



United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Division of Privacy and Identity Protection

May 1, 2019

VIA FEDERAL EXPRESS AND EMAIL

Yevgen Yatsenko
Ul. Gorkogo 15, kv. 3
Dnepropetrovsk
49000
Ukraine
wildec LLC@gmail.com

Re: Wildec LLC Applications Meet24, FastMeet, and Meet4U

Dear Mr. Yatsenko:

You are receiving this letter in your capacity as the manager of Wildec LLC (“Wildec” or “the Company”). Several mobile applications (“apps”) operated by Wildec appear to be in violation of the Children’s Online Privacy Protection Act (“COPPA”), 15 U.S.C. § 6501 *et seq.* The staff of the Federal Trade Commission, the federal agency that enforces COPPA, wants to ensure you are aware of your compliance responsibilities under the law.

The primary goal of COPPA is to allow parents to control what information is collected from their young children online. Companies covered by COPPA and its implementing Rule, 16 C.F.R. § 312 *et seq.* (posted at <http://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>), must include certain information in their privacy policies and obtain verifiable parental consent before collecting personal information from children under 13.

Wildec’s apps Meet24, FastMeet, and Meet4U are dating services. Each of these apps solicits users’ dates of birth, in addition to other information such as email addresses and photographs, as part of the account creation process. The apps also collect users’ real-time location data. Despite a statement in each app’s Privacy Policy that users under 13 years of age are not allowed to use the apps, users who indicate they are under 13 are not prevented from accessing and using the apps or being visible to other users. In testing of Meet24, FTC staff was able to search for other users by age and location to find users near our location who indicated that they were as young as 12 years old.

Because you appear to have actual knowledge that children are using your apps, you are subject to COPPA and its implementing Rule. As noted above, it appears that the apps collect significant personal information as defined in the COPPA Rule, 16 CFR 312, from under-thirteen users. You must therefore provide notice and obtain verifiable parental consent before

collecting, using, or disclosing personal information about these users. Your failure to do so appears to violate COPPA and its implementing Rule.

Furthermore, FTC staff finds the provision of a dating service to minor children, including those as young as thirteen, to be extremely problematic. Facilitating other users'—including adults'—ability to identify and communicate with children—even those 13 or over—poses a significant risk to children's health and safety. As you may be aware, several individuals in the United States have faced criminal charges for communicating or attempting to communicate with minors via Wildec's apps.¹ Indeed, in certain circumstances, the practice of allowing children to create public dating profiles could be unfair under the Federal Trade Commission Act. Section 5(n) of that Act prohibits practices that are likely to cause substantial consumer injury that is not outweighed by countervailing benefits and that consumers could not reasonably avoid themselves.²

Accordingly, we urge you to ensure that your apps, in all versions available in the app stores or currently installed on user devices, are compliant with the requirements of COPPA and/or the FTC Act. Among other things, this will entail immediately removing personal information from children on your service, seeking parental consent before allowing minors to access your products, and eliminating any feature that allows users to specifically search for other users who are minors.³ Commission staff will be reviewing your mobile apps again in the next month in order to assess whether they comply with applicable law.

¹ See ABC WHAM, *Man who traveled to Henrietta for sex with minor pleads guilty to child enticement charge* (Mar. 19, 2019), <https://13wham.com/news/local/man-who-traveled-to-henrietta-for-sex-with-minor-pleads-guilty-to-child-enticement-charge> (Fastmeet); Vic Rodrick, *Edinburgh Evening News*, *Sex offender who admitted grooming a child will spend Christmas in jail* (Dec. 24, 2018), <https://www.edinburghnews.scotsman.com/news/crime/sex-offender-who-admitted-grooming-a-child-will-spend-christmas-in-jail-1-4848551> (Meet4U); ABC WATE 6, *West Tenn. man charged with raping teen who went missing from Wartburg* (April 8, 2019), <https://www.wate.com/news/local-news/west-tenn-man-charged-with-raping-teen-who-went-missing-from-wartburg/1908489339> (Meet24); Ben Wright, *Ledger-Enquirer*, *Columbus man, 26, chatted with 14-year-old on meeting app to have sex, police say* (Nov. 7, 2018), <https://www.ledger-enquirer.com/news/local/crime/article221280960.html> (Meet24).

² See 15 U.S.C. § 45(n).

³ The FTC provides a number of resources to help businesses comply with the FTC Act, COPPA, and other laws. Please consult our online Business Center, located at <https://www.ftc.gov/tips-advice/business-center>, for more information.

We also urge you to contact us immediately with respect to your apps' information collection practices. Please feel free to contact my colleague Robin Wetherill if you have any questions. She can be reached at +1 202-326-2220 or rwetherill@ftc.gov.

Sincerely,

A solid black rectangular box used to redact the signature of Maneesha Mithal.

Maneesha Mithal
Associate Director
Division of Privacy and Identity Protection

cc: Apple App Store, Google Play Store