



Campaign for a Commercial-Free Childhood

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Advocates Demand FTC Investigation of Echo Dot Kids Edition

*Amazon violates COPPA in many ways,
including keeping data that parents believe they deleted*

BOSTON, MA — May 9, 2019 — Today, a coalition of 19 consumer and public health advocates led by the Campaign for a Commercial-Free Childhood (CCFC) and the Center for Digital Democracy (CDD) [called on the Federal Trade Commission \(FTC\)](#) to investigate and sanction Amazon for infringing on children’s privacy through its Amazon Echo Dot Kids Edition.

An investigation by CCFC and the Institute for Public Representation (IPR) at Georgetown Law revealed that Echo Dot Kids, a candy-colored version of Amazon’s home assistant with Alexa voice technology, violates the Children’s Online Privacy Protection Act (COPPA) in many ways. Amazon collects sensitive personal information from kids, including their voice recordings and data gleaned from kids’ viewing, reading, listening, and purchasing habits, and retains it indefinitely. Most shockingly, Amazon retains children’s data even after parents believe they have deleted it. [CCFC and IPR have produced a video](#) demonstrating how Amazon ignores the request to delete or “forget” a child’s information it has remembered. The advocates’ FTC complaint also say Amazon offers parents a maze of multiple privacy policies, which violate COPPA because they are confusing, misleading and even contradictory.

“Amazon markets Echo Dot Kids as a device to educate and entertain kids, but the real purpose is to amass a treasure trove of sensitive data that it refuses to relinquish even when directed to by parents,” said Josh Golin, CCFC’s Executive Director. “COPPA makes clear that parents are the ones with the final say about what happens to their children’s data, not Jeff Bezos. The FTC must hold Amazon accountable for blatantly violating children’s privacy law and putting kids at risk.”

Amazon Echo Dot Kids Edition comes with a one-year subscription to FreeTime Unlimited, which connects children with entertainment like movies, music, audiobooks, and video games. The always-on listening device is often placed in the child’s bedroom, and kids are encouraged to interact with it as if Alexa was a close friend. Kids can download “skills,” similar to apps, to add functionality. In clear violation of COPPA, Amazon disavows responsibility for the data collection practices of Alexa skills for kids and tells parents to check the skill developers’ privacy policies. To make matters worse, 85% of skills for kids have no privacy policy posted.

Amazon does not verify that the person consenting to data collection is an adult, let alone the child's parent. The advocates also say the Echo Dot has a "playdate problem": a child whose parents have not consented will have their conversations recorded and sensitive information retained when visiting a friend who owns the device.

"We spent months analyzing the Echo Dot Kids and the device's myriad privacy policies and we still don't have a clear picture of what data is collected by Amazon and who has access to it," said Angela Campbell, a CCFC Board Member and Director of IPR's Communications and Technology Clinic at Georgetown Law, which researched and drafted the complaint. "If privacy experts can't make heads or tails of Amazon's privacy policy labyrinth, how can a parent meaningfully consent to the collection of their children's data?"

"By providing misleading tools that don't actually allow parents to delete their children's data, Amazon has made a farce of parents' difficult task of protecting their children's privacy," said Lindsey Barrett, Staff Attorney and Teaching Fellow at IPR. "COPPA requires companies to allow parents to delete their children's personal information, and Amazon is breaking the law— not to mention breaking parents' trust."

"It's shameful that Amazon is ensnaring children and their valuable data in its race to market dominance," said Jeff Chester of CDD. "COPPA was enacted to empower parents to have control over their children's data, but at every turn Echo Dot Kids thwarts parents who want to limit what Amazon knows about their child. The FTC must hold Amazon accountable to make clear that voice-activated, always-on devices must respect children's privacy."

Organizations which signed today's complaint were the Campaign for a Commercial-Free Childhood, Center for Digital Democracy, Berkeley Media Studies Group, Color of Change, Consumer Action, Consumer Federation of America, Defending the Early Years, Electronic Privacy Information Center, New Dream, Open MIC (Open Media and Information Companies Initiative), Parents Across America, Parent Coalition for Student Privacy, Parents Television Council, Peace Educators Allied for Children Everywhere (P.E.A.C.E.), Public Citizen, Raffi Foundation for Child Honouring, Story of Stuff, TRUCE (Teachers Resisting Unhealthy Childhood Entertainment), and U.S. PIRG.

In May 2018, CCFC and CDD issued a [warning](#), supported by experts like Drs. Sherry Turkle, Jenny Radesky, and Dipesh Navsaria, that parents should steer clear of Echo Dot Kids. The advocates cautioned that Echo Dot endangers children's privacy, and by encouraging young children to spend more time with and form "faux relationships" with digital devices, it threatens their healthy development.

Added Josh Golin: "Echo Dot Kids interferes with children's healthy development and relationships and threatens their privacy. Parents should resist Amazon's efforts to indoctrinate children into a culture of surveillance, and say 'no' to Echo Dot Kids."

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