

## **- TUENTI Additional Report about 'Safer Social Networking Principles' Implementation-**

### **EU SNS Safer Social Networking Principles Self-Declaration**

In Madrid, on 7 January 2010,

#### **I. Introduction:**

- On 12 June 2009 TUENTI submitted its "Self Declaration" to the European Commission detailing its interpretation and level of adjustment to the Safer Social Networking Principles for the European Union.
- Since then TUENTI has endeavoured to effectively adapt as much as possible to said principles, reinforcing its privacy protection and online safety system, in particular with respect to adolescents aged between 14 and 18.
- On 22 December 2009 TUENTI received a report and a questionnaire completed by an independent expert in response to the variables proposed by the European Commission and which leaves out specific aspects of the implementation of the European Union Principles which TUENTI has carried out on its platform and which are vital for offering users a safe experience of navigation and communication.
- This report has been drafted by Natalia Martos Díaz, Manager of the Legal and Privacy Department, in collaboration with Erin Neff, Head of User Support and Ícaro Moyano Díaz, Communications Manager, all of whom are TUENTI staff members.

#### **Results of TUENTI's implementation of Safer Social Networking Principles for the European Union.**

***Principle 1. Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and careers in a prominent, clear under age-appropriate manner.***

TUENTI displays the Conditions of Use and Privacy Policy at the foot of its web page on a permanent basis so that they are available for consultation at any time. Said conditions have been agreed with the Spanish Data Protection Agency, which ensures that the TUENTI platform is fully in line with both European and Spanish legislation.

In order to comply with this principle in a clear and decisive manner, on 10 December 2009 TUENTI published its "help page" which is available to parents, children, teachers or any one else without needing to be a member of the platform. This help

page can be located on the home page of [www.tuenti.com](http://www.tuenti.com) and contains the following:

1. General recommendations for ensuring user privacy.
2. Simple recommendations for any users relating to privacy, data protection, image rights and on line safety.
3. Specific recommendations for adolescents aged between 14 and 18.
4. A clear and concise summary of the Conditions of Use and the Privacy Policy in simple language easily comprehensible for anyone of the minimum access age, 14.
5. External links to advice on safe navigation offered by Spanish government institutions as well as the Spanish Data Protection Agency.

***Principle 2. Work towards ensuring that services are age-appropriate for the intended audience.***

The minimum age for access to TUENTI has been established at 14, which is the age stipulated by Spanish legislation and which is also in line with European legislation on data protection. This minimum age for access is established in the Conditions of Use and Privacy Policy, however, to date there is no effective mechanism for checking a user's age when registering. Despite this fact, TUENTI has imposed two proactive measures:

1. A maximum registration year has been established at 1995;
2. Since 17 April 2009 TUENTI has been carrying out a procedure of investigating users and deleting those under the age of 14. This protocol was implemented in collaboration with the Spanish Data Protection Agency and as a result part of TUENTI's human resources team checks an average of 1,000 suspicious profiles a week and requests that they send a copy of their official identification either scanned or by fax so that their age can be verified. If within 92 hours the users fail to provide authentic identification, their profiles will be immediately eliminated.
3. When users who have been deleted through this process attempt to register once more with the same email address, the TUENTI system prevents them from doing so.

With respect to TUENTI's system of registration by user invitation only, TUENTI has achieved sustainable growth whereby traceability of users can be checked and it is possible to see who has invited which users. This system ensures that user numbers are not massive and that the incidence of false profiles is minimal compared to other social networks as registration cannot be freely obtained. Any unofficial websites which offer invitations to TUENTI are not legal and TUENTI's legal team prosecutes their illegal activities.

***Principle 3. Empowers users through Tools and technology.***

Since TUENTE's adherence to these Principles on 12 June 2009, all profiles of those under 18 have by default the maximum degree of privacy known as "Friends only" which is closed to unknown users.

The TUENTI "privacy panel" is extremely simple and enables users to manage their own privacy with just 3 clicks. In addition, the user is able to choose not to receive messages from unknown users and prevent their photos from being downloaded.

TUENTI's reporting system permits both profiles (persons) and photos to be reported. These complaints are transferred automatically to the User Support human resources team which analyses them and responds within a minimum period. In cases in which the user may be at risk or a possible offence may have been committed, the case is immediately sent to the Legal and Privacy Department which analyses it and makes an official complaint to the Police within a term not exceeding 24 hours if there is a likelihood of criminal offence.

With regard to the Help Service, since 10 December 2009 the HELP page is available to everyone, irrespective of whether or not they are TUENTI users, at <http://www.tuenti.com/ayuda/> and it responds to all kinds of basic questions on how to navigate TUENTI. This information is public and available to parents and teachers.

***Principle 4. Provide easy-to-use mechanisms to report conduct or content that violates the terms of service.***

For reporting purposes, TUENTI has a specialised team of 20 people all of whom are experts in legislation and action protocols and who receive ongoing training in these fields. The team receives on average 1,200 requests and/or consultations daily.

The previously mentioned Help page is available, along with a system of personalised attention provided by the support team which replies personally to each individual request. When users send their first e-mail to [soporte@tuenti.com](mailto:soporte@tuenti.com) they receive an automatic e-mail ticket or monitoring notification and shortly after someone will contact the user to resolve the problem.

In the event of a potentially dangerous situation, as a result of the recent agreement TUENTI liaises with the Police by submitting any potentially criminal information in order to act on the matter as quickly as possible. Both the support team and the legal department deal with cases individually in order to resolve all queries in the shortest possible time.

***Principle 5. Respond to notifications of illegal content or conduct.***

As anticipated, TUENTI's User Support team responds very quickly to user requests, queries or complaints, providing the best possible advice backed by legal know how and in accordance with internal action protocols.

The complaints system enables users, photographs and any other content to be reported. Also, claims of any kind are dealt with by TUENTI in the strictest confidentiality.

***Principle 6. Enable and encourage users to employ a safe approach to personal information and privacy.***

On the general Help page and the specific Privacy page both of which can be found on [www.tuenti.com/ayuda](http://www.tuenti.com/ayuda), users are encouraged to navigate safely with particular emphasis placed on protection of their privacy. Direct and clear advice is provided for all users and specifically those aged between 14 and 18. Additionally, external links are provided for obtaining advice on protecting privacy and safe and responsible navigation.

In a complementary manner, both the Communications Manager and the Legal and Privacy Department Manager are available to give free educational talks to parents, government agencies, young people, associations and other groups on how to protect privacy and navigate safely in TUENTI. In this respect, TUENTI collaborates with Protégeles by publishing its recommendations and videos in TUENTI free of charge (for example "Safer Internet Day" in 2009 and for the next edition in 2010) as well as giving talks in secondary schools all over Spain.

***Principle 7. Assess the means for reviewing illegal or prohibited content/conduct.***

As mentioned previously, TUENTI has entered into an Agreement with the Judicial Police department of the Guardia Civil which ensures that should any potentially criminal cases arise this department will be immediately notified in order to act accordingly. Similarly it collaborates on a daily basis by responding to numerous Police requests for information. For safety reasons this data is not disclosed in detail on the web page.