



Coordinated Privacy Disclosure, Final Report

Pokémon Champions Android (jp.pokemon.pokemonchampions)

The Pokémon Company, Minato-ku, Tokyo, Japan (EU adequacy jurisdiction)

SILENT · CASE CLOSED AND PUBLISHED 25 SEPTEMBER 2026, TWO DAYS AFTER THE EMBARGO, NINE DELIVERED MESSAGES, ZERO REPLY OF ANY KIND

Target	Pokémon Champions, a competitive battling app in the globally recognized Pokémon children's franchise
Package	jp.pokemon.pokemonchampions
Operator	The Pokémon Company, 4-1-1 Toranomon, Minato-ku, Tokyo 105-0001, Japan (EU adequacy decision in force since 2019)
Initial Disclosure	2026-06-25
Original Embargo	2026-09-23 (90 days from disclosure, as stated in the original notice)
Report Published	2026-09-25, two days after the embargo, an internal publishing gap, not a change in terms
Regulators	Austrian DSB (lead SA), CERT.at
Total Outbound Messages	12, across 83 days: an initial same-day attempt to privacy@pokemon.co.jp bounced entirely; a parallel attempt to dataprotectionofficer@pokemon.com found a working channel at privacyquestions@pokemon.com , used for nine further delivered messages through 16 September 2026, cc'ing dataprotectionofficer@nintendo.de and support@pokemon.zendesk.com .
Inbound Replies	0. No reply, automated or human, was ever received on any address.

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Executive Summary

On 25 June 2026, RFI-IRFOS disclosed to The Pokémon Company that its Pokémon Champions Android app initializes both FirebaseInitProvider (initOrder=100) and an Adjust lifecycle provider at process creation, both directBootAware, before any Activity and before any consent dialog can appear. The Pokémon franchise is globally recognized children's intellectual property; GDPR Art. 8 requires verifiable parental consent before processing a child's personal data, and pre-consent SDK initialization means attribution and analytics collection begins before any consent mechanism, including a heightened one for child users, can be presented.

A second finding names the combined advertising and attribution footprint, not a single SDK: AdMob serves targeted advertising, Adjust tracks install attribution and in-app purchase events, and a Facebook Attribution ID is queried from any installed Facebook app on the device, all in a title marketed to a primary audience of children. The app additionally registers a BOOT_COMPLETED receiver and runs a foreground data-sync service, meaning device-level behavioral data collection can begin at device boot, before the app is ever opened by the user.

Twelve messages were sent across 83 days. An initial same-day attempt to privacy@pokemon.co.jp and press@pokemon.co.jp bounced entirely; a parallel attempt found a working channel at privacyquestions@pokemon.com, used for nine further delivered messages through 16 September 2026, cc'ing dataprotectionofficer@nintendo.de and support@pokemon.zendesk.com. Not one reply, automated or human, was ever received on any address at any point. The 90-day embargo, set at first contact, elapsed on 23 September 2026. This report and the accompanying closure notice publish two days later, an internal gap on RFI-IRFOS's side, not a change to the terms already disclosed.

Scope: Root-level static analysis of the production Pokémon Champions Android application (`jp.pokemon.pokemonchampions`, version 1.1.3, 18.5 MB base plus a Unity data asset pack), as pulled via ADB from a physical device and reviewed on 25 June 2026. No dynamic instrumentation, live traffic capture, or interaction with The Pokémon Company's, Google's, Adjust's, or Meta's backend infrastructure was performed.

Disposition

Four findings were disclosed on 25 June 2026, re-scored under CVSS v4.0. Pre-consent Firebase and Adjust initialization, and a combined AdMob/Adjust/Facebook attribution stack, both compute to MEDIUM on their base CVSS bands and are held at HIGH under an explicit blast-radius escalation given the Pokémon franchise's globally recognized primary audience of children. A boot-persistent data-sync foreground service and a hard-coded Firebase API key both correct to MEDIUM. Twelve messages were sent across 83 days, nine of them successfully delivered to a confirmed working address. Not one reply of any kind was ever received.

ID	Severity	Title
C1	HIGH	Firebase and Adjust Both Initialize Before Any Consent Screen in a Children's Franchise

ID	Severity	Title
H1	MEDIUM	Boot-Persistent Data-Sync Foreground Service
H2	MEDIUM	Firebase API Key Hardcoded and Extractable
H3	HIGH	AdMob, Adjust, and Facebook Attribution Combined in a Children's Franchise

Subject & Operator Analysis

Pokémon Champions is a competitive battling app in the globally recognized Pokémon franchise, operated by The Pokémon Company, headquartered in Tokyo, Japan, a jurisdiction covered by an EU adequacy decision in force since 2019.

Several genuine positives are worth naming. `allowBackup` is correctly set to false. No `READ_PHONE_STATE`, camera, microphone, or location permissions are declared. No PRC-affiliated ad networks were found. The Japan adequacy decision means no Art. 44-49 third-country transfer issue arises from the operator's own location. The permission set is notably focused compared to comparable Unity-engine games reviewed in this series.

Twelve Messages, Nine Delivered, Zero Reply

This case's correspondence record involved a parallel-address strategy after an initial bounce. The first same-day attempt, to `privacy@pokemon.co.jp` and `press@pokemon.co.jp`, bounced entirely. A parallel attempt the same day to `dataprotectionofficer@pokemon.com`, `privacyquestions@pokemon.com`, and `pr@pokemon.com` found a working channel at `privacyquestions@pokemon.com`, used for nine further messages delivered successfully across the following 83 days, cc'ing `dataprotectionofficer@nintendo.de` and `support@pokemon.zendesk.com`. Not one reply, automated or human, was ever received on any address at any point.

Findings

C1: Firebase and Adjust Both Initialize Before Any Consent Screen in a Children's Franchise

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. RFI-IRFOS blast-radius escalation: held at HIGH because Pokémon is a globally recognized children's IP franchise, and pre-consent tracking under GDPR Art. 8's heightened parental-consent standard carries materially higher real-world stakes than the same technical gap on a general-audience app.

FirebaseInitProvider (initOrder=100) and an Adjust lifecycle provider are both declared `directBootAware="true"` and both fire at process creation, before any Activity and before any consent dialog. GDPR Art. 8 requires verifiable parental consent before processing a child's personal data; pre-consent initialization means this collection begins before any consent mechanism, heightened or otherwise, can be presented.

```
com.google.firebase.provider.FirebaseInitProvider
  authorities: jp.pokemon.pokemonchampions.firebaseinitprovider
  initOrder=100 (0x64), directBootAware=true
jp.pokemon.pokemonchampions.adjust-lifecycle-provider
  directBootAware=true (fires at process creation)
```

Impact: Attribution and analytics data collection begins in a globally recognized children's franchise before any consent mechanism, including the heightened parental-consent standard GDPR Art. 8 requires for children's data, can be presented. RFI-IRFOS blast-radius escalation: raised from MEDIUM/6.9 to HIGH because Pokémon is a globally recognized children's IP franchise, and pre-consent tracking under GDPR Art. 8's heightened parental-consent standard carries materially higher real-world stakes than the same technical gap on a general-audience app.

Fix: Defer both providers' initialization until after a verifiable, parental consent flow has run. No confirmation that this has occurred was ever received.

H1: Boot-Persistent Data-Sync Foreground Service

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.

The app registers a `BOOT_COMPLETED` broadcast receiver and declares `FOREGROUND_SERVICE_DATA_SYNC`, meaning it starts itself at device boot, not only when a user opens it, and runs a data-synchronization foreground service. Combined with Adjust attribution tracking and Firebase analytics, device-level behavioral data collection can begin at boot time, before the app is ever opened.

```
android.permission.RECEIVE_BOOT_COMPLETED
android.permission.FOREGROUND_SERVICE_DATA_SYNC
intent-filter: android.intent.action.BOOT_COMPLETED
```

Impact: A game has no disclosed reason to run a data-sync foreground service at device boot; this persistence pattern more closely resembles a notification scheduler or analytics pipeline requiring guaranteed uptime than a gameplay feature.

Fix: Remove boot-time auto-start unless load-bearing for a specific, disclosed feature, and document the purpose of the data-sync foreground service. No confirmation that this has occurred was ever received.

H2: Firebase API Key Hardcoded and Extractable

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

A Firebase API key and project identifiers are extractable from the production binary, a standard quota/billing denial-of-service and rules-misconfiguration vector.

```
Firebase API key: AIzaSyDsiWgre5TS30Rec6tQRNPtAT0zw5Jxsw
Firebase project: tpc-pokemonchampions
Storage bucket: tpc-pokemonchampions.firebaseio.com
```

Impact: The key is trivially extractable, and depending on the security-rule configuration behind it, could enable unauthorized access or quota-exhaustion denial of service against legitimate users.

Fix: Restrict the Firebase API key by package name and SHA-1 certificate fingerprint. No confirmation that this has occurred was ever received.

H3: AdMob, Adjust, and Facebook Attribution Combined in a Children's Franchise

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. RFI-IRFOS blast-radius escalation: held at HIGH because Pokémon is a globally recognized children's IP franchise, and combined advertising, attribution, and cross-app tracking infrastructure targeting a primary audience of children carries materially higher real-world stakes than the same technical gap on a general-audience app.

AdMob serves targeted advertising (confirmed via `admob_app_id` and live impression logging). Adjust tracks install attribution and in-app purchase events, with a dedicated preinstall-referrer receiver. A Facebook Attribution ID is queried from any installed Facebook app on the device via a content provider call. All three Privacy Sandbox attribution permissions are declared, extending tracking to cross-app behavioral data. Each of these, in a title whose primary audience is children, requires verifiable parental consent under GDPR Art. 8.

```
AdMob: admob_app_id, "AdMob ad impression logged", AdvertisingIdClient
Adjust: com.adjust.sdk.*, AdjustPreinstallReferrerReceiver,
        AdjustPurchaseVerificationResult
Facebook: content://com.facebook.katana.provider.AttributionIdProvider
ACCESS_AD SERVICES_AD_ID + ACCESS_AD SERVICES_ATTRIBUTION
```

Impact: A child playing a globally recognized Pokémon title is subject to targeted advertising, install/purchase attribution, and cross-app Facebook attribution linkage, each requiring verifiable parental consent that pre-consent initialization structurally forecloses. RFI-IRFOS blast-radius escalation: raised from MEDIUM/6.9 to HIGH because Pokémon is a globally recognized children's IP franchise, and combined advertising, attribution, and cross-app tracking infrastructure targeting a primary audience of children carries materially higher real-world stakes than the same technical gap on a general-audience app.

Fix: Gate all three integrations behind a verifiable, parental consent flow compliant with GDPR Art. 8 and COPPA, or remove them from builds targeting a child audience. No confirmation that this has occurred was ever received.

Data Protection, Article by Article

The findings map onto a small, specific set of GDPR provisions and the US COPPA rule, set out below in one place instead of scattered across the findings themselves.

Article/Rule	Finding	Basis
GDPR Art. 7, Art. 8, Art. 25	C1	Pre-consent SDK initialization in a children's franchise, ahead of any heightened consent mechanism.
GDPR Art. 5(1)(b)/(c), Art. 13(1)(c)	H1	Boot-persistent data-sync foreground service with no disclosed game-play purpose.
GDPR Art. 32	H2	Hardcoded, trivially extractable Firebase API key.
GDPR Art. 6(1), Art. 8, Art. 13(1)(c); COPPA	H3	Combined advertising, attribution, and cross-app tracking targeting a children's audience.

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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, factors such as user population size, a vulnerable or protected class of users, or a standing corporate governance exposure the technical vector alone cannot express. RFI-IRFOS reserves the right to weigh that blast radius above the bare CVSS score, and, more rarely, to hold a score below what CVSS alone would suggest when the underlying claim is unconfirmed or disputed with evidence. In this report, C1 and H3 are held at HIGH under an explicit RFI-IRFOS blast-radius escalation given Pokémon's globally recognized children's-franchise status; H1 and H2 correct to MEDIUM to match their own computed bands. Disclosure conducted under ISO/IEC 29147 and the Austrian Forschungsfreiheitsgesetz, Art. 17 StGG. REF REF: POKEMON-2026-R1.