

Attention parents! This is not a game! Such are the dangers of free online games on mobile phones!

Budapest, 8 June 2023 – In 24 out of 30 free-online games, in-game purchases were possible. Interstitial advertising often promises "rewards", encourages purchases or further downloads, and half of the games tested asked children to provide personal data - among other things, these were revealed by the experts of the Hungarian Competition Authority in a sweep of free online games for children on mobile phones. The GVH's experts also made recommendations to parents and the businesses concerned. The Hungarian Competition Authority would like to draw the attention of the latter to the fact that, in order to protect children, it will continue to monitor this area closely and will examine the use of its proposals to businesses and their compliance with them.

In May 2023, the Hungarian Competition Authority carried out a sweep of free online mobile games aimed at children to check whether they contain so-called dark patterns. These are digital messages and user interfaces that can lead consumers to make undesirable choices without being noticed.

The investigation was launched as a result of professional work [in the Family-Friendly Working Group set up by the GVH in 2022](#). The Ministry of Justice's Consumer Protection Unit is also involved in the control of video games, and official controls are currently underway.

The GVH experts tested a total of 30 popular games on both Android and iOS, 19 of which were recommended for all ages (PEGI rating 3), 10 of which were not recommended for preschoolers (PEGI rating 7) and 1 of which was recommended for older children only (PEGI rating 12).

The NCA's sweep identified a number of problems, most of which were related to game-interrupting advertising. These are the main source of revenue for free-to-download game apps.

Of the games containing advertisements, only one in two indicated the advertising nature of the advertisement (e.g. "Ad", "advertisement"). Half of the advertisements displayed were designed to encourage users to download another game by allowing them to try it interactively during the ad, thus encouraging receptive children to make further transactions.

In some cases, the much "slowed down" countdown timer in video advertisements did not provide real-time information about how much time was left in the advertisement. There were also instances where an 'x' in the corner of the screen indicating exit took the user to a page in the app store where they could click to download the advertised game immediately, instead of continuing with the original game.

Rewards for viewing advertisements were often offered, but it was unclear whether or not they were credited, and in several cases, early exit from the advertisement resulted in the loss of the reward offered. It also happened that after reaching a certain level, the app would only let the player move on if they watched one or more commercials.

While all the games examined were free to download, the vast majority (24) offered in-game purchase options. While the information on purchases was typically clear and understandable, for 3 games it was not clear how much was to be paid or in what currency.

The GVH's sweep also identified dark patterns that attempted to encourage children to continue playing beyond their initial intentions: in many cases it was not clear how to exit the app (11 cases); in several cases it was possible to level up - by simply making a purchase - without any real achievement behind it (7 games); and nearly half of the games examined used positive reinforcement messages (12 games) to encourage children to continue playing, often with payment.

It was also found that only a small proportion of the games surveyed had descriptions of data management and terms and conditions in Hungarian, and it was rare for these to be written in language that children could understand - while almost half of the games surveyed asked young players to provide personal data.

The Hungarian Competition Authority recommends that parents:

1. Increase monitoring of games available for free download on mobile phones, with a particular focus on their recommended PEGI rating.
2. With regard to in-game shopping, it is a good idea for parents to agree with their child in advance on the maximum amount and frequency of purchases, teaching the child the digital use of money
3. In addition to parental supervision services, making children aware of the tricks - dark patterns - used by game makers to influence them, as seen during sweeps, can also help them to develop safe mobile phone use (including setting daily screen time and choosing age-appropriate apps).

The GVH proposes that the businesses concerned should:

1. Always indicate clearly when the game is interrupted by a commercial, and also when the commercial allows you to return to the original game.
2. When making in-game purchases with "real" money, always state the exact amount to be paid and the currency used
3. Provide a privacy policy and terms and conditions guide that explains the most important information about the online game in a way that is understandable to Hungarian children.

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