

Protecting Children Online:

AN EXPLORATION OF ATTITUDES, DANGERS AND THE WAY FORWARD TO CHILD ONLINE SAFETY IN GREECE

INTRODUCTION

Young people are growing up in an incredibly connected world, where the use of digital platforms, apps, and technologies comes as second nature to them.

However, while they are protected in other areas of life like putting their seatbelts on in the car, giving them helmets when they first ride their bike and helping them tie their shoelaces, the online world remains a 'wild west', treating them as adults and leaving them vulnerable to breaches of privacy, exploitation, manipulation, and addiction. In fact, by the time a young person turns 13, advertisers hold an estimated 72 million data points about them.1 Just as we strive to protect their rights and ensure their well-being offline, it is crucial to safeguard their privacy online.

At the EU level, the first steps towards a safer online environment for children were made earlier this year. As part of the EU strategy for a better internet for kids (BIK+) adopted in May 2022, the European Commission will facilitate a comprehensive EU Code of Conduct on ageappropriate design.²

The code, which is due to be implemented in 2024, will set out a set of standards for online services that are likely to be accessed by children. These standards will likely cover a range of

issues, such as requiring platforms to verify users' age, curtailing addictive features, and making children's profiles private by default.

The code, whilst a significant development in the European Union's efforts to protect children online, must be strong and robust if it is to properly protect and safeguard children online. As young participants in our study told us: an impactful children's code can and should go farther.

At the national level, Greece has long been committed to protecting the privacy of its citizens and standing up for them when platforms overreach. Just last year, the Hellenic Data Protection Authority (HDPA) fined Clearview AI €22 million for illegally collecting, processing and storing personal data, thus failing to comply with the General Data Protection Regulation (GDPR). As a country, Greece has consistently gone above and beyond existing regulations to ensure that its citizens are protected.

¹ Fowler, Geoffrey. "Your kids' apps are spying on them". Washington Post, 2 June 2022, https://www.washingtonpost.com/technology/2022/06/09/apps-kids-privacy/

² "A European strategy for a better internet for kids", 8 Feb 2023, https://digital-strategy. ec.europa.eu/en/policies/strategy-better-internet-kids

INTRODUCTION

The Ministry of Education, Religion and Sports has recently announced its plan for the new strategy towards "digital education", including actions to promote digital literacy.3 Additionally, the Hellenic Data Protection Authority has a dedicated page on their website to help young people navigate the online risks and protect their privacy.4 Finally, the SaferInternet4kids Institute that also serves as a Greek Representative to the EC's Working Group for the Code of Conduct for age-appropriate design, has been very active in educating children on issues related to online safety and how to protect themselves from fraudulent actions and social media.5

Now, we ask that Greece once more goes above and beyond, to ensure a children's code is not only strong and robust but also effectively implemented and exercised.

It is time to ensure that children's rights are fully realised in the digital age. By making platforms safe, private, and secure by design, we can empower young digital citizens and pave the way for a future where their privacy is respected, and their rights are protected.

This report sheds light on the current situation for young people online in Greece, examining the challenges, concerns, and recommendations for strengthening their protection and their privacy.

WE HOPE THAT THE FINDINGS OF THIS REPORT DEMONSTRATE THE STRONG APPETITE OF THE GREEK PUBLIC — OF ALL AGES — FOR TOUGHER REGULATION THAT PROTECTS GREEK CHILDREN AND MANDATES TECHNOLOGY IS SAFE AND PRIVATE BY DESIGN.





³ Alphavita Newsroom, "Ο μπλε φάκελος του Υπουργείου Παιδείας, Θρησκευμάτων και Αθλητισμού", 1st of July 2023, https://www.alfavita.gr/ekpaideysi/420484_ypoyrgeio-paideias-oi-35-basikoi-stohoitis-psifiakis-stratigikis-tis-paideias [last accessed 31 July 2023]

⁴https://www.dpa.gr/mikroi_polites [last accessed 31 July 2023]

⁵ https://saferinternet4kids.gr/

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EXECUTIVE SUMMARY



This summary provides an overview of the research conducted in Greece on children's data collection and privacy by YouGov, Humankind Research, and Homo Digitalis in May - June 2023. The study employed both quantitative and qualitative methodologies to assess public sentiment and gather insights from young people on how to improve existing and proposed policy.

Overall, the research found high levels of concern amongst adults and young people underlying the need to advocate for and implement a strong and robust children's code. Furthermore, the research found that significant investment in awareness building on issues of privacy, protection, and safety online in Greek education is critical.

Key findings from the quantitative research

The online YouGov survey of Greek adults on attitudes to child online safety found that they harbour:

- High levels of concern: 83% of Greeks are worried about children's privacy online;
- A severe lack of trust: A significant majority of Greeks (71%) expressed a lack of trust in digital platforms to safeguard children and young people's privacy online;

- Fear of lack of data control: Most Greek adults (84%) believed that children have minimal control over how their data is collected and used;
- **Belief of parental responsibility: Most** Greeks (68%) feel that parents are primarily responsible for protecting children online;
- Insufficient legal framework and lack of enforcement: 76% of Greeks felt that current rules were inadequate in protecting children and young people's privacy and data while 38% of Greeks are sceptical over platforms' appetite for compliance and accountability.

Adults in Greece are right to be worried. Our analysis of the most popular digital apps and platforms used in Greece deploy over 28 trackers and request access to sensitive information

EXECUTIVE SUMMARY

about users, such as their precise location, their calendar info, contacts, and so on.⁶ EdTech apps, which children are often required to use for school, act as an additional data-gatherer.⁷

Key findings from the qualitative research:

We spoke to young people about these issues and more through focus groups, which provided valuable insights into young people's lived experiences and perspectives of the digital world they navigate. In focus groups, young people told us:

- Shocked and concerned: When told, most for the first time, about invasive data collection processes, the young participants expressed shock and high levels of concern about the vast amount of information being collected about them, feeling out of control to stop it.
- **Stuck:** They felt forced to provide their data or risk isolation from friends, families, and their social lives online.
- **Unprotected:** They perceived the current rules and regulations as insufficient to protect them.
- **Recommendations:** They offered suggestions for making platforms better and rules stronger, such as conducting age verification for users, making T's & C's accessible, and prioritising safety and privacy in platform design rather than as an afterthought.

Overall, the research findings demonstrate that Greeks are very concerned about childrens' safety online. It also underlines the big gap in young and older people's digital literacy, as most of them do not know the risks, nor do they have sufficient information on how to protect themselves. The lack of trust in digital platforms and the inability of

governmental bodies to enforce rules aggravate the feeling of insecurity when navigating the internet.

What is more, the survey unveils an urgent need for comprehensive measures to protect children's privacy and wellbeing in Greece. We recommend that policymakers hold digital platforms to account within the framework of current data and rights protection legislation, as well as advocate for a strong and robust children's code. In addition, it is of utmost importance to further enhance the collaboration amongst educators, parents, governmental bodies and NGOs to ensure young people are aware of their rights online and bridge the existing knowledge gap.





⁷Such as Moodle, Open EClass, Seesaw and Edmodo.



A HIGHLY CONCERNED PUBLIC: RESULTS FROM SURVEY OF GREEK ADULTS

Methodology

The findings presented in this report are based on a quantitative research study conducted by YouGov in partnership with Humankind Research, with consultation from Homo Digitalis. The fieldwork for the survey was carried out from 25th to 29th May 2023. The sample comprised 1,006 Greek adults aged 18 and above, with just over one third (323) of respondents being parents of children under 18.

The survey was conducted online, utilizing YouGov Panels, which consists of individuals who have voluntarily agreed to participate in online interviews. Each member of the panel received an email invitation containing a link to the survey. To ensure the accuracy and representativeness of the findings, appropriate weighting techniques were applied. This process involved adjusting the survey responses to match the demographic characteristics of the entire Greek adult population, meaning that this survey is nationally representative of people over 18.

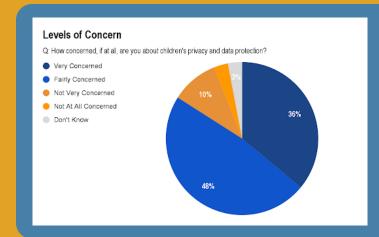
Greek adults are highly concerned about children's privacy and protection online

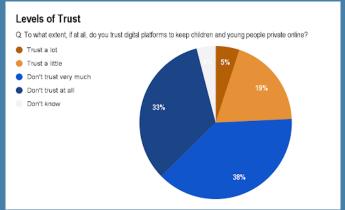
Concerns regarding children's privacy and data protection are widespread among Greek adults, with 83% expressing apprehension ranging from 'fairly' to 'very' (this compares to 65% of the Finnish population when asked a similar question in 2022).8

It appears concern increases with age up to a point, and is even more pronounced among parents, particularly those with children aged 15-18, where the figure rises to 87%. However, amongst younger adults, concern is significantly lower. The research showed that 62% of 18-24 year olds expressed concern about children's privacy and data protection — a full 25% less than those aged 35+ — perhaps attributed to their own native usage and sense of control over their online experiences.

⁸ Insoll T & Farthing R, Finland wants better protection for children online (Suojellaan Lapsia ry. 2022).

A HIGHLY CONCERNED PUBLIC: RESULTS FROM SURVEY OF GREEK ADULTS

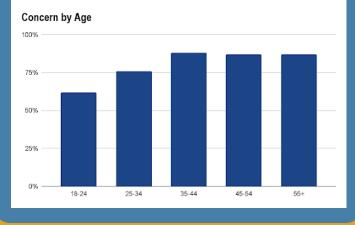




Most Greeks do not trust digital platforms

The research indicates that a considerable majority of Greek adults lack trust in digital platforms' ability to protect children and young people's privacy online, with a staggering 71% expressing this sentiment.

What's more, one third (33%) of the adult population reported not trusting digital platforms 'at all'.



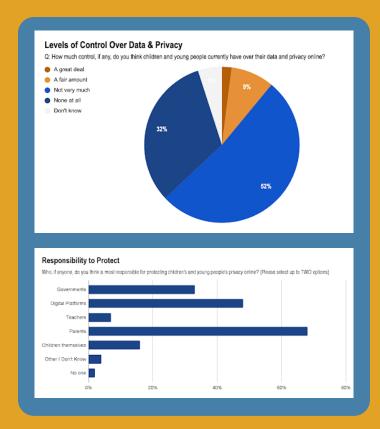
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Demographic disparities were evident in the research findings, with women exhibiting higher levels of distrust towards digital platforms (76%) compared to men (66%). Additionally, the research unveils a generational divide, with younger adults displaying greater trust in digital platforms, as evidenced by 42% of 18-24 year-olds reporting some level of trust, compared to the national average of just 24%.

Greeks feel that young people have little control over their data and privacy online

It appears the substantial lack of trust amongst the population extends to the belief that children and young people have limited control over their online data, as reported by 84% of adults. In fact, 32% of the population reported that children and young people have 'no control at all'. Given this overriding sense of little to no control, there is a substantial role for others to play in safeguarding children's data and privacy online — whether the state, educators, parents, or others.

A HIGHLY CONCERNED PUBLIC: RESULTS FROM SURVEY OF GREEK ADULTS



It should be noted that 18-24 year-olds exhibited a higher belief that young people have control over their data (21%) compared to the national average (11%). This discrepancy is expected, given young people's increased usage of platforms and their having been born into usage of such technology.

However, once more it illustrates an opportunity for education on the subject. Younger It should It should be noted that 18-24 year-olds exhibited a higher belief that young people have control over their data (21%) compared to the national average (11%). This discrepancy is expected, given young people's increased usage of platforms and their having been born into usage of such technology.

Greeks are" split" when it comes to who is ultimately responsible for the children's protection

When asked to choose two groups who were 'most responsible' for protecting children's and young people's privacy online, 68% of the population selected parents. In second place were digital platforms themselves (48%), and then governments⁹ (33%). This split illustrates a sense that with little in the way of enforceable regulation to protect children and young people, the population feels that parents should take on online safeguarding as part of their parental duties. It should be noted that parents themselves were most likely to support this option, with 72% of parents of children 0-14 selecting this choice. There is also support for self-regulation by the platforms themselves — especially held by older people (51% for those aged 45+, and 53% of parents of older teenagers [15-18]) — indicating a belief that platforms should ultimately serve children and young people by design, rather than harm them. One third (33%) believe the state is most responsible for protecting children and young people's privacy, signalling a clear appetite amongst a segment of the population for increased state intervention as well as a lack of awareness around current regulation.

Inadequate rules and lack of enforcement

The majority of Greek adults (76%) believe that the existing regulation of digital platforms does not go far enough to protect children's and young people's privacy and data. This sentiment is encouragingly high — when a similar question was asked in Finland in 2022, 65% of adults reported that children and young people do

^{9 &#}x27;Governments' was used as an option to reflect state bodies and independent regulators

¹⁰ Insoll T & Farthing R, Finland wants better protection for children online (Suojellaan Lapsia ry. 2022).

A HIGHLY CONCERNED PUBLIC: RESULTS FROM SURVEY OF GREEK ADULTS

not currently have sufficient protections. 10 Such support for tougher regulation gives governing and regulating bodies the backing of the public to take comprehensive action.

However, it should be noted that a significant percent of the population is sceptical that new rules would change the reality. 38% of adults felt it was unlikely that digital platforms would be made to follow stricter rules if they were to be in place. Interestingly, younger adults aged 18-24 were the most sceptical that new rules would change anything, with 43% selecting unlikely compared to the national average of 38%. This signals a scepticism, especially held by younger adults, either of the platform's ability to change or the state's ability to enforce such rules and indicates that the public need to see governing bodies and independent regulators holding digital platforms to account.



"I FEEL I AM BEING WATCHED. BEING LISTENED TO, LIKE I AM UNDER SURVEILLANCE"

- Young person, aged 16, Greece

Methodology

In the focus group, we interviewed six young people aged 15-18 across the country to understand their perspectives on their own privacy and protection online. Conversations were conducted in triads online and lasted 90 minutes. Despite entering the conversations relatively unaware of online harm and confident in their control over their digital worlds, all the young people we spoke to left conversations shocked, confused, and in strong support of change. Much like their adult counterparts, the young

people we spoke to showed high levels of concern after they learned more about the intrusions to their privacy that happen every day, and Greeks are right to be concerned about these invasive data collection processes. The main topics of the discussions were on social media usage, extent of data collection but also levels of awareness of risks and available privacy features.



Social Media Usage & Addiction

"WHEN I WAKE UP, I TURN ON MY PHONE, SEE IF THERE'S A MESSAGE AND SCROLL ON INSTAGRAM AND TITKTOK. IN THE AFTERNOON I PLAY A GAME OR SCROLL ON SOCIAL MEDIA. AND IN THE EVENING, I USE SOCIAL MEDIA AGAIN AND WATCH A

- Young person, aged 17, Greece

MOVIE, UNTIL BEDTIME."

During our focus group discussions, participants reported spending an average of four hours per day online, with social media platforms occupying most of their online presence. It should be noted that accurately monitoring the internet use of young people poses significant challenges, primarily due to the common practice of young users providing inaccurate ages during sign-up to bypass age restrictions and parental consent requirements. However, we can use a snapshot of the most popular apps among the general population in Greece as a proxy. At present, many of these applications deploy 'nudge' techniques to keep users hooked on the platform, scrolling endlessly and helping to fuel addiction.11

Social Media Usage				
Digital Platform	# of Users in Greece			
YouTube	7,490,000			
Facebook	5,000,000			
FB Messenger	4,350,000			
Instagram	4,050,000			
TikTok	3,010,000			
Pinterest	1,840,000			
Twitter	938,100			
Snapchat	915,000			

The teenagers we spoke to told us that TikTok, Instagram, and YouTube were their primary destinations, all of which they worried their peers were addicted to. One participant estimated that 25% of her classmates are addicted to social media, and had become fully detached from reality. The real figure, whilst smaller, poses significant concern: according to one 2022 study, 1 in 7 Greek teenagers are experiencing signs of addiction to social media that are linked to depressive symptoms and lack of self-esteem. As hours per day increases on platforms like YouTube, so too do the severity of depressive symptoms of addiction.¹³



¹¹ Nudge techniques include auto-play videos, notifications and alerts and infinite scrolling. For more see: Ceres, Pia. "Lawmakers Want Social Media Companies to Stop Getting Kids Hooked", Washington Post, 15 June 2022, https://www.wired.com/story/social-media-addiction-laws-children-tiktok-instagram/

¹² DataReportal (2023), "DIGITAL 2023: GREECE", retrieved from https://datareportal.com/reports/digital-2023-greece

¹⁸ E-Kathimerini (2023) One in seven teens use too much social media, eKathimerini.com. Available at: https://www.ekathimerini.com/society/1207001/onein-seven-teens-use-too-much-social-media/ (Accessed: 12 June 2023).

ON DAYS WHEN I'M TIRED, I FIND MYSELF SITTING DOWN TO STUDY AND I TURN TO MY SMARTPHONE TO HAVE A BREAK AND THEN I REALISE THAT IT'S 8 AT NIGHT AND I'M STILL ON MY CELL PHONE BECAUSE I CAN'T PUT IT DOWN." -

Young person, aged 16, Greece, TikTok

Youtube, and Instagram's usage of 'nudge' techniques is fuelling a crisis of addiction in Greece. Designed to auto-play videos, enable an endless feed, and remind users to come back as often as possible, young people are bearing the brunt of social media platforms desire.

Between school and sleep, young people in Greece are spending nearly all of their free time on digital platforms that are designed to keep them there as long as possible.

Extent of Data Collection

"I EITHER GIVE THEM NOTHING. OR THEY TAKE EVERYTHING FROM ME. IT'S EXCESSIVE."

Young person, aged 15, Greece

In focus groups, we told participants about how digital platforms such as Instagram and TikTok are

constantly collecting vast amounts of information about their users. Teenagers accepted this, until they learned that the information gathered about them goes beyond details about their interests, online activities, and posted content. These platforms obtain more personal information, including the user's location, information of their physical and mental health, their social connections, habits, and even their most personal information such as sexuality or preference. In some cases, they can even employ sophisticated techniques such as eye-tracking to collect data on users' interactions with content, irrespective of whether they click on it or show explicit interest. When teenagers we spoke to learned about the vast scale of data being collected about them, they were in disbelief.

"IT IS AS IF SOMEBODY IS STANDING OVER YOU — THEY KNOW WHAT YOU DO, WHAT YOU THINK. THERE'S NO **PRIVACY AT ALL."**

- Young person, aged 18, Greece

As the table shows, all the most popular digital platforms in Greece employ various trackers and/or request permissions that enable them to monitor users and access personal information. Since young people utilise these same apps without specialised under-15 accounts, it is reasonable to assume that similar trackers are deployed, and permissions are requested from them.

¹⁴ https://privacycenter.instagram.com/policy/

¹⁵ https://www.tiktok.com/legal/page/row/privacy-policy/en

¹⁶ See privacy policy for Facebook, TikTok and Instagram as examples

Popular Platforms: Trackers Deployed and Permissions Requested on Android							
App or platform	# of Users in Greece ¹⁷	# of trackers in android version ¹⁸	# of permissions requested in android version ¹⁹	Permission to access precise location data?	Permission to read contacts on phone?	Permission to read calendar events?	
YouTube	7,490,000	2	39	Yes	Yes	No	
Facebook	5,000,000	0	64	Yes	Yes	Yes	
FB Messenger	4,350,000	5	68	Yes	Yes	No	
Instagram	4,050,000	2	46	Yes	Yes	No	
TikTok	3,010,000	5	73	Yes	Yes	Yes	
Pinterest	1,840,000	5	25	Yes	Yes	No	
Twitter	938,100	4	49	Yes	Yes	No	
Snapchat	915,000	3	59	Yes	Yes	No	

The number of trackers and permissions requested by the latest version of each app, in Android²⁰

Let's take TikTok as an example. When users sign up for TikTok²¹, they unknowingly provide more than just their name and date of birth, as focus group participants first assumed. In fact, the app tracks their device information, location, calendar events, contact details, IP address, search history, message content, viewed content, and duration of viewing. Furthermore, it can even collect text, images, and videos from the user's phone's clipboard without explicit consent.

"THEY MAKE YOU BUY OR LIKE SOMETHING THAT IN REAL TERMS YOU DON'T REALLY LIKE. THEY CHANGE THE WAY YOU THINK."

- Young person, aged 17, Greece

All this data is then "shared" with third party contractors, or else sold to advertisers, who then exploit it to target users with different content and products, regardless of their age or consent. As mentioned previously, by the time a user reaches 13 years of age, an estimated 72 million pieces of information about them are held by advertisers. As users, young and old people alike have limited control over how this data is utilised and it has resulted in tangible harm such as the recommendation of inappropriate or violent content, manipulation, discrimination, and cybercrime.²² Young users are particularly vulnerable to these and other harms. Even if harm is not explicit, this is a violation of a young person's right to privacy.

 $^{^{17}\, \}text{DataReportal (2023), "DIGITAL 2023: GREECE", retrieved from https://datareportal.com/reports/digital-2023-greece}$

¹⁸ Exodus Privacy define trackers as 'software deployed to gather information on the person using the application, on how they use it, or on the smartphone being used'. https://reports.exodus-privacy.eu.org/en/info/trackers/

¹⁹ According to Exodus Privacy, permissions are requested 'to gain access to features or pieces of information, such as access to your geolocation, your contacts, your files, your microphone, vibrate function, camera and so on'. https://reports.exodus-privacy.eu.org/en/info/permissions/

²⁰ As documented by Exodus Privacy https://exodus-privacy.eu.org/en/

²¹ https://www.tiktok.com/legal/page/row/privacy-policy/en

²² Milmo, Dan. "The bleakest of worlds': how Molly Russell fell into a vortex of despair on social media", The Guardian, 30 Sept 2022, https://www.thequardian.com/technology/2022/sep/30/how-molly-russell-fell-into-a-vortex-of-despair-on-social-media

EdTech products and consent

Beyond using apps like TikTok for entertainment, the usage of digital platforms is widespread in Greek classrooms, in part due to the necessity to turn to digital during the Covid-19 pandemic. A 2022 Human Rights Watch report, looking at discovered that 89% of EdTech products they examined across the world monitored or had the capability to monitor children, often without their or their parents' consent. Some platforms collected data on children's identities, locations, and activities within virtual classrooms, while others gathered information about their family and friends, as well as the devices they used. Just like their entertainment equivalents, some EdTech platforms deployed trackers that followed children online, even outside of school hours, deeply intruding into their private lives.

These digital platforms are intended to bolster a child's education, but in fact come with harmful and invasive practices, all in the fine print. Whether used for leisure, communication, or education, no platform should be allowed to gather data on a minor without the user's informed consent. At present, the terms and conditions of such platforms are dozens of pages, couched in beyond university-level language. and seldom available in Greek language. Young people in focus groups told us they never read T's & C's, and had little idea what cookies are. Instead, they 'accept' without giving true, informed consent.

"I THINK WE ALL JUST ACCEPT **EVERYTHING WHEN IT COMES TO** TERMS AND CONDITIONS, WE ALL BYPASS THEM. I'VE NEVER READ THEM. I THINK EVERYBODY DOES IT, WE'RE ALL ON SOCIAL MEDIA THINKING THERE'S NO DANGER TO **US PERSONALLY SINCE THEY'VE** ALL GOT MILLIONS OF USERS."

- Young person, aged 17, Greece

In the drafting of the children's code, it is pertinent that data collection for minors is curtailed, and robust requirements for accessible, easy to digest terms and conditions are put in place.

Awareness Amongst Young Users

Our conversations with participants revealed a near total lack of awareness among young Greeks regarding concepts of data and privacy online. Although few participants mentioned methods such as using incognito mode and VPNs when asked about how they stay protected, the majority of participants engaged in full, active, and unprotected usage of digital platforms without reservation. However, young people don't feel they have any other choice. They reported a sense of compulsion to accept all cookies, proceed without reading the terms and conditions, and even provide false ages to gain access, otherwise they risk being cut off from school, social lives, and family communication.

²³ Human Rights Watch. "How Dare They Peep into My Private Life?" Children's Rights Violations by Governments That Endorsed Online Learning During the Covid-19 Pandemic. © 2022 by Human Rights Watch. https://www.hrw.org/sites/default/files/media_2022/10/HRW_20220711_Students%20Not%20 Products%20Report%20Final-IV-%20Inside%20Pages%20and%20Cover.pdf

The simple truth is that their lives now centre around the online world, and staying off digital platforms is not an option.

"EITHER YOU ACCEPT THAT SOMEONE IS TAKING YOUR DATA OR YOU DON'T ACCEPT AND LOSE ACCESS TO THE INTERNET."

- Young person, aged 18, Greece

What's more, young people were under the impression that websites offer default settings that adequately protect them. This is supported by the statistic stated earlier, in which younger adults are more trusting of digital platforms to keep young people safe and secure. However, when prodded, we found that young people's feeling of protection while using the internet is based more on wishful thinking than reality.

"I'M NOT SURE I UNDERSTAND
WHAT COOKIES ARE, I LOOKED
IT UP BUT I DON'T REALLY
UNDERSTAND".

- Young person, aged 17, Greece

Participants in our study expressed shock upon discovering the extent and depth of data collection by social media companies, mainly for marketing purposes. They never imagined Participants in our study expressed shock upon discovering the extent and depth of data collection by social media companies, mainly for marketing purposes. They never imagined that, by providing what they perceived as "essential" data, social media companies would still manage to accumulate such a vast amount of information through automatic and untraceable means. Consequently, they feel constantly under surveillance, their personal agency undermined in the face of overwhelming data collection practices. They worried about what this meant for younger children, and what it might mean for their own futures if a data profile they did not know existed follows them through life. The knowledge possessed by social media companies about them left them feeling powerless and exposed.



CONCLUSIONS & RECOMMENDATIONS

"THE INTERNET SHOULD BE A PLACE WHERE WE FEEL SAFE, NOT EXPOSED TO THE REST OF THE WORLD."

- Young person, aged 18, Greece

From digital platforms used for educational purposes like Zoom to popular entertainment platforms like TikTok, the personal data of young users is constantly being harvested and sold to advertisers. This pervasive practice forms the core of revenue generation for digital platforms, but it comes at a significant cost to both users and nonusers alike.

This report reveals a significant lack of public trust in the ability of digital platforms to keep children safe, secure, and private online. Over 75% of the population believes that more rules and regulations are needed to safeguard children's rights online, while young people feel that current and proposed measures are insufficient. This clearly indicates the need for drastic changes in how digital platforms interact with children and young people.



"I'M SCARED OF THE AMOUNT... IT'S EXTREME... I CAN'T UNDERSTAND HOW SO MUCH INFORMATION IS GIVEN WHEN I'VE ONLY GIVEN MY NAME AND AGE."

- Young person, aged 15, Greece

The gap in awareness exhibited by the participants in our study emphasises the urgent need for comprehensive education and awareness campaigns among Greek young people to empower them in protecting their personal data online. Whilst we firmly believe the ultimate responsibility lies with policymakers and digital platforms to provide safe, secure experiences for young users, we recognise change takes time In the interim, young people should be equipped with information they need To make informed decisions about themselves and the content they share online.

Young people's rules for a safer internet – focus group

Whilst young people were upset about the current practices underway by the digital platforms they love, they were not despondent. In fact, they wanted more than ever for things to change. They felt that existing protections don't provide any real protections for them, and wanted to understand

CONCLUSIONS & RECOMMENDATIONS

what the potential provisions for a children's code might offer. After looking at what impacts the children's code has had in the United Kingdom, (known there as the Age Appropriate Design Code) young people offered their suggestions for making a European code even stronger:

 Verify Age: Though currently the subject of intense debate, the young people we spoke to supported age verification of some sort, otherwise they felt changes would be ineffective so long as children can continue to open adult accounts.

"THEY SHOULD ASK TO PROVE
YOUR AGE LIKE GAMBLING
WEBSITES, NOT JUST ABLE TO
A FAKE AGE, THEY NEED TO
CORROBORATE DATA"

- Young person, aged 17, Greece
- Go Back to Basics on Data Collection:
 Young people understood that in order to
 market products, companies need to know
 information about their consumers. However,
 they suggested going back to basics and
 gathering data through market research
 instead.

"INSTEAD OF VIOLATING ALL
THESE THINGS THEY CAN
CONDUCT THEIR OWN RESEARCH
AND HEAR WHAT OTHER PEOPLE
HAVE TO SAY, NOT JUST STEAL
THINGS FROM OTHERS"

- Young person, aged 17, Greece

Prevent Addiction: Young people are
 outraged that products are designed to fuel
 the addiction they see around them and
 experience themselves. They called for an
 all-out stop to addictive nudge techniques. As
 the children's code in the European Union is
 developed, it is pertinent that member-states
 prioritise and bolster the limitation on nudge
 techniques to safeguard young people's
 wellbeing and development.

"AS TEENAGERS WE ARE
ADDICTED TO THE INTERNET
... IT WOULD BE A MASSIVE
DEACTIVATION IF WE STOPPED
USING SOCIAL MEDIA".

- Young person, aged 18, Greece
- Give Us Real Information: Participants felt current terms and conditions were absurdly long, complex, and hidden away. What's more, they were surprised no one had ever told them about data collection practices before. They called for more access to truthful information about why and how their data is collected, and for the chance to meaningfully consent or not, without losing access to the platforms they love.

"I THINK THERE IS INFORMATION,
BUT WE DON'T READ IT. THERE
SHOULD BE INFORMATION
ABOUT THIS, AND WITHIN THE
EDUCATIONAL SYSTEM".

- Young person, aged 15, Greece

CONCLUSIONS & RECOMMENDATIONS

Make Safety the Norm: Above all else, the young people we spoke to couldn't understand why digital platforms were created to exploit them, instead of to enhance their lives. They called for all digital products, platforms, and apps to be created safe in the design phase, instead of bandaged for harm after the fact.

"I WANT TO LOG ON WITHOUT BEING AFRAID OF OUR DATA BEING STOLEN, NO DATA PHISHING. NO ACCESS TO MATERIAL THAT WILL EXPOSE ME."

- Young person, aged 15, Greece

Finally, they made clear why policymakers, regulators, campaigners and platforms should listen to them when making the rules about the digital world:

"WE ARE THE GENERATION WHO ARE ON THESE PLATFORMS THE MOST. WE WERE BORN INTO IT. AND WE HAVE TO LIVE THE REST OF OUR LIVES WITH IT."

- Young person, aged 17, Greece



Stronger, enforceable actions at EU and national level

To address this, strong regulatory protection is essential. With over 70% of Greeks lacking trust in platforms and young people unaware of the data they unknowingly give away, relying solely on young individuals to protect their digital privacy and data rights is inappropriate. Empowered regulators must step in to enforce strong regulations that prioritise the privacy and data protection of young people.

In addition, member states should advocate for a more comprehensive version of the children's code than what has already been adopted in other places. Current codes of conduct lay a foundation for safe technology but fall short in preventing addiction and invasive data collection that violates children's privacy rights. Greece should collaborate with relevant authorities in developing recommendations and ensure swift and rigorous implementation when the code becomes practical, in order to fully realise children's rights. As part of these recommendations to improve the children's code, our research specifically points to the need for:

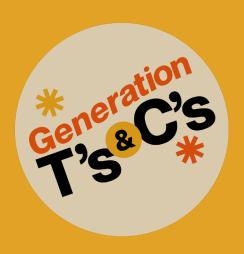
- Prioritising and bolstering limitations on nudge techniques to safeguard young people's wellbeing and development from addiction.
- Curtailment of collecting data on minors and the creation of robust requirements for accessible, easy to digest terms and conditions in order to provide informed and meaningful consent.

CONCLUSIONS & RECOMMENDATIONS

Given the awareness gap evidenced among young people about concepts of data and privacy, as well as their reported reliance on teachers for guidance, our research also recommends comprehensive investment in digital literacy training on these topics in Greek schools.

Finally, we recommend that young people be actively involved in and consulted on decisions related to the protection of their data and privacy. As evidenced above, they possess valuable insights and suggestions for change that truly benefit those they aim to protect.

Greece's commitment to holding technology companies and digital platforms to account has been commendable, but the well-being, privacy, and future of its children are currently at risk. As a children's code is being drafted, Greece should prioritise robust education, strong regulation, and consistent enforcement to protect the rights of young people in our digitised world.





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