

# Descomplica

**Recommended by:**  
Brazil: São Paulo

## Developer's Description:

[translation] “Getting Started Classes for ENEM 2021: Bespoke study plan for those who haven't started studying yet. Get your approval!”<sup>1</sup>

## Information

**Type:** App, Website

**Apparently designed for children?** Yes

**Developer:** Descomplica Cursos Livres Via Web S.A

**Analyzed by Human Rights Watch**

**Version:** v. 96.0

**Release date:** January 25, 2021

**Estimated users<sup>2</sup>:** 1,000,000+

**URL at the time of analysis:**

[Link 1](#), [Link 2](#)

**Was there a publicly available privacy policy at the time of analysis?** Yes. [Link](#)

## Website Analysis

This website collected and sent the following data about users to third-party companies<sup>3</sup>:

### To track the user | 30 ad trackers sent data about users to third-party companies

6 ad trackers sent users' data to **Google** through the domains google-analytics.com, double-click.net, googletagmanager.com, googleadservices, googleoptimize.com, youtube.com

2 ad trackers sent users' data to **Facebook** through the domain facebook.com, facebook.net

3 ad trackers sent users' data to **Microsoft** through the domains adsymptotic.com, licdn.com, bing.com

2 ad trackers sent users' data to **Criteo** through the domain criteo.com, criteo.net

2 ad trackers sent users' data to **Hubspot** through the domain hubspot.com, hs-analytics.net

2 ad trackers sent users' data to **Mixpanel** through the domain mixpanel.com, mxpnl.com

2 ad trackers sent users' data to **Twitter** through the domain twitter.com, t.co

1 ad tracker sent users' data to **WarnerMedia** through the domain adnxs.com

1 ad tracker sent users' data to **Hotjar** through the domain hotjar.com

1 ad tracker sent users' data to **OneSignal** through the domain onesignal.com

1 ad tracker sent users' data to **Pinterest** through the domain pinterest.com

1 ad tracker sent users' data to **Wingify** through the domain visualwebsiteoptimizer.com

1 ad tracker sent users' data to **TikTok** through the domain tiktok.com

1 ad tracker sent users' data to **Awin** through the domain dwin1.com

1 ad tracker sent users' data to **getblue** through the domain getblue.io

1 ad tracker sent users' data to **IP-API** through the domain ip-api.com

1 ad tracker sent users' data to **Reytp** through the domain omappapi.com

1 ad tracker sent users' data to **rtb123.com** through the domain rtb123.com

### To watch and record the user

This site used session recording to record what users did on this website, including clicks and mouse movements around the page, and sent the recording to **Hotjar** through the domains script.hotjar.com, static.hotjar.com

### To capture what users type, before they hit send

Key logging was not detected on this site.

### To find out who the user is

Canvas fingerprinting was not detected on this site.

<sup>1</sup> Translation provided by Google Translate. Brazil, São Paulo State Department of Education, “Centro de Mídias da Educação de São Paulo,” <https://web.archive.org/web/20210303205616/https://estudeemcasa.educacao.mg.gov.br/> (accessed March 3, 2021)

<sup>2</sup> As verified by Google Play Store installs globally, as of October 2021.

<sup>3</sup> A technical analysis does not definitively determine the intent of any particular tracking technology, or how the collected data is used. For example, an EdTech product can include third-party tracking code that collects information that may be useful to monitor the product's performance and stability. The same data collected by the same third-party code may also be used for advertising or other marketing purposes.

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**To track the user across the internet | 19 third-party cookies were found on this site that tracked users across the internet**

10 cookies sent users' data to **Microsoft** through the domains linkedin.com, ads.linkedin.com, bing.com, bat.bing.com

3 cookies sent users' data to **Google** through the domains doubleclick.net, youtube.com

2 cookies sent users' data to **WarnerMedia** through the domain adnxs.com

1 cookie sent users' data to **Twitter** through the domain twitter.com

1 cookie sent users' data to **getblue** through the domain getblue.io

1 cookie sent users' data to **Meu Dim Dim** through the domain track.meudimdim.com.br

1 cookie sent users' data to **Enviou** through the domain life.enviou.com.br

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**This website collected and sent users' data through these tracking technologies:**

**Facebook Pixel<sup>4</sup>** | was detected on this site sending data about users to Facebook. This allows this website to later target its users with ads on Facebook and Instagram. Facebook can also retain and use this data for its own advertising purposes.

**Google Analytics' 'remarketing audiences'** | was detected on this site sending data about users to Google. This allows this website to target its users with ads across the internet.

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## App Analysis (static)

This app included code that has the capability to collect the following personal data<sup>5</sup>:

**To find out who the user is:**

Android Advertising ID

**To track where the user is:**

This app does not collect users' location data.

**To track who the user knows, and with whom they talk:**

This app does not collect contacts' information, phone number, call or SMS logs.

**To track what the user does:**

Camera

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This app requested access to the following sensitive data on the user's device<sup>6</sup>:

**"Dangerous" (as defined by Android) Permissions requested:**

READ\_EXTERNAL\_STORAGE  
WRITE\_EXTERNAL\_STORAGE  
CAMERA

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This app embedded the following third-party code, which the app may permit to collect and send users' data to that third-party company<sup>7</sup>:

Google Crashlytics  
Google Firebase Analytics  
Google AdMob  
Facebook Analytics  
Facebook Login  
Facebook Places  
Facebook Share  
MixPanel

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<sup>5</sup> As noted in the [report](#), this type of analysis observes whether the code is capable of collecting specific types of personal data, but not whether it is being collected, or how it is being used. Put another way, an app may not use all of the programmed functionalities of which it is capable.

<sup>6</sup> Android labels permissions as "dangerous" when granting that permission to an app can "potentially affect the user's privacy or the device's normal operation," because the app "wants data or resources that involve the user's private information, or could potentially affect the user's stored data or the operation of other apps." Human Rights Watch also notes that the use of "dangerous" permissions to access sensitive data is not inherently unsafe, but poses risks to users' privacy if there are no safeguards that protect against the abuse of such access by the host app or its embedded third-party SDKs. See: Android Developers, "Permissions overview," May 7, 2020, <https://web.archive.org/web/20200712090715/https://developer.android.com/guide/topics/permissions/overview> (accessed April 24, 2022).

<sup>7</sup> Human Rights Watch does not conclusively determine whether, or how, any given SDK is used by a specific app, and notes that some SDKs may provide multiple capabilities in addition to advertising.