FORBRUKERRÅDET



Snapchat

A review of deceptive design and harmful features

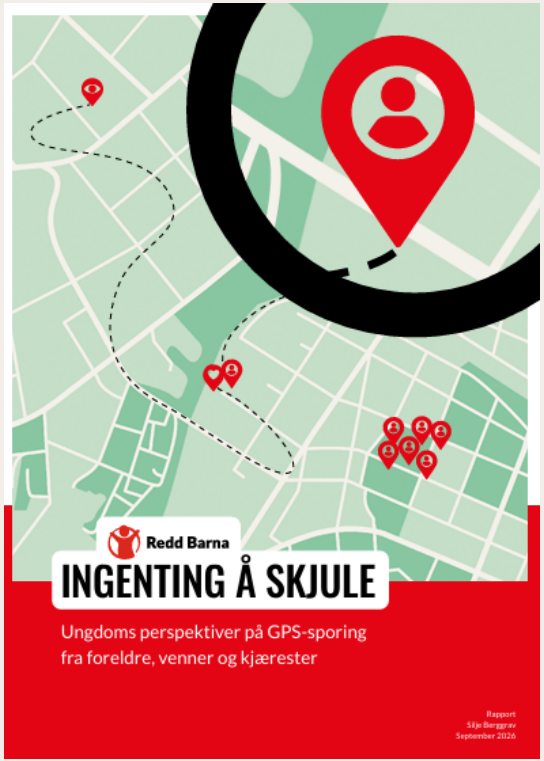
Who we are



Link: https://www.forbrukerradet.no/rapporter/kommersiell-utnytting-av-barn-og-unge/



Link: https://files.nettsteder.regjeringen.no/wpuploads01/sites/451/2022/10/Rapport_PVK_Intervjuer-med-barn_GFC_180222.pdf



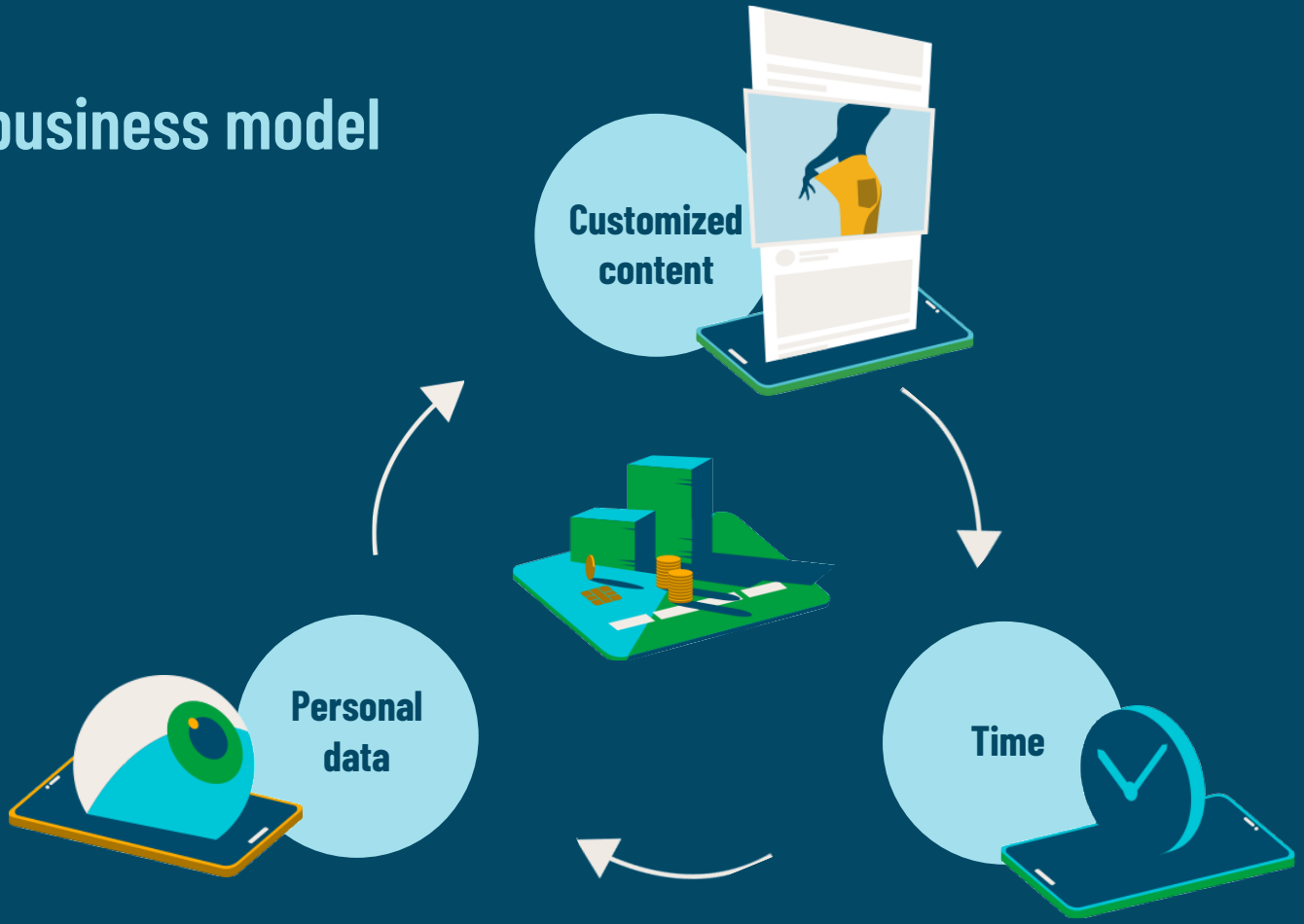
Link: https://resourcecentre.savethechildren.net/pdf/Redd-Barna-Ingenting-a-skjule-Ungdoms-perspektiver-pa-GPS-sporing-fra-foreldre-venner-og-kjaerester.pdf

Snapchat project

A collaboration between Save the Children Norway, the Norwegian Consumer Council, and Christian G. Falch.



The business model





Users are locked in

- Network effect
- «Sunk cost fallacy»
- Technical lock-in
- Deceptive design & addictive mechanisms

Snapchat in Norway



Sources:
- Norwegian Media Authority, 'Fanget i feeden' 2026
- Kapital, 25/01/2025
-Barna betaler prisen for Snapchats suksess i Norge | DN

Snapchat in Norway

Popular among youth:

12 % among 9-10 year olds
47 % among 11-12 year olds
90% among 13-14 year olds

Increased turnover from 15 million NOK in 2017 to more than 560 million in 2024

Soruces:
Norwegian Media Authority, Report: 'Fanget i feeden' 2026: https://www.medietilsynet.no/fakta/rapporter/barn-og-medier/2026/fanget-i-feeden-1/
Kapital, 25/01/2025,
Dagens Næringsliv: https://www.dn.no/innlegg/snapchat/barn/sosiale-medier/barna-betaler-prisen-for-snapchats-suksess-i-norge/2-1-1873213

Barna betaler prisen for Snapchats suksess i Norge

Snapchat har kuppet norske tenåringers sosiale liv på en usunn og utrygg måte. Vi må hjelpe barna slik at de slipper å sende 500 snaps daglig for å føle seg normale.


Christian G. Falch


Finn Lützow-Holm Myrstad


Kaja Hegdal

INNLEGG
Christian G. Falch, designer med researchoppdrag for Personvernkommisjonen og Skjermbrukutvalget. Kaja Hegdal, spesialrådgiver i Redd Barna, og Finn Lützow-Holm Myrstad, fagdirektør i Forbrukerrådet

Hvis du ser at en annen plutselig er blitt mer populær hos din beste-venn, uten at du vet hvorfor, føler du fo på det (Jente 15)

Appen Snapchat har en ekstrem suksess i Norge, og det er barna som betaler prisen. Tjenesten, som ofte går «ti-i» når kritikken hagler mot andre sosiale medier, kupper det sosiale livet til norske barn på en usunn, utrygg og sannsynligvis lovstridig måte.

Ni av ti barn og unge mellom 13 og 18 år i Norge bruker Snapchat, og gir appen bortimot monopol som sosial plattform for denne aldersgruppen. Her foregår hele livet, med venner, skolegrupper og informasjonsflyt. Du kan følge med på influensere og få mye morsomt innhold. Tilsynelatende gøyalt og sosialt, så hva er problemet?

Det er Snapchats oppmerksomhetsbaserte forretningsmodell: Jo mer avhengig brukerne er av appen, desto mer penger tjener Snapchats morselskap Snap Inc. Vi har sett, blant annet i NRK-serien «Avloggia», at det er normalt å sende og motta rundt 500 (!) snaps hver dag. Da er det ikke vanskelig å forstå at en slik ekstrembruk gir ekstremsuksess.

400 – 500 snaps om dagen er vanlig. De fleste ligger omtrent der (Jente 14)

I kjølvannet av innføringen av aldersgrense ved salg av energidrikk, etterlyser Hudd-gründeren Jonas Floberg Åkre tilsvarende politisk vilje når det kommer til ansvarsfulle digitale plattformer.

Snapchat er som en digital høyenergidrikk. Koffein og andre sentralstimulerende stoffer er byttet ut med FOMO, dopaminavhengighet og god gammeldags masing. Resultatet er en høypotent avhengighetskarusell som forårsaker søvnproblemer, konsentrasjonsvansker, ekskludering og psykisk uhelse.

Den digitale høyenergi drikken består av tre hovedingredienser:

➔ Manipulerende design, som får folk til å dele personlig informasjon og å godta et varslingsregime som holder unge brukere på plattformen 24/7. Karttjenesten Snapchat gjør at barn kan følge med på hverandre og foreldre holde øye med hvor barna er.

➔ Avhengighetsskapende mekanismer, «spillifisering», som bruker spilltriks for å skape engasjement, dopamin-utløsende belønningssystemer som streaks, samt Snapchats unike grunnpremiss om at meldingene forsvinner, gir brukerne en frykt for å gå glipp av noe, eller FOMO.

➔ Sosial rangering, kvantifisering og manipulering av vennskap, som booster usikkerhet og systematiserer ekskludering. Denne funksjonen er spesielt rettet mot barn og unge, og rangerer bestevenner basert på hyppigheten i kommunikasjon.

Vennskapene blir visualisert med tall og ikoner på en måte som måler vennskapene opp mot hverandre. Bestevenn-listen er til og med utstyrt med piler som viser hvilken «vei» vennskapene trender.

Snap var de første til å rulle ut en KI-drevet chatrobot rettet mot unge, uten å gjøre nødvendige vurderinger av sikkerhets- og personvern. Informasjon som brukerne gir fra seg i samtaler med sin «KI-venn» kan også brukes til målrettet markedsføring og det menneskelige språket og raske responsen til «vennen» kan lede folk til å dele sensitive opplysninger om seg selv og andre.

Det er barna som betaler prisen for Snapchats gode inntjening. Dette er et samfunnsproblem som må løses politisk.

Regjeringen bør derfor gå foran og forby reklame basert på overvåkning slik at vi fjerner selve drivstoffet som holder pengemaskinen i gang, i tråd med kravet som ble overlevert av en rekke organisasjoner til digitaliseringsministeren før sommeren.

Det er mye som tyder på at Snapchats utspekulerte maskineri kan stride mot ulike lover:

➔ Den voldsomme bruken av avhengighetsskapende mekanismer kan definetes som en aggressiv og urimelig handelspraksis, noe som er forbudt etter markedsføringsloven.

➔ Etter vårt syn bruker selskapet manipulerende design for å få brukerne til å gi fra seg mest mulig personopplysninger, og såkn sett kan de også bryte personopplysningsloven.

➔ Når bruken av Snapchat kan gi stress, søvnmangel og psykiske plager hos unge, bør myndighetene også vurdere om det utløser regelverket for produktkontroll som skal hindre helseskader og sikre trygge tjenester.

Norske tilsyn burde i fellesskap gå til aksjon mot tjenesten og vurdere lovligheten. Ved overtredelser av lovverket må det være en reell risiko for sanksjoner, spesielt i saker som gjelder barn.

Dette krevde en rekke organisasjoner også i vår, da vi kom med fem konkrete forslag til forbedringer i håndhevingen av reglene som skal beskytte barn og unge på nett.

Barns rettigheter må komme først.

Er du ikke på Snap, er du ikke med. Snapchat benytter avhengighetsskapende mekanismer for å holde barn, i sin mest sosialt sårbare livsfase, limt til skjermen, samtidig som de samler enorme mengder data som omsettes til personaliserte annonser og betalt innhold.

Barn er særlig sårbare i vår avhengighet til amerikanske selskaper. Nå må vi starte utfasingen av Snapchat som en sentral infrastruktur i barns liv. Vi må investere i, og satse på, trygg teknologi som er alderstilpasset og i tråd med barns rett til å delta i det digitale samfunnet. Det burde være mulig å lage en bra kommunikasjonsapp for unge uten profitt-styrt avhengighetsmekanikk.

Barns beste må være et grunnleggende hensyn som FNs barnekonvensjon fastslår. Snapchats forretningsmodell bryter med dette, og gjør etter vårt syn barn og unge til forsøkskaniner i et ukontrollert eksperiment. Snapchat er mer opptatt av å styrke sin egen bunnlinje enn å beskytte våre barn.

Nå må vi hjelpe barna slik at de ikke trenger å sende 500 snaps hver dag for å føle seg normale.

Vi har en Streak på over 1500 (dager). Du vil ikke bryte den (Jente 15) ■

Ni av ti unge tenåringer i Norge bruker Snapchat. Jo mer avhengig brukerne er av appen, desto mer penger tjener Snapchat. Foto: Matt Cardy/Getty Images

FOTO: MATT CARDY/GETTY IMAGES

«our priorities are clear: first, grow our community and deepen engagement across Snapchat, with a focus on **highly monetizable geographies**; second, accelerate and diversify revenue growth; and third, build a more profitable and cash-generative core business, while investing with discipline in Specs and our long-term opportunity in intelligent eyewear.» (emhpasis added)

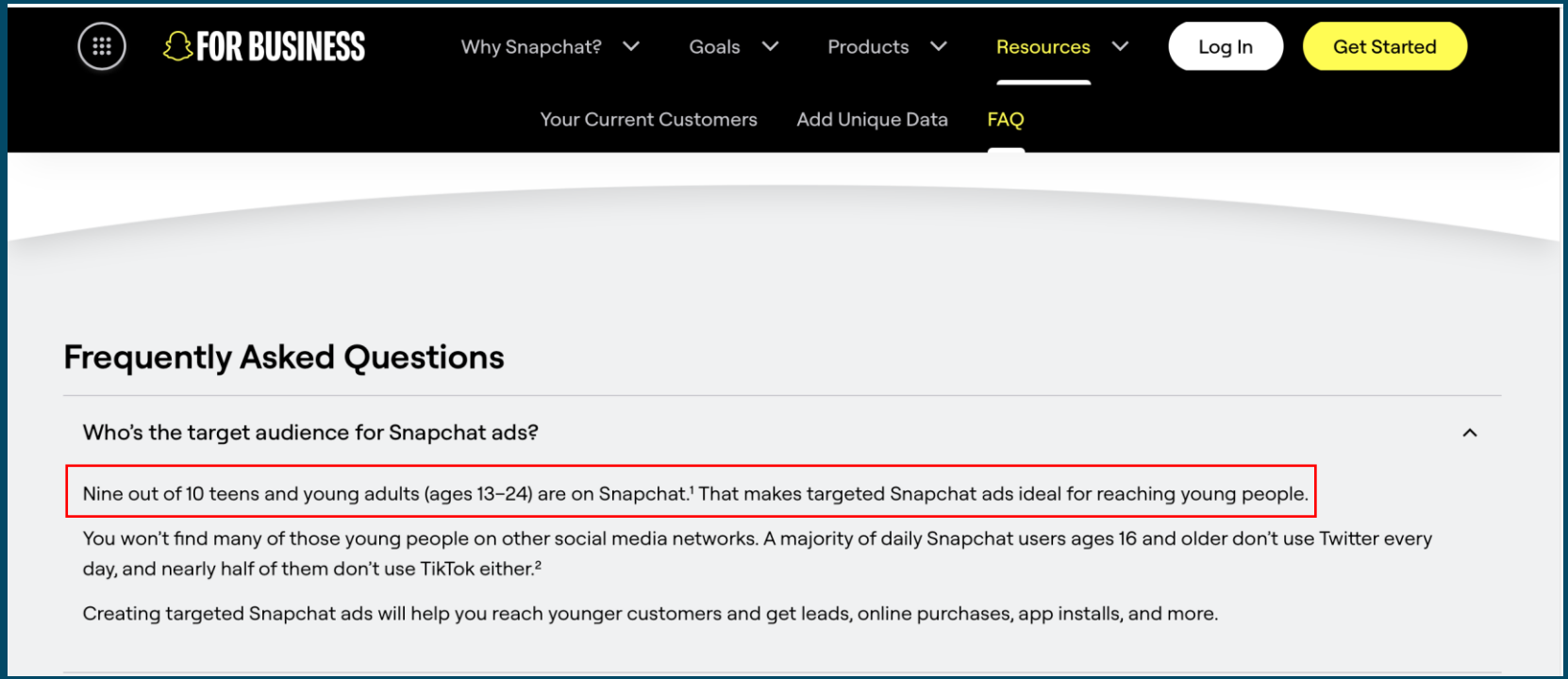
Snap Inc.

Investor Letter Q1 2026

May 6, 2026

Link: https://s25.q4cdn.com/442043304/files/doc_financials/2026/q1/Snap-Inc-Q1-2026-Investor-Letter.pdf

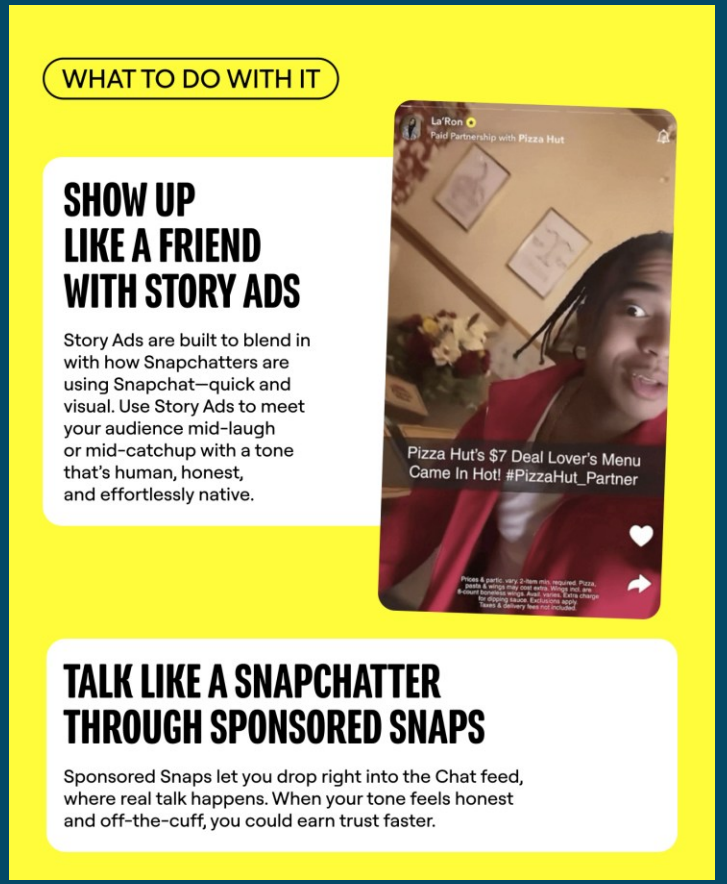
Youth as a key target group



https://forbusiness.snapchat.com/advertising/audience-targeting

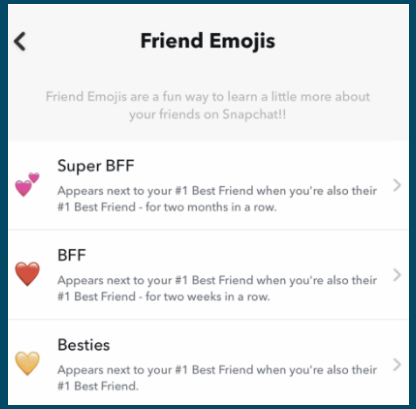
Systematically erase boundries between advertising and other content





https://forbusiness.snapchat.com/advertising/why-snapchat-ads-no

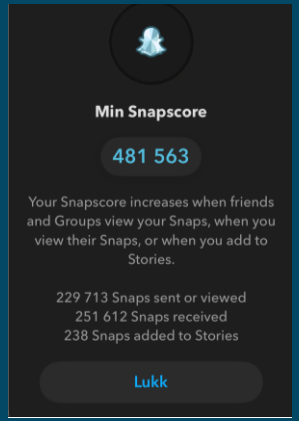
Designed for addiction and exploitation of vulnerabilities



Friend ranking



Streaks



Snapscore



Notifications

Designed for addiction and exploitation of vulnerabilites: friend ranking – reinforces social insecurity and FOMO

Friend Emoji Guide 💛

💕 **Super BFF**
Pink hearts mean you have been each other's #1 Best Friend for two months in a row. This is getting serious!

❤️ **BFF**
A red heart means you have been each other's #1 Best Friend for two weeks in a row. Aww!

💛 **Besties**
A yellow heart means you are each other's #1 Best Friend. You sent the most Snaps to this Snapchatter, and they sent the most Snaps to you, too.

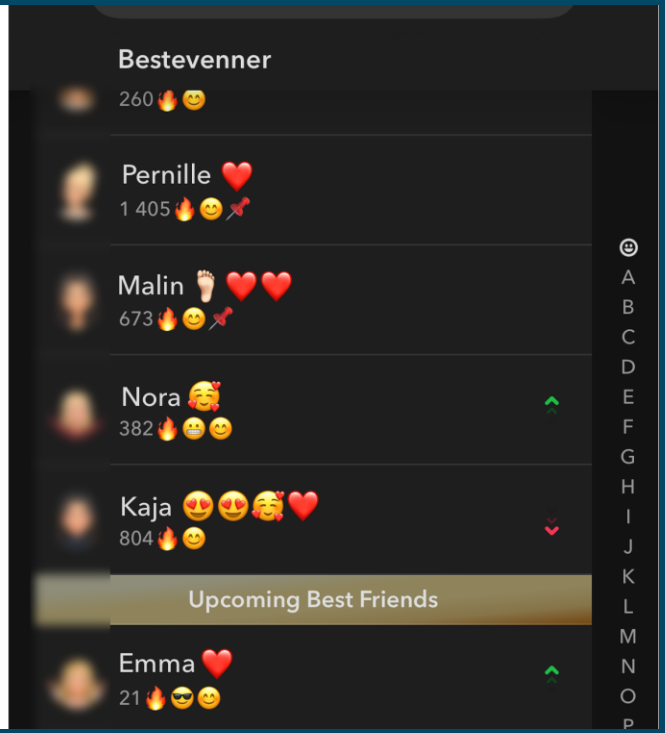
😊 **BFs**
A smiley face emoji means they're one of your Best Friends! You send a lot of Snaps to this Snapchatter, but they're not your #1 Best Friend.

😬 **Mutual Besties**
A grimacing face emoji means your #1 Best Friend is also their #1 Best Friend.

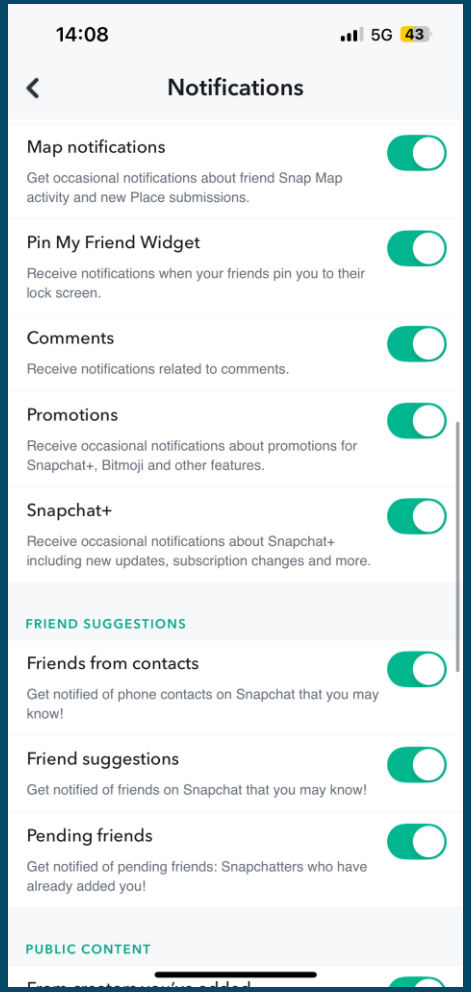
😎 **Mutual BFs**
An emoji with sunglasses on means one of your Best Friends is also one of this Snapchatter's Best Friends!

🔥 **Streak!**
A fire emoji means you're on a Streak! This appears next to the number of days that you and a friend have continually Snapped each other.

⌛ **Streak is ending**
An hourglass emoji means your Streak is going to end soon! Both you and your friend need to send a Snap to each



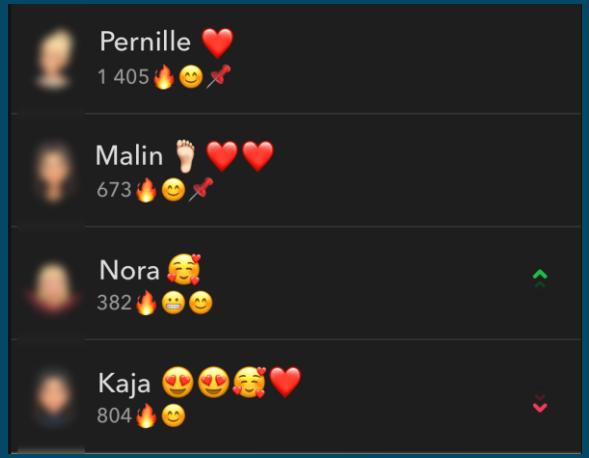
All notifications are enabled by default



Screen shot from test account, youth 14 years old

Streaks – exploting FOMO and sunk cost fallacy

"I send a lot of snaps in the evening because of streaks, and when I wake up, I often have 50 to 60 people who have replied back to me."



Source :Norwegian Media Authority, 'Fanget i feeden', 2026

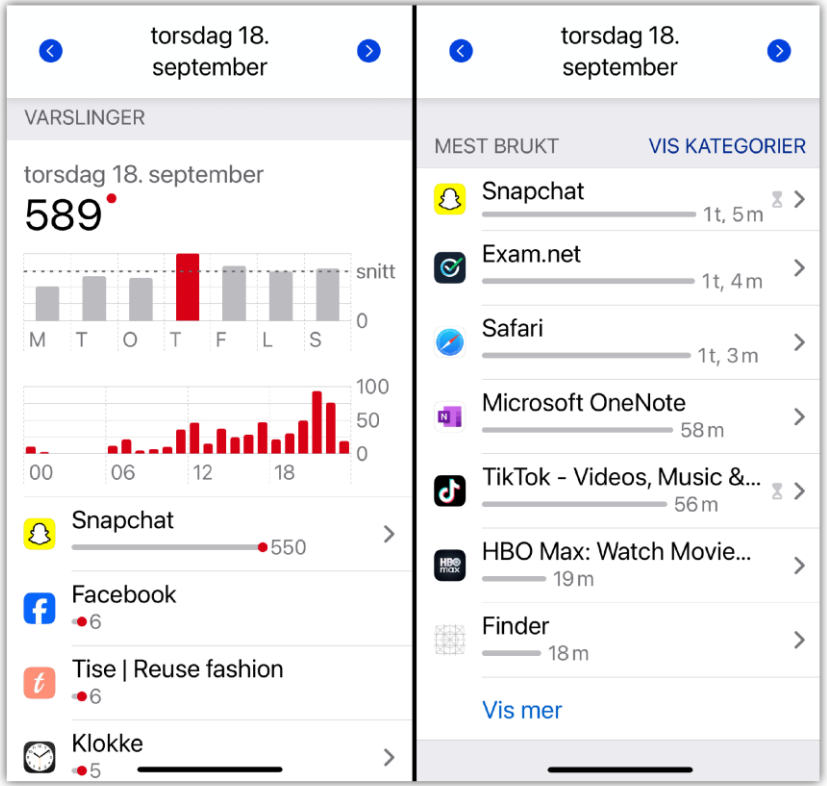
Screenshots - Snapchat Use: Teen girl 15 yrs - One day - One average week

Overview Week:
Average Notifications per day:
around 500

Frequency of Notifications during the day:

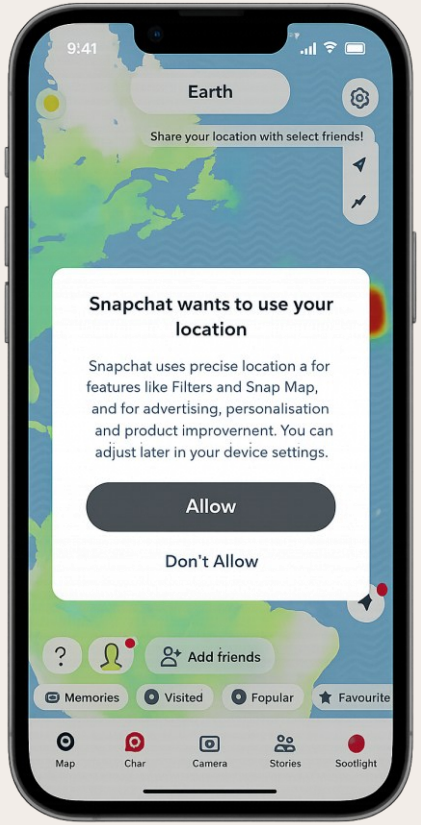
Notifications from Snapchat same day:
550

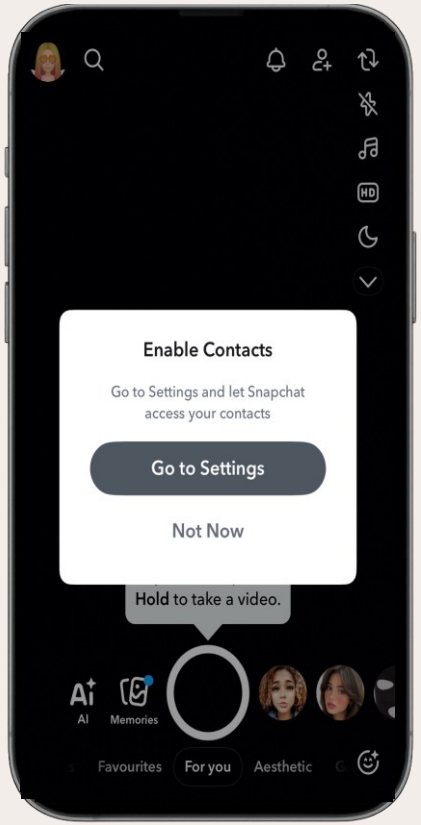
Notifications from other apps same day:
Total 39



Time used on Snapchat same day:
1 hour 5 min

Push users in the opposite direction of security and privacy through nagging and deceptive design





Most annoying functions in Snapmap according to focus group with 16 year olds

- That you always have to consider that people know where you are.
- That you can see when the last time someone answered a call.
- That you can see when the last time someone was on Snap.
- That you can see people's houses (also people you don´t really know).
- It is really easy to accidentally post a picture on Snapmap that is connected to a place, for instance your own home. This will remain public and everybody can see it.



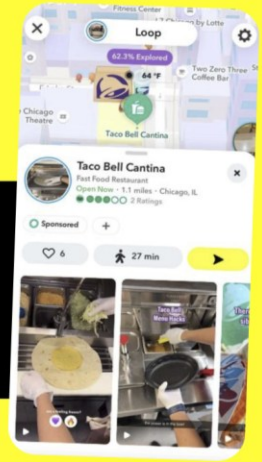
PUT YOUR BRAND IN THEIR PATH WITH PROMOTED PLACES

Snapchatters are always down to try something new. While they love to check the map to see where their friends are, the second most popular reason to go on the Snap Map is to see what's happening in their area![21] Promoted Places gets your brand in front of 400M+ monthly Snap Map users who are already looking for where to go next.[22]

REAL RESULTS *from* REAL BRANDS

TACO BELL

When Taco Bell activated a promoted place on the map, they received more than 1B impressions on the map for the first 2 weeks![23]



Snapmap – exploiting social pressure with commercial intent

"You're pressured into using a tracking app, because if you don't, people assume you've got something to hide."

"You don't have control over everyone who has access to your location"

Focus group, 16 years old

“You’re pressured into using a tracking app, because if you don’t, people assume you’ve got something to hide.”

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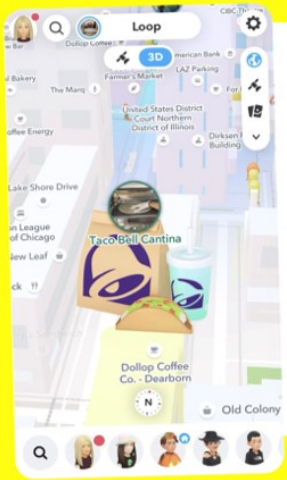
Focus group, 16 years old



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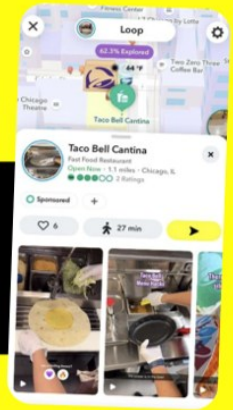
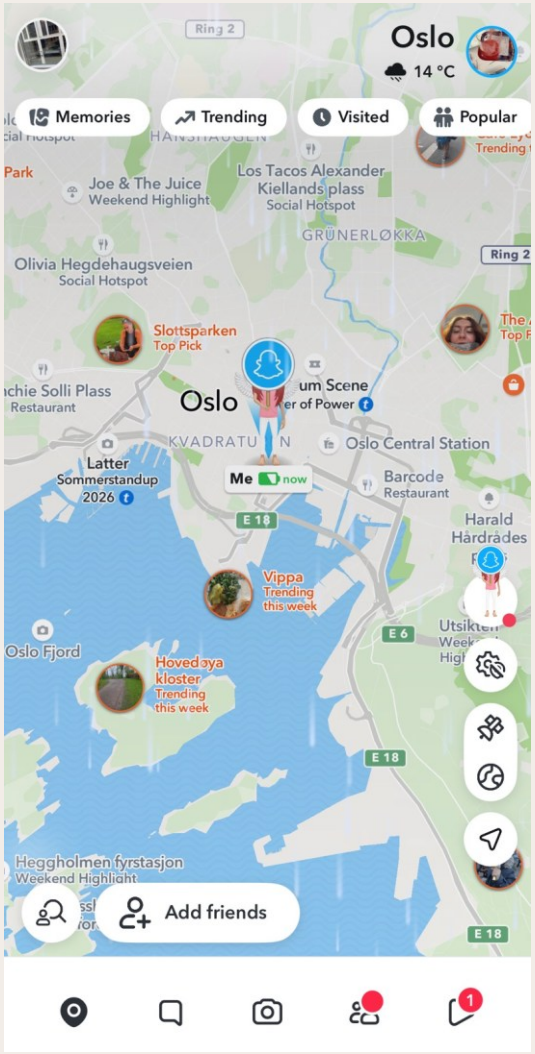




Snapmap can lead to

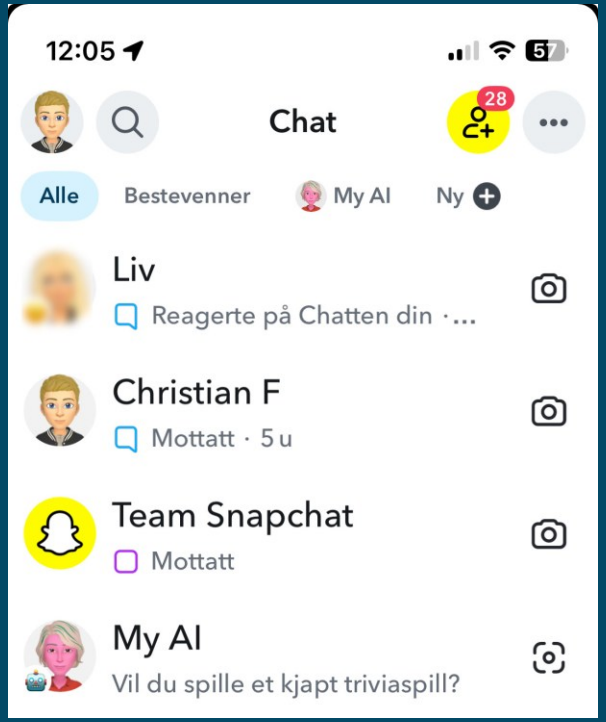
- Threats, bullying & exclusion
- Social pressure
- Stalking
- Allow for data collection for targeted ads & content
- Normalises surveillance and social control among peers and parents (Save the Children Norway report in september)

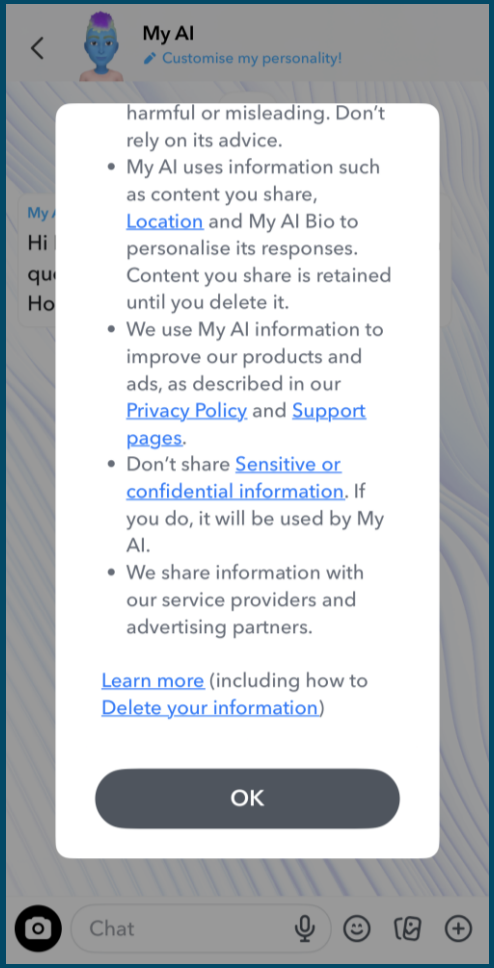
Charging for Memories

Snap requires payment for memories above 5GB

Not easy for users to easily move their memories, effectively locked

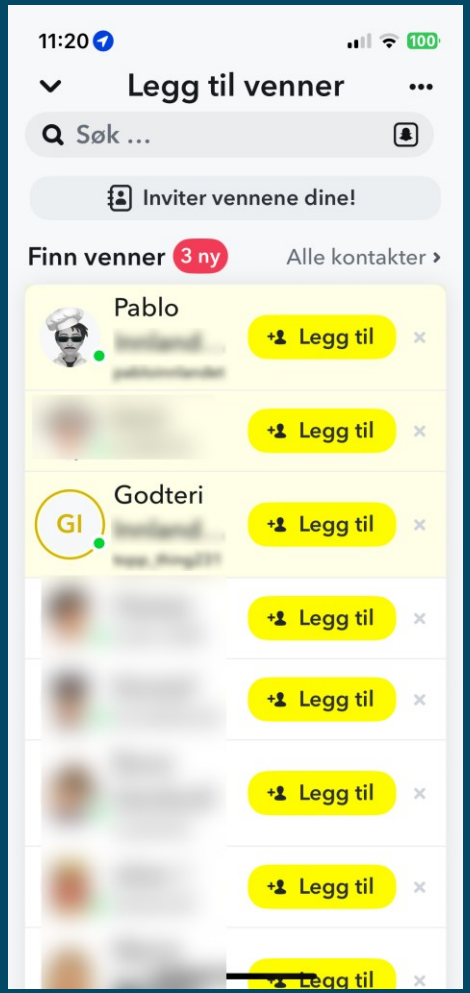
Exploits vulnerabilities with AI

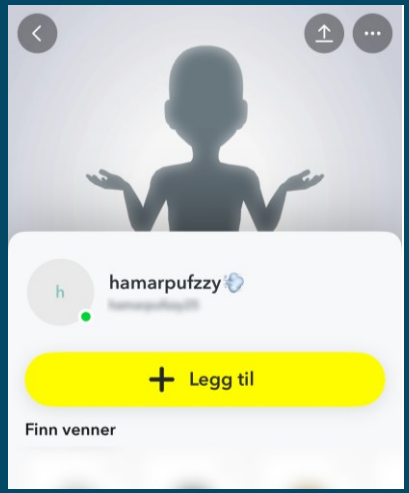




(dangerously) weak safety:

Quick Add function put you in touch with strangers







«Snapchat is the most risky arena, epecially among the youngest»

“On Snapchat, you can add users from your phone’s contact list, search for users, and add users via the Quick Add feature, which suggests friends based on factors such as friends of friends”

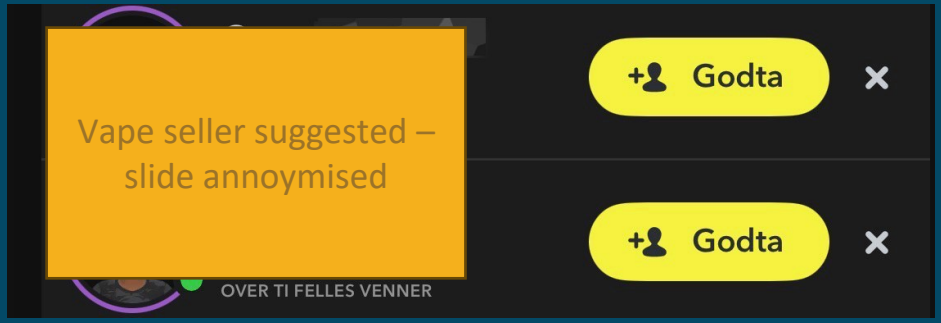
“It is highly likely that Snapchat will continue to be the dominant platform used by online predators to target children.”

National Criminal Investigation Service (NCIS): https://www.politiet.no/globalassets/tall-og-fakta/seksuelle-overgrep-mot-barn/2024-11-27_a_trusselaktorers-kontaktetablering-med-barn-pa-internett.pdf



«It is easy to find acquaintances via ‘Quick add’ and ‘mutual friends’. This means that users who sell things only add people who they can imagine are potential customers»

Vape Seller, Quote from the research project





Screen shots from focus group members

DEVIANT BEHAVIOR
https://doi.org/10.1080/01639625.2025.2550351

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From Gray to Black Markets – A Quasi-Experimental Study on Algorithmically Driven Digital Drift Opportunities on Social Media

Kristoffer Aagesen and Jakob Demant

Department of Sociology, University of Copenhagen, Copenhagen, Denmark

ABSTRACT

This study examines how Snapchat's recommendation algorithms facilitate digi-tal drift from legal to illegal activities. Using microsociological observations, we conducted a quasi-experiment with 40 profiles that engaged with gray markets for nicotine vapes and sex work. Within four days, 65% of these profiles were directed to illicit drug sellers, despite no prior engagement with illegal content. Our audit of Snapchat's affordances highlights their criminogenic potential, showing how platform algorithms can actively steer users toward illicit networks. These findings underscore how social media platforms function not only as offender convergence spaces but also as facilitators of illegal activity.

ARTICLE HISTORY
Received 9 October 2024
Accepted 14 August 2025

Introduction

Recent research and news reports show expanding markets for illicit goods, such as drugs, weapons, and scams, on open social media platforms, such as Facebook, TikTok, and Snapchat (Demant et al. 2019; Dodd 2024; Moyle et al. 2019; Solotaroff 2024). They also host gray-zone markets for nicotine and sex work in neighboring digital spaces. While neither nicotine products nor sex work is illegal under Danish penal code, these social media markets are not a part of the legitimate economy and are somewhat stigmatized in the public perception (cf. Becker 1963; Sanders et al. 2017).

Social media markets range in form from moderator-controlled subreddits and Facebook groups to less structured TikTok and Snapchat markets functioning through implicit social control and reputation management (Bakken, Oksanen, and Demant 2023; Demant and Aagesen 2023; Demant et al. 2019, 2019; Demant, Anderdal Bakken, and Hall 2020; Martin 2014; Moeller 2022; Moeller, Munksgaard, and Demant 2021; Tzanetakis et al. 2016; van der Sanden et al. 2022). The existence of gray and black markets on social media platforms is well described in the literature (Bakken and Demant 2019; Moyle et al. 2019; Søgaard et al. 2019). Through qualitative interviews, previous research has illustrated how features such as asynchronous textual contact and affordances of anonymity on social media influence actors' behavior and risk perception (Bakken and Demant 2019; Childs and Bernot 2024; Demant and Anker Nexø 2024; van der Sanden, Wilkins, and Rychert 2024). Social media platforms employ an array of algorithms to sort, present and recommend content and social interaction. When illicit markets operate on social media, they are subjected to the whims of the algorithm as well, facilitating or hindering spread of content and access. While algorithms shape user's experiences on social media, their effects have not been researched in relation to gray and black markets. This is, possibly due to the workings of the algorithms not being directly observable (Christin 2020; Kitchin 2017). It is possible, however, to observe the algorithm's output as well as control which data points we surrender as input. The focus of the

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This article has been corrected with minor changes. These changes do not impact the academic content of the article.

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«This study examines how Snapchat's recommendation algorithms facilitate digi-tal drift from legal to illegal activities. Using microsociological observations, weconducted a quasi-experiment with 40 profiles that engaged with gray marketsfor nicotine vapes and sex work. Within four days, 65% of these profiles weredirected to illicit drug sellers, despite no prior engagement with illegal content.»

Aagesen, K., & Demant, J. (2025). From Gray to Black Markets – A Quasi-Experimental Study on Algorithmically Driven Digital Drift Opportunities on Social Media. *Deviant Behavior*, 1–14. https://doi.org/10.1080/01639625.2025.2550351

«The whole concept of Snapchat is that all content of photos and messages that are sent is deleted.»

Quote from the research project

Ephemeral appearance:

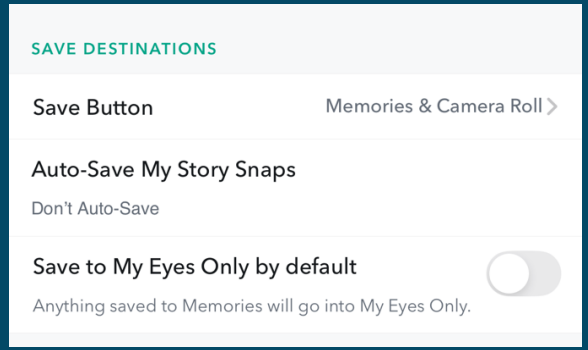
- Create a false sense of privacy
- Makes enforcement difficult
- Enhances FOMO, sense of urgency and addictive user patterns
- Focus group: this nudges more risky behaviour

«What!!! Can Snapchat use my Memories to everything?!»

Focus group, girl 16

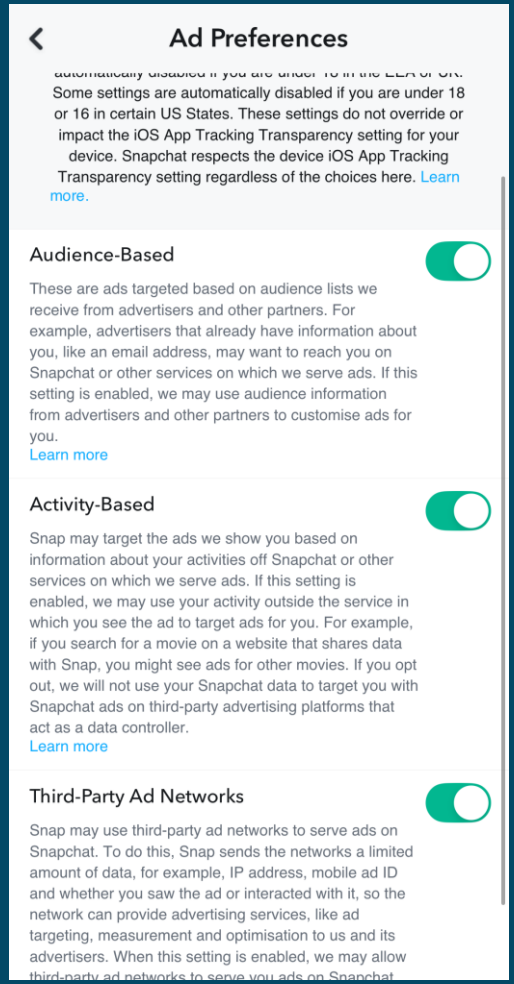
Source: https://help.snapchat.com/hc/en-gb/articles/22535044112532-Learn-About-How-Snap-Uses-Data

Memories	• Memories, not including My Eyes Only	Provided by you	Operate, Deliver, and Maintain Services Personalization - Content Personalization & Measurement - Ads Development Analytics Research Security Marketing & Promotion Non-Marketing/Promotion Support Enforcement



Uses deceptive design to collect personal data

On by default



Key findings

- Default settings, nudging, addictive mechanisms, deceptive design and exploitation of vulnerabilities in Snapchat push youth in the opposite direction of digital and physical privacy and security
- Snapchat's design lead to:
  - Excessive use
  - Undermines users automony & well-being
  - Social control, social comparison and increased risk of unwanted contact with strangers
  - Exposure to harmful ads, dangerous content and illegal or age-restricted products
  - Increased commercial surveillance
  - Unfair commercial exposure

Snapchat investigation by the EC

The investigation focus on five areas

1. Age assurance
2. Grooming and recruitment of minors for criminal activities
3. **Inadequate default account settings**
4. Dissemination of information on the sale of prohibited products
5. Reporting of illegal content

Inadequate default account settings

The Commission suspects that Snapchat's **default settings do not provide sufficient privacy, safety, and security protections** for minors. For example, children and teens are automatically recommended to other users through the 'Find Friends' system, and push notifications remain enabled by default. Additionally, when creating an account, users are **not offered adequate guidance** on privacy and safety features, nor given an explanation of how to adjust account settings.

[*emphasis added*]

Background for case

“The Commission used the 2025 DSA Guidelines on the protection of minors as a benchmark to evaluate platforms' compliance with the obligation to ensure a high level of privacy, safety and security for minors.”

“The Commission's opening of an investigation is based on the analysis of Snapchat's risk assessment reports from 2023, 2024 and 2025, as well as on the replies to the request for information sent on 10 October 2025. This request sought details on Snapchat's age verification system, as well as on the measures to prevent users from accessing illegal products, including drugs, and minors from accessing age-restricted products, such as vapes.”

Relevant: DSA articles 16, 25, 28, 34, 35

Article 16, **Notice and action mechanisms**

Article 25, **Online interface design** and organisation (only notice and actions mechanisms)

Article 28, **Online protection of minors**

Article 34, **Risk assessment**

Article 35, Mitigation of risks

Guidelines on the protection of minors

These include, among others **(emphasis added):**

- **Setting minors' accounts to private by default** so their personal information, data, and social media content is hidden from those they aren't connected with to reduce the risk of unsolicited contact by strangers.
- **Disabling by default features that contribute to excessive use.** like communication "streaks," ephemeral content, "read receipts," autoplay, or push notifications, as well as removing persuasive design features aimed predominantly at engagement and putting safeguards around AI chatbots integrated into online platforms.
- **Ensuring that children's lack of commercial literacy is not exploited** and that they are not exposed to commercial practices that may be manipulative, lead to unwanted spending or addictive behaviours, including certain virtual currencies or loot-boxes.

Link: https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-protection-minors