



PRISM.IN 2023 CHILDREN

Privacy Research & Insights Study of
Mobile Apps and Websites. INDIA

This is an adjunct study to the main Arrka study. The same is available at www.arrka.com

Contents

▶ Foreword	1
▶ Methodology and Approach	2
▶ What Personal Data of your Child are Apps collecting?	7
▶ Whom is your Child's Personal Data being shared with?	10
▶ How transparent are Organizations being with you?	12
▶ Other Aspects pertaining to Children's Privacy	13
▶ Comparison with International Apps	15
▶ Authors	18
▶ About Arrka	19

Foreword

We at Arrka are delighted to launch this **Children's Privacy Study** this year as an *adjunct* to our main **Annual Privacy study**.

Why did we decide to bring out this independent focus?

On one hand, we have been seeing the increased focus on Children's Privacy worldwide with several regulations kicking in over the last year. On the other, we have been seeing - with alarm - the kind of Personal Data of Children being processed around us, without any guardrails per se. Hence we thought we should gather some specific data points to evaluate how critical things really are.

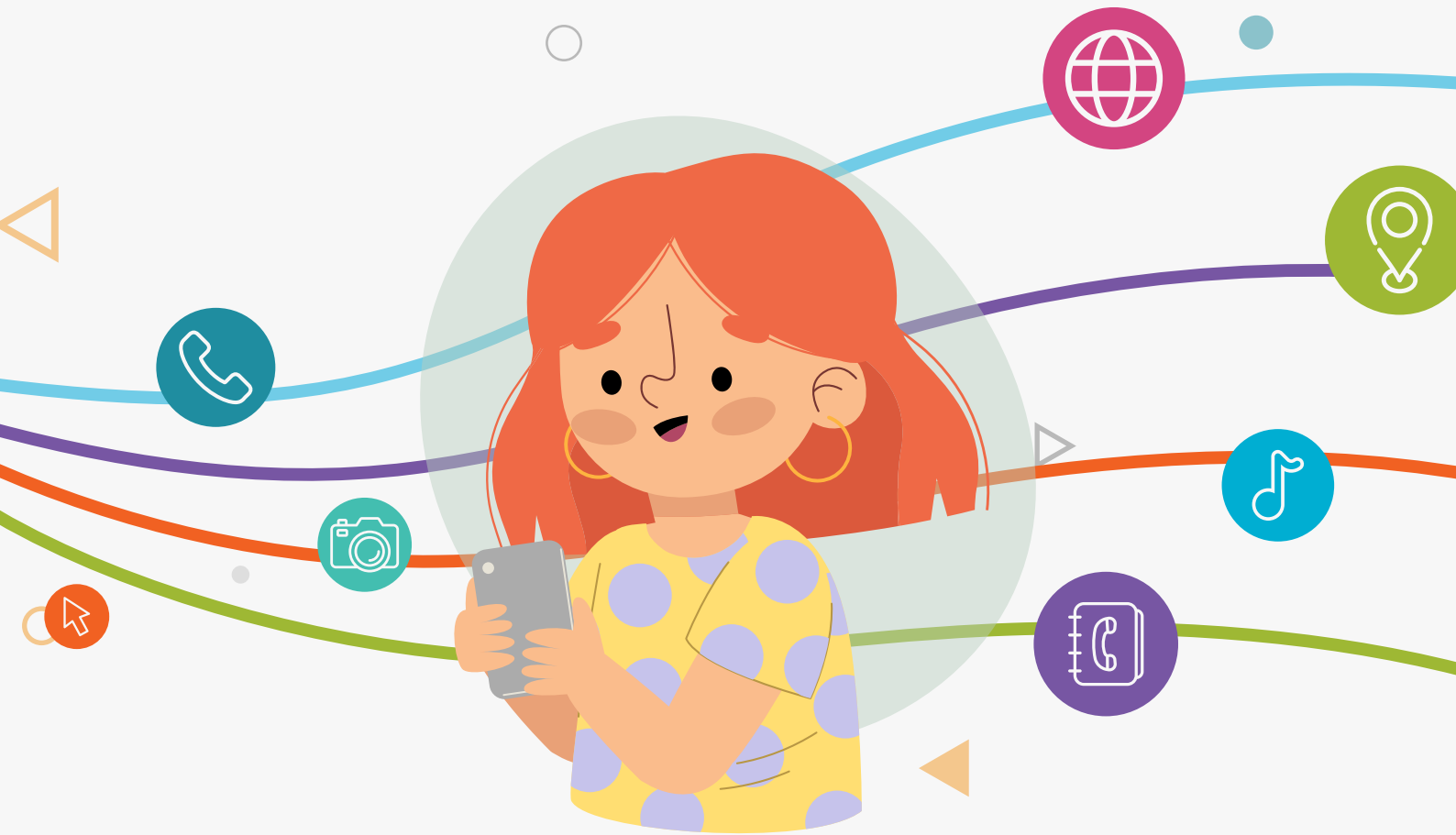
Ergo, **PRISM.IN - Children** is being launched.

The good news is that the **Indian Digital Personal Data Protection Act (DPDPA)** has mandated some clear protective measures for Children's data. We are sure that this will provide the necessary impetus to get Indian entities, including educational institutions, finally moving to protect the privacy of India's children.

Via this report, we would like to urge everyone who works with Children and processes their data, to do their bit in this mighty endeavour ahead for the country. **After all, we owe it to our children!**

Shivangi Nadkarni

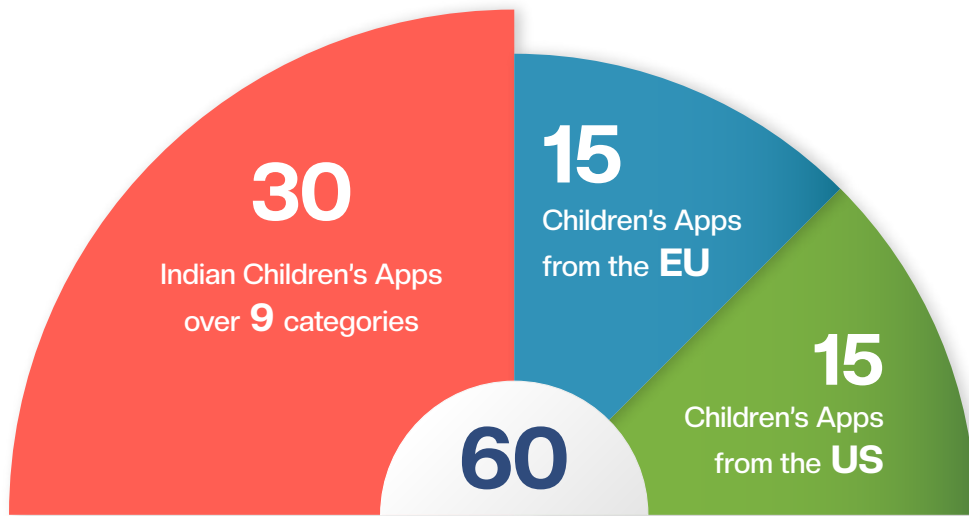
Co-Founder & CEO, Arrka



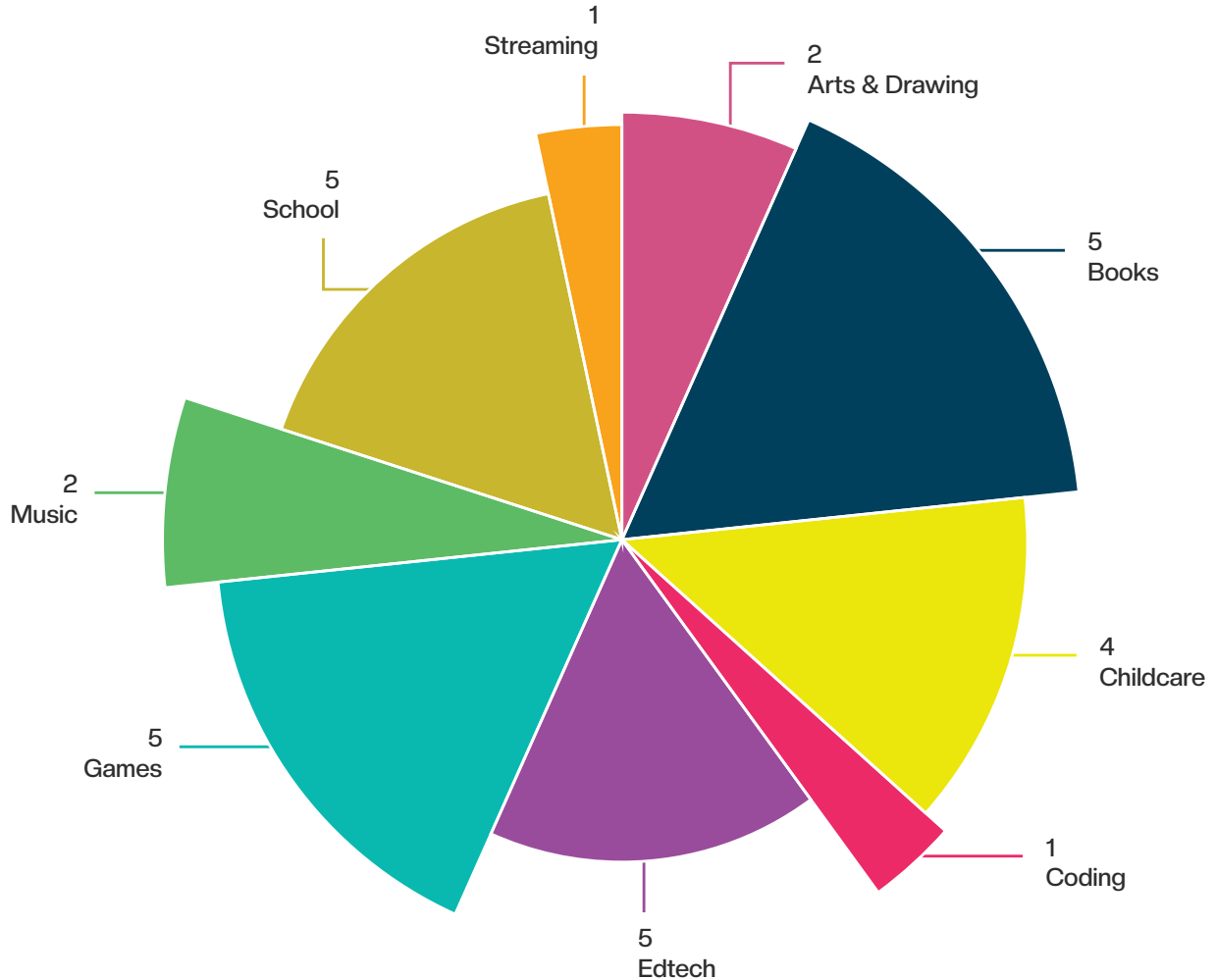
Study Methodology & Approach

Who did we Study?

60 Android Children's Apps were covered in this Study.



Categories of Children's Apps studied



What did we Study?

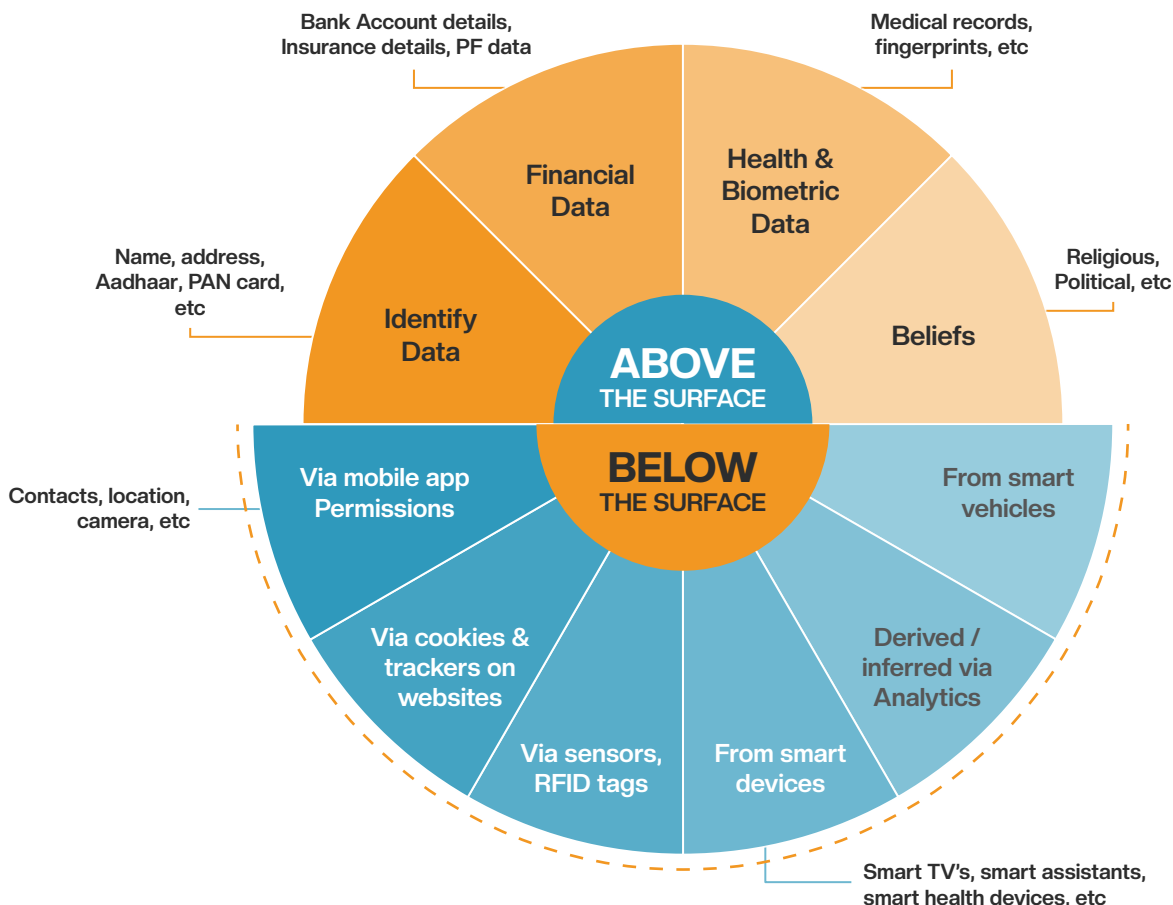
Data Privacy is all about Personal Data – and how much of control an individual can exercise over their Personal Data. The Arrka Study focuses on understanding some aspects of this in the context of Organizations targeting Children through Mobile Apps.

Our Study primarily focuses on:

'Below The Surface' Personal Data that Mobile Apps and Websites have access to

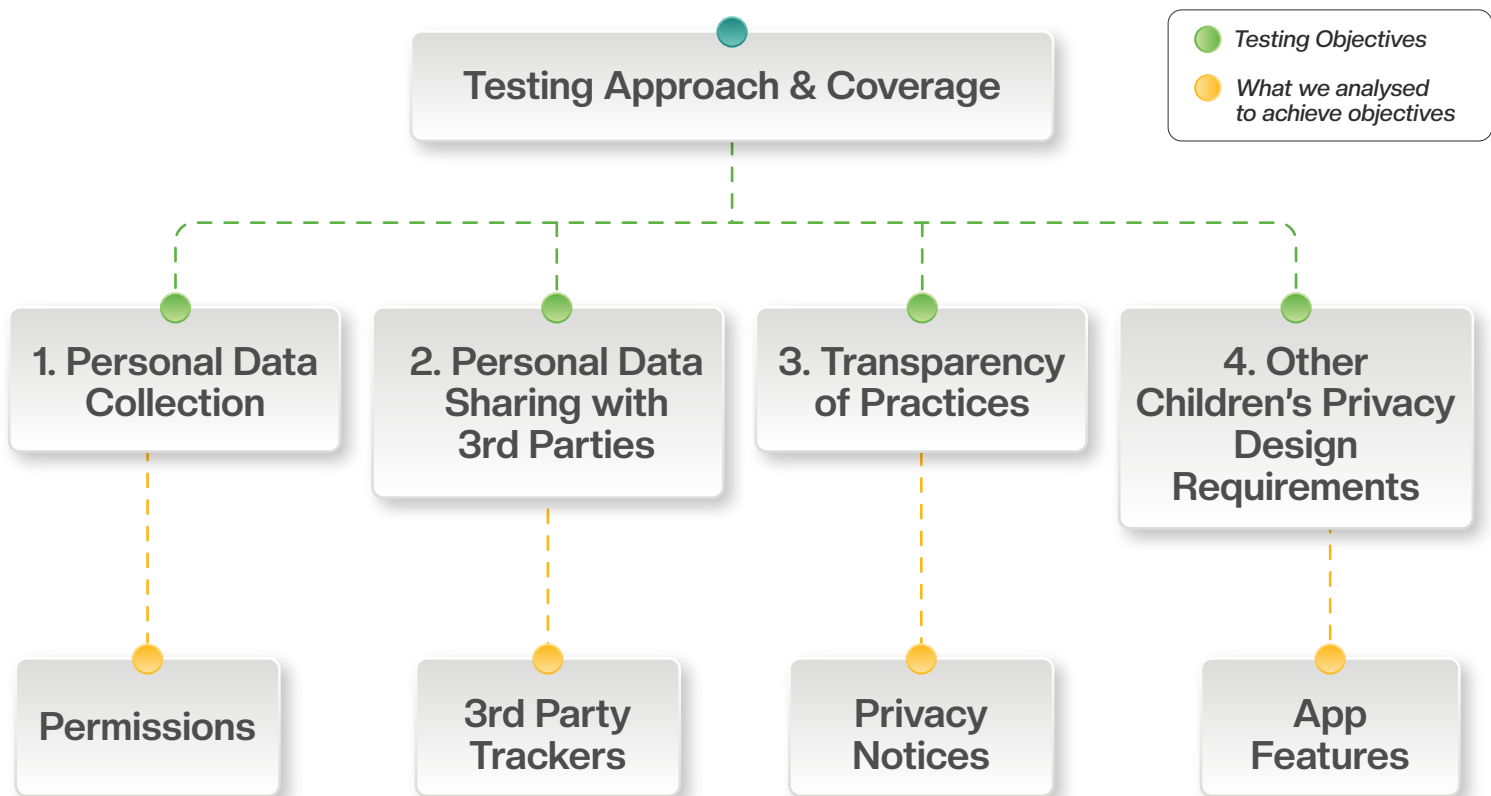
- What kind of Data is being collected via Permissions?
- Is Data being shared with external (3rd) Parties?
- How transparent are organizations being via their Privacy Notices?
- How Indian Children's Apps compare with those in the US & EU?
- Are Children's Apps following Design practices which are compliant to the DPDPA* requirements around Children's Personal Data and other best practices followed by Children's Apps globally?

*The Indian Digital Personal Data Protection Act, 2023



How did we conduct this Study?

The Study covers 4 Key Areas related to Privacy in organizations targeting Children – specific to their Android Apps:



Note:

Data used is from Privacy Testing done at the Arrka Privacy Lab as well as from external sources like Exodus.

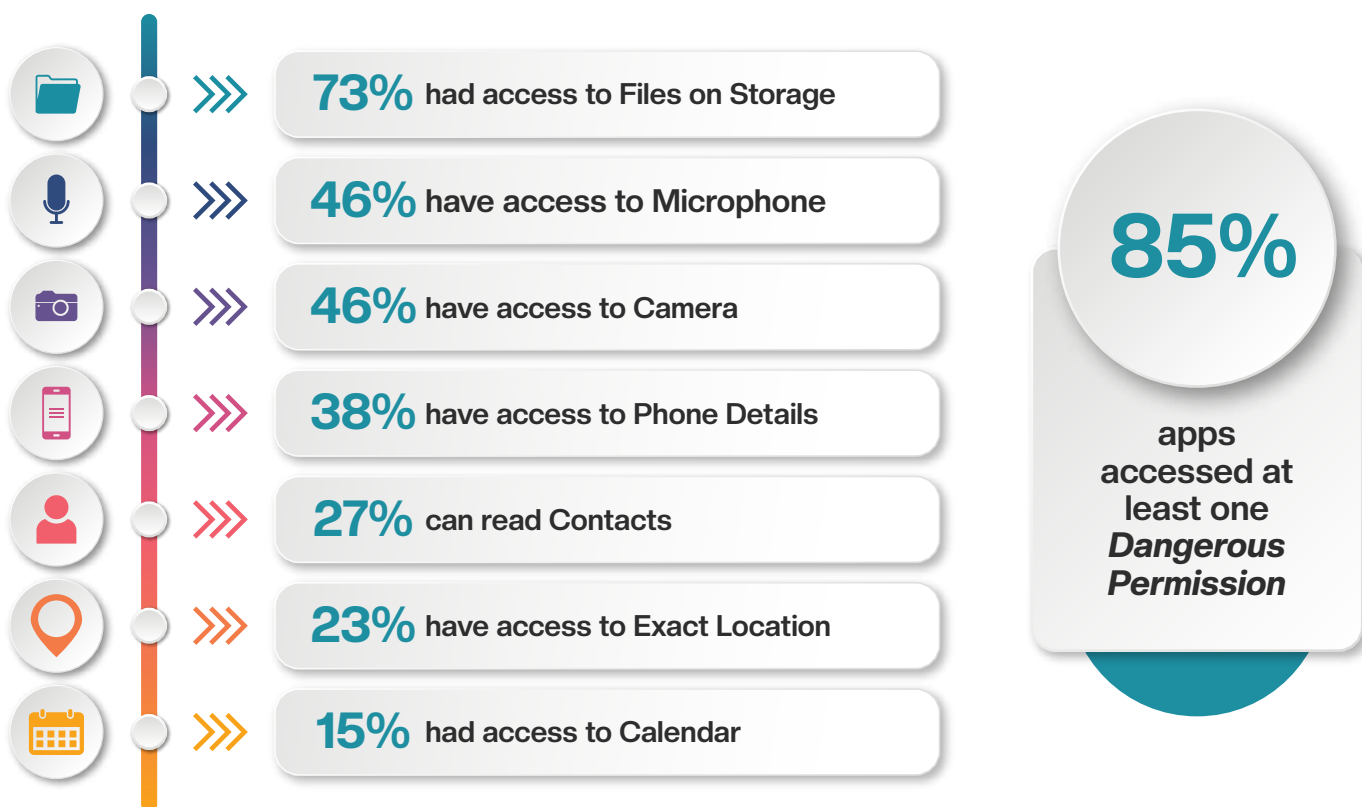


Key Findings - Indian Children's Apps

What Personal Data of your Child are Apps collecting?

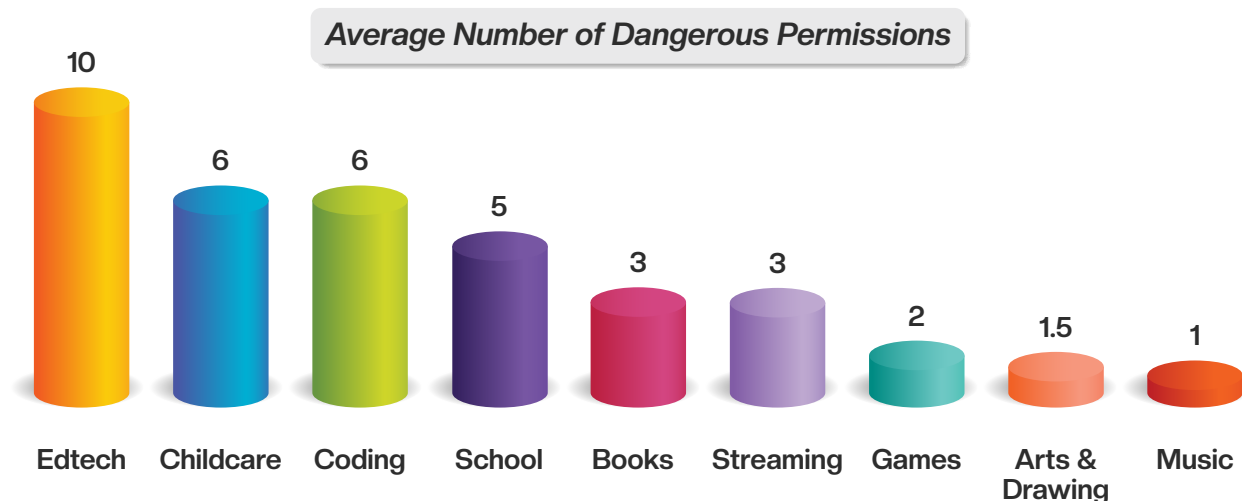
Mobile Apps collect a lot of Personal Data about your children via permissions. 'Dangerous Permissions' are those via which the data collected is highly sensitive, the misuse of which can cause harm to your children.

➤ A.1 : Top Dangerous Permissions Accessed by Children's Apps

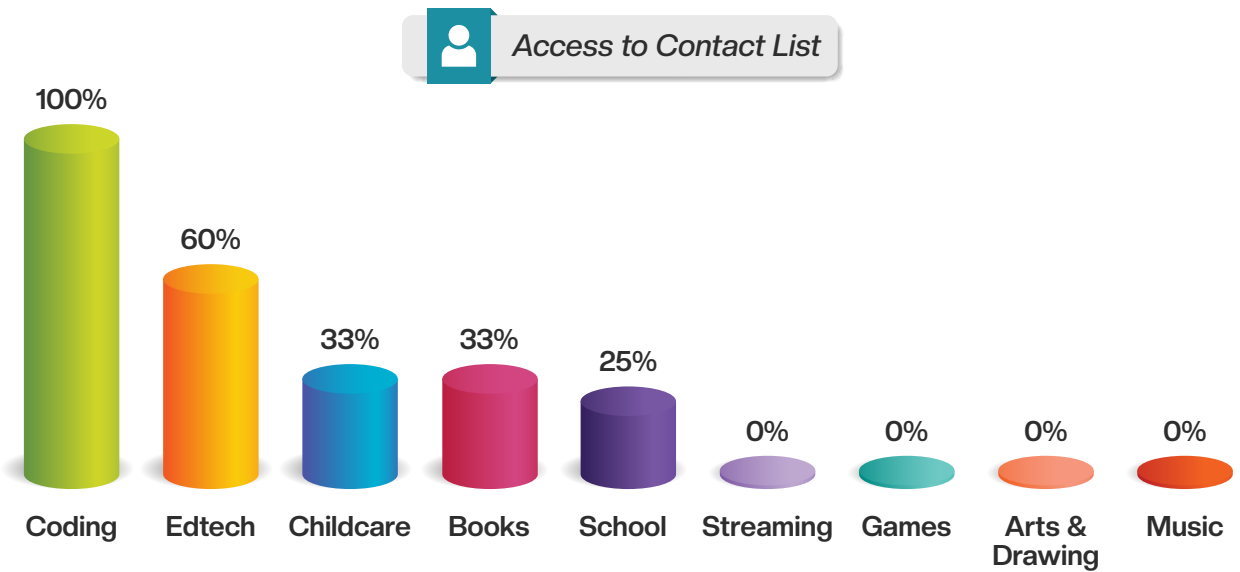
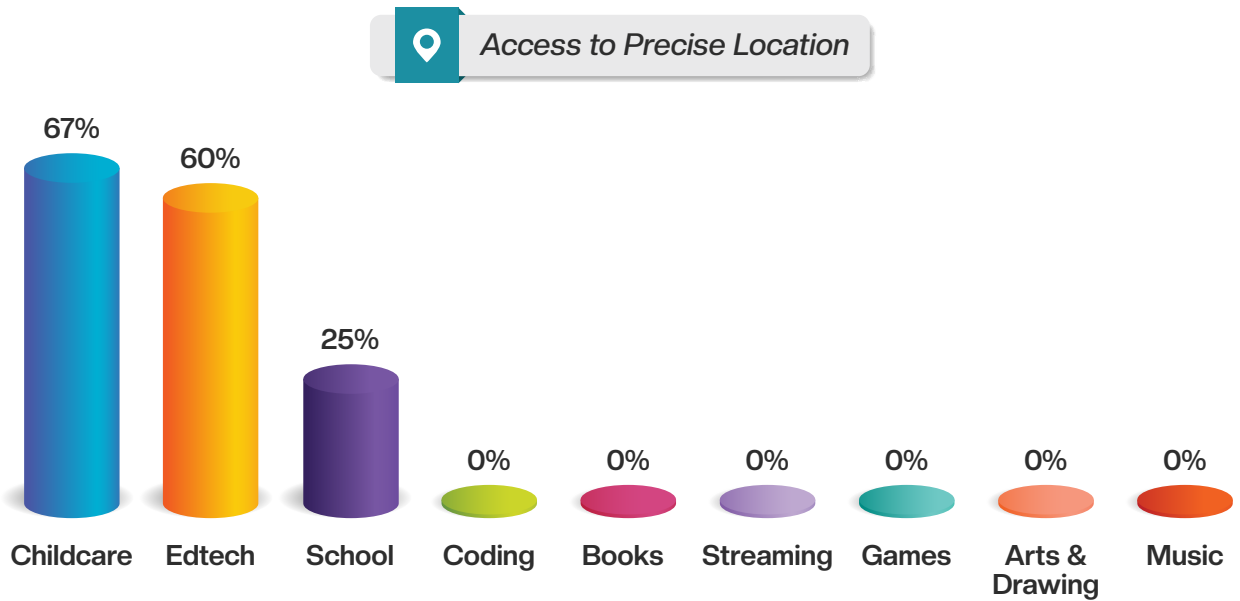



➤ A.2 : Categories of Children's Apps that access Maximum Number of Dangerous Permissions

Edtech is the category of Children's Apps which takes the maximum number of Dangerous Permissions.



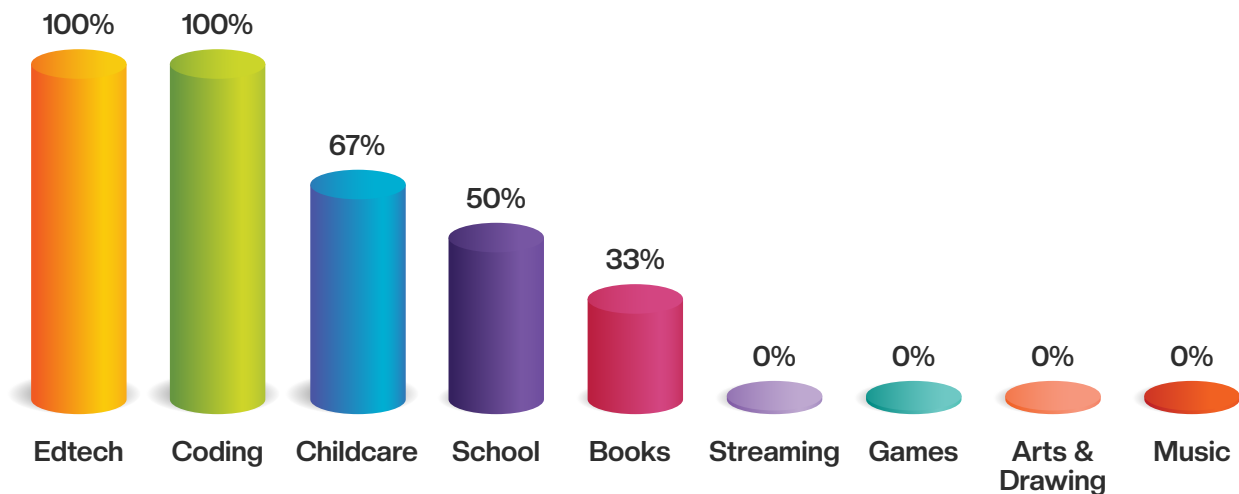
➤ A.3 : Permissions by Category



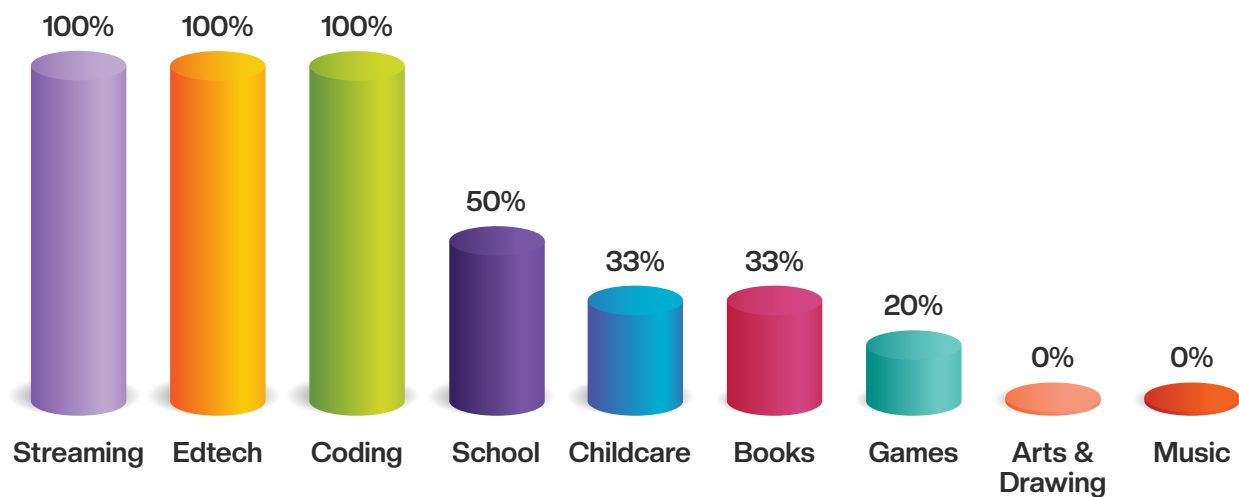
 **Note:** % indicates the number of Apps from the category taking this permission



Access to Camera



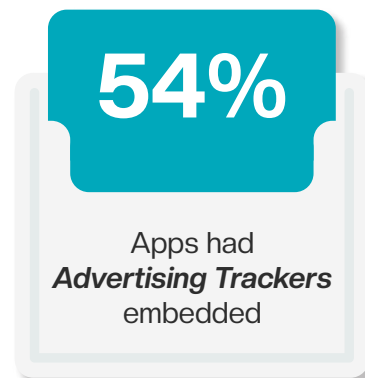
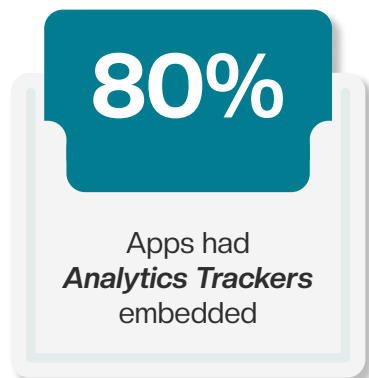
Access to Microphone



Note:
% indicates the number of Apps from the category taking this permission

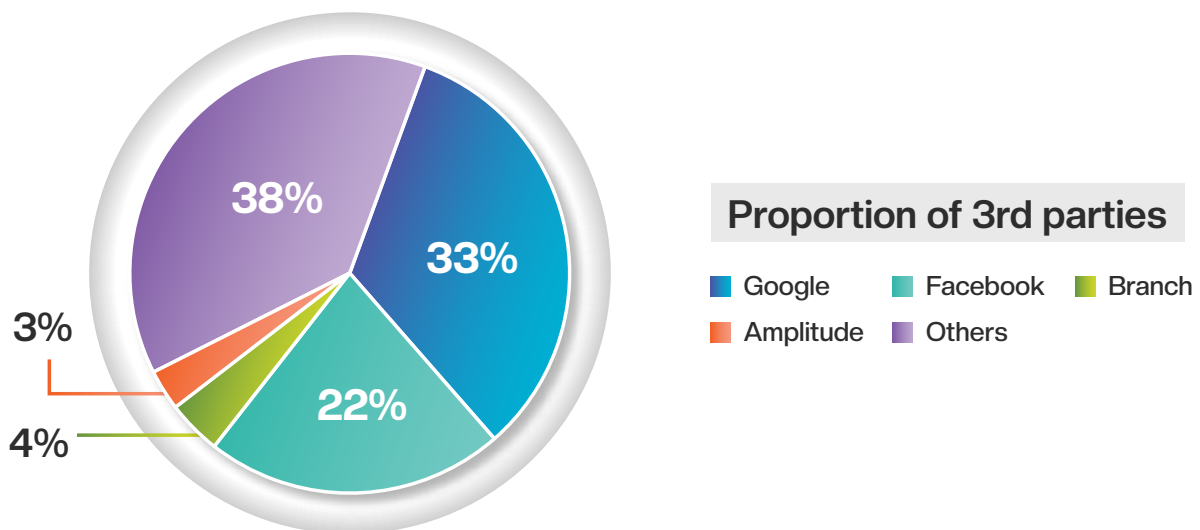
Whom is your Child's Personal Data being shared with?

As part of our Analysis of Children's Apps, we observed that significant number of Apps had Analytics and Advertising Trackers embedded. These would be **violating the India DPDPA** which requires Organizations to not indulge in **Tracking or Behavioral Monitoring** of children and **Targeted Advertising to children**.



➤ A.1 Which entities are your Child's data's Top Recipients?

- ◉ **Google (33%)** is the leading recipient of your data with **Facebook (22%)** coming a distant second
- ◉ We observed a long tail of small recipients, each contributing to less than **2%** of the overall trackers identified. E.g. AppsFlyer, AppLovin

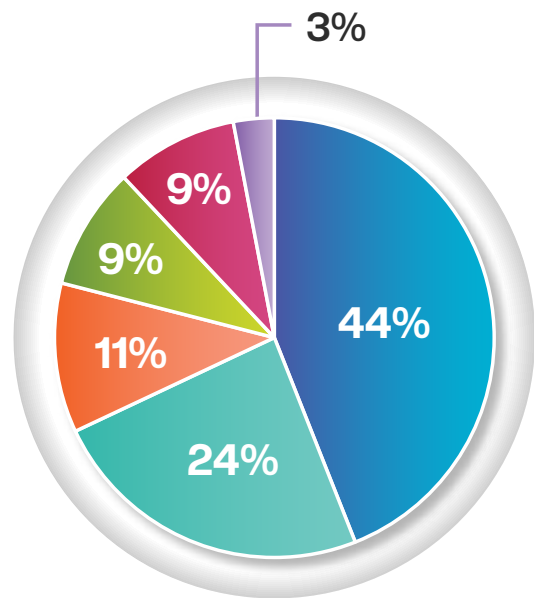


A.2 Which functional categories do the trackers belong to?

44% of 3rd Parties are related to Analytics

Categories of Trackers

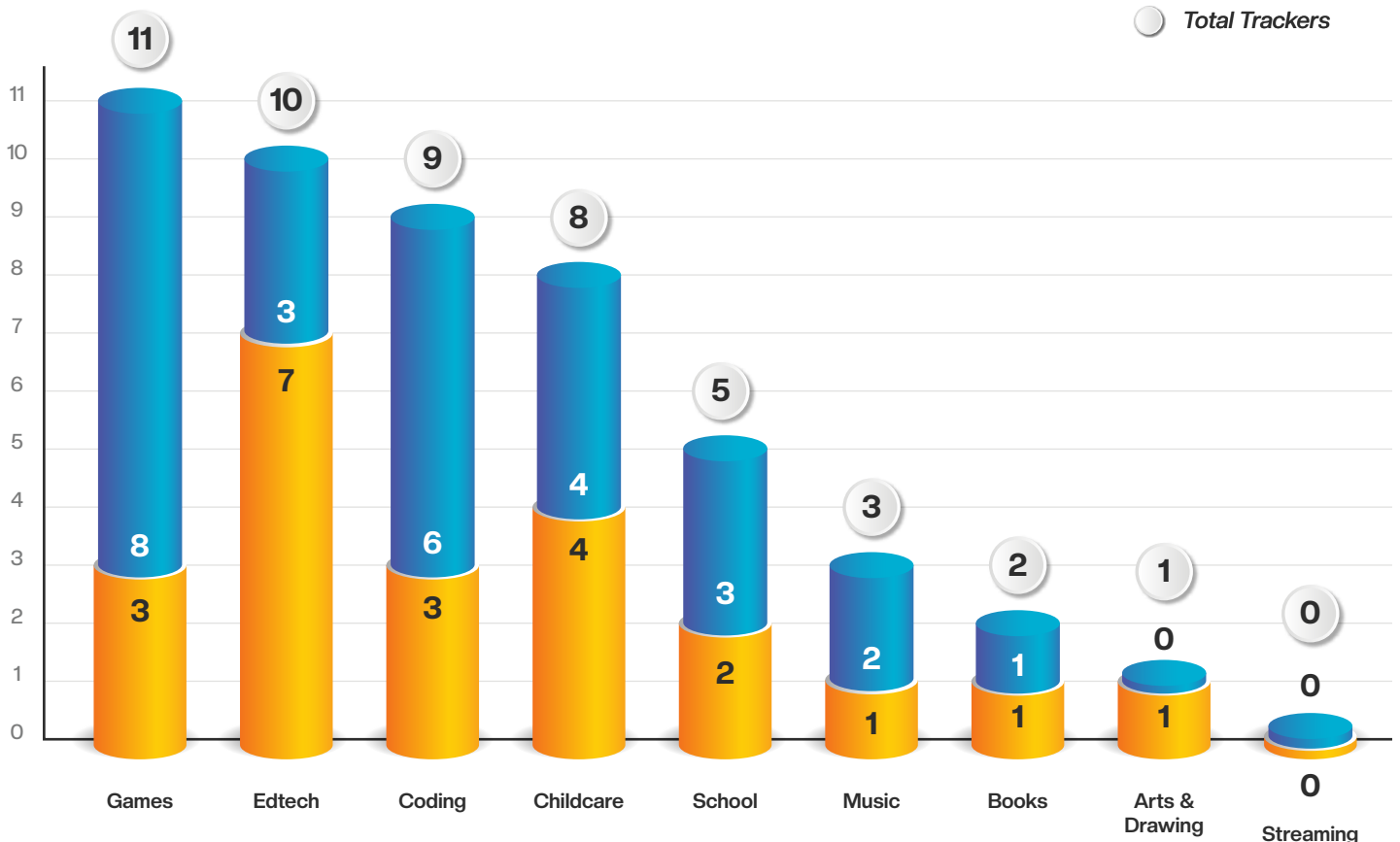
- Analytics
- Advertising
- Crash Reporting
- Identification
- Profiling
- Location



A.3 Categories of Children's Apps that have Maximum Number of Trackers

Avg. Trackers by Category

- Analytics Trackers
- Other Trackers
- 0 Total Trackers



How transparent are Organizations being with you?

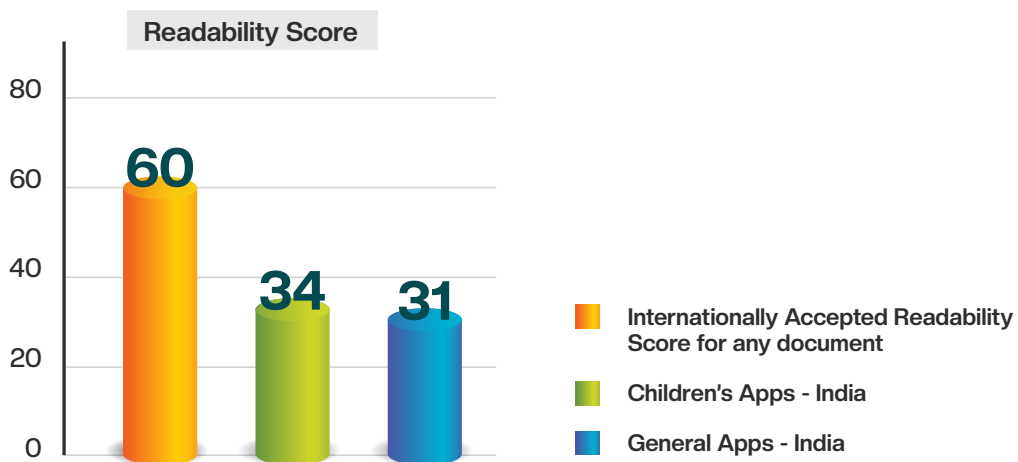
To test how easy organizations were making it for you and your children to understand their practices, we tested Privacy Notices on ease of their Readability.

To analyze Notice Readability, we used the Industry Standard **"Flesch Reading Ease Scale"**. The Flesch Reading Ease scores are being used as a standard readability formula by many US Government Agencies.

Standard Acceptable scores on the Flesch Reading Ease Scale are **60-70** (on a scale of 0-100).

Key Findings

- ◆ The Privacy Notice of an average Children's App from India is rated as **34/100** on the Readability Scale. This is **~57%** of the Internationally Accepted Readability Score which applies to any document
- ◆ Although the Notice Readability Score for Children's Apps is **10%** higher than General Apps, it is still way below International Standard



Specifically for Children's Apps, we also studied some additional parameters to evaluate Transparency. We assessed if Apps are providing a separate Privacy Policy for Children which is simplified and easily understandable by the children. As parents, since you are prime consumers of the Privacy Policies of Children's Apps, we assessed if there was any dedicated section in the App's Privacy Policy for parents.

Our Study concludes that these numbers are significantly lower than those for Children's Apps in the EU and US.

41%

Apps had a separate **Privacy Policy** for Children

38%

Apps had a **dedicated section** for parents

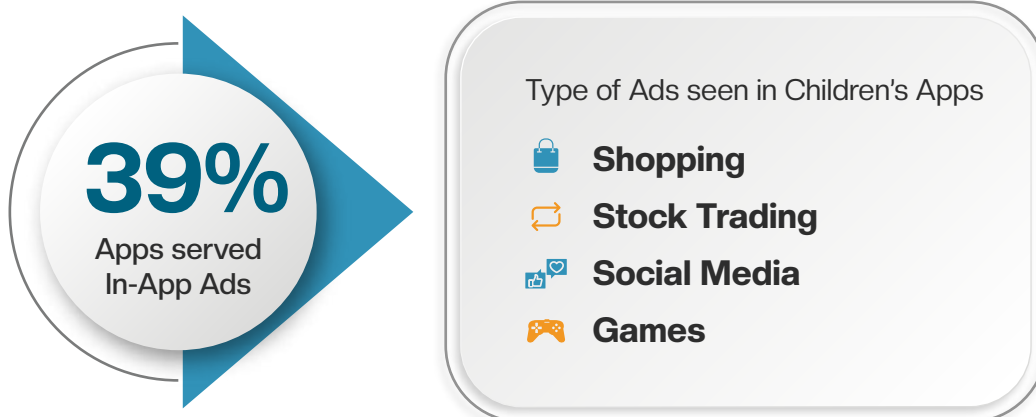
Other Aspects pertaining to Children's Privacy

As part of our Study, we also evaluated other aspects that are important from the perspective of Children's Privacy.

▀ A.1 Targeted Advertising

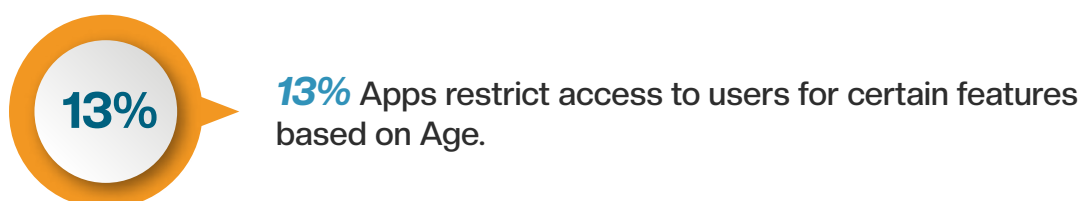
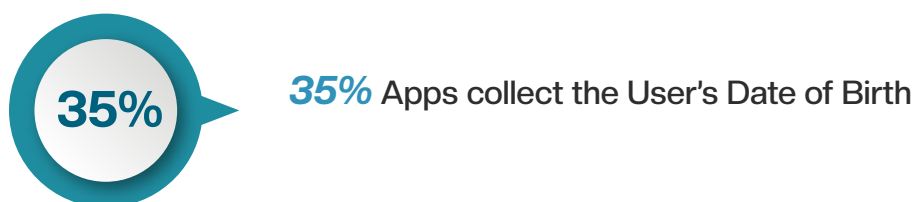
The India DPDPA prohibits Targeted Advertising to Children. To see how Indian Children's Apps fare on this aspect, we studied -

- (a) **How many Apps served Ads** and
- (b) **What were the types of Ads served.**



▀ A.2 Age Gating

Age Gating is the mechanism used to ascertain the age of a user and restrict features and offerings to users below a certain age. This is an important aspect of DPDPA compliance, given the requirements around Children's Data. We observed that Indian Apps have a long way to go in this aspect.



▾ A.3 Other Processing impacting Children

The DPDPA says Organizations **cannot undertake any processing that is likely to cause any detrimental effect on the well-being of a child**. In keeping with this caveat, we evaluated the following two aspects in Indian Android Apps that can impact a child adversely:



52% Apps provided In-App Purchases.

This may involve purchases using real currency or In-App currency (E.g. Coins) based on App usage.



52% Apps ask users to sign up using their Social Media Accounts.

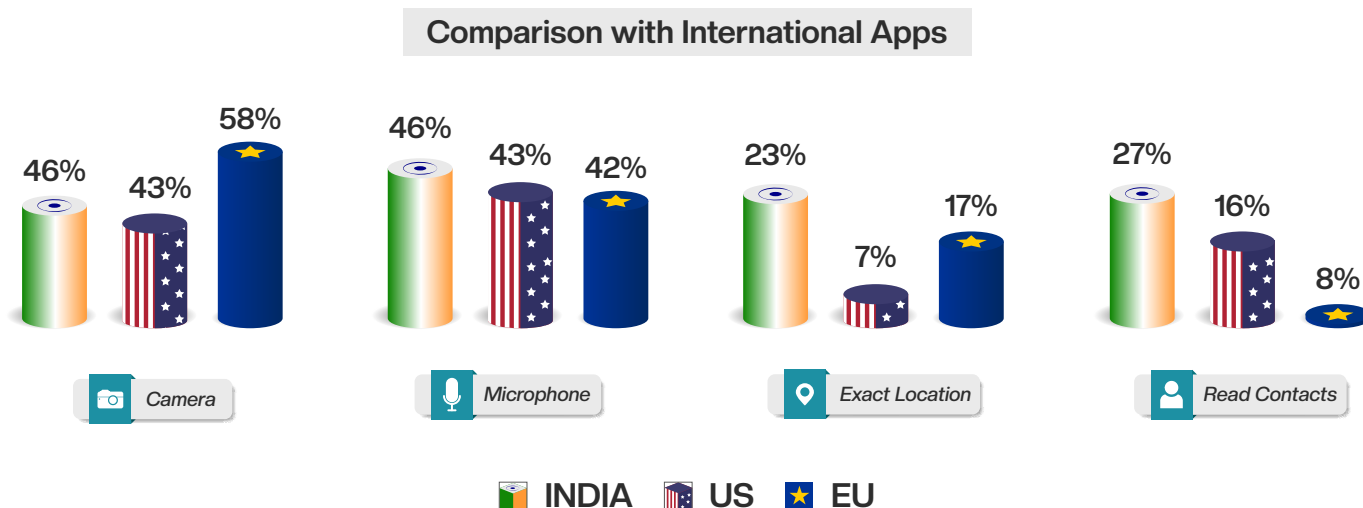


Comparison with International Apps

To understand, how Children's Apps from India stack up in comparison to Children's Apps from the US and EU in terms of Privacy, we studied 15 EU and 15 US Apps to study the patterns.

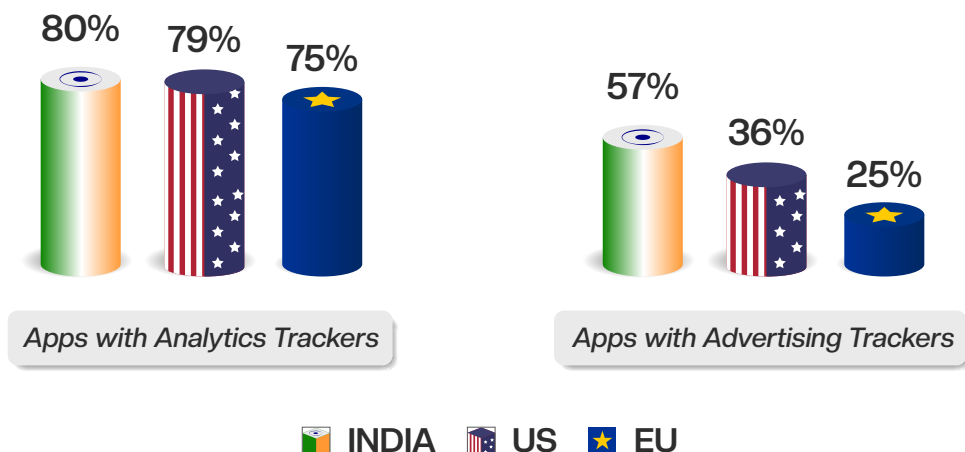
➤ A. Comparison with International Apps - Personal Data Collection

Our study finding indicates that there are some permissions like Exact Location and Contact List which are accessed by a **significantly higher number of Indian Apps** as compared to EU and US. However, there are other permissions like Camera and Microphone where the access by the Indian Apps are either **comparable or even lower** than the EU and US Apps.



➤ B. Comparison with International Apps - Personal Data Sharing

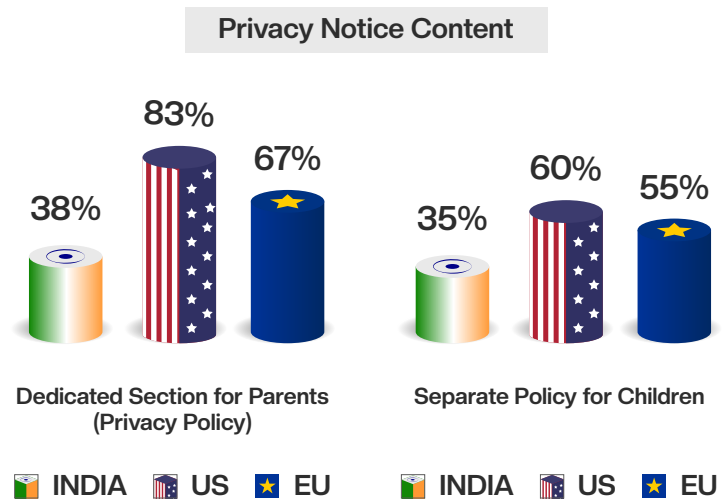
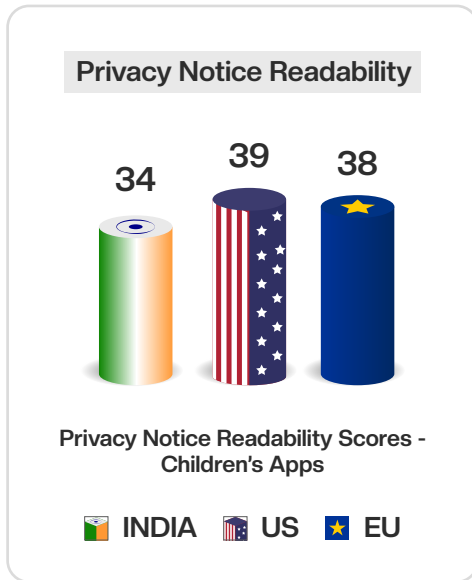
Our study finding indicates that although there is no difference in terms of presence of percentage of Children's Apps having Analytics trackers. In terms of Advertising Trackers, there is a **significant difference** between Indian Apps (which have a higher %) in comparison to EU and US Apps.



➤ C. Comparison with International Apps - Transparency

Our study finding indicates that the Readability Scores of Children's Apps in the EU and US are *significantly higher* than that of India.

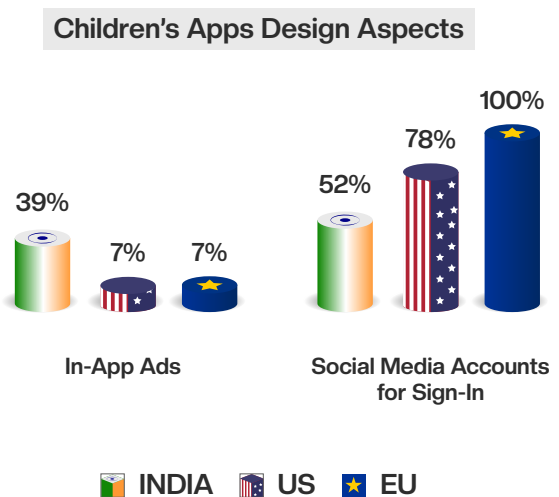
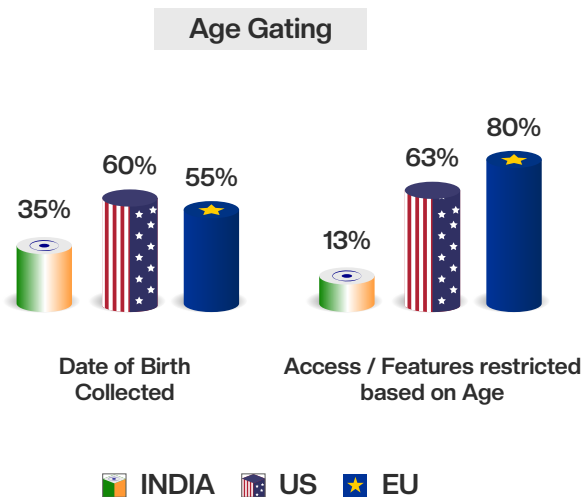
The Children's Apps in India also *lag in other aspects of transparency* like not having a Dedicated section for Parents in the Privacy Policy or not having a Separate Privacy Policy for Children.



➤ D. Comparison with International Apps - Other Children's Privacy Design Aspects

We observed that the number of Indian Apps using Age Gating were significantly lower than their Global counterparts.

The Children's Apps in India also have *significantly higher In-App Ads* as compared to their Global Counterparts. *Significantly lower* Indian Apps ask users to sign into the App using their Social Media Accounts as compared to their Global Counterparts.



Authors



Shivangi Nadkarni

Co-Founder & CEO
- Arrka

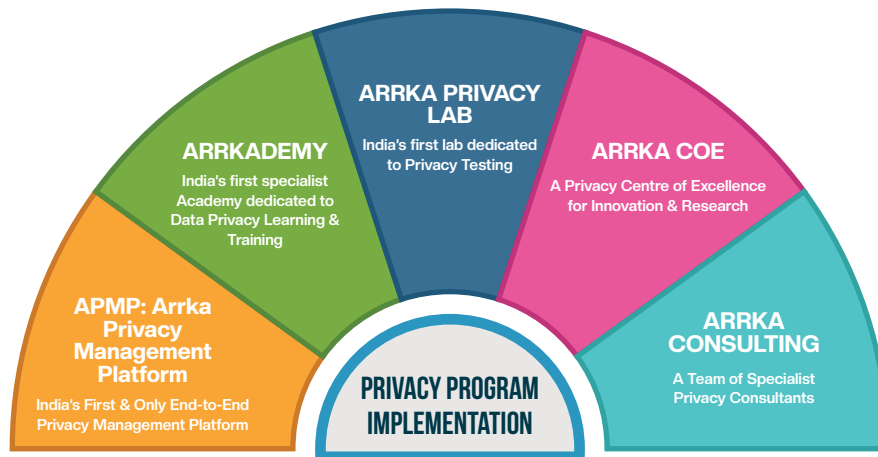
Sandeep Rao

Chief Product Officer
- Arrka



All the testing for this study was carried out at the Arrka Privacy Lab; India's first Lab dedicated to Privacy Testing.

Arrka: The Privacy Implementation Specialist



APMP: Arrka Privacy Management Platform

APMP equips you manage your Privacy Compliance through the entire Program Lifecycle.

Whether you have to comply with **ONE law** or standard or **MULTIPLE laws**, it is all available out-of-the-box in an integrated manner.

The Arrka Platform empowers you no matter which stage of your privacy compliance journey you are on:

Yet-to-start, Mid-way or All-done

ARRKA Privacy Centre of Excellence (COE)

The COE has developed the following frameworks that Arrka deploys to equip organizations to implement & manage their Privacy Programs.

APIF

The Arrka Privacy Implementation Framework or APIF enables an organization to deploy a comprehensible, adaptable privacy program which can integrate multiple laws and regulations.

APPF

The Arrka Privacy Product Framework or APPF is specially designed for Products or Applications. It helps integrate Privacy features and functionalities into Product Design that are Privacy Law Agnostic

P-SMB

After having done over 200 Privacy Program Implementations over the last decade, we at Arrka understand that the requirements of a Small Business is dramatically different from that of a large enterprise. Hence we built the P-SMB or Privacy for SMBs – a framework specially designed for Small Businesses to implement Privacy.

PDAM

Personal Data Attribute Mapping or PDAM is Arrka's methodology for building the foundation of a Privacy Program in an organization. Honed over a decade of implementing Privacy, PDAM is a structured foundational step that gives an organizational a quick overview of what is going on with its Personal Data – based on which its Privacy Program can get started.

ARRKADEMY

Arrkademy caters to the Data Privacy Learning & Training requirements across the spectrum: **From Specialist Practitioners to End-Users**

For Accredited Privacy Courses, we are Official Training Partners of **iapp** **DSCI**

The **International Academy for Digital Governance**:

For end-users & privacy champions in organizations and for self-learning, online Privacy Courses, we have partnered with **Global Talent Track (GTT)** to set up IADG.

IADG combines Arrka's Privacy expertise and GTT's two-decades old training expertise to bring the best to our participants

ARRKA LAB

Arrka Lab does **Privacy Testing**. Not to be confused with Security Testing like VAPT, Privacy Testing tests for Cookies & Trackers embedded in your website, Dangerous & High Risk Permissions that your Mobile App takes and the legitimate, non-malicious SDKs embedded in your App.

Critical from a Data Privacy perspective, Privacy Testing helps you get and remain compliant with Privacy laws as well as the privacy policies of the Android PlayStore / iOS AppStore.

ARRKA Consulting

To help an organization navigate through its Privacy Challenges, Arrka's team of Privacy Consultants & Subject Matter Experts work closely with the organization's Privacy Team and other stakeholders, equipping and empowering them to implement, manage and sustain their privacy programs.

Head Office:

Level 8, Platinum Towers, 1, Naylor Road, Off Mangaldas Road, Pune 411001.

www.arrka.com

✉ privacy@arrka.com

🐦 [@arrka2](https://twitter.com/arrka2)

🌐 www.linkedin.com/company/Arrka

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