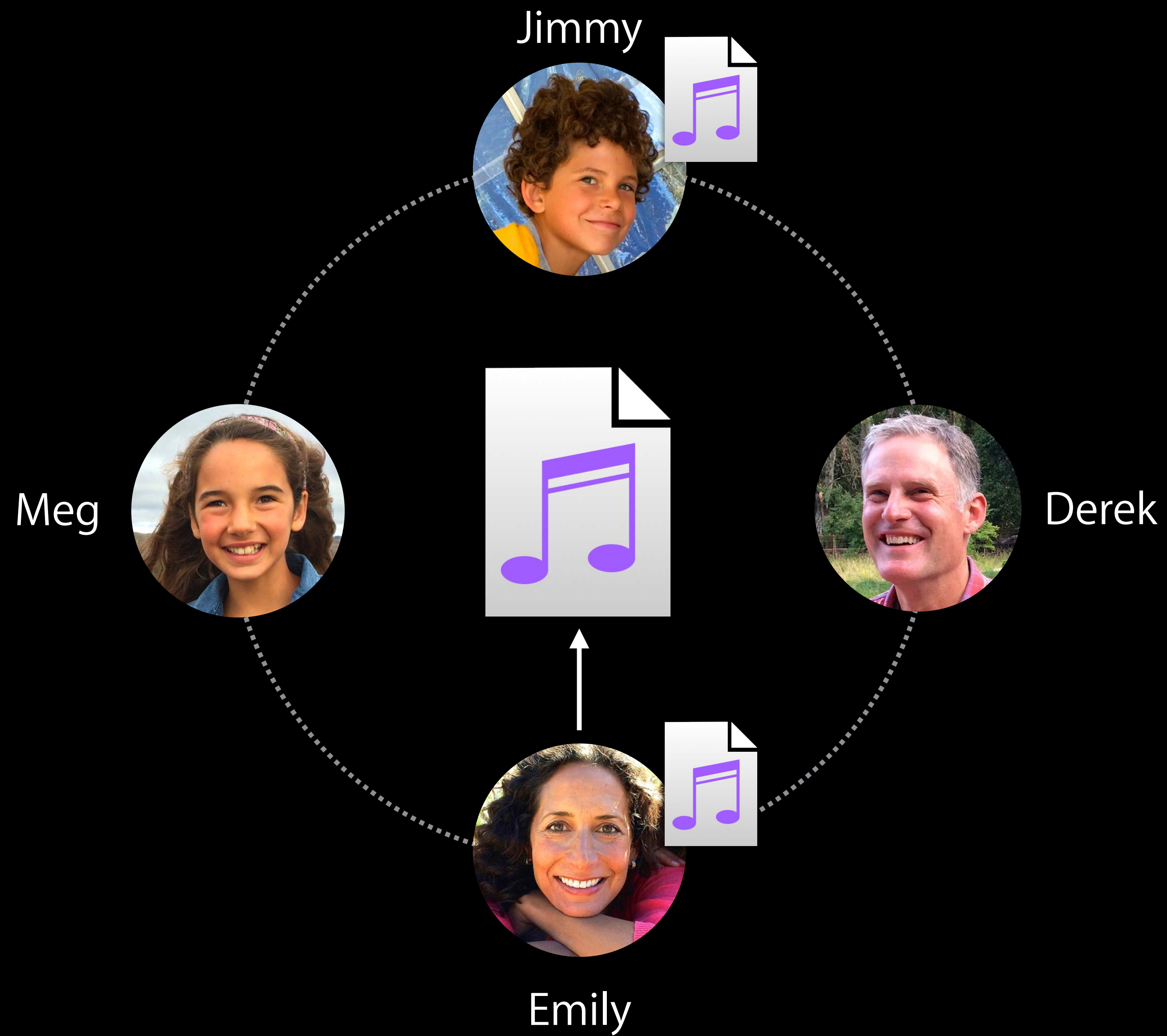
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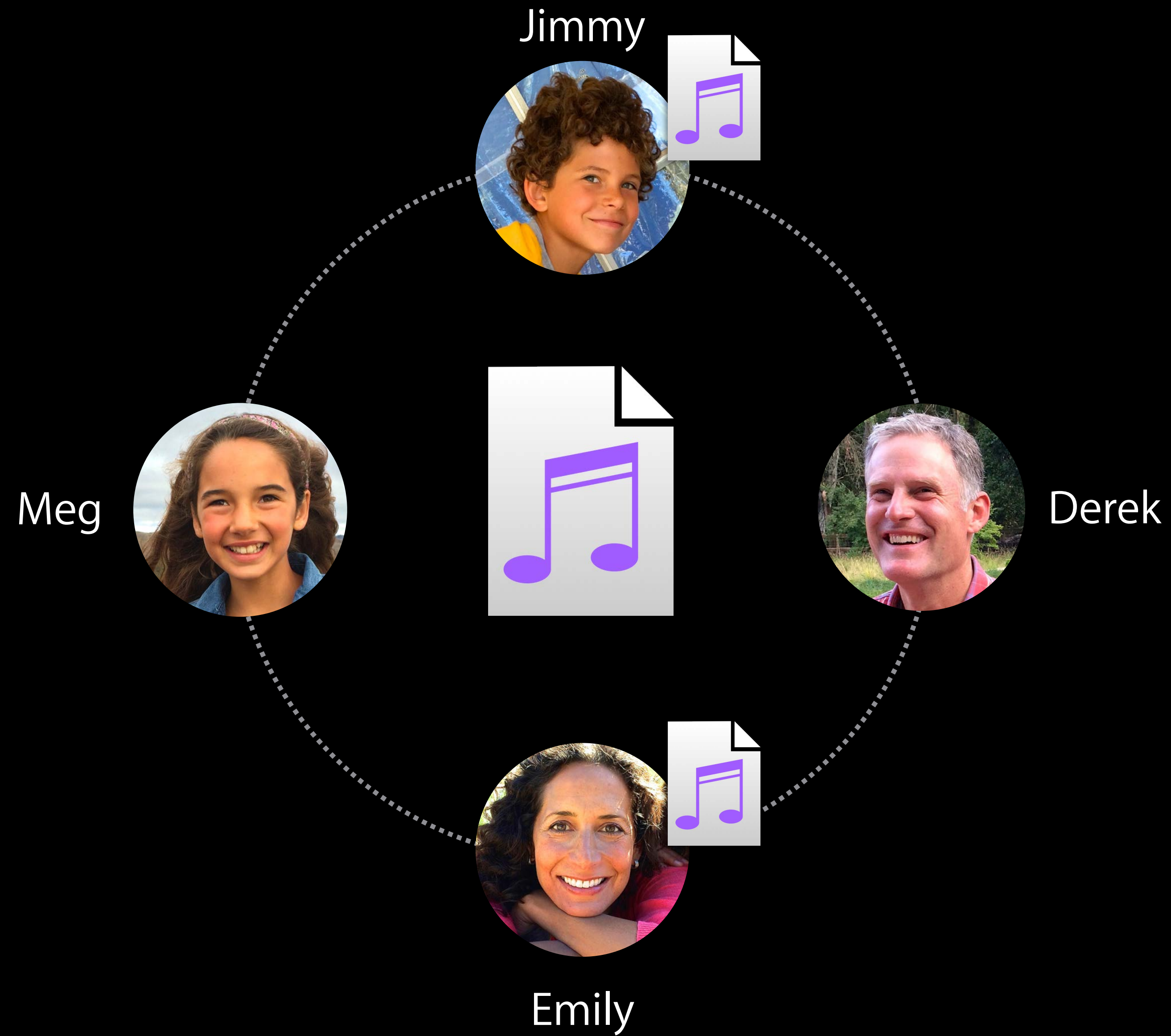
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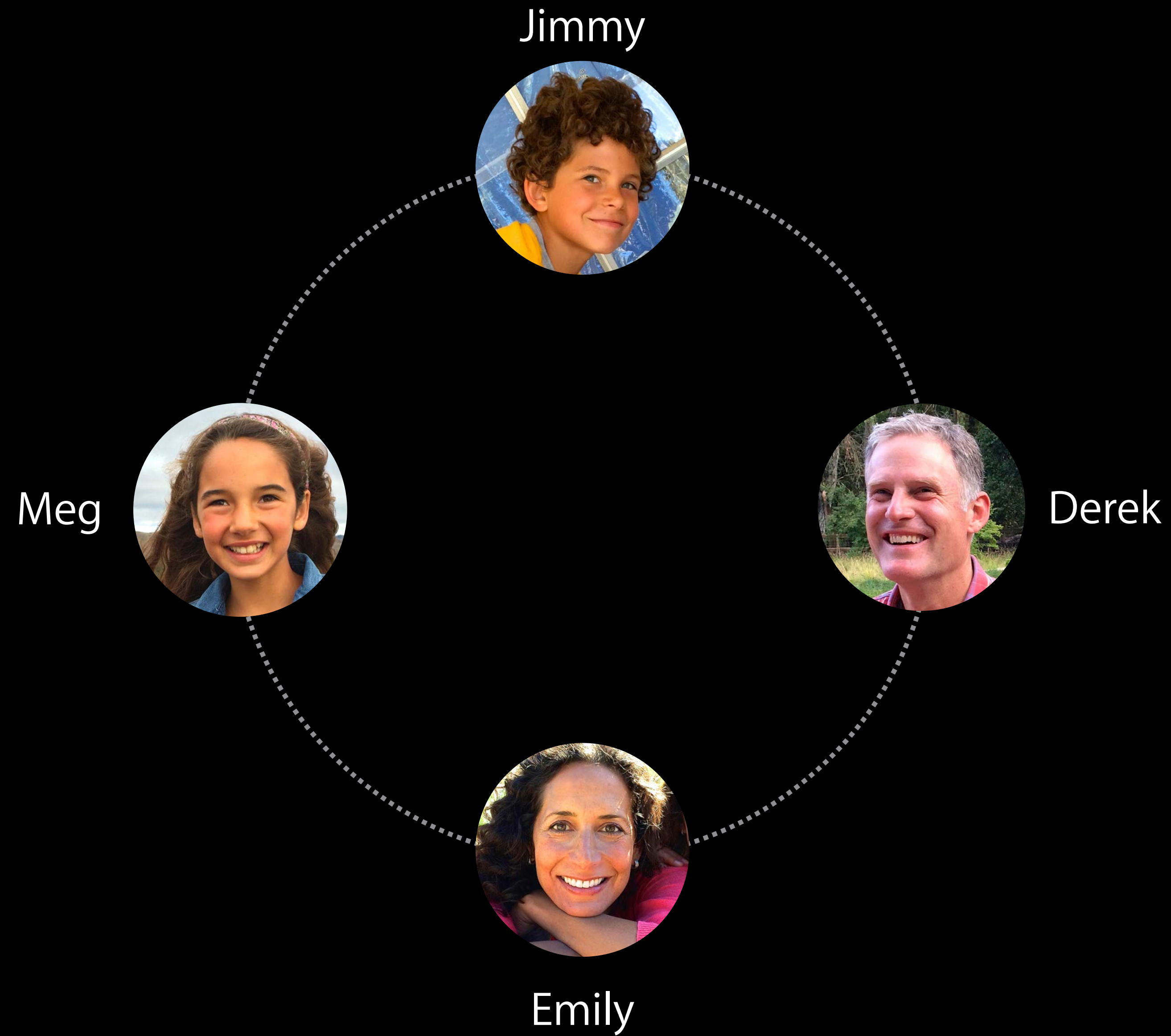
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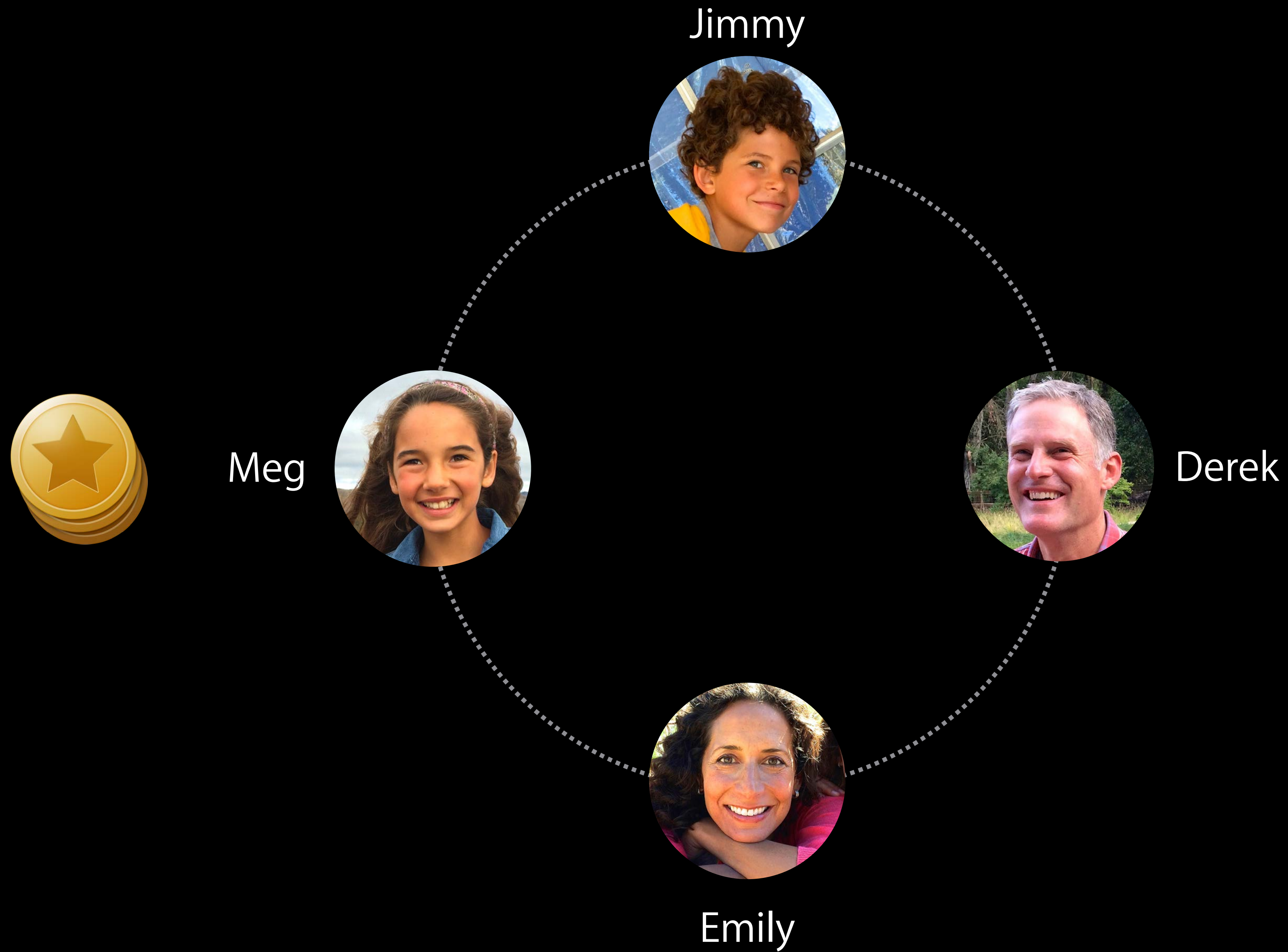
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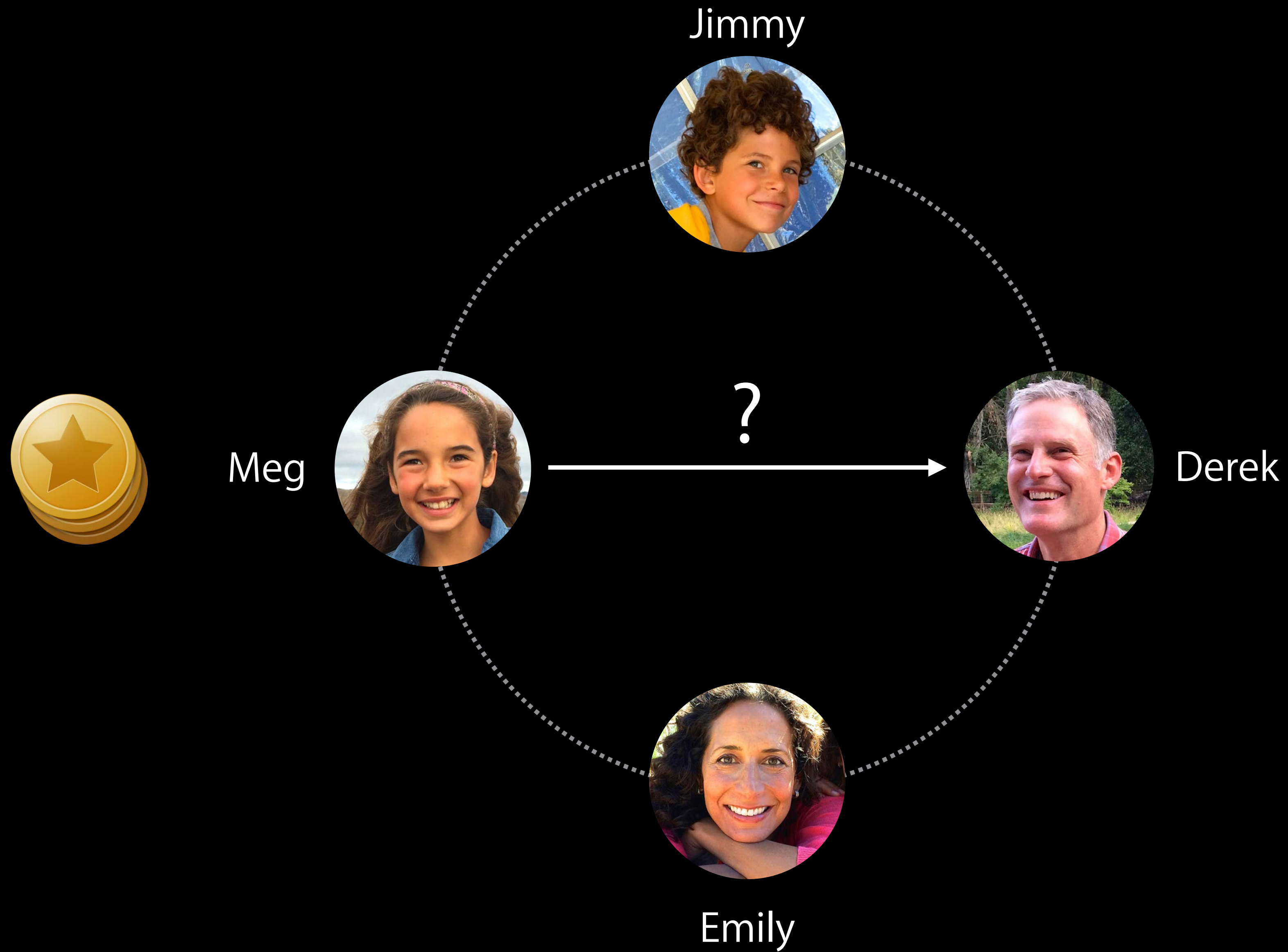
Ask To Buy



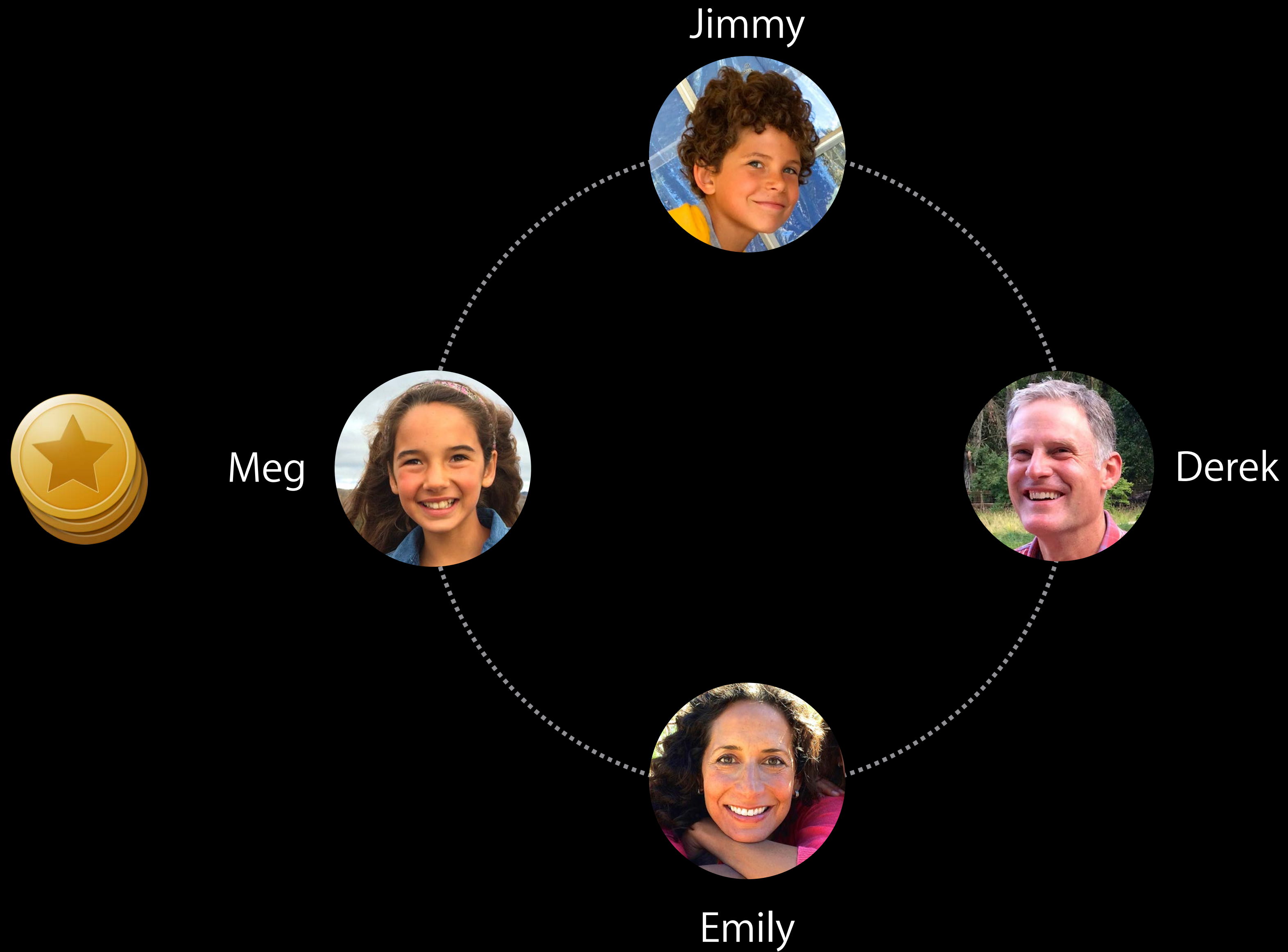
Ask To Buy



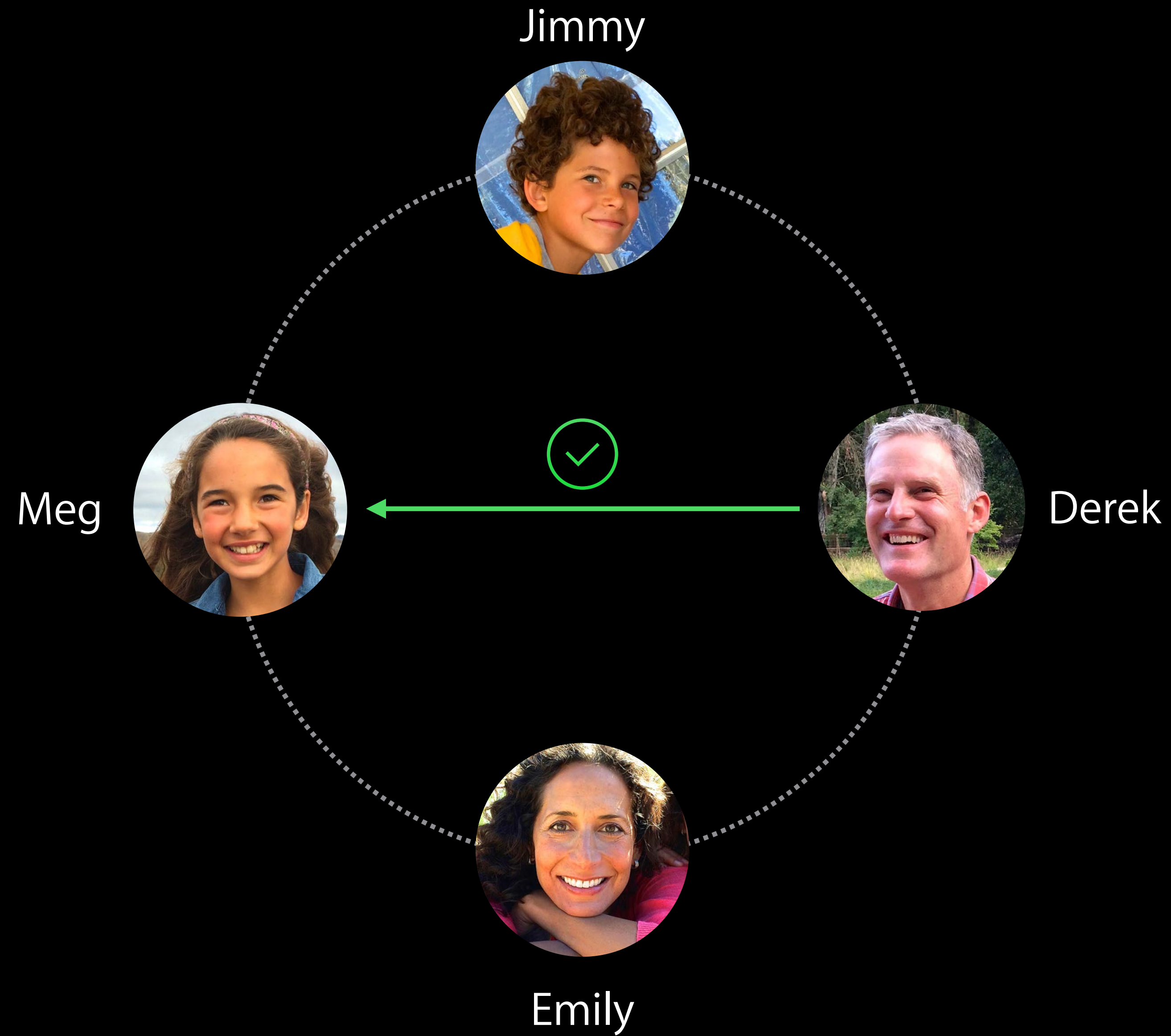
Ask To Buy



Ask To Buy



Ask To Buy



What Does This Mean for You?

What Does This Mean for You?

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



18

21

16

19

20

21

18

21

20

19

20

21

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

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

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|-----------------------------|----------------|-----------------|
| ● 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 |
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 WWDC14