Market scan into Online Games

Netherlands Authority for Consumers and Markets
July 2013

Summary

This market scan by the Netherlands Authority for Consumers and Markets (ACM) contains the results of a market study into online games. This study was announced in the 2012-2013 Agenda of the Netherlands Consumer Authority.[1] ACM has regulatory powers to act against violations of rules it enforces, including collective violations of consumer protection laws.

ACM carried out this market scan because the market for online games is a growth market populated by many young consumers. In addition, ACM received a number of indications about potential consumer problems. Having carried out the study, ACM has concluded that official actions are not necessary at this time because no abuses have been found. ACM has come to that conclusion after analyzing, on the one hand, the abovementioned indications and their nature, as well as the actions and attitudes of individual companies and organizations that are active in this market.

However, ACM does recognize that a combination of several factors create a risk for concrete problems. These factors include:
- Intensive use of online games and social network sites by young players (4-15 years of age);
- The line between real and virtual money (euros and credits) is blurring;
- The relative speed with which children are able to pay on their own for games, and to make in-game purchases.
- Little awareness of the potential consequences of sharing personal information;
- The unfamiliarity among children and parents with changing the settings on their tablets and computers.

ACM has shared its conclusions with relevant companies and organizations (such as trade organizations of game developers, parent organizations, individual game developers, and other relevant regulators) in order to prevent problems. In addition, ACM has published on its consumer information portal ConsuWijzer several tips on how to protect personal information and on how to change settings. If abuses are found in the future, ACM will not hesitate to take official actions.

---

[1] https://www.acm.nl/en/publications/publication/7497/Consumer-Authority-will-closely-monitor-untrustworthy-webshops/

1. Study into online games

In this chapter, ACM explains what the background and scope of the study into online games were, and it briefly accounts for how the study was executed.

Background

ACM had several reasons to look into the practices involving online games. The first reason was that ACM received indications about this industry. These came, on the one hand, through ConsuWijzer[2], from, among others, parents who indicated that their children had spent money on an online game without their permission, and from players who indicated that they did not get what they had paid for. On the other hand, indications also came from public publications which revealed, among other things, that 53% of 15-year olds received unsolicited follow-up emails after playing online games, and that 3% of this group felt misled after responding to these emails.[3]

The second reason is that the online games market is growing, both in terms of number of players and of money spent on these games. In one year, the number of people that play online games has risen from 3.2 to 4.4 million, and the number of players that spend money on mobile games is rising, and is currently 20%, which is approximately EUR 900,000.[4]

The third and final reason is that the use (as well as the ease of use) of tablets is rising, and that online games are popular, especially among children and young people. And these groups in particular are not always fully aware of the differences between virtual and real money, and of the internet settings on their computers.[5] These groups can be particularly vulnerable with respect to online games.

Scope

ACM has focused on games for which players need an internet connection for obtaining and/or playing these games. These online games can have the following characteristics:

- The games may involve a single-player game or a multiplayer game;
- The games can be played at home (on computers or laptops) or on a mobile device (on smartphones or tablets);
- Players can buy the game as a one-time purchase, or play games as part of a subscription;

---

[2] ConsuWijzer is ACM's consumer information portal with practical advice about consumer rights.

[3] Dutch National Youth Council, *Young people about ads on social network sites*, January 2011 (in Dutch).

[4] Newzoo, *2.6 million tablet users in the Netherlands*, 15 May 2012 (in Dutch).

[5] Which is illustrated by, among other publications: newspaper Dagblad van het Noorden, *Free games turn out to be super expensive*, 13 March 2013.

- The game may require a one-time or permanent internet connection in order to buy and play the game, respectively.

Different combinations of these characteristics can be observed, which means that online games cannot be easily grouped into clearly defined categories. A first category is the casual games, which are, generally speaking, played individually, and which are clearly demarcated in terms of time. Players usually play these games between other activities. In these games, little information of the players themselves and of the played games is saved for future use. Popular games[6] are Bubble Game, Mahjongg, Angry Birds, Bejeweled and Candy Crush Saga.

A second category is the social games. These games are played with other players, and take longer to play. In order to keep track of the player's progress in the game, more information about players and the game itself are saved. Popular games are Banditi, Landleven, Planetside 2, My Free Zoo and Smurfs Village.

A third category could be classified as casual games with social aspects. These games are played with others, who can play the play separately when it is convenient for them. These are mostly short games. Popular games are Ruzzle, SongPop, Draw Something, WordFreud and Djenga.

Finally, ACM notes that online games can differ from other games such as traditional board games and card games on one important characteristic. Online games can usually be expanded during the game through additional purchases, which are called in-game purchases. With these in-game purchases, players are able to play more levels and/or faster.

Example of games
There are games where players must start and manage a company, or build a city. Credits (virtual money) are needed to achieve certain objectives or to increase the game's speed.

Other types of games involve players needing weapons or protective gear in order to finish a level. That way, players obtain resources to defeat the other player.

---

[6] This is the result of an analysis of the popular games sites www.spele.nl, www.spelen.nl, www.spelletje.nl, Android Market and the App Store.

Accountability

ACM's findings in this report are based on an analysis of consumer indications submitted to ACM through ConsuWijzer, on public information, and on relevant laws and regulations. In addition, ACM also spoke with individual market participants and interest groups. A joint expert meeting was also held, which brought together lawyers, consultants and representatives of organizations that focus on parents, the information society, media skills, and commercial awareness among children. Finally, a number of ACM employees themselves have played several online games as well.

2. Relevant information about the context

This chapter contains information about internet availability and internet usage, about players of online games, and about the market itself. ACM has collected this information to get an idea of the context of online games.

Availability and usage of internet (fixed and mobile)

Internet availability and usage in the Netherlands is very high. The use of mobile internet and mobile games is increasing tremendously.

More information:
- A report by the European Commission reveals that 90% of the Dutch population regularly uses internet. This is higher than the European average of 65%.[7]
- Because of the swift rise of tablets and smartphones, more than half of the Dutch population has access to mobile internet. This rise is expected to continue because of, among other reasons, the recent investments in next-generation networks such as 4G.

Demand side

Public publications reveal that online games are popular among all age groups, and particularly among young children and teenagers. It is evident that these groups are in a stage of life in which they are discovering themselves and their environment. One in four of all 7-17 year olds play online games more than four hours a day.

More information:
- The number of Dutch players per platform is enormous: 5.1 million players on casual websites and 3.3 million players on social networks.[8] In one year, the number of Dutch players that play mobile games has increased from 3.2 million to 4.4 million. On average, players are active on 3.2 platforms.

---

[7] Source: http://europa.eu/rapid/press-release_IP-11-663_nl.htm
[8] Source: http://www.newzoo.com/infographics/infographic-2012-netherlands/

- Players thus use online games and social network sites extensively. These are websites on which users create profiles. Users can then connect their profiles to other profiles within their social network. A study among 7-17 year olds[9] has revealed that, on average, they play online games 2 to 3 hours per day. One in four even plays more than 4 hours per day.
- For the group of 0-7 year olds, there are often multiple media channels available at home. On average, they play on computers/consoles and tablets 10 to 20 minutes per day. This group predominantly plays skill games and adventure games. Their level of self-reliance is high: 90% of all 7 year olds are able to locate and launch software by themselves, and 75% of them search for websites by themselves.[10]

Example: sharing game results

Players of online games are able to share their game results with their personal contacts on the social network site on which they play the game. Their contacts receive the following message:

Supply side

In 2012, consumers spent an estimated EUR 139 million on mobile games, casual websites and social networks. Providers of online games and social network sites usually work together in order to increase their reach: the bigger the social networks, the more online games are played (potentially), the higher the revenues.

More information:
- In 2012, consumers spent an estimated EUR 570 million on games, which included mobile games (EUR 54 million), casual websites (EUR 53 million) and social networks (EUR 32 million), totaling EUR 139 million.[11]
- The Dutch game industry consists of developers, publishers and distributors (platforms for mobile media such as GooglePlay and AppStore). Global players Spil Games and Gamehouse have their European headquarters in The Netherlands. The Dutch

---

[9] http://www.gamecapital.nl/?page=news

[10] Stichting Mijn Kind Online, *Iene Miene Media, een onderzoek naar internetgebruik door kleine kinderen*, 2012.

[11] Source: http://www.newzoo.com/infographics/infographic-2012-netherlands/

government named the creative industry, which includes gaming, one of the country´s top industries.[12] This means that the government in cooperation with the corporate sector and academia will make specific investments in this industry.

- Market participants and social network sites such as Facebook and Hyves usually work together to increase their market reach and, as such, their revenues. This has proven to be an effective business model. For example, Spil Games offers games on Hyves, one of the most popular social network sites in the Netherlands.

3. Payment options and business models

This chapter contains information on the payment options that players of online games have, and about the business models and strategies that the providers of such online games use.

Payment options

In order to be able to play online games, players usually have to pay. Players can pay in euros or, more indirectly, by providing personal information that providers use for, among other purposes, personalized ads. Payments can be made easily, allowing players to continue with their games quickly. However, it also means that children and teenagers hardly come across any payment obstacles.

More information:
- Online games players (including children) can pay in different ways when purchasing games or making in-game purchases. These include text messaging, premium rate numbers, prepaid, credit card, online banking, and direct debit. An example is what is known as micro direct debit. Using text messages, players approve the collection of EUR 50 from their phone bills. The risk of having these payment options such as these is that the difference between virtual and real money becomes less clear: smartphones and tablets become people's wallets. This may result in situations where players do not exactly know how much they have already spent, and are thus having difficulties determining whether or not they wish to spend more on the game.
- Some free games are truly free. Sometimes games seem to be free, but players need to 'pay' with their personal information.[13] They 'pay' when registering on, among other sites, social network sites (it is unclear how such sites deal with privacy concerns) and for accounts for online games. It is most likely that players are aware of the fact that they are giving away their details, but they are not always familiar with the possible

---

[12] http://www.rijksoverheid.nl/onderwerpen/ondernemersklimaat-en-innovatie/investeren-in-topsectoren/creatieve-industrie
[13] More information about personal information as a method of payment in the 'attention economy' can be found in: P. Olsthoorn, *De Macht van Facebook. Theo ben je dood ofzo?*

implications thereof. Based on players' details, online ads, which are presented on screen during gameplay, can be geared to the profiles of these players with the aim that as many players as possible click on these ads.

Example: paying by text message or phone

Example: paying by credit card

When creating an account for the AppStore and for GooglePlay, consumers are asked to provide their credit card details. Google's default setting is that no password or pin code needs to be entered when the credit card is charged for an in-game purchase. This setting can be changed when going to 'settings'. With Apple products, consumers must enter their Apple ID before their credit cards are charged. After a purchase, consumers do not need to re-enter their Apple ID for up to 15 minutes for subsequent purchases. This setting can be changed.

Business models

Market participants use different business models to generate revenues. The better game developers, advertisers and social network sites are at tailoring to the individual preferences of users, the more revenues they are able to generate.

ACM has encountered the following business models, either individually or in combinations of several of these:

- Ads that have been customized to the average player's profile. Payments are made per 'click' or per sale.
- In-game purchases that allow players to play more levels or to play levels faster.

- Players are able to buy a subscription to online games, which gives them unlimited access to a vast number of games for the duration of the subscription.
- Revenues generated from one-off sales of games. Players make one-time purchases for playing the game.
- Market participants and social network sites set up collaborations with commercial arrangements, one of which is usually about sharing personal information of players. ACM has not carried out any further investigation into the way this is actually implemented.

Marketing strategies

Online games are designed in such a way that players are encouraged to play additional games, which is reflected in the game's functionalities and its lay-out. With social games, an additional factor that plays a role in the use of games is peer pressure.[14] Children and teenagers in particular are susceptible to peer pressure, as a result of which they might eventually join in, albeit reluctantly.

ACM has encountered the following strategies, which are aimed at persuading players to make purchases or to exchange information:

- The use of a payment option that allows players to continue play immediately.
- Offering free online games if players register first, who thus de facto pay with their personal information.
- The first hour (or half hour) can be played for free, after which players must pay.
- The use of other currencies (such as credits) instead of euros. In the absence of a direct relationship between credits and euros, players become less cost-conscious.
- Some online games can be played faster, offer more functionalities and/or have more playable levels if players make in-game purchases.
- Extending the game or holding out the prospect of rewards to players if they keep returning to the game: the longer players are active in the game, the more likely they are to make purchases.
- Offering extra credits if players click on ads.
- The necessity to have friends in order to progress further in the game.

---

[14] The social evidential value is one of the factors that lead to obedience. See: R. Cialdini, *Invloed. De zes geheimen van het overtuigen*.

Example: in-game purchases

A player's progress in the game may depend on in-game purchases. Games that seem to be free can sometimes only be continued if players pay, and in paid games additional payments may be necessary. If such is the case, players may encounter a screen such as this one.

Je hebt niet genoeg Daalders.
Wil je nu meer Daalders kopen?

OK   Annuleren

Example: British regulator investigates 'free' games

The Office of Fair Trading (OFT) in April 2013 launched an investigation into potentially misleading or commercially aggressive practices in so-called 'free' games:

The OFT has launched an investigation into whether children are being unfairly pressured or encouraged to pay for additional content in 'free' web and app-based games, including upgraded membership or virtual currency such as coins, gems or fruit. Typically, players can access only portions of these games for free, with new levels or features, such as faster game play, costing money. … The OFT investigation is exploring whether these games are misleading, commercially aggressive or otherwise unfair. In particular, the OFT is looking into whether these games include 'direct exhortations' to children - a strong encouragement to make a purchase, or to do something that will necessitate making a purchase, or to persuade their parents or other adults to make a purchase for them. … As part of the investigation, the OFT will also consider whether the full cost of some of these games is made clear when they are downloaded or accessed, potentially leading to children and parents to make decisions they may not have made if prices were more transparently advertised at the start of the purchasing process.

Source: http://www.oft.gov.uk/news-and-updates/press/2013/33-13

4. Conclusions

Following its scan, ACM has drawn four conclusions, which are detailed below. With each conclusion, ACM explains its considerations.

Conclusion about correct information in advance

The first conclusion concerns the information that players get prior to the purchasing and/or playing of games.

ACM's considerations are:
- Information about the provider's identity and contact details is not always easily found, potentially making fast and effective contact difficult. This is particularly the case with platforms of online games such as those of Google and Apple. In some cases, if players look under 'Contact' or after clicking on a few links, which refer to the game's provider, players reach an English website (instead of a localized Dutch website).
- When players begin to play online games, it is not clear whether and how much they must pay in order to actually finish the game. With free games, it is often not clear that in-game purchases are needed for the game to function quickly and fully. In addition, other information is often missing, for example, only that a few levels can be played for free, and that players must pay in order to play the entire game.
- The general terms and conditions are often written in legal Dutch or sometimes even in legal English, and are therefore not tailored to the reading comprehension and thinking skills of young players.
- In order to be able to play games properly, players often need hardware than meet certain minimum requirements. Information about the minimum requirements is often not available prior to the actual purchase.
- ACM has learned that market participants, in principle, are not unwilling to implement changes if they are approached about them. That is a positive sign.

Conclusion. ACM has concluded that players currently not always have fast access to the right information in Dutch that they easily understand, and that such information is often not available before they decide to purchase a game. To ACM, it is critical that consumers are informed properly, fully, and on time. In addition, consumers should be able to find contact details relatively easily, allowing them to ask questions promptly. ACM is of the opinion that this is necessary in order to allow consumers to make a well-informed choice. Market participants appear to be willing to take their responsibility.

Conclusion about children and their social environment

The second conclusion concerns parental supervision of their children's gaming behavior, and the social environment of these players.

ACM´s considerations are:
- Parents supervise their young children. With regard to 4-7 year old children:
  - Approximately 80% of their parents remain close to them if they are playing games.
  - 55%-65% (parents of 4 and 7 year old children respectively) tell their children what games they can and cannot play.[15]
- At the expert meeting organized by ACM, it turned out that parents are not always familiar with what they can do in terms of setting their own settings of games and platforms. These setting relate to online and in-game purchases.
- In most games that are clearly aimed at children, a checkbox with the following text must be ticked: 'Yes, my parents have given me permission.'
- ACM has come across situations where children are encouraged to buy products or to convince their parents to buy products for them. The Dutch Advertising Code Committee (SRC) has stated that the upcoming revision of the Children and Youth Code will be addressing this particular topic more explicitly.[16]
- The satisfaction of gamers is partially determined by the mutual interaction or by the social aspect of gaming such as with competitive games and social network sites. This can generate peer pressure, particularly with teenagers because they are very aware of their social environment.
- If a game is played on a social network site, the player's network receives a message that the player is playing the game, and, in some cases, his progress and results are shared with his network, too. This also helps build up peer pressure.

Conclusion. ACM has concluded that parents wish to supervise, but that they would be able to do so more effectively if knew how to change the settings on their computer, laptop or tablet. If they know how to do that, they are better able to decide whether and how they want to supervise their children when they are playing.

---

[15] Stichting Mijn Kind Online, *Iene Miene Media, een onderzoek naar internetgebruik door kleine kinderen*, 2012.
[16] The Children and Youth Code is part of the Dutch Advertising Code. The former contains rules that apply to the development of ads aimed at children. In the upcoming revision of that code, rules will be added about game and in-game advertising, virtual environments and social media. The starting point is that ads for this target audience must be recognizable, cannot be misleading, and cannot inflict moral or physical damage.

**Pagina
12/18**

Muzenstraat 41 | 2511 WB Den Haag
Postbus 16326 | 2500 BH Den Haag

T 070 722 20 00 | F 070 722 23 55
info @acm.nl | www.acm.nl | www.consuwijzer.nl

Example: earning credits by clicking on ads

Players can sometimes earn extra credits for games if they click on ads, as a result of which they are offered more options. Below is an example of such ads.

Verdien gratis Daalders

| Alles | Gratis | Vragenlijsten | Winkelen | Video | ▼ Meer | | ☰ Sorteer op |

+20

1. Kies een aanbieding
uit de onderstaande lijst

2. Voltooi de aanbieding
zoals staat beschreven

3. Ontvang uw beloning
Daalders na de vermelde tijd!

Kies het juiste logo en maak kans op een iPhone 5!
Registreer met geldige gegevens. Aankoop niet vereist.

SP

Gratis

+5

⊘ 02:59:59
Tijd resterend

Daalders binnen ongeveer 22 uur

Example: Children are encouraged to involve their parents

„Grollys Memory" is verkrijgbaar in drie varianten: Azië, Afrika en Noordpool. Het beste is nog: **Azië is nu gratis te downloaden in de Appstore**! Vraag je ouders of het mag, en klik hier, om het te downloaden! De app is in het Engels, of in het Duits te verkrijgen.

Veel plezier!
Max en Ella

Conclusion about personal information

The third conclusion concerns the degree to which players are aware of the implications of sharing their personal information within online games.

ACM's considerations are:

- When starting a game or during a game, players are sometimes required to enter their personal information, only to find later what the purpose thereof was. Players should be informed beforehand of the purpose of sharing personal information, allowing them to determine themselves whether or not they wish to continue. That way, players are able to see whether their personal information is used solely for their account or possibly also for other uses.
- It is not always clear what terms and conditions players agree with. Attempts are sometimes made to have players install a tool, without his explicit permission, that monitors players' gaming behavior. Players are sometimes not offered an opt-out,

meaning they cannot play the game without sharing their personal information and without their behavior being monitored.

- 16-21 year olds appear not to value privacy. A study revealed that 22% within this group attached 'average to little' value to their privacy and 61% attached 'little to no' value.[17] A possible explanation is that they are not aware of the potential implications of sharing their personal information.
- In some games, children can earn more credits if they click on ads and enter their details. This might be a violation of the Children and Youth Advertising Code, which the SRC enforces.

Conclusion. ACM has concluded that the commercial value of the personal information of users is high, and that market participants with social network sites take advantage thereof, often without players being aware thereof. With respect to the collection of personal information and to the asking in advance for permission to use such information, the Dutch Data Protection Authority (CBP) is authorized to enforce compliance with privacy regulations. ACM is charged with oversight on apps and cookies that facilitates data collection.

Conclusion about payment options
The fourth conclusion concerns the speed with which young players of online games are able to pay, and that they hardly come across any obstacles in that process.

ACM´s considerations are:
- ACM´s own research revealed that there were no uncertainties about what amount players had to pay or about what the payment procedure exactly entailed.
- Several payment options allow players to pay quickly and easily, and to be able to go through the payment process on their own. These aspects make it harder for parents to supervise their children.
- Another aspect is that the settings of some devices allow players to make additional in-game purchases for a period of several minutes after an initial purchase without having to re-enter their password. Such settings can be changed easily, provided that individuals know that it is possible and how to do so.
- Virtual money is perceived differently than real money, particularly among young players. They pay by clicking their mouse, and have no direct contact with the seller. The bill comes later.
- ACM has seen games where players are influenced when paying. This is done by having default settings such as 'best option' or 'most preferred option.' Players are thus not shown an overview without any 'preferred options'.

---

[17] This was the outcome of a study into increasing awareness of public profiles on Facebook and Twitter, see: http://www.marqit.nl/newsitem/10897/

- Sometimes, free games are not free at all, but players need to make in-game purchases in order to complete the game or to finish it faster. Such in-game purchases often involve small amounts that can add up to large amounts. Players, however, see the low price of each separate purchase without seeing the total amount already spent on that game. This affects their cost consciousness.
- At the expert meeting, it turned out several self-regulation initiatives exist aimed at drawing attention to in-game purchases by children.[18]

Conclusion. ACM has concluded that playing online games becomes easier and more fun if players are able to progress. Paying quickly offers more levels and more options. However, ACM does identify an obvious risk, which is that players are often not or cannot be aware of the total costs of their decisions and game behavior. With regard to this aspect, there is room for improvement, as well as with regard to raising awareness among children and parents. And, settings of this particular aspect on people's devices, too, can be changed relatively easily.

Example: default settings

In some games, players are influenced when making purchases through default settings such as 'best option' or 'most preferred option.' See the illustration below: the option with the green border has been set as the default selection.

---

5. Final conclusion and recommendations

Final conclusion

ACM promotes opportunities and options for consumer and businesses alike. Increasing consumer welfare in the broadest sense of the word is ACM's main motivator. In all of our actions, consumer sovereignty is the starting point. ACM carried out this scan to see whether the online games market faces any problems (existing or potential).

As regulator, ACM is statutorily authorized to act against violations of regulations it enforces, including collective violations of consumer protection laws. After this study, ACM has concluded that no official actions are necessary at this time, because no abuses have been identified. ACM has come to this conclusion after an analysis of, on the one hand, indications it has received as well as their nature, and, on the other hand, of the actions and attitudes of individual companies and organizations that are active in this market. In that regard, ACM took into consideration the fact that the Dutch legislature's basic principle has always been that, when consumer protection laws are violated, ACM is only expected to take action if the market (the 'private foundation') is insufficiently capable of putting an end to these violations by itself.[19] Based on the scan, it has not been revealed that this system is not functioning. However, ACM is of the opinion that the companies and organizations in question have their own responsibilities, and that they should sometimes take on these responsibilities more. In its recommendations, ACM therefore targets these parties. If it turns out, in the future, that the system is not functioning or if abuses are detected, ACM will not hesitate to take firm action.

The study reveals that the online games market is a growth market in terms of number of players and turnover. In general, ACM concludes that, with online games, a combination of several factors creates a risk for concrete problems, particularly for young players (4-16 years of age). These factors are:
- Internet, games and social network sites are available, easy to access, and are used frequently.
- Very young children grow up with online games either playing by themselves or with friends. The experiences they gain today determine their awareness in the future.
- These young players are in a stage of life in which they are discovering themselves and their environment. In that process, they are susceptible to peer pressure and public perception. This may be reflected in playing online games together (where results are shared) such as on social network sites.
- The line between virtual money and real money is blurring, because purchasing online games and making in-game purchases mostly takes place through the phone bill.

---

[19] When the Dutch Act on Enforcement of Consumer Protection was drafted: Dutch House of Representatives, parliamentary year 2005–2006, 30 411, no 3, page 6.

Young players in particular should learn to understand the value of money, as well as the value of personal information and privacy, which is a much more abstract concept for young people.
- Companies design online games in such a way that games are attractive, that players can sometimes start playing for free, and that players can become better and/or faster in the game through in-game purchases. Players are thus encouraged to play (or to play more).
- Companies use payment options that make it possible to pay fast, easily and independently, even in games that are aimed at young children.
- Parental supervision can be enhanced if parents become more aware of how to change the settings on their devices, for example the setting regarding time limits and the types of games that can be played.

Recommendations

The study into online games has led to the following recommendations by ACM:

1. Companies have their own responsibilities towards their customers (current and future ones). They should be aware of the fact that their actions influence their customers' behavior. In that context, honesty is a critical value: being honest about costs, about the use of personal information, and about game functionality, before and during the game. It is important that relevant information is accessible, which means it must be easy to find, and it must be easy to understand by the target audience. ACM has shared its findings with the trade organizations and individual companies it had spoken with. ACM is calling on all game companies involved to make a serious effort to each take on their own responsibility.

2. Children and their parents can become more aware of the options they have to set up their devices according to their preferences. Game developers and game providers could indicate more clearly what options parents have to change the settings on tablets, laptops and computers.
   Parents, children, and professionals (such as teachers) can use the free educational software 'Free money does not exist' (in Dutch: 'Gratis geld bestaat niet'[20]), which is an educational software program about free games, shopping, money and ads in virtual environments. In addition, the free brochure '104 useful apps & sites' (in Dutch: 104 leerzame apps & sites'[21]) gives practical advice on, among other topics, how make tablets more child-friendly. ACM has listed these tips and the tips below on its own portal ConsuWijzer.

---

[20] This educational program was developed by several parties, including Media Rakkers, see: www.mediarakkers.nl.
[21] This is a publication of Kennisnet and Stichting Mijn Kind Online, see: www.kn.nu/leerzame-apps-sites.

Tips for changing the settings on devices
Parents and children can find information on how to change settings on their devices online. Check out the following websites:

- For Apple products, see: http://support.apple.com/kb/HT4213?viewlocale=en_US Information on this website describes how to change the settings in such a way that a password needs to be reentered every time an in-game purchase is made.
- For settings in Google's Android, see: http://support.google.com/googleplay/bin/answer.py?hl=nl&answer=1626831 (in Dutch). This page explains how users can set up additional protection by, next to a pin code, also choosing password protection.
- For blocking premium-rate numbers on landline phones, see: http://www.consuwijzer.nl/telecom-post/telefoonnummers/nummer-blokkeren/duur-telefoonnummer-blokkeren (in Dutch).
- For blocking text message services and for reviewing payments made through your own mobile phone, see: http://www.payinfo.nl (in Dutch)

3. In the scan, ACM has come across ads aimed at young children and the use of personal information and monitoring tools. Other organizations are authorized to take action against potential abuses: the Dutch Advertising Code Committee and the Dutch Data Protection Authority respectively. ACM has passed on its findings to these organizations and will take action together, wherever needed. See below for two practical tips from these two organizations, which ACM also listed on its portal Consuwijzer.nl.

Tips about ads and privacy

If parents believe that ads directed at their children are misleading or unnecessarily offensive, they can file a complaint about it with the Dutch Advertising Code Committee. In principle, filing a complaint is free. For more information, see: https://www.reclamecode.nl/consument/default.asp?paginaID=72&hID=2 (in Dutch).

Information about protecting personal information and about privacy on the internet is also available, see http://www.watchyourspace.nl/hoe.bescherm.je.je.gegevens.htm (in Dutch).

4. Young players may encounter too few obstacles when making in-game purchases. ACM believes that creating several payment obstacles and/or providing more payment

information would be justified, for example, informing players during a game of not only the costs of a single transaction but of all costs so far. Interest groups representing game providers and consumers can play a role therein. Furthermore, there are ways for parents to change the settings on their devices according to their preferences (see above text).

5. At this time, ACM sees no reasons to take any follow-up actions. However, ACM will continue to monitor developments in the industry in general, at individual game developers, on platforms, and in the indications received by ConsuWijzer. If future developments require ACM to step in, ACM will act accordingly.