

September 18th, 2020

Dear Google, Facebook, Apple, Amazon and Microsoft

We represent a diverse coalition of interest groups and individuals calling on you to end targeted, ‘behavioural’ advertising to children on your sites, and the tracking which underpins it.

We recognise that most popular sites and apps are funded by behavioural advertising. But these products, overwhelmingly designed for and by adults, are accessed by large and growing numbers of children; children who are tracked, profiled and targeted with ads such that their attention can be most effectively monetised.

Behavioural advertising undermines children’s privacy. For under 13s, it shouldn’t be happening at all: unless informed parental consent is granted, data protection laws expressly prohibit the datamining of young children on which behavioural advertising depends. The fact that ad-tech companies hold 72 million data points on a child by the time they turn 13 shows the extent of disregard for these laws, and the extraordinary surveillance to which children are subjected.

But our concerns extend beyond the very young, and beyond issues of privacy. Children of all ages are more susceptible to the pressures of marketing, less likely to recognise paid-for content, and less likely to understand how and what kinds of data are used for these purposes than adults.

That’s why we are calling for an end to behavioural ads to those individuals platforms know are – or are identified as – under 18. There is no justification for targeting teenagers with personalised ads any more than there is for targeting 12-year-olds.

You, the most powerful companies on the internet, have a responsibility to protect your users. With children online more than ever in a post-Covid world, we urge you to take that responsibility seriously and commit to ending behavioural advertising to children.

Signed:

- 5Rights Foundation
- Action For Happiness
- AdBlock Brum
- Adfree Cities
- Alana Institute, Brazil - Child and Consumerism Program
- Jon Alexander, New Citizenship Project*
- Amnesty International
- Campaign for a Commercial-Free Childhood
- Caroline Lucas MP
- Demos
- Professor Angela Druckman, Centre for the Understanding of Sustainable Prosperity

- Foxglove
- Friends of the Earth England, Wales and Northern Ireland
- Global Action Plan
- Dr Elly Hanson, Clinical Psychologist
- Roger Higman, Network of Wellbeing
- Tim Kasser, Ph.D., Emeritus Professor of Psychology, Knox College
- Professor Sonia Livingstone OBE, Dept of Media & Communications, LSE
- Duncan McCann, Representative Claimant in £2.5bn *McCann v Google* lawsuit
- New Economics Foundation
- New Weather Institute
- Open Rights Group
- Possible
- Privacy International
- Eren Sözüer, PhD Candidate and Lecturer, Istanbul University Faculty of Law
- Dr Mimi Tatlow-Golden, Senior Lecturer, Developmental Psychology & Childhood, Open University
- Dr Michael Veale, Faculty of Laws, University College London

*In personal capacity

ENDS