

Beyond Self-Declaration - On Age Assurance in Nudify Platforms

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ABSTRACT

Given the growing availability of AI-powered nudify platforms, which enable users to generate synthetic nude images from photographs of clothed individuals, concerns have emerged regarding their accessibility to children and adolescents and the harms they may facilitate, including the creation of non-consensual intimate images. As the presence of young people in digital environments continues to expand, it is essential to understand the age assurance mechanisms implemented by these platforms to prevent the exposure of this group to such content and services. In this context, this study aims to analyze the age assurance mechanisms present on nudify platforms. The research was divided into two phases. In the first phase, we examined the age assurance mechanisms implemented by the platforms, the content available on them, the minimum age required by each website, and the ease of account creation. In the second phase, we interpreted our findings in light of the requirements established by Brazilian Decree No. 12.880/2026, which regulates Law No. 15.211/2025 (“ECA Digital”) to assess whether the observed practices comply with Brazilian legislation. The results indicate that the platforms do not implement age assurance mechanisms proportional to the risks they pose and, in some cases, expose young users to inappropriate content even before authentication.

KEYWORDS

age-assurance, nudify, artificial intelligence, child protection

1 INTRODUCTION

The internet plays an important role in the daily lives of people around the world, being used for social interactions, entertainment, learning, and other purposes. Currently, around 6 billion people use the internet, which means that nearly three-quarters of the world’s population is online [16, 17].

Within a wide range of digital services, including social media, online games, and e-commerce platforms, there has been a growing adoption of Generative Artificial Intelligence (GenAI). GenAI can be described as “a category of AI systems that create new content (text, images, audio, or video)

based on inputs, leveraging ML, particularly generative adversarial networks (GANs), variational autoencoders (VAEs), large language models (LLMs), and diffusion models” [25]. This technology has driven innovation across multiple sectors and is becoming increasingly integrated into everyday life. However, despite its benefits, researchers have highlighted concerns related to misinformation and the generation of harmful content, including deepfakes (highly realistic synthetic images and videos that can depict virtually any individual without their consent) [18].

These issues have led several countries to discuss regulations governing the use of Artificial Intelligence (AI). One notable example is the European Union (EU), which, after discussions that began in 2021, adopted the AI Act in 2024. One of its objectives is to promote the uptake of human-centric and trustworthy artificial intelligence (AI), while ensuring a high level of protection of health [and] safety [27].

The importance of these discussions becomes even more evident given the widespread presence of children and adolescents in digital environments. Data from the TIC Kids Online Brasil Report indicate that 92% of Brazilians aged 9 to 17 are internet users. The same report also found that 26% of respondents first accessed the internet at the age of six [8]. These findings highlight the need to consider the rights and vulnerabilities of children and adolescents in the design and development of digital applications and platforms.

In response to the growing role of digital technologies in children’s lives, the United Nations (UN) released General Comment No. 25 (2021) on children’s rights in relation to the digital environment. The document outlines four general principles: non-discrimination, the best interests of the child, the right to life, survival and development, and respect for the views of the child. These principles provide guidance to implement the rights defined in the Convention on the Rights of the Child in digital contexts [22].

Based on those guidelines and recent incidents involving the use of GenAI platforms by children and adolescents, concerns about the safety of this population have intensified. Previous Brazilian studies highlighted the risks associated with children’s exposure to inappropriate content online [6], while recent research on AI systems has drawn attention to the vulnerabilities of children in data-driven environments, including the misuse of children’s images and the lack of accountability mechanisms in AI development [5].

These concerns reinforce the need to investigate whether platforms that provide access to sensitive or potentially harmful content implement effective mechanisms to prevent access

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by young users. Nudify platforms allow users to generate synthetic nude images from photographs of clothed individuals and can often be accessed by people under the age of 18. Recent national research has highlighted the widespread availability of AI-powered nudification services and the risks they pose to women, children, and adolescents [10]. Such accessibility raises concerns about harmful practices, including the creation of non-consensual intimate images. One notable case involved a teenager who was investigated for using AI technologies to create fake intimate images of peers [3].

In Brazil, Law No. 15.211, in its Article 6, states that providers of products and services must prevent and mitigate risks to ensure that children and adolescents are not exposed to, among other harms, pornographic content [2]. Given both the legal obligation to protect children and adolescents from sexual content and recent evidence showing how easily nudify platforms can be found online [10], it is important to understand how these services operate and whether they implement adequate safeguards to prevent children's rights from being violated.

To this end, this article evaluates the age assurance mechanisms adopted by different nudify platforms. The analysis partially replicates previous studies on access control and age verification in digital applications [23]. Furthermore, the findings are discussed in light of the principles established in the Brazilian regulatory framework for age assurance, examining how current practices may undermine requirements related to proportionality, accuracy, reliability, data minimization, purpose limitation, and user privacy [4]. A similar study has also been conducted in Brazil [26]. However, like the study conducted by Pasquale and colleagues [23], this research focused specifically on social media and communication platforms such as WhatsApp, Instagram, YouTube, and TikTok. In contrast, the present work directs its analysis exclusively toward nudify platforms, a type of platform that, to date, has not been addressed in previous studies.

The remainder of this paper is organized into the following sections: Section 2 presents the theoretical framework of the research, addressing the main concepts of the study, namely nudify platforms, age assurance, and ECA Digital. Section 3 describes the methodology used in the research, including its stages and applied techniques. Section 4 presents the results, providing an evaluation of the analyzed platforms. Section 5 discusses the findings based on the ECA Digital, seeking to understand which rights were threatened. Finally, Section 6 presents the final considerations of the research.

2 CONCEPTUAL BACKGROUND

2.1 Nudify Platforms

The popularization of GenAI has contributed to the emergence of a critical category of software: nudify platforms. These services enable users to upload photographs of clothed individuals and generate synthetic nude images (also termed *deepnudes*) based on those photographs [19]. Their widespread availability raises particular concerns for children and

adolescents, as they automate the creation of intimate content and can amplify existing forms of image-based abuse. Ringrose and Regehr report that requests for nude images have become a common practice among adolescents, placing particular pressure on girls to share intimate content [24].

The vulnerability of this population becomes even more evident when such platforms are capable of generating deepnudes from photographs of children and adolescents. In such cases, these technologies not only enable the creation of explicit content involving children and teenagers, but may also facilitate image-based abuse among peers, as intimate images can be generated and shared without the knowledge or consent of the individuals depicted.

Despite the risks that these platforms pose to individuals in general, as consent of the depicted person is not required, nudify websites can be easily found through conventional search engines such as Google due to their continued indexing [10]. Their widespread availability enables access by both adults and young users, raising concerns about children's exposure to sexualized content and reinforcing the need for effective age assurance mechanisms.

Evidence suggests that the risks associated with nudification technologies are no longer merely hypothetical. Research conducted in British schools revealed that 13% of adolescents have already been exposed to nude deepfakes [20]. At the same time, the Internet Watch Foundation has reported a growing volume of AI-generated Child Sexual Abuse Material (CSAM) online [13]. According to the organization, 19% of confirmed reports involving nude images or sexual content depicting children and young people consisted of digitally altered or manipulated images, including content generated through nudification applications [12].

These concerns gained further visibility through cases involving the AI system Grok, embedded in X ecosystem. The service was used to generate non-consensual nude images and became the subject of legal actions related to the generation of sexualized synthetic content [14]. In Brazil, Grok became the subject of a regulatory investigation by the National Data Protection Agency (ANPD) after tests indicated that the system could generate non-consensual sexualized depictions of identifiable individuals, including children, raising concerns about the adequacy of the safeguards adopted by X as an AI provider [15]. Together, these developments highlight the growing need for effective age-assurance and access-control mechanisms capable of preventing children and teenagers from accessing platforms that can facilitate the production and dissemination of harmful sexualized content.

2.2 Age-Assurance and ECA Digital

Given the various risks that online platforms and services may pose to children and adolescents, age assurance mechanisms have become increasingly important. Existing approaches include self-declaration, in which users simply report their age, a method commonly adopted during account creation processes. More robust mechanisms include identity verification, which may require users to submit official documents

or photographs to confirm their age. Other approaches rely on age estimation techniques, such as profiling methods that infer a user's age through behavioral signals and algorithmic analysis. For example, platforms such as TikTok may use user activity, language patterns, and account characteristics to identify potential children and adolescents. Additional mechanisms include user reporting systems, through which users can flag accounts suspected of belonging to underage individuals, and third-party assurance services, where age is verified by an independent trusted organization [21].

Within the Brazilian context, the importance of this technology was reinforced by Law No. 15.211/2025 (Digital Child and Adolescent Statute – ECA Digital) [1] and by Chapter VII of Decree No. 12.880/2026 [4], which regulates the ECA Digital. This law applies to any technology product or service that is directed at children or that may be accessed by them within Brazil, establishing guidelines for the protection of children and adolescents in digital environments. Decree No. 12.880/2026 establishes that age assurance mechanisms must observe criteria such as proportionality to the level of risk posed by the service, privacy protection, robustness, transparency, security of the collected information, and measures to prevent these mechanisms from being easily circumvented.

Therefore, when implementing age assurance mechanisms, platforms must provide a service that balances two fundamental objectives: preserving the privacy of children and adolescents' personal data and ensuring the protection of this group from exposure to age-inappropriate content. Although many platforms adopt age assurance mechanisms to comply with legal requirements, it is necessary to investigate not only whether such mechanisms are present but also whether they are effective, proportionate, and reliable. When poorly implemented, the corresponding features may fail to prevent young users from accessing age-restricted services while creating additional risks related to data privacy and protection.

3 RESEARCH METHOD

This research investigates the accessibility of nudify platforms to children and adolescents through the lens of age assurance mechanisms. To this end, the study was structured around two main stages: (i) the identification and selection of nudify platforms according to predefined criteria; and (ii) the evaluation of the age assurance mechanisms implemented by those platforms.

3.1 Phase 1 - Selection of Nudify Platforms

The initial data collection was conducted in April 2026 through Google using the search queries “nudify sites” and “best nudify sites,” resulting in links that led to lists of potentially relevant websites for the study. Given the large number of platforms identified, inclusion and exclusion criteria were established to support the selection process. These criteria considered platform accessibility, service type, and language availability, as summarized in Table 1.

During the search process, based on the titles of the websites that appeared to be aligned with the topic, twenty-one

Table 1: Nudify Platforms - Inclusion and Exclusion Criteria.

Criterion	Inclusion	Exclusion
Access	Platforms directly accessible through a web browser	Platforms requiring the download or installation of additional software
Service type	Platforms offering <i>nudify</i> functionalities	Platforms unrelated to <i>nudify</i> services or not aligned with the study objectives
Language	Platforms available in Portuguese or providing a Portuguese-language interface	Platforms without Portuguese-language support

platforms were identified. Each of them was evaluated according to the inclusion and exclusion criteria presented in Table 1, and as a result, seven platforms were selected for inclusion in the analysis of this study: *Unclothy*, *Nudify Online*, *Deepnudesart*, *Clothoff*, *AINudez*, *Undress.GURU*, and *Undressbaby*. These platforms were chosen because they met all inclusion criteria, were accessible through standard web browsers, offered AI-based nudification functionalities, and provided interfaces or content available to Brazilian users. Together, they represent a diverse set of publicly accessible nudify services currently available online, allowing our study of age-assurance mechanisms across different implementation approaches.

3.2 Phase 2 - Data Extraction and Analysis of Nudify Platforms

Given previous evidence on the ease with which nudify platforms can be accessed online [10], this study adapts the methodology employed by prior research on age assurance in digital platforms [7, 23]. Questions from the original instruments that were relevant to the present study were retained, while those specifically related to the context of social media platforms were excluded. Additionally, the item that considered 13 years as the minimum age threshold was adapted to 18 years, reflecting the age restrictions associated with sexually explicit content and services such as nudify platforms (cf. Table 2). Accordingly, this study adopts a research question inspired by the one proposed by Pasquale and colleagues [23]:

Research Question

How do nudify platforms implement age assurance mechanisms?

To answer this research question, a protocol adapted from previous studies on age verification was applied to the selected platforms. As shown in Table 2, the protocol consists of seven questions used to evaluate the age-assurance mechanisms implemented by each platform.

Table 2: Questions Used for Platform Evaluation

#	Question
1	What is the minimum age specified by the platform?
2	Does the platform request the user's age before access is granted?
3	What occurs when an age below the stated minimum requirement is entered?
4	If a user declares an age of 18 years or older, is any additional age assurance required?
5	Does the platform request the user's age during account creation?
6	Can the age assurance process be easily bypassed?
7	Is the minimum age requirement clearly communicated to users?

To ensure consistency in the analysis, the same data collection procedure was applied across all platforms. Initially, the existence of age restriction notices was verified before users could access the platform's homepage, observing the behavior of the platforms when users declared an age below or consistent with the established minimum age requirement. Subsequently, the homepages were analyzed in search of information regarding the minimum age required to use the platform, as well as the content displayed on these pages and any links to pages that might contain information about age restrictions, such as Privacy Policy or Terms of Use pages. In particular, we investigated the region in which each platform is based. However, the countries of the platforms were largely opaque, as most did not publicly disclose sufficient information to reliably determine their location.

We also examined the platform registration processes, e.g. whether additional age-assurance mechanisms were used and how easily an account could be created. This analysis enabled us to verify the presence of minimum age requirements and the robustness of age verification mechanisms employed by the platforms (i.e., whether a method was easy to bypass and allowed a child to use the platform, such as self-declaration).

All evidence collected by one researcher during the analysis was documented through screenshots and notes regarding the observed behaviors. Subsequently, this information was organized into a spreadsheet that provides answers to the questions presented in Table 2 and later discussed with another researcher.

4 RESULTS

This section presents the results of our evaluation of the age assurance mechanisms adopted by each nudify platform.

4.1 Unclothy

According to its privacy policy and terms of service, users must be at least 18 years old to access the platform. Upon entering *Unclothy*, users are asked to self-declare whether they meet this age requirement. To create an account, users must also accept the platform's terms and policies, as illustrated in Figure 1.

**Figure 1: Unclothy - Request for Acceptance of Policies.**

However, self-declaration alone does not constitute a robust age assurance mechanism and is generally considered insufficient for services that may expose children and adolescents to high-risk content. In the Brazilian context, this approach is no longer allowed according to the ECA Digital, which requires age-assurance measures that are proportionate to the risks posed by a service. In the case of Unclothy, an additional age check occurs only when users choose to log in through Google, which may prevent account creation for users identified as being under the age of 18, as illustrated in Figure 2. However, it is important to note that this approach also has limitations, as there are known loopholes in the Google account creation process. Nevertheless, this age-assurance mechanism can be bypassed by creating an account directly on the platform using an email address.

**Figure 2: Unclothy - Access Restriction for Users Below the Required Age.**

In this scenario, even users whose Google accounts indicate an age below eighteen can successfully register and access the service, as shown in Figure 3.

Entrar na sua conta Unclothy

Você solicitou entrar na sua conta Unclothy. Clique no botão abaixo para entrar. Se você não iniciou a solicitação, você pode ignorar este e-mail e não clicar no botão de login.

Entrar

Ou copie e cole o seguinte link no seu navegador:
<https://unclothy.com/authorize?callbackUrl=https://unclothy.com/2f/dashboard&token=92c2f0baacdf1e573565b1ba1c0bca0240a5c702094118906785c78bed90&email=realistc%40gmail.com>

Atenciosamente,
Unclothy

Figure 3: Unclothy - Access Link Received by a Young User via Email.

4.2 Nudify Online

On this platform, the minimum age requirement of 18 years is stated in the terms of service, displayed in the website footer, and presented through a pop-up shown upon access.

Age assurance on *Nudify Online* also relies exclusively on self-declaration. Users may only proceed after confirming that they are at least eighteen years old and accepting the platform's cookie policy, as we illustrate in Figure 4.



Figure 4: Nudify Online - Age Assurance and Cookie Consent Required to Continue.

Once users proceed past the age declaration screen, they can access the platform without creating an account. In particular, the homepage already displays examples of the content that can be generated by the service, allowing users to view sexually explicit material prior to any additional age-assurance measures, as illustrated in Figure 5.

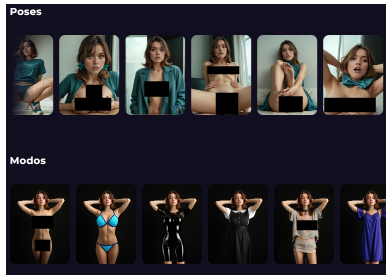


Figure 5: Nudify Online - Sexual Content Displayed on the Home Page.

The age assurance mechanism employed during account creation is fragile and can be easily circumvented. When users register directly through the platform, without relying on Google authentication, account creation requires only an email address and a confirmation code. Because this process is not linked to any assurance of the age associated with the email account, it provides no meaningful assurance regarding the user's age. As a result, we observed that young users, such as teenagers, can create accounts and access the service without encountering any effective age-related barriers.

4.3 Deepnudesart

Like the platforms analyzed previously, Deepnudesart establishes a minimum age requirement of 18 years, specified in

its Terms of Service, and relies solely on self-declaration as its age assurance mechanism, as shown in Figure 6, without requiring any additional age assurance measures during account creation. Some degree of age assurance may occur only when users authenticate through third-party services. Furthermore, the homepage displays sexually explicit content without requiring any prior age assurance measures, potentially exposing children and adolescents to material that is inappropriate for their age group.

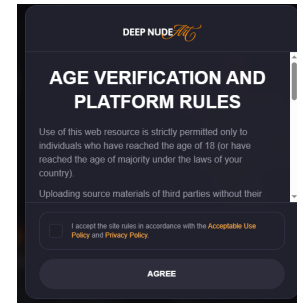


Figure 6: Deepnudesart - Age Assurance and Platform Rules.

4.4 Clothoff

Similar to the other platforms, *Clothoff* establishes a minimum age requirement of 18 years. This requirement is presented through a pop-up displayed immediately upon accessing the website, where users must accept the platform's terms and declare that they are at least eighteen years old. However, as this mechanism relies solely on self-declaration, it can be easily bypassed by users who falsely report their age. Additionally, although the platform offers a Portuguese-language interface, the age-assurance pop-up is presented entirely in English, as illustrated in Figure 7.

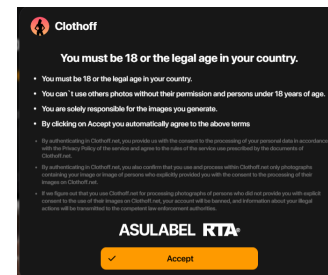


Figure 7: Clothoff - Minimum Age Requirement Notice.

The platform does not require users to provide their age again during the registration process. Instead, it offers multiple authentication options, as shown in Figure 8. While some of these options rely on third-party services, the age assurance process can be bypassed by registering directly with an email address, without any additional age assurance measures of the user's age. Furthermore, sexually explicit content is accessible from the platform's homepage prior to account creation or authentication.

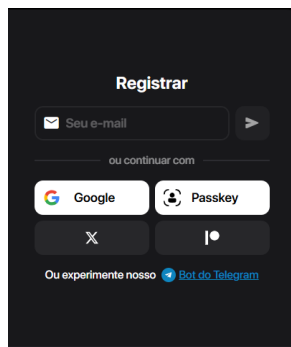


Figure 8: Clothoff - Account Registration and Login Methods.

4.5 AINudez

On this platform, the minimum age requirement of 18 years is stated both in the privacy policy and in the pop-up displayed when users first access the service as illustrated in Figure 9. After declaring that they meet this requirement, a young user can proceed to upload an image and explore the features of *AINudez*. At this stage, they are prompted to authenticate using one of the available login options, but no additional age assurance is performed.



Figure 9: AINudez - Adult Content Warning and Age Confirmation Mechanism.

As observed in other platforms, any age-related checks associated with third-party authentication services, such as Google, can be bypassed through the platform's own registration process. Users may create an account using only an email address, regardless of the age related to that account. Consequently, even individuals under the age of eighteen can register and access the service, provided they avoid authentication methods that incorporate age-related restrictions.

4.6 Undress.GURU

In this platform, no age assurance mechanism or request for the user's age during access or registration was identified. Information regarding the minimum age requirement can only be found in the website footer, under the compliance section, through a link labeled "18+ Disclaimer". Notably, although the *Undress.GURU* interface is available in Portuguese, the age-related information is presented exclusively in English, as illustrated in Figure 10. Furthermore, the homepage displays sexually explicit content without any prior age assurance measures, potentially exposing children and adolescents to material that is inappropriate for their age group.

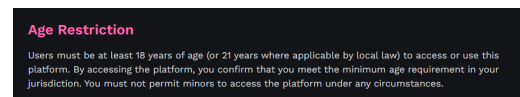


Figure 10: Undress.GURU - Minimum Age Requirement Information.

On this platform, authentication is exclusively performed via Google accounts. As a result, users cannot create accounts directly through the platform using an email address, which limits opportunities to bypass age-related restrictions. Consequently, if Google identifies a user as being under the age of eighteen, access to the service is restricted and the login process cannot be completed, as illustrated in Figure 11.

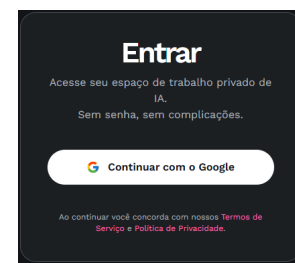


Figure 11: Undress.GURU - Login Method.

4.7 Undressbaby

Access to this platform begins with a prompt asking users to confirm that they meet the minimum age requirement. Nevertheless, this process is based exclusively on self-declaration and does not include any mechanism to verify the user's age. Although *Undressbaby* does not require account creation, users must provide an email address to receive a token that enables access to its functionality. Before the token is issued, users are once again asked to confirm that they meet the minimum age requirement. This second check also relies solely on self-declaration, offering no additional assurance regarding the user's age, as illustrated in Figure 12.



Figure 12: Undressbaby - User Age Assurance.

5 DISCUSSION

In Table 3, we summarize the results of the evaluation conducted on the selected platforms, presenting the findings according to the previously defined assessment questions. Six of the seven analyzed platforms relied primarily on self-declaration mechanisms, while one platform did not implement any explicit age-assurance process. In addition, all evaluated platforms could be bypassed by underage users, and five of them exposed users to sexualized content before account creation or effective age assurance.

As summarized in the table, the analyzed platforms exhibit significant limitations when compared to the age-assurance requirements defined by Decree No. 12.880/2026 [4]. All services provide access to sexually explicit content intended exclusively for adults, yet most rely on self-declaration mechanisms or easily circumvented procedures to verify users' ages. Given the nature of the content offered, access by children and adolescents may expose them to risks that are incompatible with their stage of development, highlighting the importance of implementing age-assurance measures that are proportionate to the risks related to the service.

Despite the requirements established in Chapter VII, Article 24, of Decree No. 12.880/2026, and considering the risks associated with the services offered by these platforms, *Undress.GURU* does not implement any age-assurance mechanism. The remaining six platforms rely primarily on self-declaration, requiring users only to confirm that they meet the minimum age requirement before accessing the service.

As revealed by our analysis, such mechanisms can be easily circumvented and do not provide meaningful assurance regarding users' ages. Furthermore, young users may be exposed to sexually explicit content even before generating images or completing any registration process.

Although six of the seven platforms offer authentication through third-party services, such as Google, this approach alone does not constitute a robust age-assurance mechanism. In most cases, age-related checks can be bypassed through alternative registration flows provided by the platforms themselves. Users may falsely declare that they meet the minimum age requirement, rely on third-party accounts registered with an age above eighteen, or create accounts directly on the platforms using an email address and password, regardless of the age associated with the email account. In particular, the effectiveness of third-party authentication depends on the accuracy of the age information associated with external accounts, which may not always reflect the user's actual age. Consequently, none of the analyzed platforms appear to implement age-assurance mechanisms that are proportionate to the level of risk posed by their services, since the content generated on these platforms intensifies issues related to digital exploitation and gender-based violence [9].

As a result, children and adolescents may gain access to the platforms' functionalities and generate synthetic nude images despite the stated age restrictions. This finding is particularly concerning given recent reports highlighting the use of AI-based nudification technologies to create non-consensual

sexualized images involving individuals under the age of eighteen and other forms of harmful content [3]. Such risks reinforce the importance of adopting robust age-assurance measures in services that provide access to sexually explicit or potentially harmful functionalities.

Although the analyzed platforms request only limited information during access and account registration, which could be interpreted as an effort to comply with the principle of data minimization, our findings suggest that such low-friction approaches are insufficient for services that provide access to sexually explicit content and AI-based nudification functionalities. In these contexts, less intrusive age-assurance mechanisms failed to prevent access by children and adolescents, indicating the need for age assurance measures that are proportionate to the level of risk associated with the service.

In addition, the *Clothoff* and *Undress.GURU* platforms present age-related information and age declaration prompts exclusively in English, despite offering Portuguese as an interface language. This practice appears inconsistent with Article 24, item X, of Decree No. 12.880/2026, which emphasizes principles of inclusion and non-discrimination. By presenting information as important as minimum age requirements and age-assurance procedures in a language that may not be understood by all users, these platforms introduce a linguistic barrier that can compromise users' ability to make informed decisions regarding access to the service.

The effectiveness of the age-assurance mechanisms adopted by the analyzed platforms can also be examined in light of Article 26 of the same chapter of Decree No. 12.880/2026. This provision establishes that the use of third-party services to obtain age-related information does not exempt platforms from their responsibility to verify users' ages and prevent children and adolescents from accessing age-restricted content. Consequently, delegating age checks to external authentication providers cannot, by itself, be considered sufficient to meet the obligations established by the decree.

This observation is particularly relevant in the case of platforms such as *Undress.GURU*, which rely exclusively on external authentication mechanisms. Although such approaches may introduce additional barriers when compared to simple self-declaration, Article 26 makes clear that platforms remain responsible for ensuring that age-assurance measures are effective and proportionate to the risks associated with their services. Given the nature of the content offered, this implies a duty to adopt age assurance mechanisms capable of meaningfully reducing the likelihood of access by children and adolescents.

Overall, the findings suggest that the analyzed platforms present significant limitations when assessed against the age-assurance requirements established by the ECA Digital framework. Although most platforms implement some form of age-related control, these mechanisms appear insufficient given the level of risk associated with the services offered. As we demonstrated throughout the evaluation, users can often bypass the adopted measures with minimal effort, potentially allowing children and adolescents to access the platforms, interact with their functionalities, and be exposed

Table 3: Results of the Evaluation of Nudify Platforms.

Question	Unclothy	Nudify Online	Deepnudesart	Clothoff	AINudez	Undress.GURU	Undressbaby
Minimum age	18 years old	18 years old	18 years old	18 years old or legal age	18 years old	18 years old or 21, according to local law	18 years old
Requests age upon access?	Yes	Yes	Yes	Yes	Yes	No	Yes
Are users under 18 blocked?	Redirected to Google	Website access is not possible	Website access is not possible	No blocking, only accept	Redirected to the Nick-elodeon website	N/A	Website access is not possible
Age assurance after declaring 18?	No	No	No	No	No	N/A	No
Requests age during account creation?	No	No	No	No	No	No	No account required
Is bypassing possible?	Yes	Yes	Yes	Yes	Yes	No	Yes
Is the minimum age visible?	Yes (Privacy Policy and pop-up)	Yes (Terms, footer, homepage and pop-up)	Yes (Terms, homepage and pop-up)	Yes (homepage pop-up)	Yes (Privacy Policy and pop-up)	Yes (Compliance tab)	Yes (Terms and pop-up)

to sexually explicit content despite the stated age restrictions. This situation ultimately creates favorable conditions for the dissemination of this type of content [11].

Taken together, these findings indicate limited alignment between the evaluated platforms and the principles underlying Decree No. 12.880/2026. Age-assurance mechanisms were often insufficiently robust and failed to prevent exposure to sexualized content, raising concerns about current industry practices in high-risk contexts involving children and adolescents. The results underscore the need for proportionate, circumvention-resistant, and transparent measures that effectively restrict underage access. The evidence and methodology developed in this study may also support enforcement by the ANPD and the Ministry of Justice under the ECA Digital, including—subject to applicable safeguards—the blocking or banning of services notoriously used for unlawful purposes, such as generating sexualized deepnudes involving children and adolescents. This possibility is illustrated by the Ministry’s recent request to block approximately 80 websites reportedly using AI to produce deepnudes¹.

6 CONCLUSION

In terms of **contribution**, the results of this study reveal significant gaps between the safeguards established by the ECA Digital and the mechanisms adopted by the evaluated platforms. Although they establish a minimum age requirement for use, none of the seven analyzed platforms implement age assurance mechanisms that are proportionate to the risks associated with the services they provide. In addition, we observed that most platforms expose users to explicit content even before account creation, increasing the risk of exposing children and adolescents to inappropriate content and reinforcing concerns that have already been discussed in the literature. Also from this academic perspective, to the best of

our knowledge, we highlight that this is one of the first studies to systematically evaluate age-assurance mechanisms in AI-powered nudify platforms through the lens of the Brazilian ECA Digital framework.

These findings may assist regulators and platform developers in the design and implementation of more robust age assurance mechanisms for high-risk digital services, particularly considering that, according to the ECA Digital implementation timeline, the period from August to November 2026 will mark the beginning of the adaptation and monitoring phase for the age assurance mechanisms currently being implemented. The results also contribute to ongoing discussions regarding the indexing of these websites by search engines, platform accountability, and the need for measures aimed at reducing the exposure of children and adolescents to content such as that generated by nudify platforms.

It is important to acknowledge the **limitations** of this study. We evaluated mechanisms observable during platform access and account creation and did not analyze potential protection mechanisms employed during the content generation process itself. Furthermore, these platforms may modify their policies and interfaces over time, which may affect the replicability of the results. Finally, internal moderation mechanisms and server-side controls that may not be visible to users were outside the scope of this study. We also highlight that the platforms were not analyzed from the perspective of legal frameworks from other countries.

As **future work**, we intend to investigate whether nudify platforms implement mechanisms capable of detecting and preventing the generation of content involving children and adolescents, as well as evaluate the degree of compliance of these platforms with international frameworks aimed at protecting children and adolescents.

7 ETHICAL CONSIDERATIONS

Although the subject of the study presents potential risks related to the exposure of children and adolescents to sexualized content, the research did not involve the participation

¹G1 - “Ministério da Justiça pede à PF e à ANPD bloqueio de 80 sites que usam IA para produzir ‘deepnude’” (18/08/2026). Available at <https://tinyurl.com/3pcph23w>

of human subjects, children, or adolescents at any stage. The investigation was conducted through the direct analysis of the platforms and their age-assurance mechanisms, without conducting interviews or collecting data directly provided by children. Furthermore, no synthetic images depicting nudity were generated, either of adults or of children and adolescents.

For the tests, email addresses created specifically for research purposes were used. None of the email addresses employed belonged to or were associated with a person under 18 years of age.

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During this process, a generative AI tool (ChatGPT) was used exclusively to support language revision and improve the clarity and readability of the paper. All analyses, interpretations, and conclusions were developed and validated by the two authors.

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