

**IN THE HIGH COURT OF JUSTICE**  
**KING’S BENCH DIVISION**  
**MEDIA AND COMMUNICATIONS LIST**

**Claim No.: KB-2025-001120**

**BETWEEN:**

**GOOD LAW PROJECT LIMITED**

**Claimant /  
Respondent**

**-and-**

**REFORM UK PARTY LIMITED**

**Defendant /  
Applicant**

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**EXHIBIT DMC1**

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<b>No.</b>	<b>Document</b>	<b>Date</b>	<b>Page</b>
1.	The Times article, 'Four-year-olds 'exploited' by tech giants app store age ratings'	30 June 2025	2 – 6

# Four-year-olds ‘exploited’ by tech giants’ app store age ratings

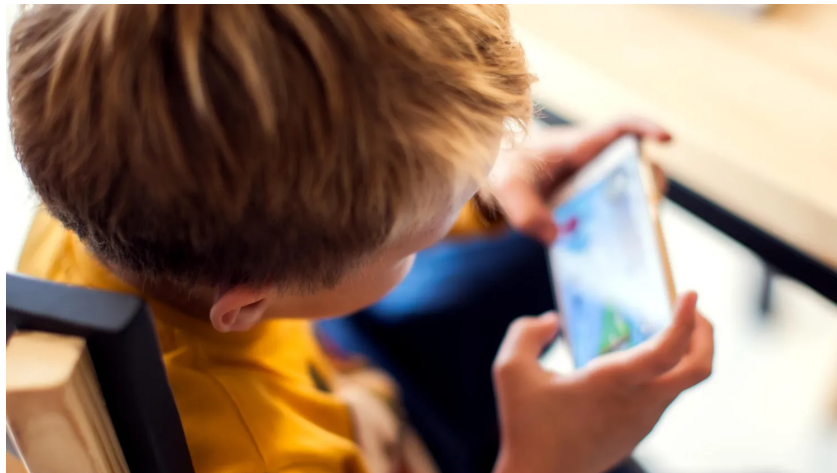
Games with in-app purchases and targeted advertising are being marketed by Apple and Google at children far younger than the limits set by developers

[Mark Sellman](#),  
Technology  
Correspondent

Monday June 30  
2025, 9.51am,  
The Times

Apple

Google



Games designed for children older than 13 are being recommended for far younger children

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Children as young as four are being exploited because of misleading age ratings on Apple and Google’s app stores, it has been claimed.

The recommended app store ages for some of the most

popular apps, such as Candy Crush Saga, Whiteout Survival and Toca Boca World, are much younger than the limits set by developers in the terms and conditions. This leads to young children being left in the “firing line” of in-app purchases, targeted advertising and data processing, campaigners say.

The Good Law Project and 5Rights, a charity protecting children’s digital rights, have filed a legal complaint with the Competition and Markets Authority (CMA) over the issue.

[Candy Crush Saga](#), which has 275 million monthly users, has an age rating of 4+ on Apple and 3 on Google, but its terms and conditions say players have to be at least 13. For Toca Boca World, which has 60 million monthly users, the ages are 4+ on Apple and 3 on Google but the terms and conditions say under-18s need parental consent. Whiteout Survival, which has 10 million monthly users, is rated 4+ on Apple and 7 on Google but its policies set a minimum age of 13 and under-18s need parental consent.



Candy Crush has 275 million monthly users

DIDEM MENTE/GETTY IMAGES

All these games are free to download but generate revenue from in-app purchases, as well as data processing and advertising. Apple and Google can take

up to 30 per cent of this revenue.

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The disparity is created by the app stores rating on content of the games but developers state ages based on data-processing laws.

Of the top 500 apps by in-app revenue, 45 per cent display a lower age rating in the app store than terms and conditions and 74 per cent have a lower app-store age than the privacy policy, the complaint says.

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Duncan McCann, Good Law Project's tech and data policy lead, said: "These tech giants are refusing to do the right thing and act, simply because it is so lucrative not to do so."

Leanda Barrington-Leach, executive director of 5Rights, said: "It is unfathomable how Apple and Google can so blatantly mislead consumers."

The CMA is investigating whether Apple and Google have "strategic market status". If the regulator finds that they do, it can impose conduct requirements on them.

Apple said: “We are committed to protecting user privacy and security and providing a safe experience for [children](#).”


“When parents or guardians create an Apple account for a child under 13 years of age, tracking permissions are disabled by default — so apps can’t request to track them through app tracking transparency. These protections are based on the user’s age, not the app.”

Google said: “Google Play does not control app ratings — these are the responsibility of the app developers and the International Age Rating Coalition. Ratings in Europe (including the United Kingdom) are maintained by Pan European Game Information.”

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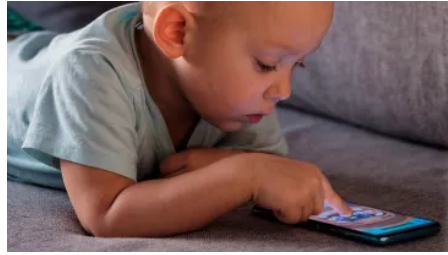
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**Graham Denny**



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