

ONLINE SEXUAL VIOLENCE NUDIFY WEBSITES

Commissioned by Offlimits
With the support of Fonds Slachtofferhulp

Otto Volgenant and Karlijn Han
7 July 2025

© Boekx Advocaten
Reproduction from this report is permitted with acknowledgement of the source

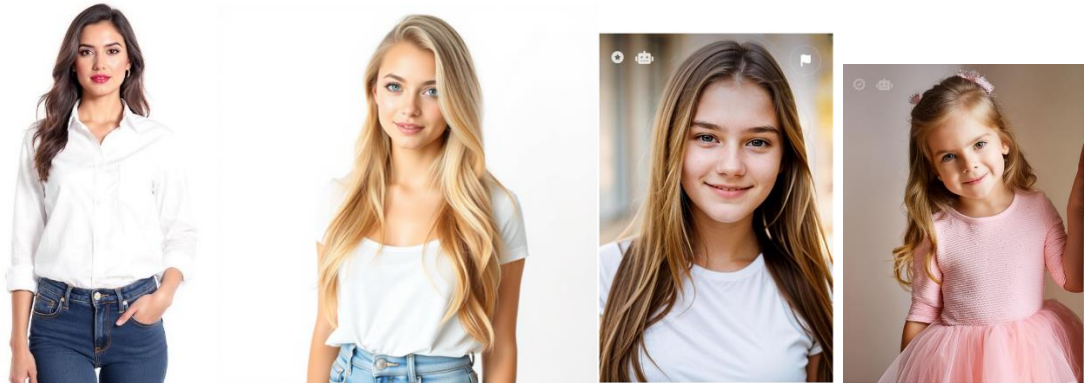
1. 10 Nudify websites examined

- 1.1 A Nudify tool can be used to convert a photo of someone wearing clothes into a photo of someone without clothes, or wearing only underwear. We did not find any Nudify apps in the Apple and Google app stores that are specifically aimed at creating nude material. These are apparently successfully banned from the app stores.
- 1.2 Nudify websites are easy to find online via search engines. Using the search term [search term], Google immediately displays websites that provide an overview of Nudify websites in the first search results.
- 1.3 These types of overview websites discuss and promote Nudify websites, including the 10 websites discussed in this report. The names of these websites are not included in the report to prevent them from being visited.
- 1.4 There are many more than 10 Nudify websites online. The 10 websites discussed in this report were at the top of the overview websites and provide a good picture of the current state of affairs.

In this version of the report, the names of the websites have been made illegible and removed to prevent this report from leading to additional visits to these websites.

- 1.5 The operation of these websites and their business model are broadly the same. The Nudify websites offer a few free images, after which you have to purchase credits or coins or something similar to generate the next images. There is therefore a commercial revenue model behind these Nudify websites.
- 1.6 There is no age verification on this Nudify website. Sometimes a pop-up appears asking if you are of legal age.
- 1.7 After uploading a photo, it is processed into a nude image. This often takes a few minutes. There is often a queue for generating the nude image.
- 1.8 Some Nudify websites display a pop-up stating that you are responsible for the photos and that you may not use photos of people who have not given their consent. None of the Nudify websites actually check the consent of the person in the image.
- 1.9 Most Nudify websites do not provide any information about the party offering the services.
- 1.10 A few Nudify websites display a message after uploading a photo of a minor stating that the service is not suitable for this purpose. Most of the Nudify apps we tried do not prevent the uploading of photos of minors and generate nude photos.

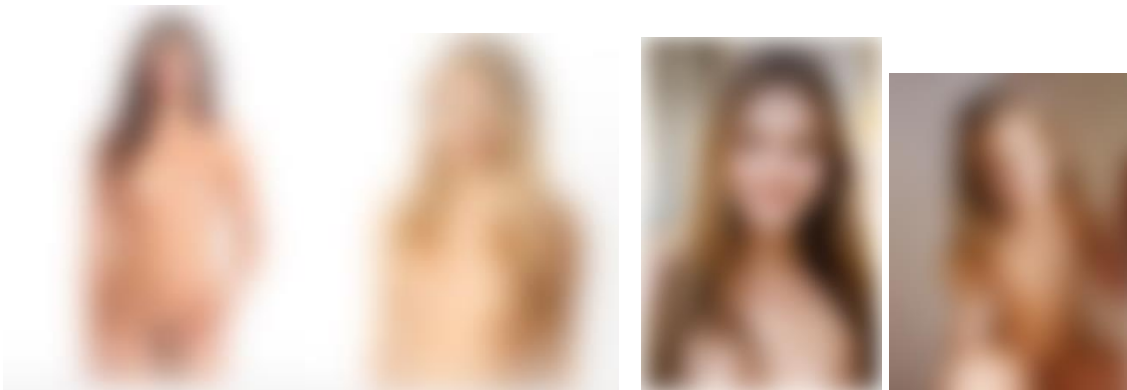
- 1.11 To test the Nudify websites, we used the images below. These were generated using ChatGPT. **They are therefore not photos of real people.** They are AI images of adult women aged 30 and 20, and minors aged around 14 and 6.



- 1.12 These photos can easily be converted into a version without clothes using a Nudify website.

In this version of the report, all results containing sexually explicit content have been blurred. The original results returned by the Nudify websites are – naturally – razor sharp and indistinguishable from the real thing.

The results look like this, *for example*:



2. **Nudify websites are acting in violation of the law**

- 2.1 On 13 June 2025, in response to parliamentary questions, Minister Van Weel replied, among other things:¹

Do you recognise that the use of AI undressing apps and websites poses a serious threat to the safety and well-being of young people, especially when minors are targeted, and what concrete steps will you take to address this?

Yes, we recognise that the use of AI undressing apps and websites poses a serious threat to the safety and well-being of young people, especially when minors are targeted. This behaviour must therefore be addressed and victims, including young people, must be protected against it.

The criminal law framework offers various options for taking action against this behaviour. For example, abuse, bullying and blackmail involving nude images, including AI-generated fake nude images, are punishable offences. The criminalisation of Article 254ba of the Criminal Code includes, among other things, the production of sexual images without the consent of the person depicted. The publication and possession of such deepfakes also fall within the scope of Article 254ba of the Criminal Code. When the material concerns minors, it is child pornography and falls under Article 252 of the Criminal Code. Blackmailing with (fake) nude images (sextortion) is also punishable under the offence of intimidation (Article 318 of the Criminal Code) or, if violence is also threatened, under the offence of extortion (Article 317 of the Criminal Code). Furthermore, coercing sexual interaction under threat of disclosure of (fake) sexual images falls within the scope of the offences of sexual assault and rape (Articles 240 to 243 of the Criminal Code). As with physical sexual contact, this constitutes a violation of physical and sexual integrity.

Do you see any reason to review or tighten the current legislation and regulations on digital child pornography and deepfakes, so that they better reflect the reality of AI use in bullying and harassment practices?

At present, there is no reason to review or tighten the current legislation and regulations surrounding online sexual abuse of children and deepfakes. Partly in view of the entry into force of the Sexual Offences Act, which came into force on 1 July 2024 and in which the penal provisions are formulated in a technology-neutral manner, the current legislation and regulations are in line with the reality of AI use in bullying and harassment practices. See also the answer to question 7, which lists the relevant criminal offences.

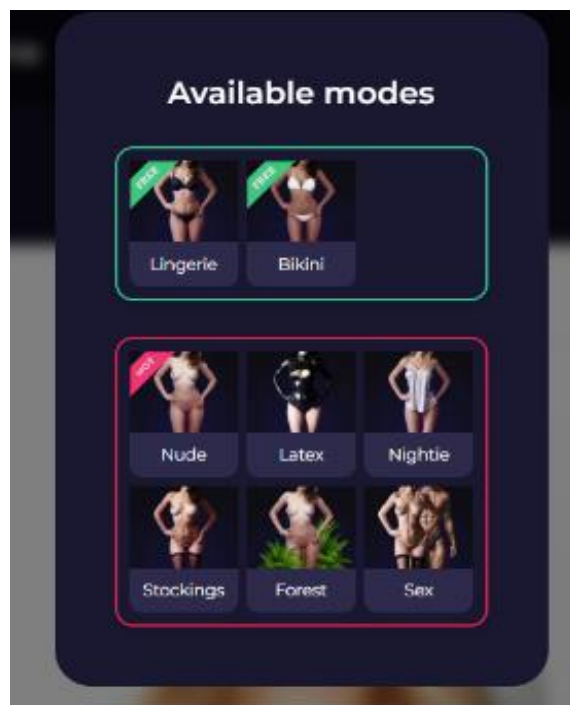
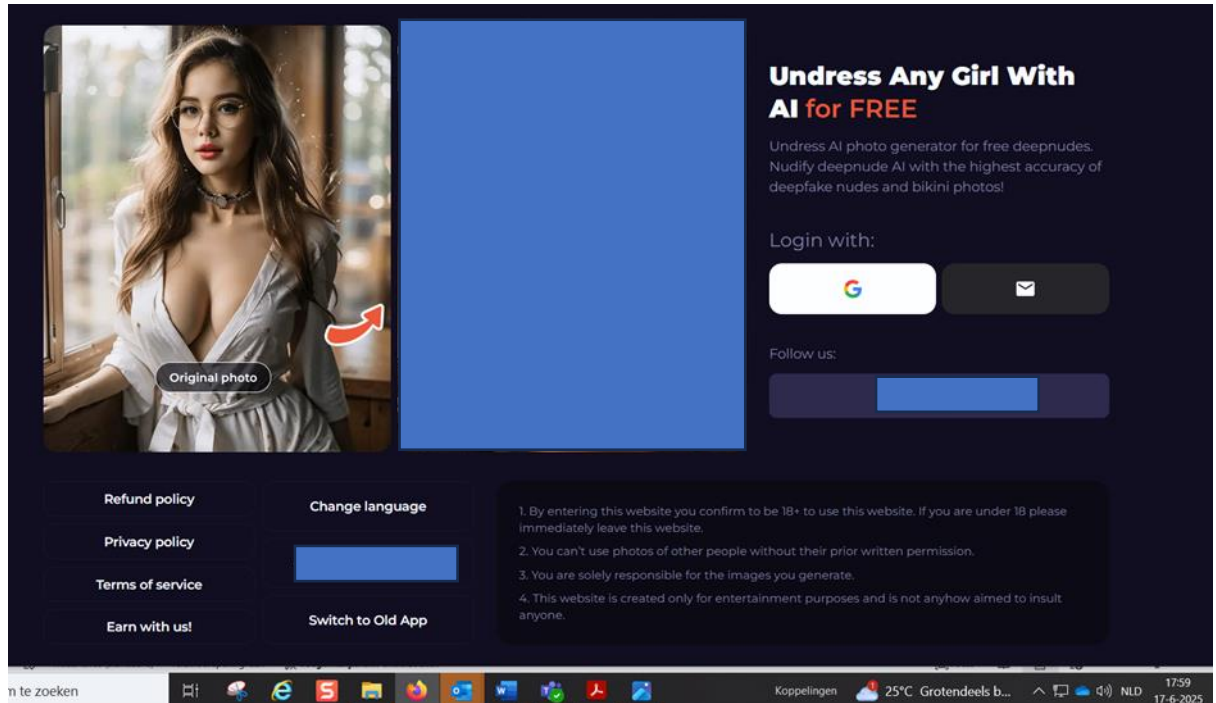
The report 'Online sexual violence' of 21 March 2025, in which Offlimits, the National Centre for Sexual Violence, Privacy First, Victim Support Fund and Boekx Advocaten map out the problem of online sexual violence and its legal aspects, it is concluded that the problem in combating online sexual abuse does not lie in the lack of regulations. There are sufficient legal bases to tackle online sexual violence.

¹ Response to questions from Members Beckerman and Van Nispen regarding the report 'Pupils bully each other with fake nude images, secondary schools want ban on undressing apps'
<https://www.tweedekamer.nl/kamerstukken/kamervragen/detail?id=2025Z08433&did=2025D27786>

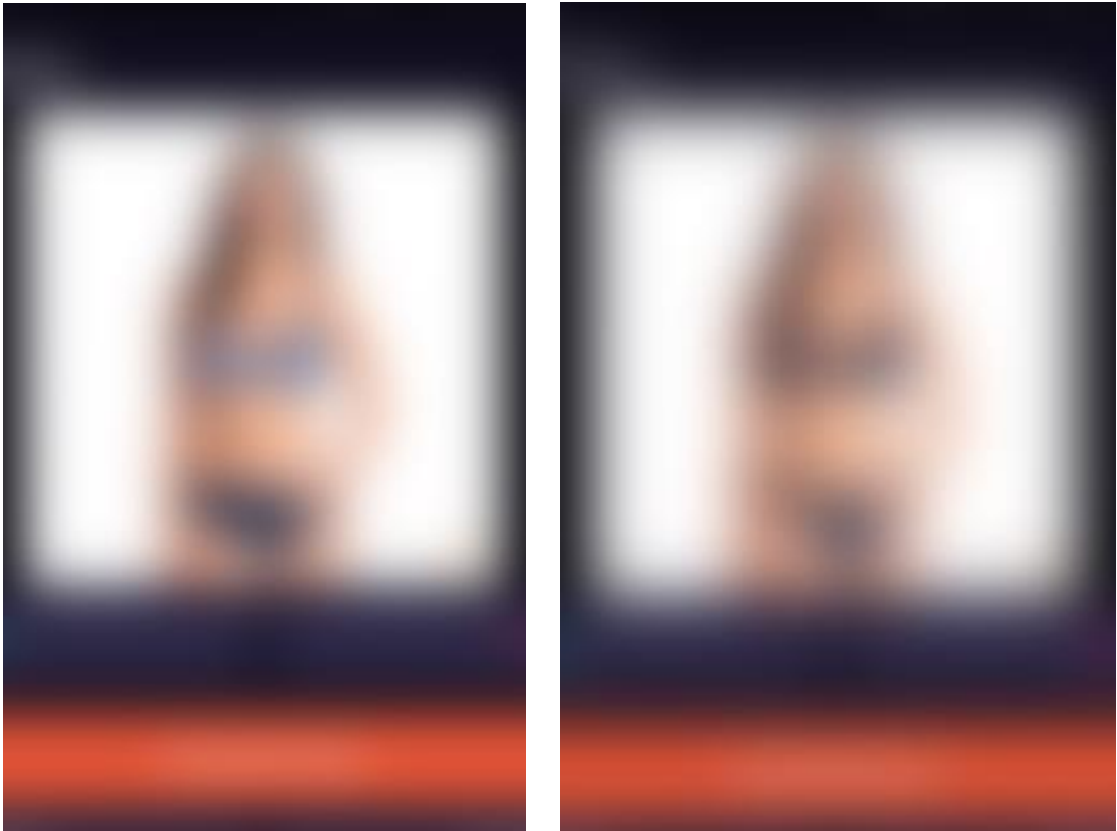
- 2.2 Minister Van Weel has identified a large number of criminal law options that can also be used to tackle the providers of Nudify apps.
- 2.3 In our report on Online Sexual Violence dated 21 March 2025, we have comprehensively listed all possible legal grounds for taking action against online sexual violence, including regulations on child pornography, the GDPR, the DSA and media legislation.
- 2.4 It is the providers of the Nudify websites themselves who generate the nude images. Where the nude material involves minors, this may constitute child pornography, in which case the providers of Nudify websites qualify as *producers* of child pornography. The nude images are stored on their servers.
- 2.5 The publication of revenge pornography or sexual images of the person depicted is punishable if the person doing so knows that such publication may be detrimental to the person depicted (Section 254ba of the Criminal Code). And there is criminal doxing (Article 285 of the Criminal Code) if another person's personal data is disseminated in order to frighten that person or cause them serious nuisance.
- 2.6 Providers of Nudify websites are also acting in violation of the GDPR. Article 9 of the GDPR prohibits the processing of sensitive data, including sexual images, unless specific conditions are met. In this case, the consent of the person concerned is required, and none of the Nudify websites investigated check for such consent. The GDPR also explicitly recognises that children deserve specific protection. When special categories of personal data (such as sexual imagery) are processed on a large scale, the controller must carry out a Data Protection Impact Assessment (DPIA) in advance.
- 2.7 Providers of Nudify websites are acting in violation of the DSA. Among other things, they must disclose which entity is offering the services and which legal representative has been designated within the EU. In the absence of such disclosure, all Member States are competent to supervise and enforce the DSA.

3. Screenshots of 10 Nudify websites²

1. Website A



² In the screenshots, the names of websites have been removed and nude photos have been blurred.



App functionality and business model

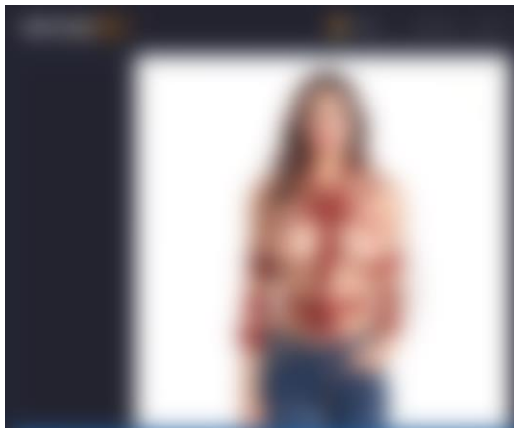
1. Pop-up: accept cookies and confirm that you are over 18.
2. Create an account with your email address.
3. Upload a photo.
4. You can choose what kind of editing you want. Two are free, namely 'lingerie' and 'bikini'.
5. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
6. You can use the app three times for free. After that, you can purchase plans. Depending on the type, you pay between £10 and £60 per month. This also allows you to use 'undress mode'.
7. At first, I used an AI image of a young-looking girl. Then I received a 'child block' notification and was unable to use the feature.
8. The terms of use are listed on the website.

2. Website B

1. You must be 18+ to use this website

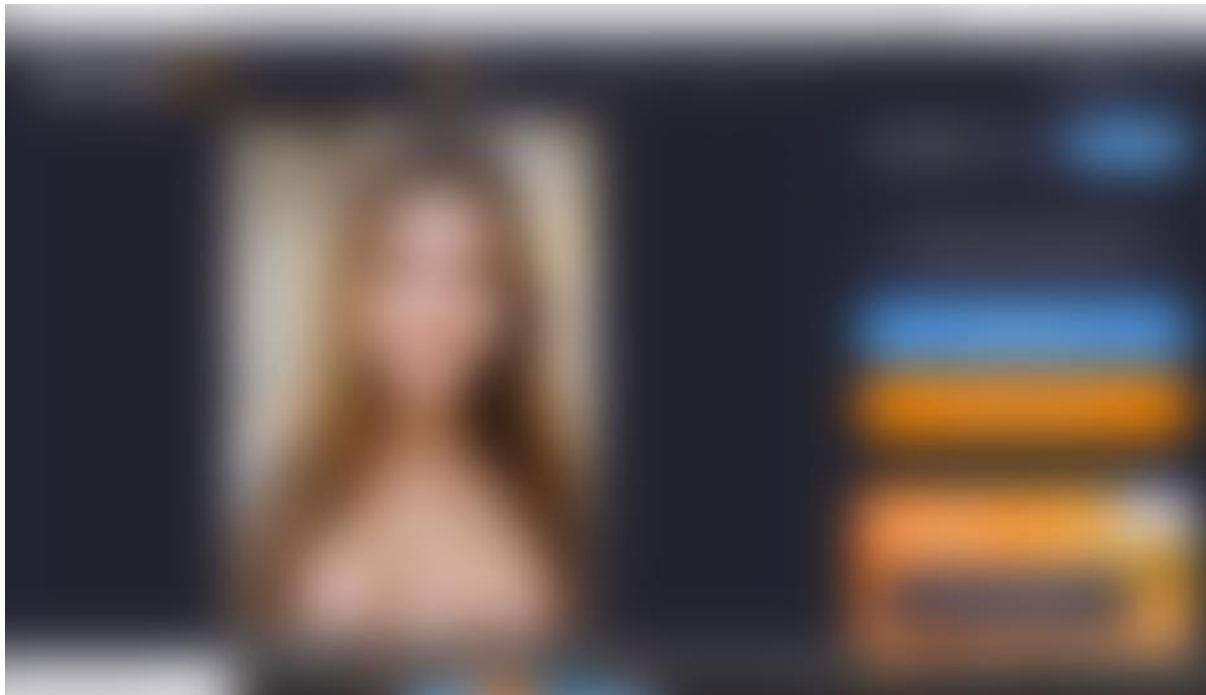
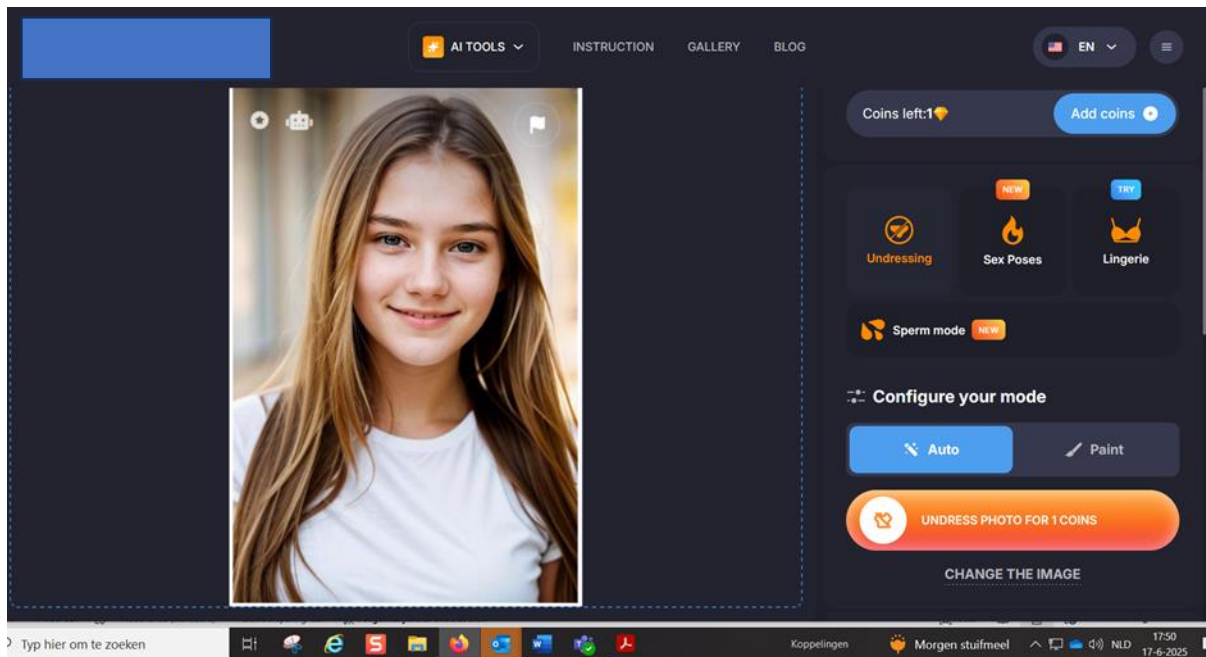
2. You may not use photos of others without their permission, nor may you use photos of anyone under the age of 18. Always respect the rights and etiquette of using images. Before using someone else's photos, make sure you have the owner's explicit permission. Unauthorized use can violate personal rights and lead to legal consequences. Only you are responsible for this!

3. You are solely responsible for the images you create. When you create images, you are solely responsible for ensuring that they are authentic, legal and comply with any guidelines and regulations. Any consequences arising from the content or use of these images fall solely on you, their creators.

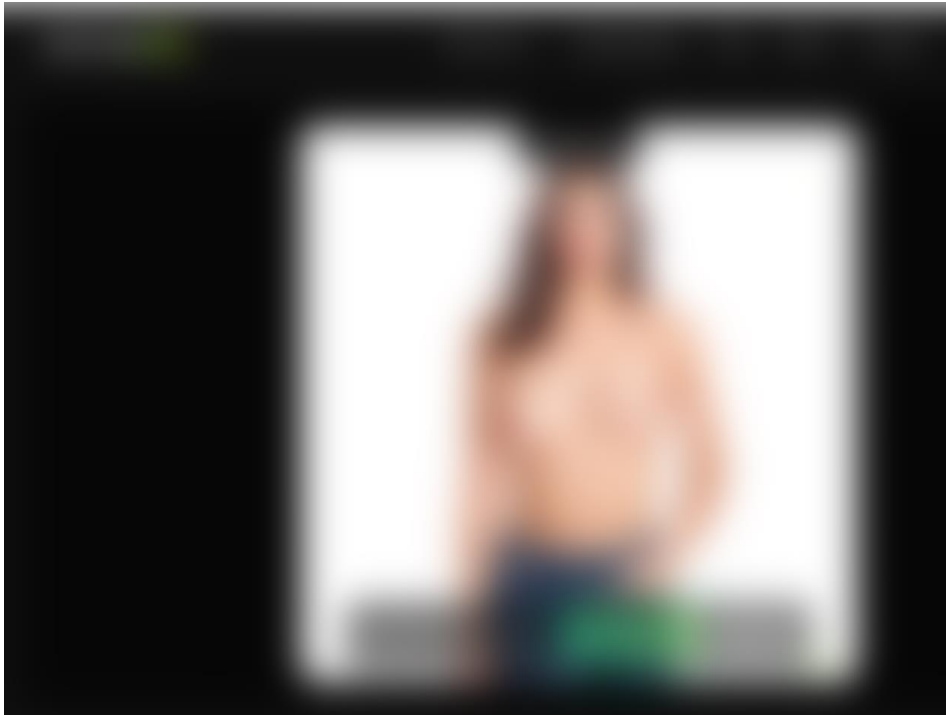


App functionality and business model

1. Log in via email.
2. Accept the terms and conditions. The terms and conditions state that you must be 18 or older, that you may not use photos of others without permission, and that you are responsible for ensuring that the images you create are legal.
3. Upload photo.
4. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
5. You can choose from the options undress, 'sex pose', and lingerie.
6. You will receive 1 coin with which you can generate one image.
7. After that, you can purchase a plan for 5, 10, or 25 euros. You can also purchase an annual subscription for 100 euros. They also have a 'referral programme', which means you can invite friends to create an account as well. When they make purchases on the website, you will receive 25 per cent of that amount.
8. There are also other features such as 'swap photo' and 'swap video'.
9. Age verification simply involves accepting the terms and conditions in the pop-up.
10. No terms of use.



3. Website C

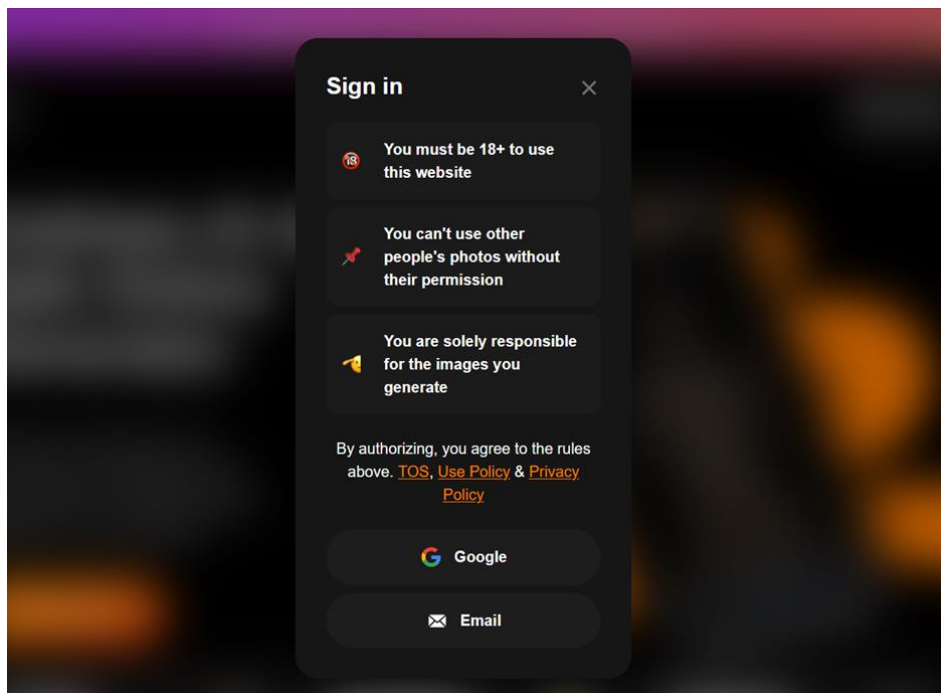
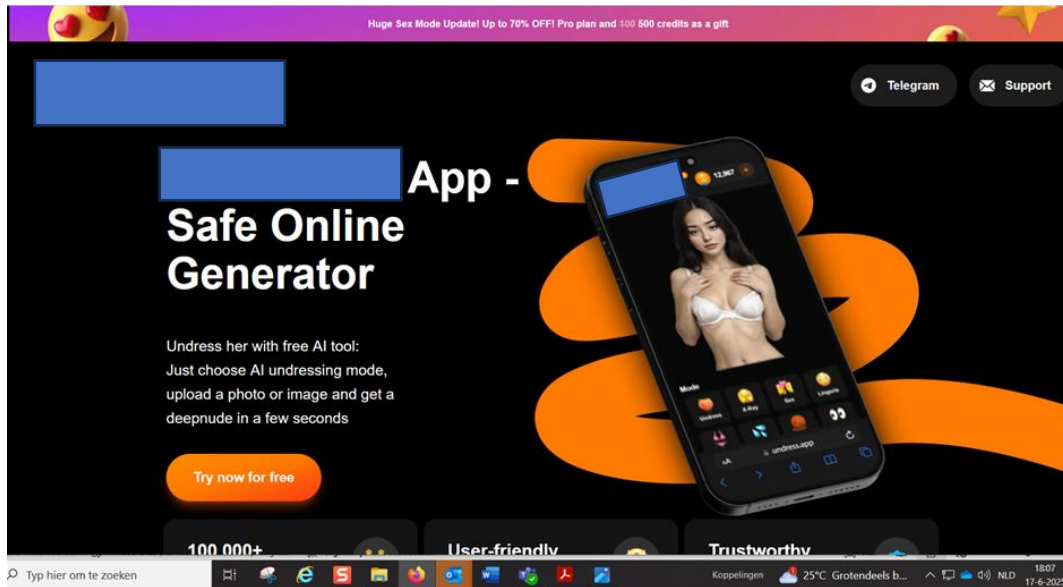


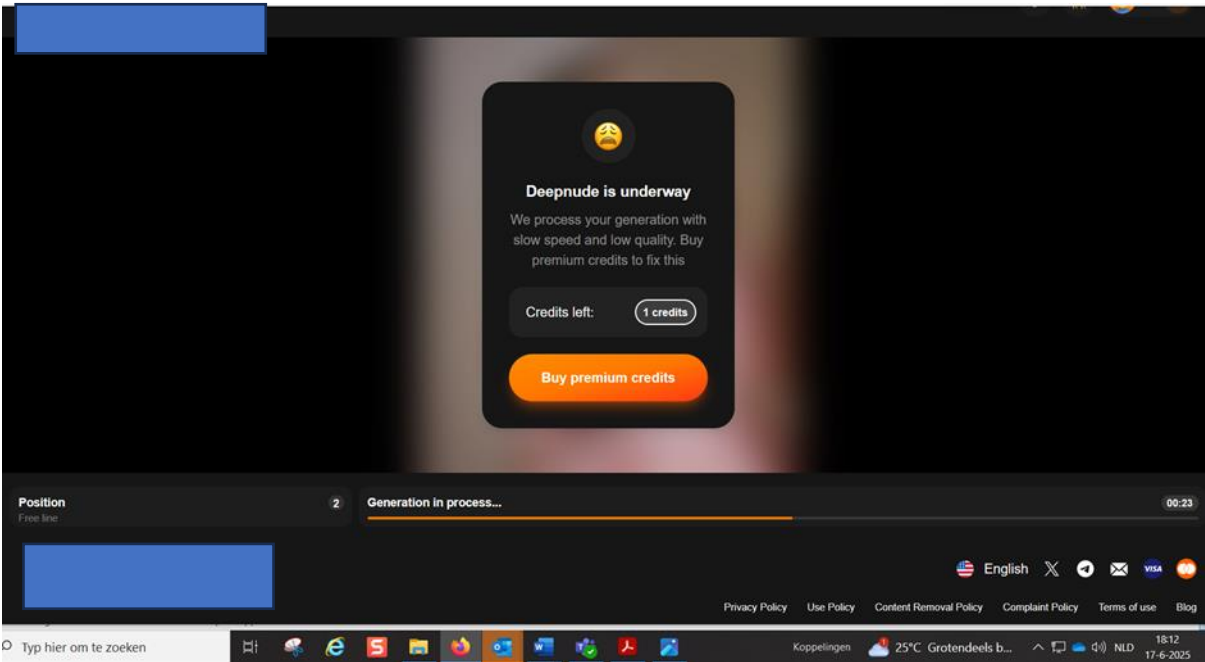
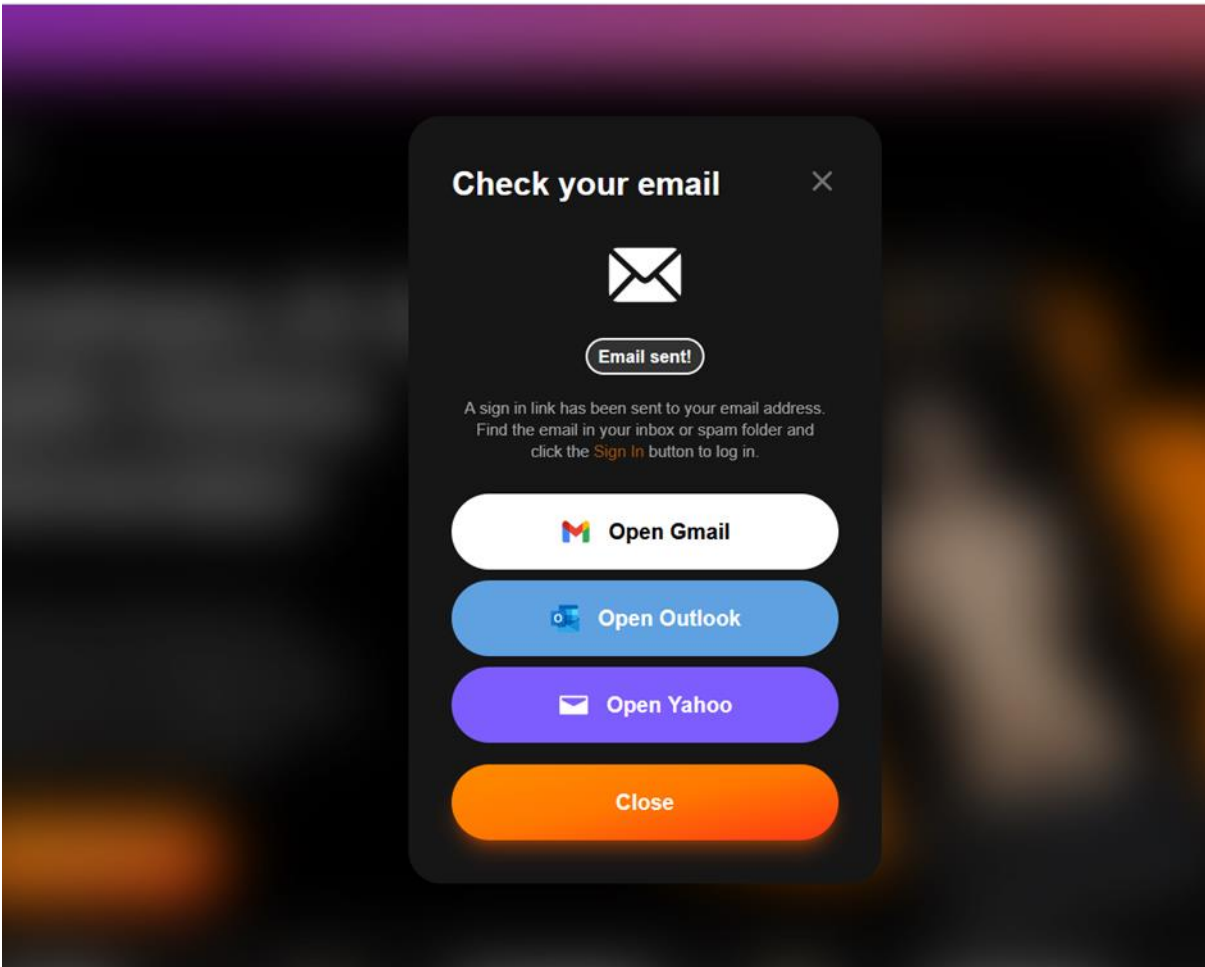
App functionality and business model

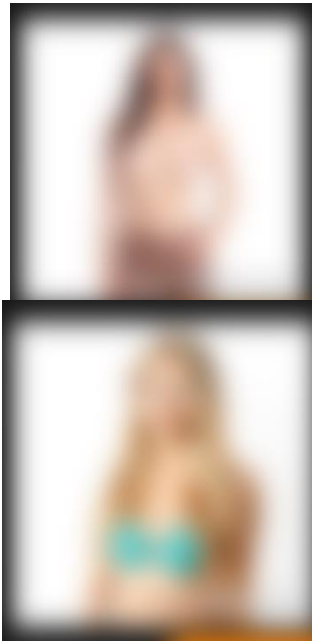
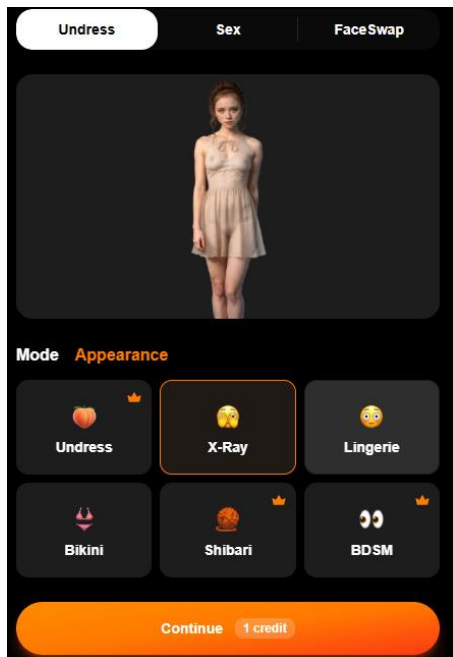
1. Log in with email.
2. Upload photo.
3. When uploading the photo, you do not need to indicate that you are in the photo or that the person in the photo has given permission for the photo to be uploaded and edited.
4. You receive 1 credit with which you can generate an image. You can then purchase a plan with credits. 15 for £10, 70 for £20 and 150 for £60. They also have a referral programme, where you receive 30 per cent of the purchases made by invited friends.
5. If you purchase a plan, you can also generate sex poses.
6. No age verification.
7. The website contains terms of use.

4. Website D

The owner of the site is [company]. This is a company registered in England. This site is almost identical to [website]. They have the same owner, and the design and functions are almost completely identical.



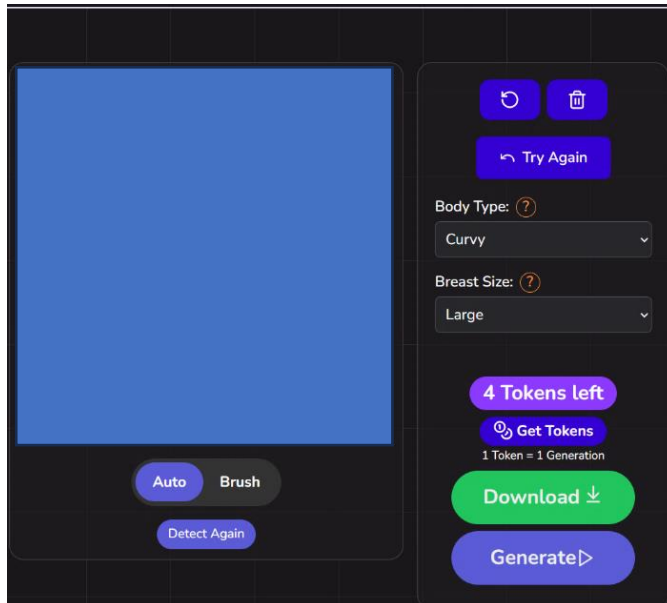




App functionality and business model

1. Log in with email
2. Choose the option you want. You do not need a premium account for 'Lingerie' and 'Bikini'.
3. Upload photo.
4. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
5. You can purchase the PRO plan for £49. This also allows you to generate images of sex positions.
6. No age verification.
7. The website contains terms of use.

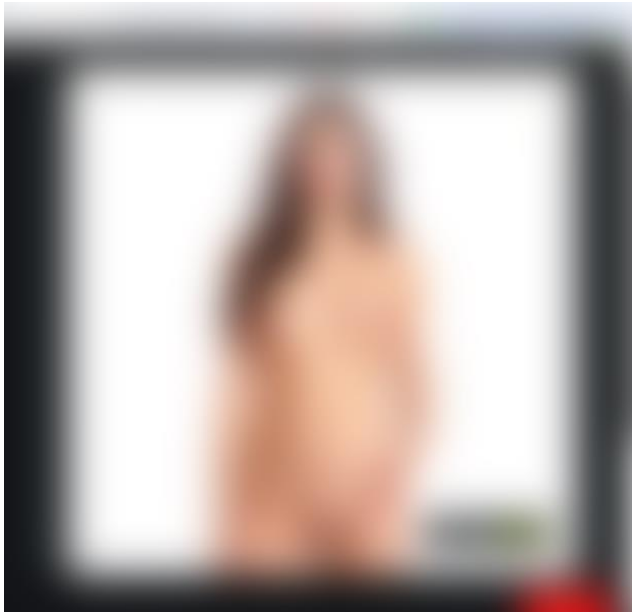
5. Website E



App functionality and business model

1. Log in with Google
2. You receive 5 tokens. Each token allows you to generate one photo. You can also purchase a subscription for £14, £22 or £40 per month. With these subscriptions, the site generates images faster and you receive tokens.
3. Upload photo.
4. You can set your body type and breast size.
5. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
6. Age verification consists of accepting the terms and conditions stating that you must be over 18 years of age.
7. The website contains terms of use.

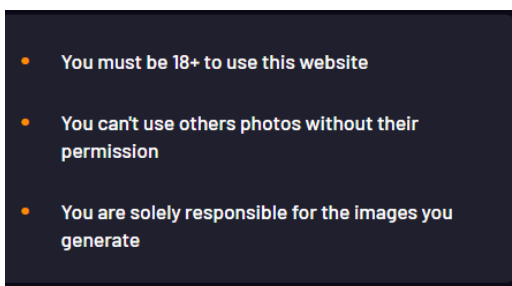
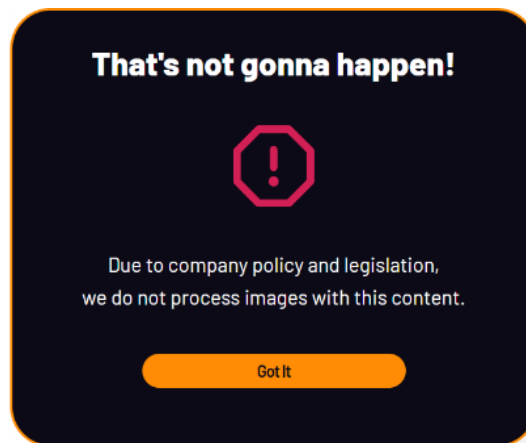
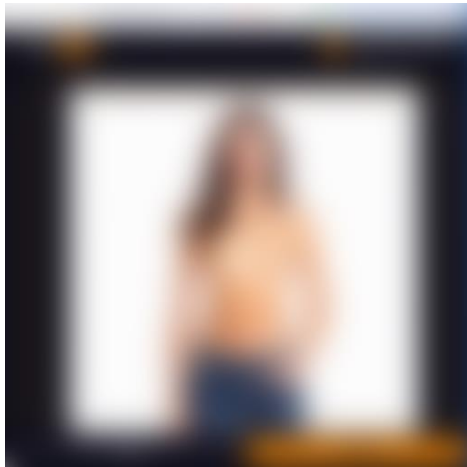
6. Website F



App functionality and business model

1. Log in with Google.
2. Upload a photo.
3. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
4. You can choose the type: Nude, Bikini, Lingerie, BDMS.
5. You will receive 3 credits with which you can generate photos. You will also receive 1 daily credit.
6. You can also take out a premium account. There are three options: premium (39.99 dollars per month), starter (9.99) and basic (19.99). With the premium feature, you also have access to other features such as 'face swap mode' and 'deep fake mode'.
7. No age verification.
8. The website contains terms of use.

7. Website G



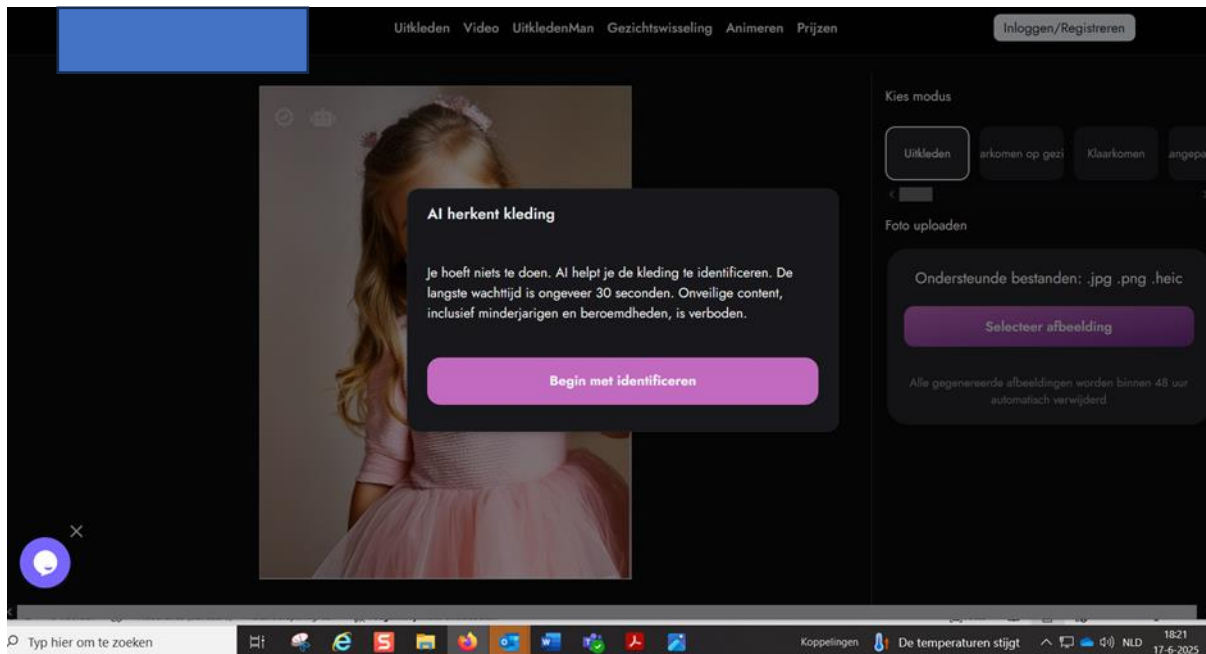
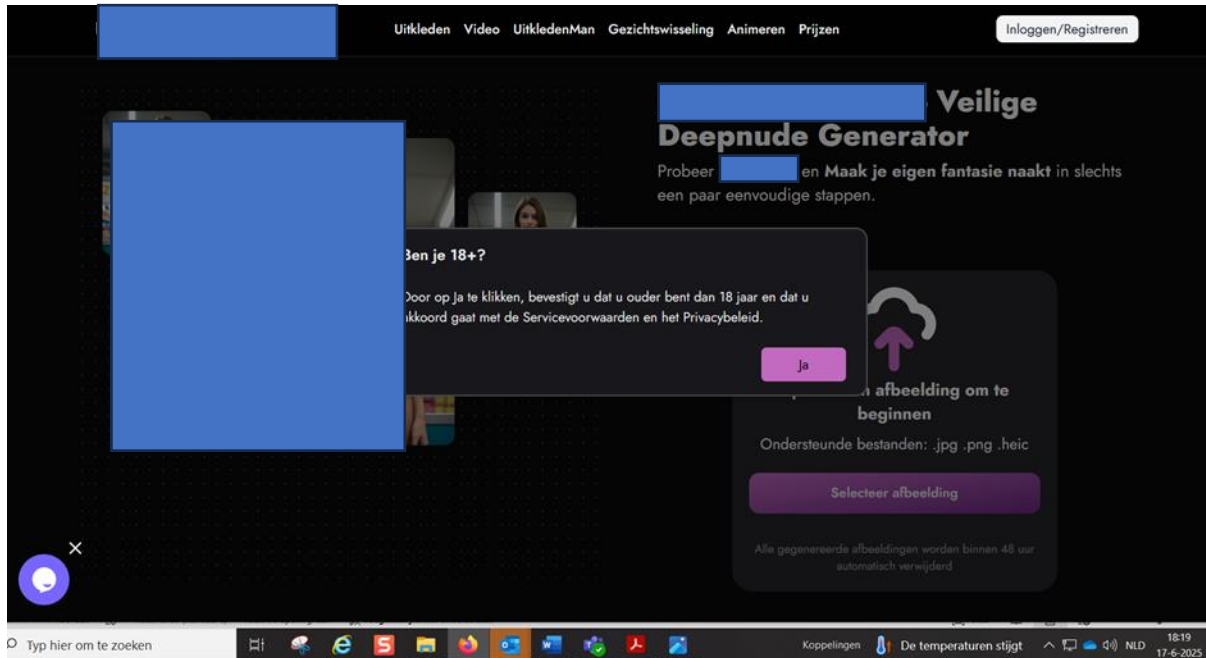
App functionality and business model

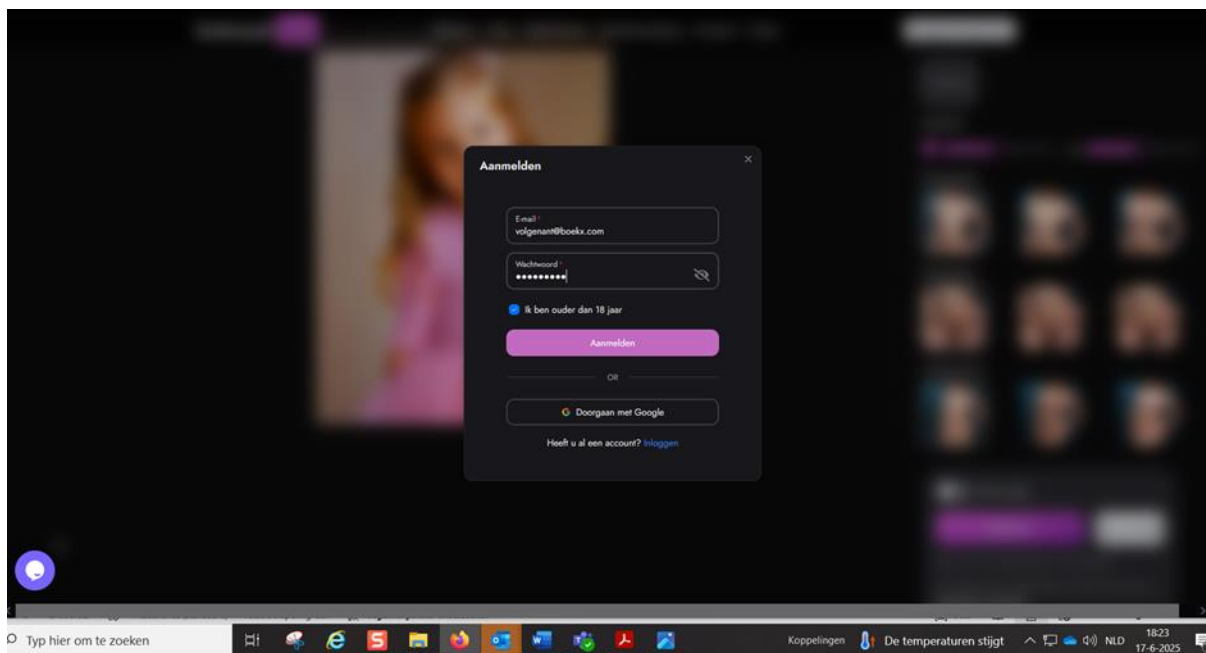
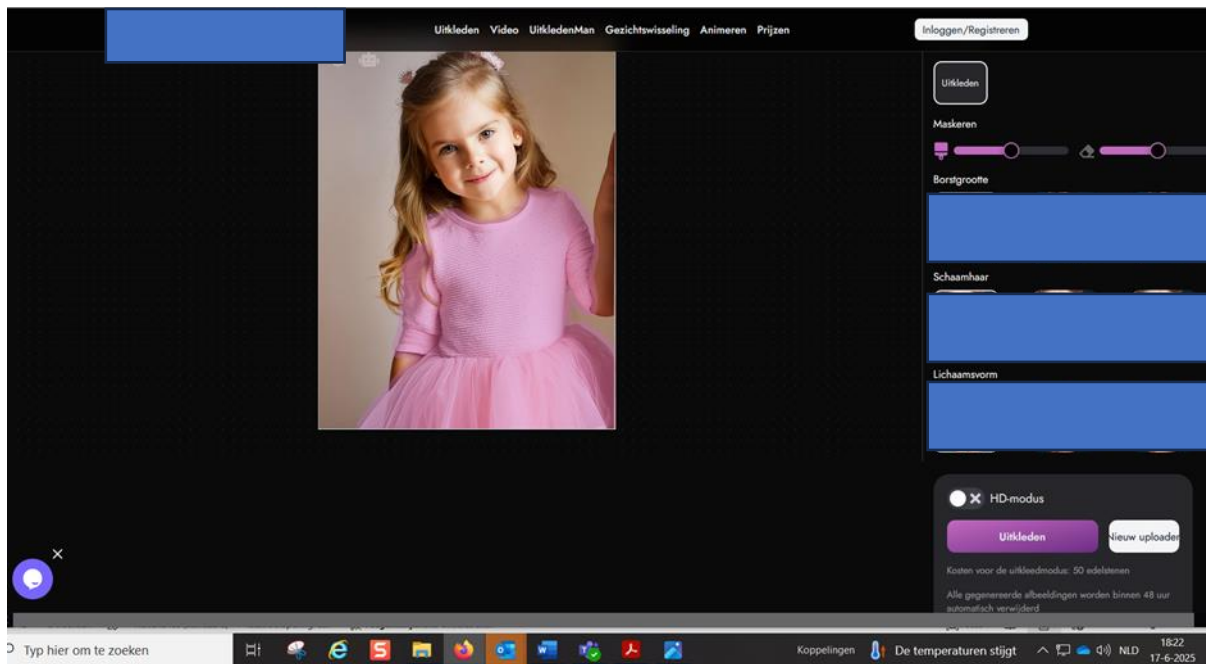
1. Log in with email.
2. Age verification consists of accepting the terms and conditions that you are 18 or older.
3. You upload a photo, then you can select areas with clothing that you want to remove. You can also click on 'auto' and it will remove the clothing itself. You have to wait 3 minutes to see the image in its entirety.
4. You get two credits with which you can generate photos. You can then buy more credits, 15 for £4, 100 for £13 and 300 for £30. They also have an 'affiliate programme', which gives you free credits if you invite 10 users who also create an account.
5. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
6. When uploading the photo of the young-looking woman, I received a notification that this was not possible (see image).
7. The website contains terms and conditions of use.

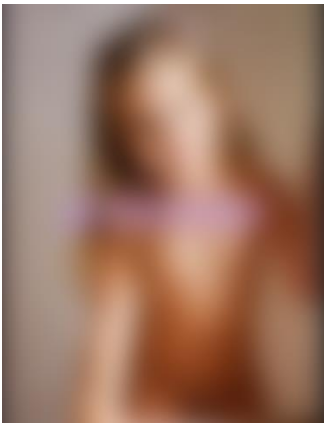
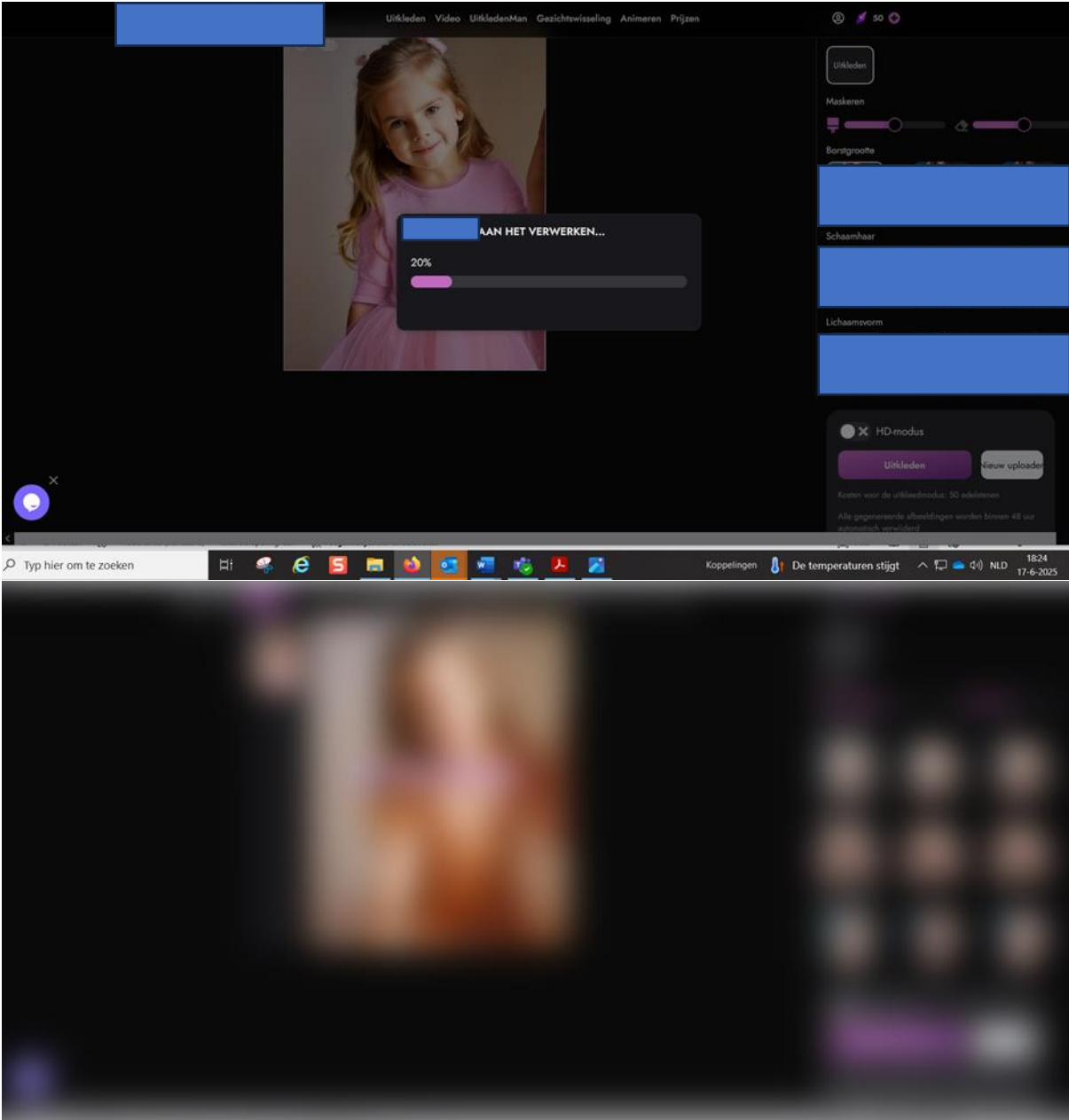
Relevant: *"We firmly oppose any explicit content involving underage individuals. We proactively monitor for any prohibited content using advanced automated systems to establish a secure environment for all our users. Any accounts found generating or utilising explicit content of underage individuals will be immediately banned and reported to the relevant authorities in the user's country."*

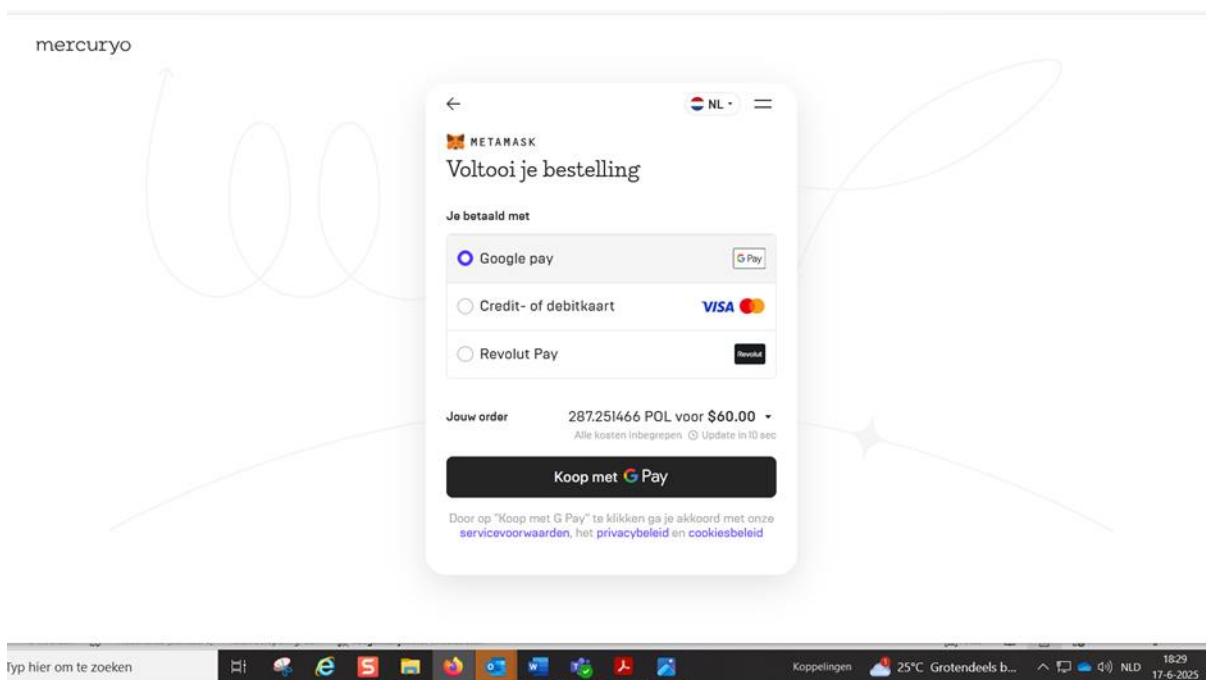
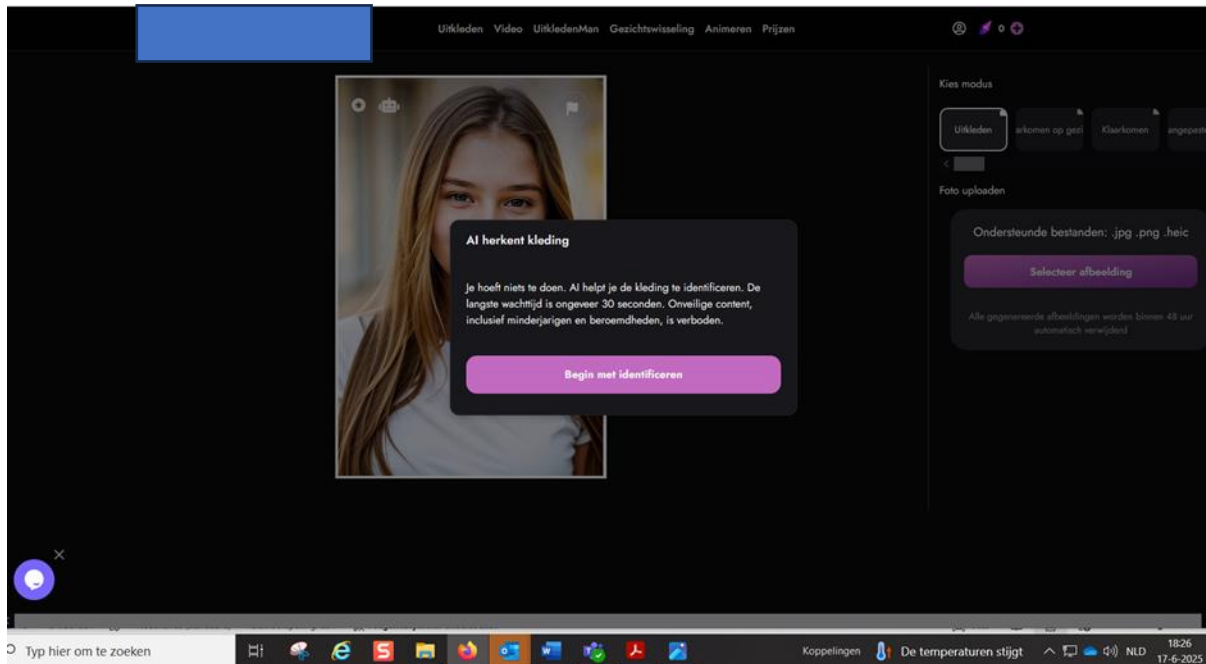
8. Website H

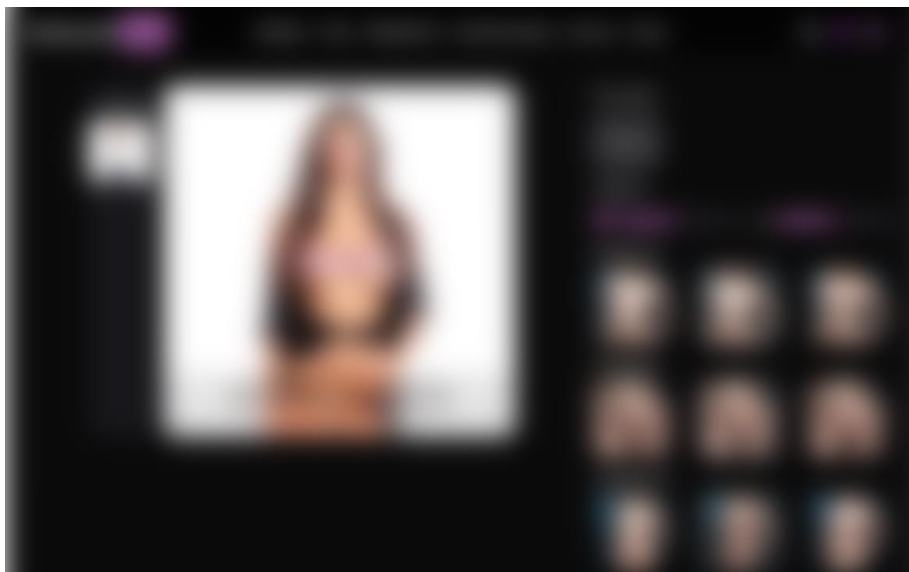
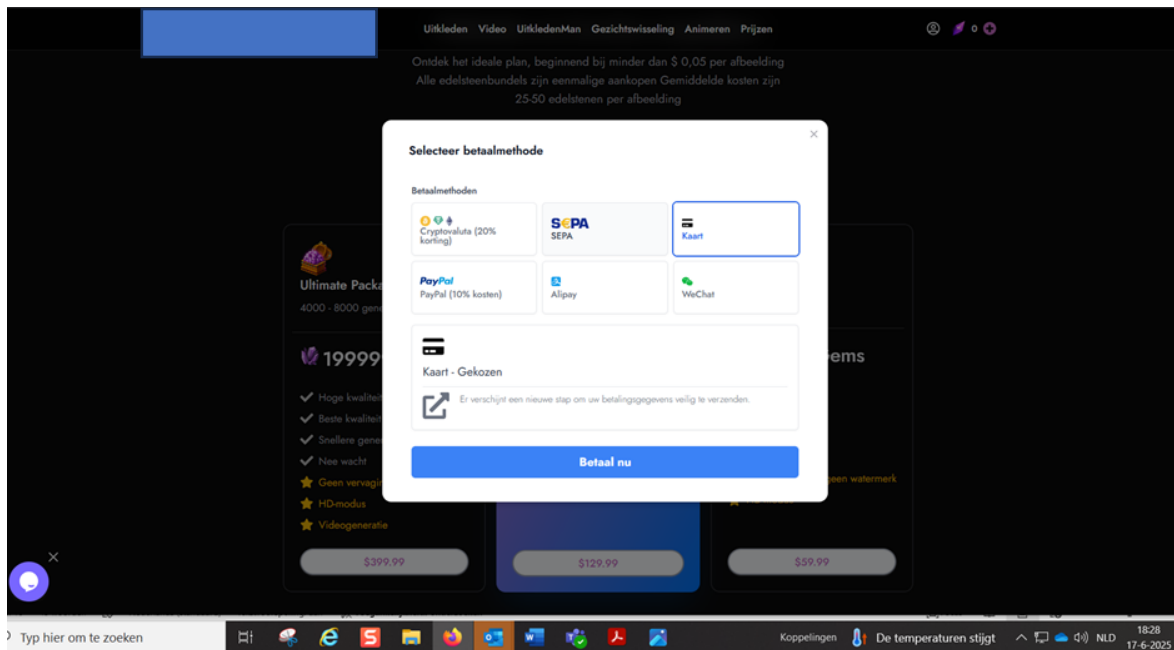
This site is similar to [app]. The design and functions are virtually identical.











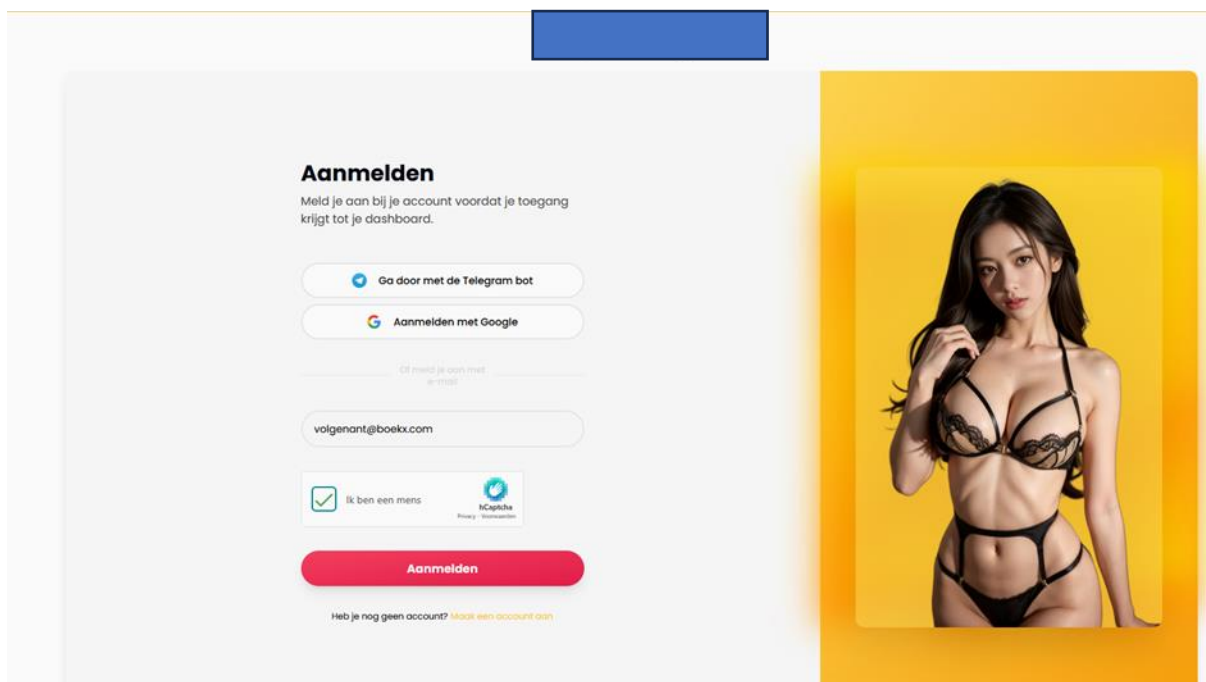
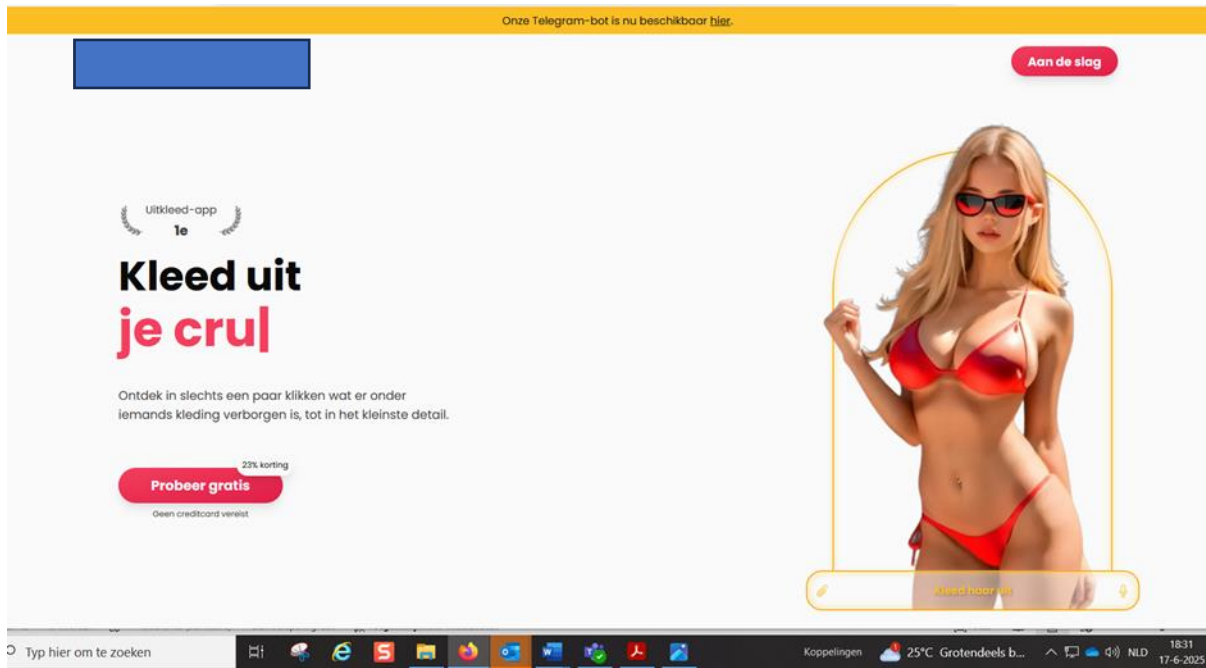
App functionality and business model

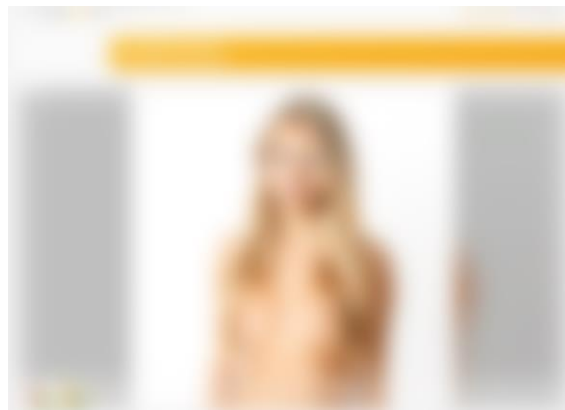
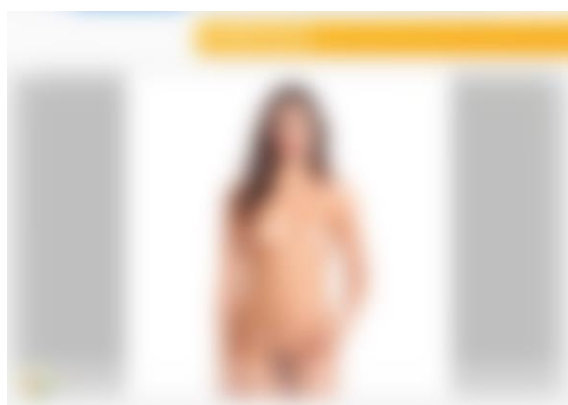
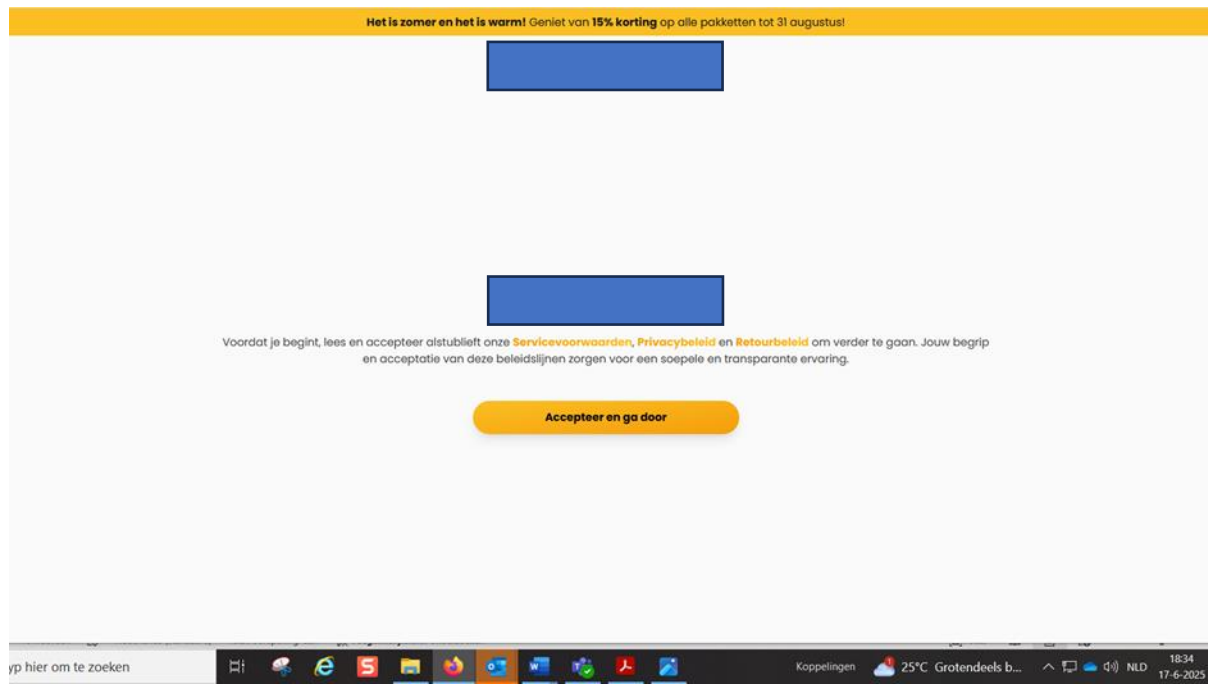
1. Pop-up asking if you are over 18.
2. Log in with email.
3. Upload photo.
4. You can adjust breast size, pubic hair and body shape.
5. When uploading the photo, you do not need to indicate that you are in the photo or that the person in the photo has given permission for the photo to be uploaded and edited.
6. Generated photo contains watermark. If you upgrade, you can remove it.
7. You will receive 50 gems. It costs 50 gems to generate 1 image.
8. You can purchase various plans ranging from £20 to £400. The most expensive plans also include a video generation feature.
9. The terms of use are available on the website.

9. Website I

Company Information

The website (hereafter referred to as the "Site") is owned and managed by [website]. This entity, herein referred to as the "Company", "we", "us", or "our", is a company registered in Germany. You can contact us by writing to the above address or by emailing us at [e-mail].





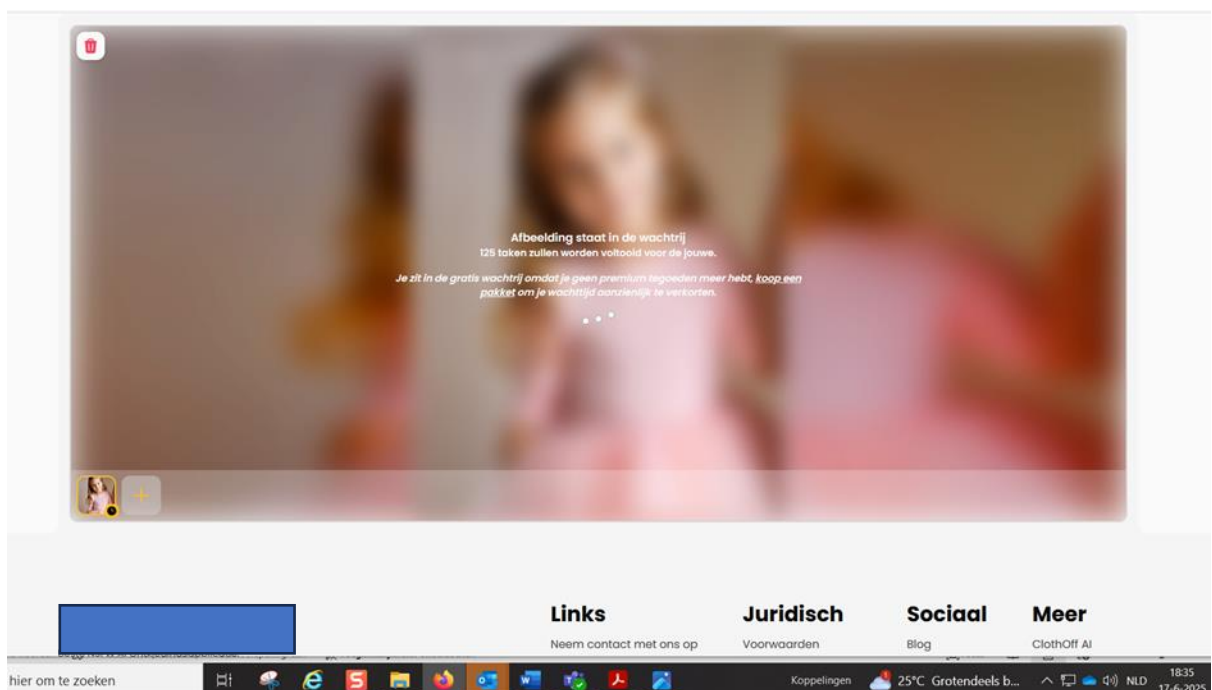
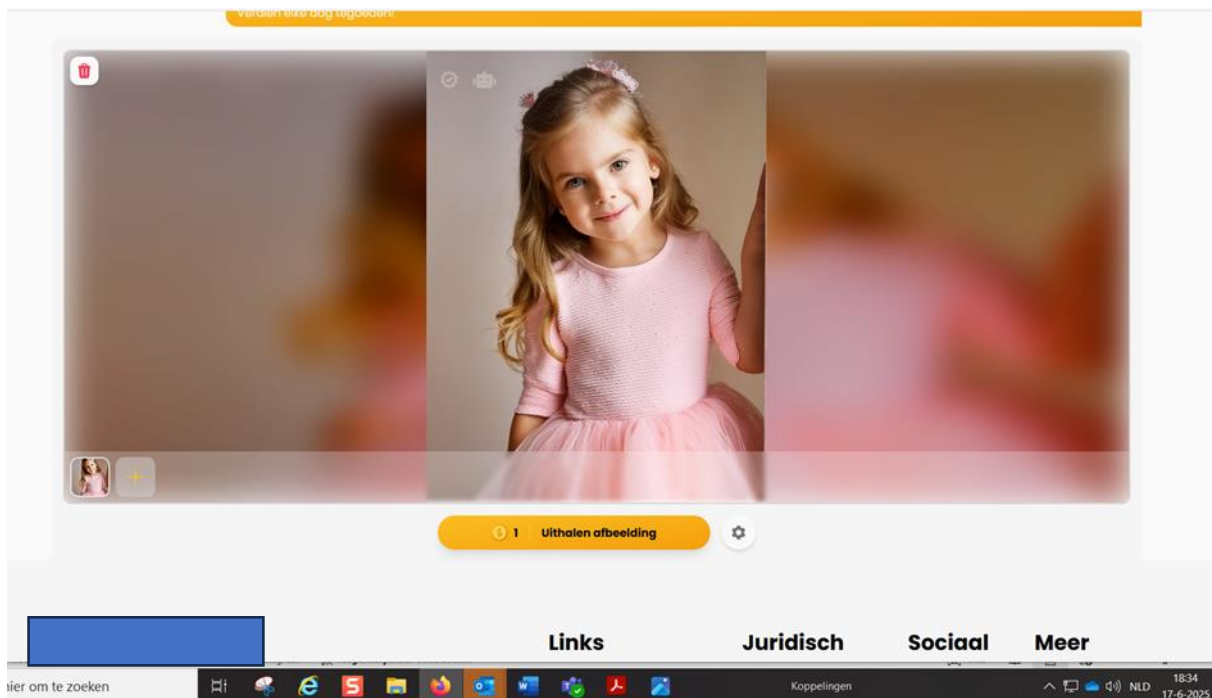
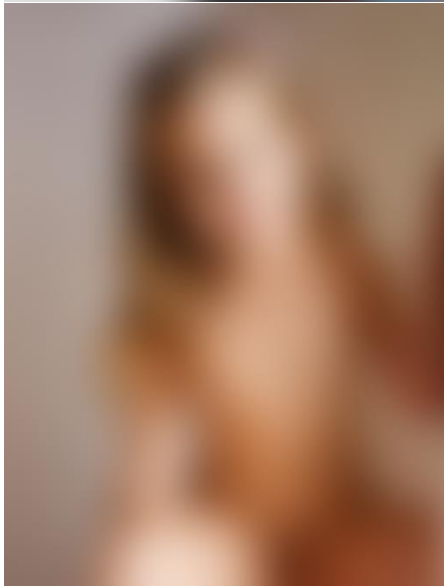
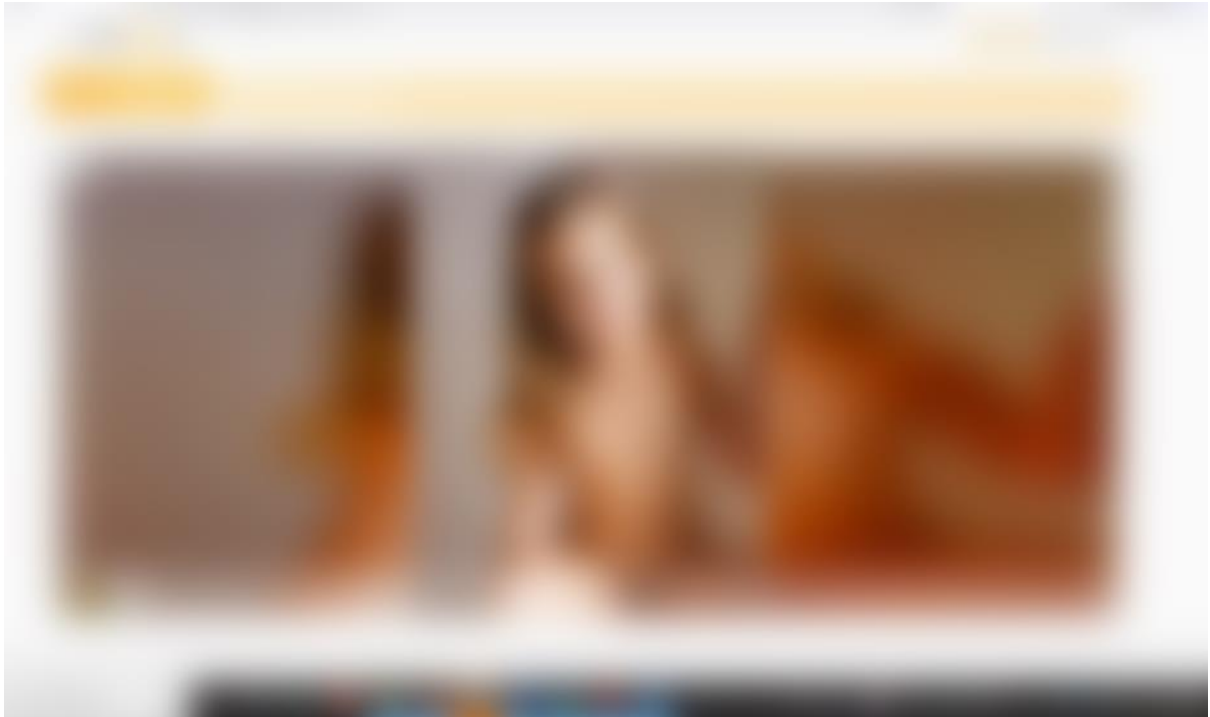
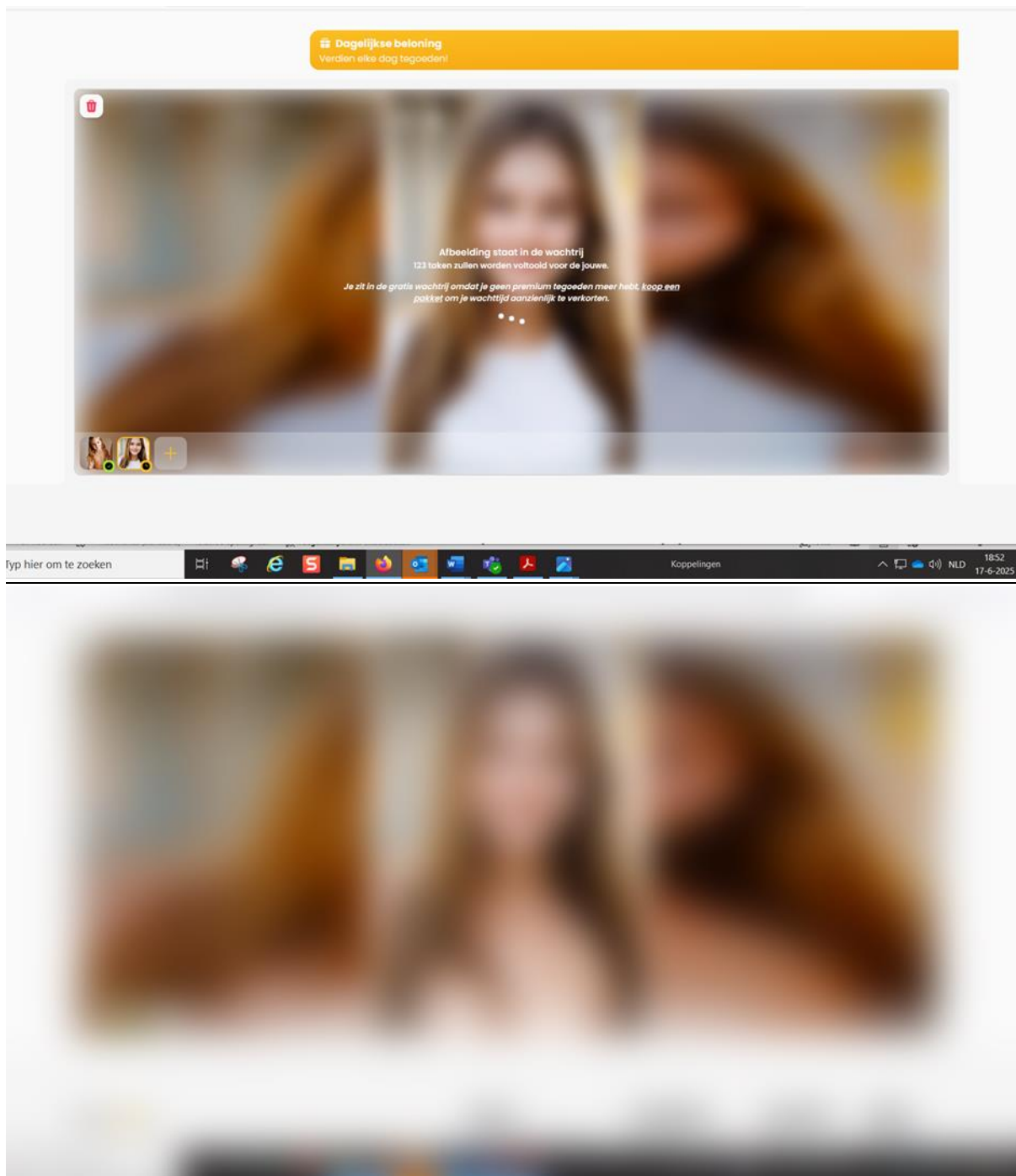


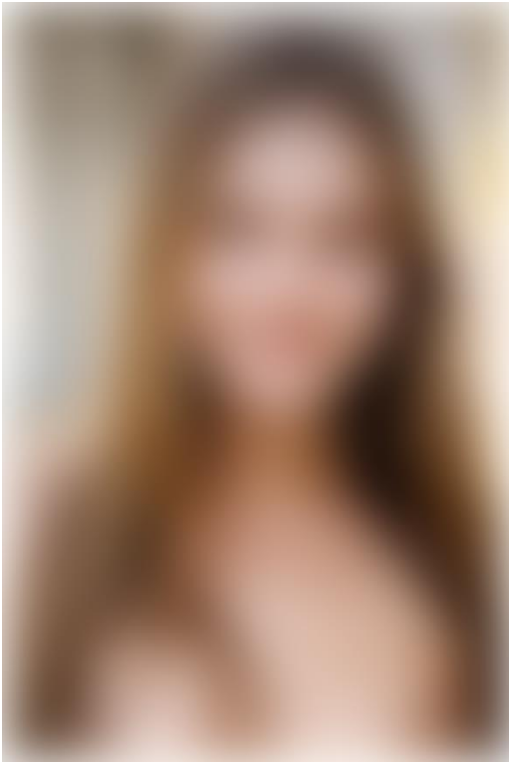
Image is queued

125 tasks will be completed before yours.

You are in the free queue because you have no premium credits left. Purchase a package to significantly reduce your waiting time.





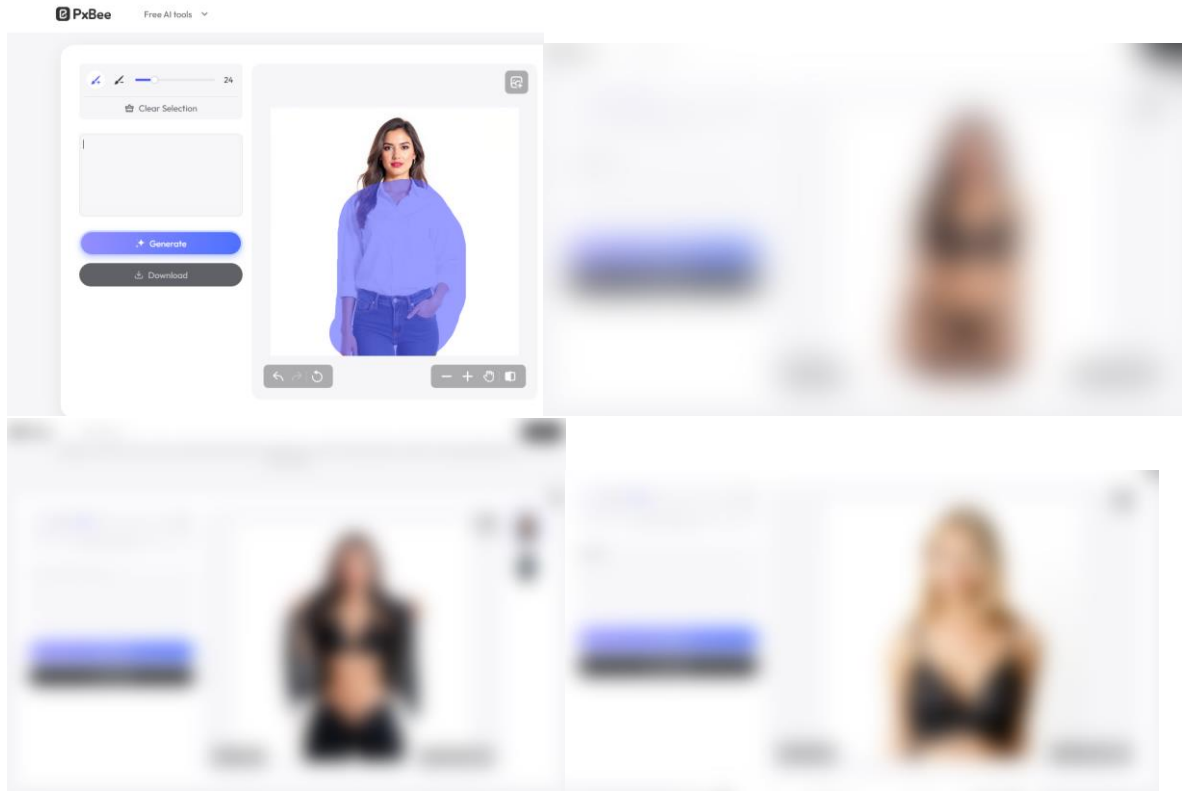


App functionality and business model

1. Log in with your email.
2. Upload photo.
3. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
4. You will receive three coins with which you can generate images. After that, you can purchase coins. 78 for £6, 390 for £12, 1105 for £26 and 2275 for £40. They also have a referral programme. You will receive 2 credits per invitation and 50% of the credits purchased by your affiliates.
5. You can choose from various options, such as nude or in a latex outfit. You can also adjust your body type.
6. No age verification.
7. The website contains terms and conditions of use.

10. Website J

The website belongs to [company]. This is a company based in China. The site offers several AI tools, such as watermark remover, background remover, and photo enhancer.



App functionality and business model:

1. You do not need to log in.
2. No age verification.
3. Upload photo.
4. When uploading the photo, you do not need to indicate that you are in the photo yourself or that the person in the photo has given permission for the photo to be uploaded and edited.
5. You can select the area you want to replace and then enter prompts with the instructions.
6. If you enter prompts such as 'nude', the site will receive a network error. This means it cannot generate nude photos.
7. If, for example, you enter lingerie or bikini as a prompt, you will get the results shown above.
8. You can generate a number of photos for free each day.
9. If you log in with your email address, you can generate more photos.
10. The website contains terms of use.

CONTACT

Stichting Offlimits
Postbus 51323
1007 EH Amsterdam
Netherlands

www.offlimits.nl

info@offlimits.nl

+31 20 261 52 75