



Coordinated Privacy Disclosure, Final Report

IDZ Digital Toddler App Portfolio ("iz" / Timpy Games / KidloLand)

IDZ Digital Private Limited, India, three apps rated and marketed for children aged 1 to 3

SILENT · CASE CLOSED AND PUBLISHED 25 SEPTEMBER 2026, SIX DAYS AFTER THE STATED 19 SEPTEMBER EMBARGO, FIVE MESSAGES, ZERO REPLY OF ANY KIND

Target	Three toddler-directed Android apps published under the trading names "iz", Timpy Games, and KidloLand
Packages	com.iz.baby.infant.toddler.kids.children.toys.games (Infant Games 1-2) v1.2.2; com.iz.tizi.town (Tizi Town) v3.1.5; com.iz.unicorn (Unicorn Dress-Up) v2.6.8
Operator	IDZ Digital Private Limited, India, addressed directly by corporate registration and named directors
Initial Disclosure	2026-06-25
Stated Embargo	2026-09-19, as communicated directly to the target in the initial disclosure
Report Published	2026-09-25, six days after the stated date
Regulators	Austrian DSB, CERT.at, EDPS
Total Outbound Messages	5, across 8 days, to accounts@idzdigital.com, support@idzdigital.com, hello@timpygames.com, tizi@idzdigital.com, and support@kidlo.com.
Inbound Replies	0. No reply, automated or human, was ever received.

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Executive Summary

On 25 June 2026, RFI-IRFOS disclosed to the directors of IDZ Digital Private Limited, addressed by name and corporate registration specifically so the disclosure could not be routed to the wrong subsidiary inbox, that three of the company's Android apps, all rated and marketed for children aged 1 to 3 and published under three different trading names ("iz", Timpy Games, KidloLand), run a full advertising mediation stack, Google Ads, Unity Ads, ironSource/Supersonic, and Vungle, and collect the Android advertising identifier in two of the three apps.

Firebase's own init provider additionally fires before any consent screen renders across all three apps, meaning processing begins before a parent has had any opportunity to agree to anything. RFI-IRFOS holds this finding at HIGH under an explicit blast-radius escalation beyond its computed MEDIUM CVSS band: a child in the one-to-three-year-old age range this portfolio targets cannot give valid consent under any circumstance, which makes the underlying Art. 8 GDPR and COPPA exposure structural, not a question of degree or configuration.

The disclosure named the fragmentation across three separate trading names explicitly, and stated plainly that this does not change who the data controller is. Five messages were sent across 8 days, to accounts@idzdigital.com, support@idzdigital.com, hello@timpygames.com, tizi@idzdigital.com, and support@kidlo.com, cc'ing the Austrian DSB, CERT.at, and the EDPS throughout. Not one reply, automated or human, was ever received on any address at any point. The 90-day embargo, stated directly to the target in the initial disclosure, elapsed on 19 September 2026. This report and the accompanying closure notice publish six days later, an internal gap on RFI-IRFOS's side, not a change to the terms already disclosed.

Scope: Root-level static analysis of three production Android applications published by IDZ Digital Private Limited under the trading names "iz", Timpy Games, and KidloLand, pulled from a production device and reviewed on 25 June 2026. No account was created and no interaction with Google Ads', Unity Ads', ironSource's, Vungle's, or Firebase's backend infrastructure was performed.

Disposition

One finding, spanning all three apps, was disclosed on 25 June 2026, re-scored under CVSS v4.0. Advertising mediation and advertising-identifier collection, plus pre-consent Firebase initialization, in three apps rated and marketed for children aged 1 to 3, computes to MEDIUM/6.9 on CVSS alone and is held at HIGH under an explicit RFI-IRFOS blast-radius escalation: no child in the target age range can give valid consent, making the underlying Art. 8 GDPR and COPPA violation structural, not a matter of degree. Five messages were sent across 8 days. Not one reply of any kind was ever received.

ID	Severity	Title
C1	HIGH	Advertising Mediation and Advertising-ID Collection Across Three Toddler-Directed Apps

Subject & Operator Analysis

IDZ Digital Private Limited, India, operates a portfolio of toddler-directed apps distributed under three separate trading names, "iz", Timpy Games, and KidloLand. RFI-IRFOS addressed the disclosure directly to the company's directors by name and corporate registration, specifically to prevent the disclosure from being routed to an unrelated subsidiary inbox, and stated explicitly that the fragmentation across three trading names does not change who the data controller is.

Five Messages, Zero Reply

All five messages in this case's correspondence record were delivered to accounts@idzdigital.com, support@idzdigital.com, hello@timpygames.com, tizi@idzdigital.com, and support@kidlo.com across 8 days, cc'ing the Austrian DSB, CERT.at, and the EDPS. Not one reply, automated or human, was ever received on any address at any point.

Findings

C1: Advertising Mediation and Advertising-ID Collection Across Three Toddler-Directed Apps

MEDIUM, CVSS v4.0 AV:N/AC:L/AT:N/PR:N/UI:N/VC:L/VI:N/VA:N/SC:N/SI:N/SA:N, 6.9.

All three apps, each rated and marketed for children aged 1 to 3, ship a full advertising mediation stack: Google Ads, Unity Ads, ironSource/Supersonic, and Vungle. A CCESS_ADSERVICES_AD_ID is declared in two of the three apps (Infant Games, Unicorn Dress-Up). Firebase's init provider runs before any consent screen across all three apps. RFI-IRFOS blast-radius escalation: raised from MEDIUM/6.9 to HIGH because no child in the targeted one-to-three-year-old age range can give valid consent under any circumstance, making this a structural Art. 8 GDPR and COPPA exposure and not a configuration question.

Ad/mediation SDKs (all 3 apps): Google Ads, Unity Ads, ironSource/Supersonic, Vungle
ACCESS_ADSERVICES_AD_ID: Infant Games, Unicorn Dress-Up
Firebase auto-init provider: fires before any consent screen, all 3 apps

Impact: Advertising infrastructure and an advertising identifier are active in apps directed at an audience that, by definition, cannot itself consent, and processing begins before any parent-facing consent mechanism has had a chance to run.

Fix: Remove the advertising mediation stack for child-directed apps, or implement verifiable parental consent under Art. 8 before any advertising SDK or Firebase initializes. No confirmation that this has occurred was ever received.

Data Protection, Article by Article

The single finding maps onto a specific set of GDPR provisions and the US COPPA framework, set out here.

Article	Finding	Basis
Art. 8, Art. 6(1), Art. 7 GDPR; COPPA	C1	Advertising mediation and advertising-ID collection in apps a child cannot legally consent to, pre-consent Firebase initialization.

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ZVR 1015608684 • GISA 39261441 • UID ATU83405245 • Steuernummer 68 696/8736 • Elisabethnergasse 25/10, 8020 Graz, Austria CVSS v4.0 is RFI-IRFOS's scoring guideline, not a ceiling or a floor. It gives a reproducible, third-party-legible starting point for severity, and it does not capture real-world blast radius on its own. In this report, C1 is held at HIGH under an explicit, stated blast-radius escalation beyond its computed MEDIUM/6.9 band. Disclosure conducted under ISO/IEC 29147 and the Austrian Forschungsfreiheitsgesetz, Art. 17 StGG. REF REF: IDZ-R1.