

“Won’t Somebody Think of the Children?”

Examining COPPA Compliance at Scale

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COPPA?

- Age 13 and under
- Bans collecting certain data
- Some (verifiable) parental consent required

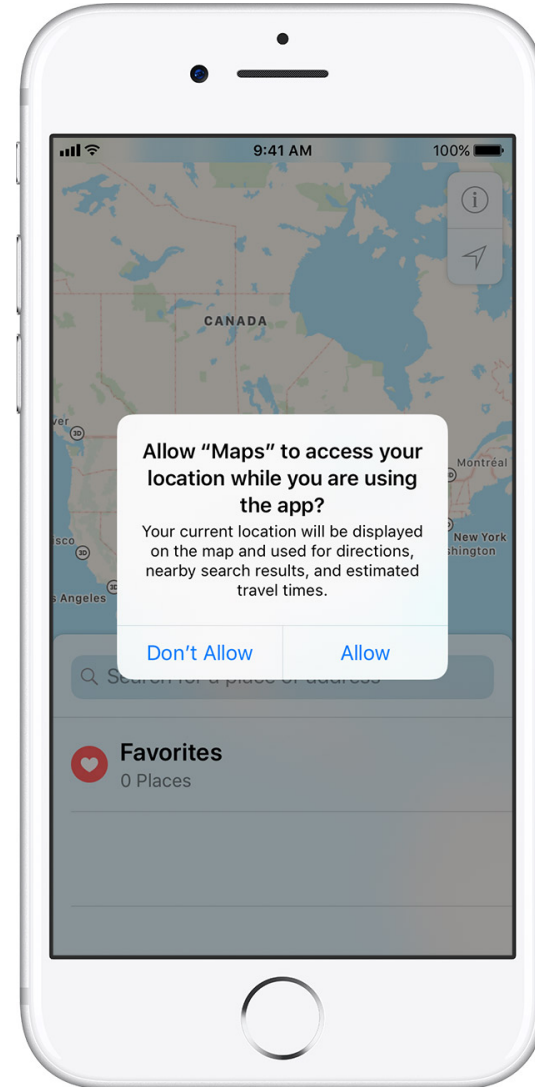
How would you “Solve” COPPA?

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.



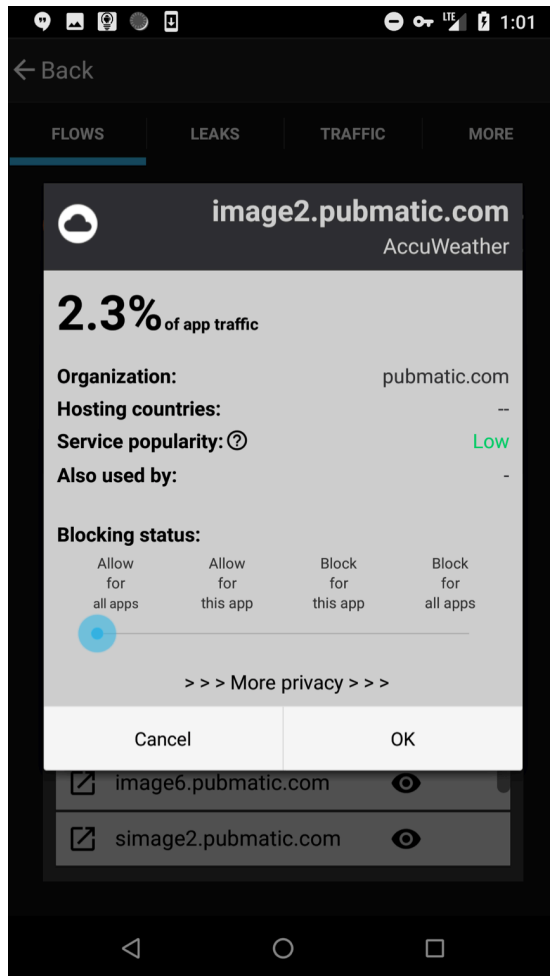
Problems





Cult of Mac

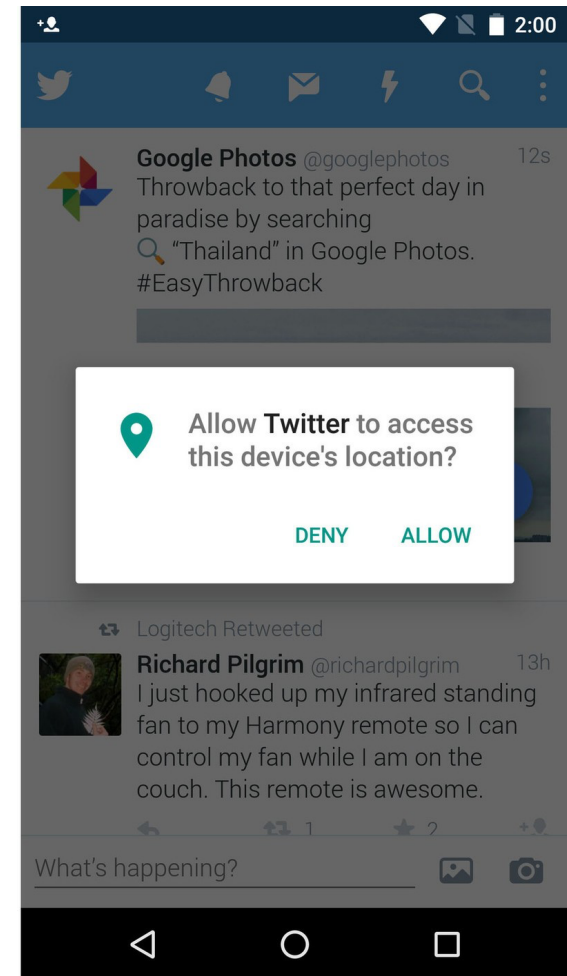
Analysis Environment



Lumen Privacy Monitor



```
~ adb shell monkey ...
```



Android Central

Home

Moments

Notifications

Messages

Search Twitter

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Charles Proxy


@charlesproxy

Charles Web Debugging Proxy. HTTP Proxy / HTTP Monitor tool for web developers.

Auckland, New Zealand

charlesproxy.com

Joined April 2009




Charles Proxy

@charlesproxy

Follow

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

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 d...

4.5/5.0 stars – 54 ratings

7:02 PM - 27 Mar 2018


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579



Tweet your reply




Adam Bulmer

@mintuz · Mar 28

Replying to @charlesproxy

How the heck has @charlesproxy got passed the iOS app review process, want to buy but imagine it's going to get pulled pretty soon that's insane.

1




Charles Proxy

@charlesproxy · Mar 28

It uses frameworks provided in order for people to develop interesting network products. The value for debugging will be huge. Also the value of visibility into what has previously been hard to see.

1



Adam Bulmer

@mintuz · Mar 28

I'm aware what benefit it provides (I have the OSX app) I'm just surprised Apple

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

The screenshot shows a web browser window with the URL `hackernoon.com`. The page features a green header with the Hacker Noon logo and navigation links. The article is by Will Strafach, dated August 21, 2017. The title is "Advisory: AccuWeather iOS app sends location information to data monetization firm". A white text box contains the following text:

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.

Below the text box, a promotional banner for Hacker Noon is visible, asking users to allow the app to access their location. The footer includes a newsletter sign-up link and a "GET UPDATES" button.

<https://techcrunch.com/2017/08/22/accuweather-revealmobile-ios/>

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



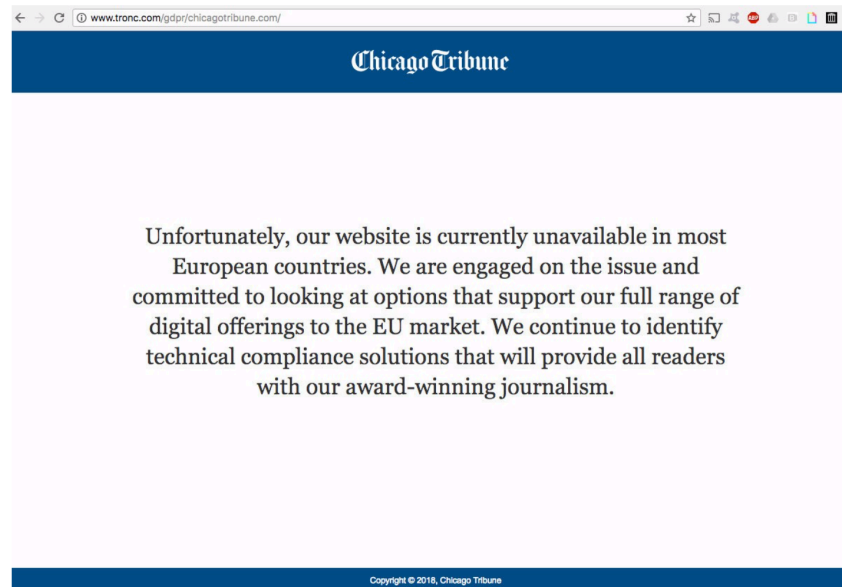
“...&coppa=true...”



“...we suspect that many privacy violations are unintentional and caused by misunderstandings of third-party SDKs.”

–Reyes et al.

U.S. News Outlets Block European Readers Over New Privacy Rules



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

By Adam Satariano

May 25, 2018



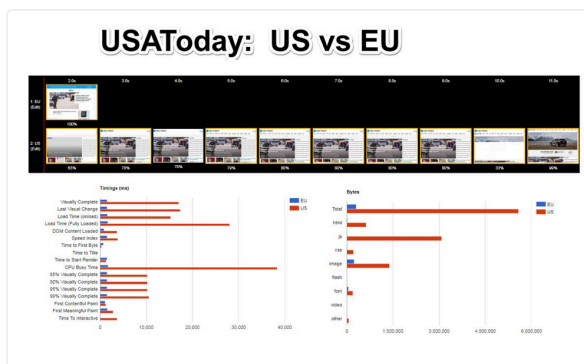
LONDON — American news outlets including The Chicago Tribune, The Los Angeles Times and The Arizona Daily Star abruptly blocked access to their websites from Europe on Friday, choosing to black out readers rather than comply with [a strict new data privacy law](#) in the European Union that limits what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



Follow

@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



2:20 PM - 25 May 2018

494 Retweets 725 Likes



18

494

725



Tweet your reply



Paul Calvano @paulcalvano · May 25

Code

```
1  module.exports = leftpad;
2  function leftpad (str, len, ch) {
3    str = String(str);
4    var i = -1;
5    if (!ch && ch !== 0) ch = ' ';
6    len = len - str.length;
7    while (++i < len) {
8      str = ch + str;
9    }
10   return str;
11 }
```