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## 2019 Technical Report: a Review of Age Verification Mechanism for 10 Social Media Apps

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Funder: CyberSafelreland



## **Technical Report**

# **A Review of Age Verification Mechanism for 10 Social Media Apps**

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**May 2019**

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# INTRODUCTION

In this study we analyze the 10 most used apps among children aged 8-12: Snapchat, Instagram, Tiktok, Viber, Skype, Facebook, HouseParty, Discord, Messenger, WhatsApp. For each application we assess whether the terms of use specify a minimum age that is compliant with the GDPR and whether the specified age is the same across all EU countries. We also verify whether each app provides mechanisms to verify the age of the user and how easy is to circumvent the verification mechanisms. The remainder of this report discusses the results of our study providing evidence to support the answers provided for each question.

The choice of social media apps was derived from CyberSafeIreland's annual survey of the most popular social media apps used by children, aged 8-12. Testing was undertaken by Paola Zippo, Politecnico di Bari and Visiting Masters student at University College Dublin. The research was supervised by Liliana Pasquale, Assistant Professor in the School of Computer Science, University College Dublin.

The research was commissioned by CyberSafeIreland, a not-for-profit organisation, established in 2015, that works to empower children, parents and teachers to navigate the online world in a safe and responsible manner.

# 1. SNAPCHAT

Snapchat is a mobile app that allows users to send photos and videos (called snaps) to other users. The permitted age limit is 13 years. For users between 13 and 16, Snapchat states that it does not keep any data related to these users to comply with the new EU privacy regulations under GDPR. However, this app does not provide any type of age verification mechanism, thus allowing children to use it by lying on their age.

<i>QUESTIONS</i>	<i>SNAPCHAT</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	Yes
4. If so, what happens if you enter age 12?	Warning window that it is not possible to register on social media with that age.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

**1. What is the minimum age stated in the terms of use?**

As shown in Figure 1, the terms of use indicate that the minimum age limit to use Snapchat is 13 years.

**1. Who can use the Services**

No one under 13 is allowed to create an account or use the Services. We may offer additional Services with additional terms that may require you to be even older to use them. So please read all terms carefully.

*Figure 1. Paragraph of the terms of use that states the age limit.*

**2. Is this the same across all EU countries?**

As shown in Figure 2, the term of use is the same for all the EU countries, for all places outside the United States. So, the minimum age is 13 years for all Europe.

There are 2 different terms of service for Snapchat: outside the United States and for the United States.

**Snap Group Limited Terms of Service**

(If you live outside the United States)

Effective: 18 February 2019

*Figure 2. Terms of Service for user outside Unites States.*

**3. Do they ask for your age on signup?**

As shown in Figure 3, Snapchat asks for the user age during sign up.

When's your birthday?

BIRTHDAY

---

Continue

11	Mar	2000
12	Apr	2001
13	May	2002

Figure 3. Step of the sign up in Snapchat: ask user age.

#### 4. If so, what happens if you enter age 12?

As shown in Figure 4, it is not possible to sign up in Snapchat by declaring to be 12 years old.

When's your birthday?

BIRTHDAY

11 Apr 2007

---

Sorry, it looks like you're not eligible for Snapchat ... but thanks for checking us out!

OK

10	Mar	2006
11	Apr	2007
12	May	2008

Figure 4. Warning window when enter an age under the age limit.

**5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Declaring oneself to be 13 years old when signing up to Snapchat does not involve any additional verification process. As shown in Figure 5, the terms of use explain how Snapchat uses children's data.

### Children

Our services are not intended for—and we don't direct them to—anyone under 13. And that's why we do not knowingly collect personal information from anyone under 13. In addition, we may limit how we collect, use, and store some of the information of EU users between 13 and 16. In some cases, this means we will be unable to provide certain functionality to these users. If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

*Figure 5. How Snapchat use data of EU users between 13 and 16.*

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

Snapchat does not provide any age verification mechanism during sign up, allowing children to create an account by lying on their age.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Declaring to be 16 years old when signing up to Snapchat does not involve any additional verification process.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.



## 2. INSTAGRAM

Instagram is a mobile app that allows users to upload photos and videos to the service, which can be edited with various filters, and organized with tags and location information.

Instagram requires a user to be at least 13 years old to register (For Spain and South Korea the age limit is 14). During the registration process, Instagram asks whether the user is a minor, in order to understand how user's data should be handled and what functionalities can be offered. Under the age of 16, Instagram suggests asking for parental authorization. However, a child can skip this last step and can also lie about his/her age as there are no age checks.

<i>QUESTIONS</i>	<i>INSTAGRAM</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	No, in Spain is 14.
3. Do they ask for your age on signup?	Yes
4. if so, what happens if you enter age 12?	Warning window that it is not possible to register on social media with that age.
5. if you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	Yes: Email a parent (optional).
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age.
7. if you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

### 1. What is the minimum age stated in the terms of use?

As shown in Figure 6, the terms of use indicate that the minimum age limit to use Instagram is 13 years.

### Your Commitments

In return for our commitment to provide the Service, we require you to make the below commitments to us.

**Who Can Use Instagram.** We want our Service to be as open and inclusive as possible, but we also want it to be safe, secure, and in accordance with the law. So, we need you to commit to a few restrictions in order to be part of the Instagram community.

- You must be at least 13 years old.

Figure 6. Paragraph of the terms of use that states the age limit.

## 2. Is this the same across all EU countries?

Instagram is a Facebook product. Facebook wanted to create a global community. However, as shown in Figure 7, Spain and South Korea have a different age limit. As shown in Figure 8, the specific terms of use of Instagram indicates that the minimum age limit to use Instagram in Spain is 14 years.

### How do I report a child under the age of 14 in South Korea or Spain?

[Share Article](#)

In most jurisdictions, Facebook requires everyone to be at least 13 years old before they can create an account. We strive to create a global community with consistent standards for everyone, but we also strive to respect local laws. In observance of laws in South Korea and Spain, we require anyone living in these countries to be at least 14 years old before they can create an account.

- If your underage child created an account on Facebook, you can [help your child delete their account](#).
- [Report a child under 14](#) living in South Korea or Spain.
- [Report a child under 13](#) living outside of South Korea or Spain.

We'll promptly delete the account of any underage child that's reported to us through these forms.

Figure 7. Facebook and the minimum age limit.

### Compromisos que asumes

Nosotros te proporcionamos el Servicio a cambio de que asumas los siguientes compromisos.

**Quién puede usar Instagram.** Queremos que nuestro Servicio sea lo más inclusivo y abierto posible, pero también que sea seguro y conforme a la ley. Por este motivo, si quieres formar parte de la comunidad de Instagram, es necesario que aceptes algunas restricciones:

- Debes tener al menos **14 años**, o la edad mínima legal en tu país.

Figure 8. Terms of Use of Instagram in Spain.

### 3. Do they ask for your age on signup?

As shown in Figure 9 and 10, Instagram asks the user age during the sign up.

#### Are You 18 Years or Older?

You can still use Instagram if you're younger than 18. Your age affects the resources we offer and the way we use your data for ads.

18 or Older

Under 18

Figure 9. Step of the sign up in Instagram: ask user age.

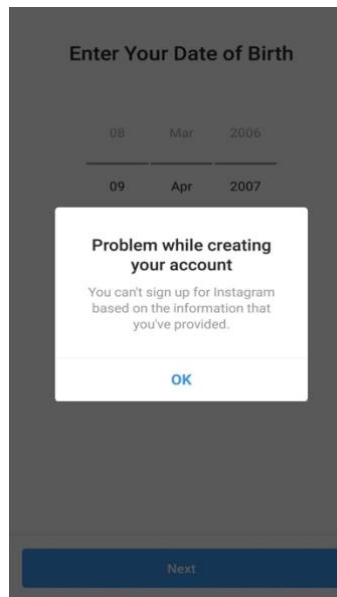
#### Enter Your Date of Birth

09	Mar	2002
<hr/>		
10	Apr	2003
<hr/>		
11	May	2004

Figure 10. Step of the sign up in Instagram: ask user age.

### 4. If so, what happens if you enter age 12?

As shown in Figure 11, it is not possible to create a new account on Instagram declaring to be 12 years old.



*Figure 11. Warning window when enter an age under the minimum age limit.*

**5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

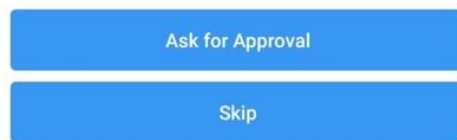
Declaring to be 13 years of age during sign up on Instagram triggers a request for parental authorization to complete the creation of the new user account. As shown in Figure 12 and 13, under the age of 16, Instagram suggests asking for parental authorization. However, a child can skip this last step, as shown in particular in Figure 12.

## Ask a Parent/Guardian to See Better Ads

We learn about your interests based on your activity across Facebook Products. If you want, you can ask a parent or guardian to let us show you ads that are more relevant based on more of your interests.

If you tap Skip or a parent or guardian doesn't respond, you'll still see the same number of ads but they may be less relevant to you.

Your parent or guardian won't be able to see anything you've posted on Instagram that you haven't already shared with them or that isn't public.



*Figure 12. Step of the sign up in Instagram: suggestion asking for parental authorization.*

## Parent/Guardian Email Address

We'll send your parent or guardian an email. They won't be able to see anything you've posted on Instagram that you haven't already shared with them or that isn't public.

Email address

---

*Figure 13. Step of sign up if the children want to ask for parental authorization.*

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

It is easy to circumvent the authentication mechanism by entering a false age because there is no type of age verification.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Declaring to be 16 years old when creating a new account on Instagram does not involve any additional age verification process.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.

### 3. TIKTOK

Tik Tok is a mobile app that allows users to watch music clips, create short clips and even edit and add special effects. The platform is reserved for people over the age of 13. During the registration phase, Tik Tok asks for the user's age. For users under the age of 13, the signup cannot be completed. Within the app for minor users but with an age greater than 13, parents can activate a "Digital Wellbeing" setting by blocking it with a passcode. "Digital Wellbeing" has 2 settings: "Restricted Mode" to filter the content and "Screen Time Management" to limit the time on the app to 2 hours a day. The minimum age to register is the same in every country. However, in the United States a safe version of Tik Tok has been created for users under 13. Even here there is no age verification and children can lie without problems.

<i>QUESTIONS</i>	<i>TIK TOK</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	Yes
4. If so, what happens if you enter age 12?	Warning window that it is not possible to register on social media with that age.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

#### 1. What is the minimum age stated in the terms of use?

As shown in Figure 13, the terms of use indicate that the minimum age limit to use Tik Tok is 13 years.

- **Age Limit.**The Platform is only for people 13 years old and over unless they have the consent of a parent or legal guardian. By using the Platform, you confirm that you are over the relevant age specified above. If we learn that someone under the relevant age specified above is using the Platform, we will terminate that user's account. In addition, if you are under the relevant age specified above, you confirm that you possess legal parental or guardian consent for accessing or using the Platform, and are fully able and competent to enter into, abide by, and comply with the Terms

*Figure 13. Paragraph of the terms of use that states the age limit.*

## 2. Is this the same across all EU countries?

In the general terms, there are 6 terms of use for specific countries. As shown in Figure 14, there are the terms of use for the EU countries. Also in Germany, as shown in Figure 15, the different terms of use indicate the same minimum age limit: 13 years.

## General Terms

If you are an EU resident, instead of the below, [this EULA](#) shall apply. If your usual residence is in Germany, [this EULA](#) shall apply. If your usual residence is in Russia, [this EULA](#) shall apply. If your usual residence is in India, [this EULA](#) shall apply. If your residence is in another country, and not the US, [this EULA](#) shall apply.

*Figure 14. General terms in Tik Tok.*

d. **Nutzungsberechtigung.** DER DIENST IST NICHT FÜR PERSONEN UNTER 13 JAHREN BESTIMMT ODER FÜR NUTZER, DIE VON DER GESELLSCHAFT VON DER NUTZUNG DES DIENSTS AUSGESCHLOSSEN WORDEN SIND. WENN SIE UNTER 13 JAHRE ALT SIND, DÜRFEN SIE DIE DIENSTE ZU KEINEM ZEITPUNKT UND IN KEINER WEISE BENUTZEN ODER DARAUFGREIFEN. Mit Zugriff oder Nutzung unseres Diensts versichern Sie, entweder mindestens 18 Jahre alt zu sein oder aufgrund einer vorherigen Einwilligung des/der volljährigen Erziehungsberechtigten zur Nutzung unseres Services berechtigt zu sein.

*Figure 15. Paragraph of the terms of use in Germany that states the minimum age limit.*



### 3. Do they ask for your age on signup?

As shown in Figure 16, Tik Tok asks for the user age during the sign up.



The image shows a mobile app sign-up screen. At the top, it asks "What's your birthday?" with a sub-note "Your birthday won't be shown publicly." Below this is a text input field labeled "Birthday". At the bottom, there is a date picker showing three options: "Mar 10 2018", "Apr 11 2019", and "May 12 2020". A grey arrow button is positioned to the right of the date picker.

Figure 16. Step of the sign up in Tik Tok: ask user age.

### 4. If so, what happens if you enter age 12?

As shown in Figure 17, it is not possible to create a new account on Tik Tok by declaring to be 12 years old.

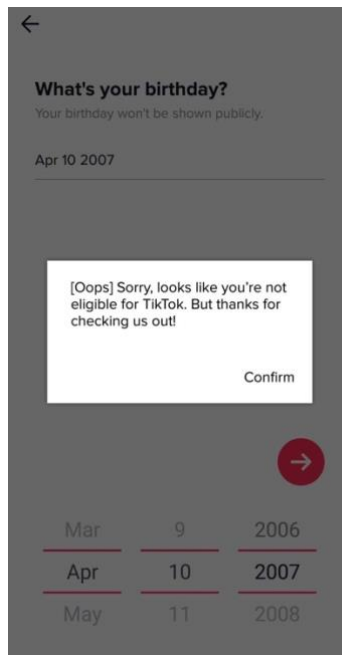


Figure 17. Warning window when enter an age under the minimum age limit.

**5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Declaring to be 13 years old when registering Tik Tok does not involve any additional verification process.

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

No mechanism for age verification is provided.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Declaring to be 16 years old when creating a new account in Tik Tok does not involve any additional verification process.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.

## 4. VIBER

Viber is a mobile application that allows every user to send messages, make calls, send stickers to other Viber users for free. During the account creation phase, Viber will request the user's telephone number and subsequently send an access code to activate Viber. The access code ensures that the user is the real owner of the registered number. To complete the registration, Viber also requires the inclusion of the user's name and date of birth. Viber is interested in the age of young users: if a user is under the age of 13, it is not possible to create an account; if a user is between 13 and 16 years old, Viber gives the possibility to use its services with greater controls and privacy protection.

For users under 16, it is not possible to enable three privacy settings: Collect analytics, Allow Content personalization and Allow accurate location-based services. However, it is easy to circumvent this system, as a child can declare an older age both to register and for not having any kind of limit. There is no kind of age verification.

<i>QUESTIONS</i>	<i>VIBER</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	Yes
4. If so, what happens if you enter age 12?	Cannot enter an age below 13 years.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

### 1. What is the minimum age stated in the terms of use?

As shown in Figure 18, the terms of use indicate that the minimum age limit to use Viber is 13 years.

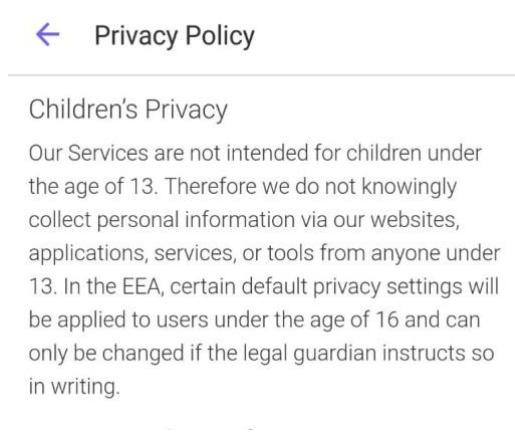


Figure 18. Paragraph of the terms of use that states the age limit.

### 2. Is this the same across all EU countries?

The minimum age is the same across all EU countries. There is only one single Terms of Use valid for all countries.

### 3. Do they ask for your age on signup?

As shown in Figure 19, Viber asks for the user age during the sign up.

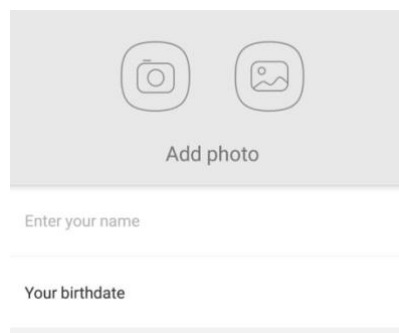


Figure 19. Step of the sign up in Viber: ask user age.

4. **If so, what happens if you enter age 12?**

As shown in Figure 20, it is not possible to declare to be 12 years old in Viber.



Figure 20. Step of sign up in Viber.

5. **If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Declaring to be 13 years old when signing up to Viber does not involve any additional verification process but as shown in Figure 21, there are some restrictions for the use of the service.

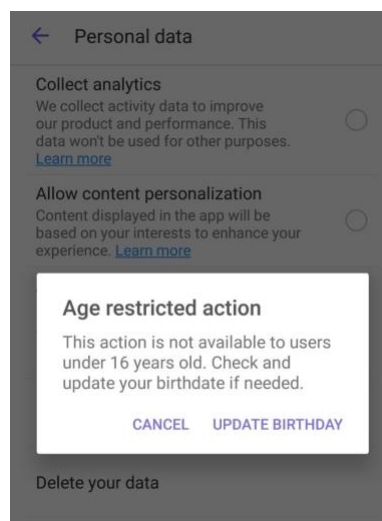


Figure 21. Not possible under 16 to enable three privacy settings.

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

No type of age verification mechanism is provided.

**7. If you enter age 16 on signup, is there any attempt at verification?**

A user can declare to be older than 16 without any additional verification process

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.

## 5. SKYPE

Skype is a well know call service owned by Microsoft through which users can make free calls and video calls to other users all over the world. It is available on all major software platforms, including mobile ones. The age limit on Skype is 13 years. But until reaching the age of majority, Skype requires parental consent. Thus, Skype assumes no responsibility to control the child. Unlike Instagram, in Skype it is not possible to ignore the consent procedure by the parent. But to avoid this phase, a child could declare another age.

<i>QUESTIONS</i>	<i>SKYPE</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	Yes
4. If so, what happens if you enter age 12?	Warning window that it is not possible to register on social media with that age.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	Yes: Email a parent (mandatory).
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

### 1. What is the minimum age stated in the terms of use?

As shown in Figure 22, the terms of use indicate that the minimum age limit to use Skype is 13 years.

a. *Minimum Age.* By using the Mixer Service, you represent that you are at least 13 years old and, if you are under the age of majority where you live, your use is supervised by a parent or legal guardian.

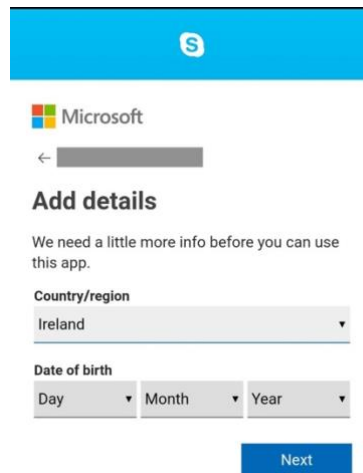
Figure 22. Paragraph of the terms of use that states the age limit.

## 2. Is this the same across all EU countries?

The minimum age is the same across all EU countries. There is only one single Terms of Use valid for all countries.

## 3. Do they ask for your age on signup?

As shown in Figure 23, Skype ask for the user age during the sign up.



The screenshot shows the Skype sign-up process. At the top is a blue header with the Skype 'S' logo. Below it is the Microsoft logo and a grey navigation bar with a back arrow. The main heading is 'Add details'. Below this, there is a message: 'We need a little more info before you can use this app.' The form includes a 'Country/region' dropdown menu with 'Ireland' selected, and a 'Date of birth' section with three dropdown menus for 'Day', 'Month', and 'Year'. A blue 'Next' button is positioned at the bottom right of the form.

Figure 23. Step of sign up in Skype.

## 4. If so, what happens if you enter age 12?

As shown in Figure 24, it is not possible to register in Skype declaring to be 12 years old.



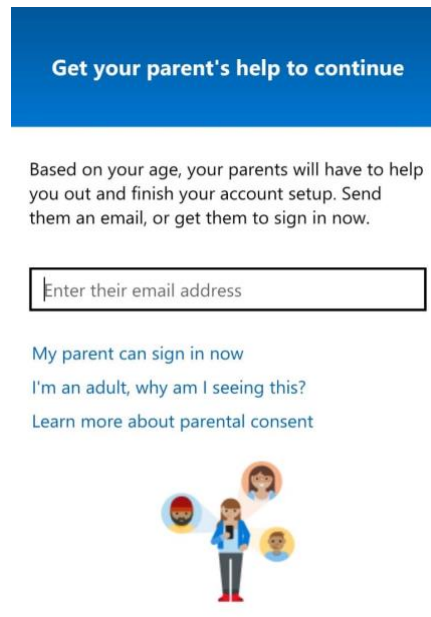
The screenshot shows a warning window on the Skype sign-up screen. The top part of the screen is a blue header with the Skype 'S' logo. Below it is the Microsoft logo and a grey navigation bar with a back arrow and a user profile icon. A large blue banner with white text reads 'Your account shows you're underage'. Below the banner, there is a message: 'If you're an adult seeing and seeing this by mistake, update your date of birth. Otherwise, you'll need to sign in with a different Microsoft account.' At the bottom, there are two links: 'Sign in with another account' and 'Update date of birth'.

Figure 24. Warning window when enter an age under the age limit.



5. **If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

As shown in Figure 25 and 26, declaring to be 13 years old when registering Skype triggers the app to send an email to a parent.



*Figure 25. Step in the sign up in Skype: emailing to a parent under the age of "majority".*

iii. **Kids and Accounts.** By signing up, you represent that you have either reached the age of "majority" where you live or have valid parent or legal guardian consent to be bound by these Terms. If you do not know whether you have reached the age of majority where you live, or do not understand this section, please do not create a Microsoft account before you have asked your parent or legal guardian for help and consent. If you are the parent or legal guardian of a minor who creates a Microsoft account, you and the minor accept and agree to be bound by these Terms and you are responsible for supervising your minor in the use of the Microsoft account or Services, including purchases, whether the minor's account is now open or created later.

*Figure 26. Paragraph in the Terms of Use of Skype about kids.*

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

No type of age verification mechanism is provided

**7. If you enter age 16 on signup, is there any attempt at verification?**

If a user declares to be 16 years old when signing up to Skype, no additional verification process is performed.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.

## 6. FACEBOOK

Facebook is a social networking website where users can post comments, share photographs and post links to news or other interesting content on the web, chat live and share personal thoughts. The minimum age for enrolment is 13 years, except for Spain and South Korea which is 14 years. Any teenager over the age of 13 can register and use the social media.

However, to view any content, it is necessary to ask parents for authorization. Within the social network it is possible to send this request via email. Also on Facebook no type of age verification mechanism is performed.

<i>QUESTIONS</i>	<i>FACEBOOK</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	No, in Spain is 14.
3. Do they ask for your age on signup?	Yes
4. If so, what happens if you enter age 12?	Warning window that it is not possible to register on social media with that age.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

## 1. What is the minimum age stated in the terms of use?

As shown in Figure 27, the terms of use indicate that the minimum age limit to use Facebook is 13 years.

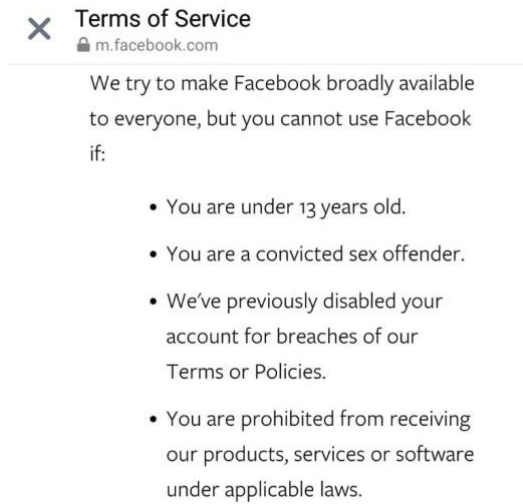


Figure 27. Paragraph of the terms of use that states the age limit.

## 2. Is this the same across all EU countries?

Facebook aims to create a global community, but as shown in Figure 28 and 29, Spain and South Korea have a different age limit.



Figure 28. Facebook security.

#### 1. Quién puede usar Facebook

Queremos que nuestra comunidad sea un entorno seguro en el que las personas se responsabilicen de sus opiniones y sus acciones. Por este motivo, debes cumplir con lo siguiente:

- Usar el mismo nombre que utilizas en tu vida diaria.
- Proporcionar información exacta sobre ti.
- Crear solo una cuenta (propia) y usar la biografía para fines personales.
- No compartir tu contraseña ni dar acceso a otras personas a tu cuenta de Facebook, ni transferirles tu cuenta sin nuestro permiso.

Intentamos que Facebook esté disponible para todo el mundo, pero no puedes usar la plataforma en los siguientes casos:

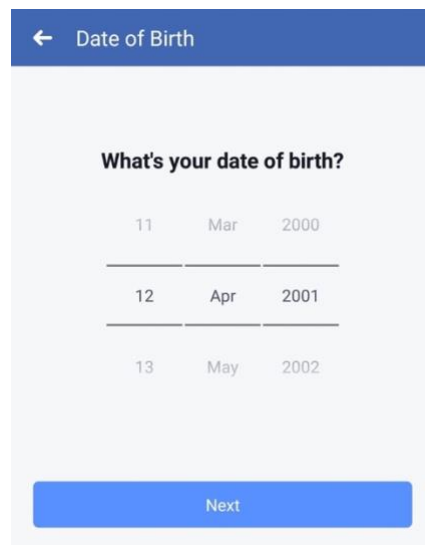
- No tienes la edad mínima necesaria (14 años en el caso de España).

*Figure*

*29. Terms of Use of Facebook in Spain.*

### 3. Do they ask for your age on signup?

As shown in Figure 30, Facebook asks for the user age during the sign up.



Day	Month	Year
11	Mar	2000
12	Apr	2001
13	May	2002

*Figure 30. Step of the sign up in Facebook: ask user age.*

#### 4. If so, what happens if you enter age 12?

As shown in Figure 31, it is not possible to sign up on Facebook by declaring to be 12 years old.

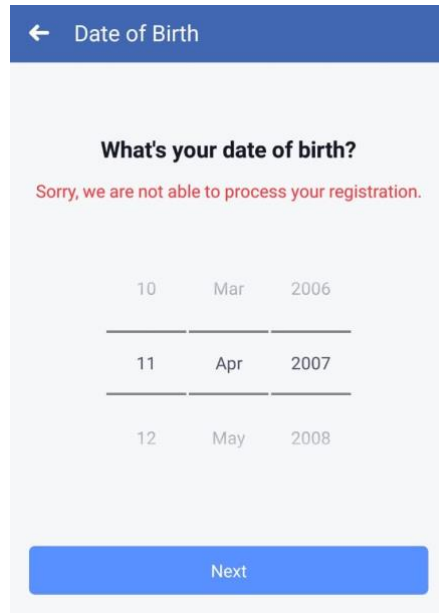


Figure 31. Warning window when enter an age under the age limit.

#### 5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?

Declaring to be 13 years old when creating a new account on Facebook does not involve any additional verification process. If a child decides to go to a Facebook section, as shown in Figure 32, s/he could optionally ask for parent's approval.

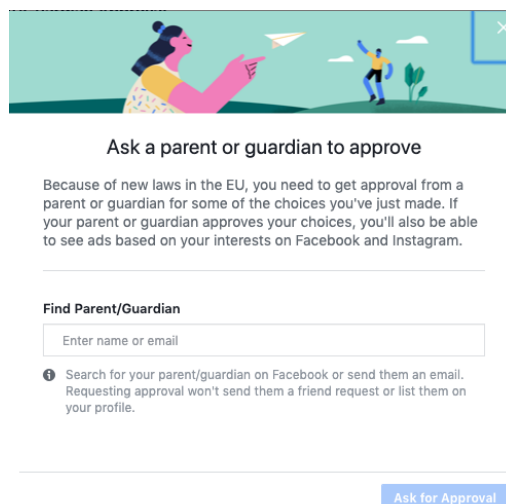


Figure 32. Facebook section for emailing to a parent.

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

No age verification mechanism is performed during sign up.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Declaring to be 16 years old when signing up on Facebook does not involve any additional verification process.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.

## 7. HOUSEPARTY

HouseParty is a mobile app that allows users to make group video calls involving up to 10 friends. The age limit here is also 13 years to register. However, there is no age verification on signup.

<i>QUESTIONS</i>	<i>HOUSEPARTY</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	Yes
4. If so, what happens if you enter age 12?	Warning window that it is not possible to register on social media with that age.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

### 1. What is the minimum age stated in the terms of use?

As shown in Figure 33, the terms of use indicate that the minimum age limit to use HouseParty is 13 years.

## 10. Children's Privacy

The Services are not directed to children under 13 years of age, and we do not knowingly collect Personal Information from children under 13 years of age. If you are under the age of 13 you must have your parent's permission to access the Services. We urge parents to instruct their children never to give out their real names, addresses, or phone numbers, without parental permission, when online. If you learn that your child has provided us with Personal Information without your consent, you may alert us at [hello@houseparty.com](mailto:hello@houseparty.com). If we learn that we have collected any Personal Information from children under 13 without verifiable parental consent, we will promptly take steps to delete such information and terminate the child's account.

Figure 33. Paragraph of the terms of use that states the age limit.

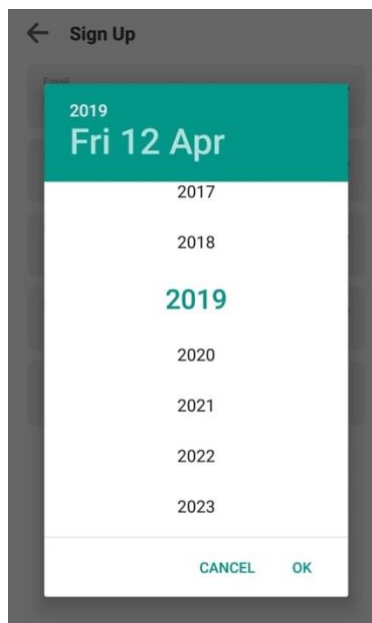


**2. Is this the same across all EU countries?**

The age of use is the same across all EU countries. There is only one single Terms of Use valid for all countries.

**3. Do they ask for your age on signup?**

As shown in Figure 34, HouseParty asks for the user age during the sign up.



*Figure 34. Step of the sign up in HouseParty.*

**4. If so, what happens if you enter age 12?**

As shown in Figure 35, it is not possible to create a new account to HouseParty for users declaring to be under 13 years of age.

The screenshot shows a 'Sign Up' form with five input fields: Email, Full Name, Username, Password, and Birthday. Each field has a green checkmark to its right, indicating it is valid. Below the fields is a red-bordered warning box with the text: 'You don't meet the age requirements. April 11, 2007' and a red 'X' icon. At the bottom, there is a small text line: 'By signing up you're agreeing to our Privacy Policy and Terms of Service.'

Figure 35. Warning window when enter an age under the age limit.

**5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Declaring to be 13 years old, as shown in Figure 36, when creating a new account on HouseParty does not involve any additional verification process.

The screenshot shows a 'Sign Up' form with five input fields: Email, Full Name, Username, Password, and Birthday. Each field has a green checkmark to its right, indicating it is valid. The Birthday field contains the text 'April 11, 2006'. At the bottom, there is a small text line: 'By signing up you're agreeing to our Privacy Policy and Terms of Service.'

Figure 36. Satisfied requirements in HouseParty.

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

No age verification is performed during sign up.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Declaring to be 16 years old or older when registering does not involve any additional verification process.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear in the terms of use and during the sign up.

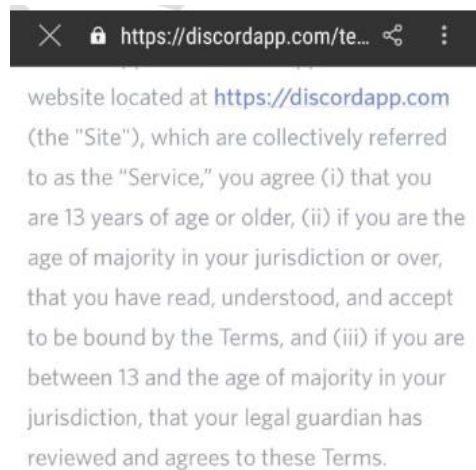
## 8. DISCORD

Discord is a mobile app specifically designed for gamers that allows users to exchange text messages and voice chats. The age limit is 13 years, as specified in the terms of use. During the creation of an account Discord does not ask for the age of the user. However, by accepting the terms and conditions, a user declares to be at least 13 years old. However, terms of use are not expressed clearly and are hard to read, especially for children.

<i>QUESTIONS</i>	<i>DISCORD</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	No
4. If so, what happens if you enter age 12?	Nothing, not ask.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, ignoring the age limit.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	No

### 1. What is the minimum age stated in the terms of use?

As shown in Figure 37, the terms of use indicate that the minimum age limit to use Discord is 13 years.



*Figure 37. Paragraph of the terms of use that states the age limit*

**2. Is this the same across all EU countries?**

There is only one single Terms of Use valid for all countries.

**3. Do they ask for your age on signup?**

Discord does not ask for the user age during the sign up.

**4. If so, what happens if you enter age 12?**

Not possible. Not ask for the user age.

**5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Not possible. Not ask for the user age.

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

It is easy to circumvent because Discord not ask the age.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Age is not even requested to create a new user account. Not possible. The app does not require to input the user's age

**8. At any point is the minimum age made clear to the user?**

The minimum age is not clear to the user in Discord. Although the minimum age is written in the terms of use, the sign up procedure does not require the user to input his/her age.

## 9. MESSENGER

Messenger is an application that allows a user to send and receive messages in real time to other Facebook users or to the numbers in the phonebook, and to make voice calls.

The terms of the application are the same as those of Facebook because Messenger is a Facebook product. So, the minimum age is always 13 in all of Europe except for Spain which is 14. Like Discord, Messenger also does not ask for the age of the user during account creation, making it very easy for an underage child to circumvent the terms and conditions.

<i>QUESTIONS</i>	<i>MESSENGER</i>
1. What is the minimum age stated in the terms of use?	13
2. Is this the same across all EU countries?	No, in Spain is 14.
3. Do they ask for your age on signup?	No
4. If so, what happens if you enter age 12?	Nothing, not ask.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, ignoring the age limit.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	No

### 1. What is the minimum age stated in the terms of use?

Messenger is a Facebook product. The age limit in Messenger for using the service is 13. It is written in the terms of use of Facebook.

### 2. Is this the same across all EU countries?

As shown in Figure 38, Messenger is a Facebook product. Facebook aims to create a global community, but Spain and South Korea have a different age limit.

## What are the Facebook Products?

Computer Help Mobile Help ▾

Share Article

The Facebook Products include Facebook (including the Facebook mobile app and in-app browser), [Messenger](#), Instagram (including apps like Direct and Boomerang), Portal-branded devices, Bonfire, Facebook Mentions, Spark AR Studio, Audience Network, and any other features, apps, technologies, software, products, or services offered by Facebook Inc. or Facebook Ireland Limited under our [Data Policy](#). The Facebook Products also include [Facebook Business Tools](#), which are tools used by website owners and publishers, app developers, business partners (including advertisers) and their customers to support business services and exchange information with Facebook, such as social plugins (like the "Like" or "Share" button) and our SDKs and APIs.

Facebook Products does not include some Facebook-offered products or services that have their own separate privacy policies and terms of service – such as Workplace, Free Basics, and Messenger Kids.

Figure 38. Facebook products

### 3. Do they ask for your age on signup?

As shown in Figure 39, Messenger does not ask for the user age during the sign up.

#### What's your mobile number?

#### Finish creating account

By tapping Create Account, you agree to our [Terms](#). Learn how we collect, use and share your data in our [Data Policy](#) and how we use cookies and similar technology in our [Cookies Policy](#). You may receive SMS notifications from us and can opt out at any time.

You will not be creating a Facebook profile.

CREATE ACCOUNT



## Create a password

Enter a combination of at least six numbers, letters and punctuation marks (such as ! and &).

..... 

## What's your name?

First name

Surname

*Figure 39. Steps of the sign up in Messenger*

**4. If so, what happens if you enter age 12?**

Not possible. Age is not requested during sign up.

**5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Not possible. Age is not requested during sign up.

**6. Can you easily bypass these verification processes? (Do you get access anyway?)**

Age is not requested during sign up.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Not possible. Age is not requested during sign up.

**8. At any point is the minimum age made clear to the user?**

The minimum age is not clear to the user in Messenger; although it is indicated explicitly in the terms of use, Messenger does not explicitly require the age during the sign up.

## 10. WHATSAPP

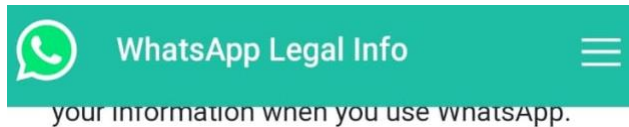
WhatsApp is a multi-platform messaging application that allows users to send messages, photos, videos, documents and voice recordings to other users via the Internet using a user's phone number as an identifier. The age limit is 16 years within Europe, as specified in the Terms of Use and it is also explicitly reported during the creation of a new account.

WhatsApp does not ask for the age of the user. By accepting the terms of use, a user automatically declares to be older than the age limit. WhatsApp also rewrites the limit even after the terms have been accepted. A child under the age of 16 can easily ignore the restriction and create an account.

<i>QUESTIONS</i>	<i>WHATSAPP</i>
1. What is the minimum age stated in the terms of use?	16
2. Is this the same across all EU countries?	Yes
3. Do they ask for your age on signup?	No
4. If so, what happens if you enter age 12?	Nothing, not ask.
5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No
6. Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, ignoring the age limit.
7. If you enter age 16 on signup, is there any attempt at verification?	No
8. At any point is the minimum age made clear to the user?	Yes

### 1. What is the minimum age stated in the terms of use?

As shown in Figure 40, the terms of use indicate that the minimum age limit to use WhatsApp is 16 years.



your information when you use WhatsApp.

**Age Requirement.** To use WhatsApp, you must be **at least 16 years old**.

*Figure 40. Paragraph of the terms of use that states the age limit.*

## **2. Is this the same across all EU countries?**

As shown in Figure 41, the minimum age is the same across all EU countries.

**Age.** If you live in a country in the **European Region**, you must be at least 16 years old to use our Services or such greater age required in your country to register for or use our Services. If you live in any other country except those in the **European Region**, you must be at least 13 years old to use our Services or such greater age required in your country to register for or use our Services. In addition to being of the minimum required age to use our Services under applicable law, if you are not old enough to have authority to agree to our Terms in your country, your parent or guardian must agree to our Terms on your behalf.

*Figure 41. Paragraph of the terms of use that states the age limit in the Europe Region.*

## **3. Do they ask for your age on signup?**

WhatsApp does not ask for the user age during the sign up.

## **4. If so, what happens if you enter age 12?**

Not possible. Age is not requested during sign up.

## **5. If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?**

Not possible. Age is not requested during sign up.

## **6. Can you easily bypass these verification processes? (Do you get access anyway?)**

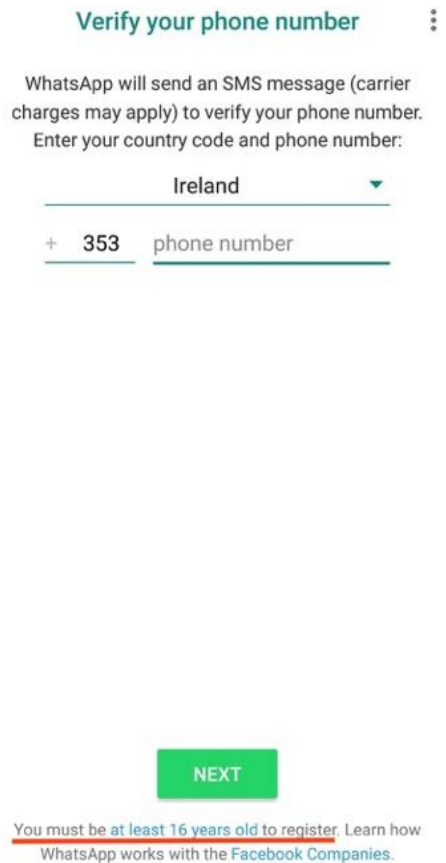
It is easy to circumvent the age verification mechanisms because WhatsApp not ask for the user's age during sign up.

**7. If you enter age 16 on signup, is there any attempt at verification?**

Not possible Age is not requested during sign up.

**8. At any point is the minimum age made clear to the user?**

The minimum age is clear to the user in WhatsApp because it is written in the terms of use and there is one reference to the age during the sign up as shown in Figure 42.



*Figure 42. Step of the sign up in WhatsApp with minimum age reference.*

## SUMMARY

<i>QUESTIONS</i>	<i>SNAPCHAT</i>	<i>INSTAGRAM</i>	<i>TIKTOK</i>	<i>VIBER</i>	<i>SKYPE</i>
What is the minimum age stated in the terms of use?	13	13	13	13	13
Is this the same across all EU countries?	Yes	No, in Spain is 14	Yes	Yes	Yes
Do they ask for your age on signup?	Yes	Yes	Yes	Yes	Yes
If so, what happens if you enter age 12?	Warning window	Warning window	Warning window	Cannot enter an age below 13 years	Warning window
If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No	Yes: Email a parent	No	No	Yes: Email a parent
Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age	Yes, just insert a false age	Yes, just insert a false age	Yes, just insert a false age	Yes, just insert a false age
If you enter age 16 on signup, is there any attempt at verification?	No	No	No	No	No
At any point is the minimum age made clear to the user?	Yes	Yes	Yes	Yes	Yes

<i>QUESTIONS</i>	<i>FACEBOOK</i>	<i>HOUSEPARTY</i>	<i>DISCORD</i>	<i>MESSENGER</i>	<i>WHATSAPP</i>
What is the minimum age stated in the terms of use?	13	13	13	13	16
Is this the same across all EU countries?	No, in Spain is 14	Yes	Yes	No, in Spain is 14	Yes
Do they ask for your age on signup?	Yes	Yes	No	No	No
If so, what happens if you enter age 12?	Warning window	Warning window	Nothing, not ask	Nothing, not ask	Nothing, not ask
If you enter age 13, are there any additional verification processes (e.g. emailing a parent)?	No	No	No	No	No
Can you easily bypass these verification processes? (Do you get access anyway?)	Yes, just insert a false age	Yes, just insert a false age	Yes, ignoring the age limit	Yes, ignoring the age limit	Yes, ignoring the age limit
If you enter age 16 on signup, is there any attempt at verification?	No	No	No	No	No
At any point is the minimum age made clear to the user?	Yes	Yes	No	No	Yes

## CONCLUSIONS

- All social networks have an age limit for using the service: 13 years. Only WhatsApp has changed the age limit to 16 as a response to the EU GDPR (General Data Protection Regulation) which was enforced on May 25 2018. The other social networks have followed a law in the USA. The COPPA law or Children's Online Privacy Protection Act states that any organizations or people operating online services (including social media services) are not allowed to collect personal information of anyone under the age of 13, without parental permission. With respect to this law, all social networking services (with the exception of WhatsApp) prefer to write this rule into their Terms and Conditions.
- Instagram, Facebook and Messenger within Europe have a age limit of 13 years. In Spain the age limit is 14.
- Each social media app during the sign up asks for the age of the user except Discord, Messenger and WhatsApp.
- Social media apps that require the user's age do not allow a user to register by entering an age below the limit.
- If you are between the ages of 13 and 16: Instagram recommends asking a parent for approval to use the app, Facebook optionally gives a child the chance to ask for parent for approval, and Skype instead requires the approval by a parent up to the age of consent.
- A child can circumvent all the age verification mechanisms of the analyzed apps by entering a false age.
- The age limit is written only in the terms of use. However, these terms are too complicated and take a long time to read. The language adopted in the terms of use is too complex for underage users. A violation is found not only of the age limit of the GDPR but also the violation of article 12 of the GDPR: *"concise, transparent, intelligible and [in an] easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child"*.

- Snapchat and Messenger have created apps for children under the age of 13 with more controls and more security: SnapKidz and Messenger Kids. Disadvantages are the reduced set of functionality that these apps provide.
- A Deloitte survey of 2,000 consumers in the U.S found that 91% of people consent to legal terms and services conditions without reading them. For younger people, the rate is even higher with 97% agreeing to conditions before reading. The language is too complex and long-winded for most, and apparently, consumers are willing to accept that the worst most companies will do is sell their name and email to a third party that wants to advertise to them. The problem is that not all users are able to read such a long and complicated text, especially younger users. Social media enter a low age limit but don't give them the chance to understand what they are agreeing to do.
- After an increasing pressure from the European Commission, Facebook has decided to have its terms of service revised to make it clear to users how it monetizes their data. By June 2019 Facebook will have to publish the terms to avoid penalties. ([https://www.upi.com/Top\\_News/US/2019/04/09/Facebook-agrees-to-change-terms-and-conditions-after-EU-pressure/6371554820495/](https://www.upi.com/Top_News/US/2019/04/09/Facebook-agrees-to-change-terms-and-conditions-after-EU-pressure/6371554820495/))

### We're Making Our Terms and Data Policy Clearer, Without New Rights to Use Your Data on Facebook

It's important to show people in black and white how our products work – it's one of the ways people can make informed decisions about their privacy. So we're updating our [terms of service](#) that include our commitments to everyone using Facebook. We explain the services we offer in language that's easier to read. We're also updating our [data policy](#) to better spell out what data we collect and how we use it in Facebook, Instagram, Messenger and other products.

These updates are about making things clearer. We're not asking for new rights to collect, use or share your data on Facebook. We're also not changing any of the privacy choices you've made in the past. Here are a few examples of what you'll find:

- **New features and tools:** We're providing information on recently introduced features. Since we last updated our terms or data policy three years ago, you can now buy and sell items on Marketplace, start a fundraiser for a cause you care about, share Live and 360 video, and add creative effects to your photos.
- **Personalized experience:** Everyone's experience on Facebook is unique, and we're providing more information on how this works. We explain how we use data and why it's needed to customize the posts and ads you see, as well as the Groups, friends and Pages we suggest.
- **What we share:** We will never sell your information to anyone. We have a responsibility to keep people's information safe and secure, and we impose strict restrictions on how our partners can use and disclose data. We explain all of the circumstances where we share information and make our commitments to people more clear.



- **Advertising:** You have control over the ads you see, and we don't share your information with advertisers. Our data policy explains more about how we decide which ads to show you.
- **One company:** Facebook is part of the same company as WhatsApp and Oculus, and we explain how we share services, infrastructure and information. We also make clear that Facebook is the corporate entity that provides the Messenger and Instagram services, which now all use the same data policy. Your experience isn't changing with any of these products.
- **Device information:** People have asked to see all the information we collect from the devices they use and whether we respect the settings on your mobile device (the short answer: we do). We've also added more specific information about the information we collect when you sync your contacts from some of our products, including call and SMS history, which people have recently asked about.
- **Addressing harmful behavior:** We better explain how we combat abuse and investigate suspicious activity, including by analyzing the content people share.

[Go to Facebook](#)