# TUENTI

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## Introduction

Tuenti is a Spanish-based Social Networking Site, the most popular amongst teenagers and young adults (14-25) in the country. It has only one language version in Spanish. It started in January 2006. It is the second largest SNS in Spain after Facebook, with 8 million users[1].
Tuenti features many tools common to social networking sites. It allows users to set up a profile, upload photos, link videos and connect with friends; it also offers a chat application and some other utilities, such as the ability to create events. A mobile version of the SNS is offered to users, with some specific features (users' mobile phone number only appear on the mobile version.
The following is a report of findings of the analysis of the self-declaration provided by Tuenti and the testing of its website. The test was conducted in December, 2010 – January, 2011.

### Summary of main findings

In spite of the fact that the minimum age requirement is 14 visitors younger than 14 can easily register on the site[2]. Even though Tuenti does not index profiles of minors in external search engines like Google or Yahoo!, inside the service, profiles of minors (set to the maximum privacy level) are not only open to "friends" but also to other "non-friends" registered users of the platform including adults) who can contact minors via private messages, ask for their friendship and even have access to a thumbnail of the profile picture, the full name, the name of the school and the city where the minor lives. The rest of the information included in the minors` profile is only accessible to friends. In other words, minors' profiles are not set to "private by default" as understood by the Safer Social Networking Principles.
Regarding the appropriateness of advertising content available on the site for minors, Tuenti does not display conventional ad formats (like banners), however brands can create an "event", that will be presented to users as reminders or offers they can decide to attend to or not. No inappropriate content for minors was found on Tuenti during testing.
Tuenti has developed an easy to use reporting mechanism to report any piece of content. However, during testing, this mechanism did not work fully efficiently. Indeed, the " bullying report" (made up for this test) was only replied to four days after submitting the complaint and the bullying content (offensive pictures of a minor) remained on the site even after the "victim" explicitly asked for the pictures to be removed.
Finally, Tuenti provides its users (and non-users) with plenty of information and practical tips on safety and privacy issues. Besides that, a concise summary of the *Terms of Use* has been developed and is presented to non-users and users in a direct and simple language.

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[1] http://www.elpais.com/articulo/economia/presidente/Tuenti/abandona/cargo/compra/Telefonica/red/social/elpepieco/20100805elpepieco_4/Tes

[2] According to the provider, TUENTI has signed an agreement with the Spanish Data Protection Agency, whereby our public commitment to prevent minors from creating and maintaining accounts in our network is formally laid out. As a consequence of this collaboration TUENTI runs an enquiry and deletion protocol applicable to users under the age of 14.

## Analysis of Results by Principle

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

*Main findings in relation to the self-declaration*

According to its self-declaration Tuenti provides *clear* guidance and safety information specifically targeted at 14-18 children on how to navigate their website safely including concrete tips and information on privacy, data protection, image rights, etc. Tuenti also claims to provide useful information and links for parents and teachers (e.g. links to the Spanish Data protection Agency). The self-declaration indicates that the Terms & Conditions and the Privacy Policy are clearly summarized and are easy to understand even for 14 year old children (the youngest allowed Tuenti users).
The self-declaration neither specifies what constitutes inappropriate behaviour on the site nor where this information can be found. Besides, no explicit information on the consequences of inappropriate behaviour on the website is found in the self-declaration. The self-declaration does not mention if the website offers parents and/or teachers any types of technical controls to support the safety of their children online apart from the general safety and privacy information aforementioned.

*Main findings in relation to the website*
Tuenti offers relevant information related to safety and privacy issues in an open area of the site, under the "Help" button (two steps from the homepage). The SNS offers the Privacy principles of the SNS, plus a concise summary of the Terms of Use in the form of a Decalogue, as well as a short, but relevant selection of external links to institutions working for a safer Internet. This information is targeted at a general public and is not directly addressed to parents and/or educators.
When the user opens a profile in Tuenti the same information relating to safety and privacy is also available on the Privacy section, under the "My account" link. Once in the Privacy section, the Q&A covers a wide variety of issues on privacy and safety in a direct and simple manner, just as stated in the self-declaration.
The information about the "Terms of Use" is only textual, and some pieces of it, such as forbidden content and the consequences of misuse, are present both in the short (Decalogue) and long versions of the Terms. As opposed to the Q&A section which is written in a more concise and direct tone, the Terms of Use and the Decalogue are written with a legal tone, not so easy to understand for minors.

***Principle 2: Work towards ensuring that services are age-appropriate for the intended audience***
*Main findings in relation to the self-declaration*

Tuenti states that the minimum age requirement to create an account on this SNS is 14. According to its self-declaration, the provider continuously verifies suspicious profiles ("enquiry and deletion protocol") so as to prevent users from attempting to re-register with a different age if they have previously been rejected for being below the minimum age required. If someone is found to have "lied" about their age (e.g. after verification of their ID), their e-mail address is blocked to avoid that they re-register in the system with the same e-mail address. Still, Tuenti admits that "there is no reliable mechanism to verify the age of users at the time of registration" because it relies on users` self-declaration of age.
In its self-declaration Tuenti refers to one main mechanism to limit the exposure of children to potentially inappropriate contact, namely the fact that Tuenti is an "invitation-only system" which would ensure that only users who get an invitation from another existing user can

register on the site. Apart from stating that inappropriate content can always be reported to Tuenti support team, the mechanisms through which the service provider ensures limited exposure to potentially inappropriate content are not clearly specified in the self-declaration.

Tuenti does not refer to the ways in which it promotes the uptake of parental controls in its self-declaration; although it does claim that they provide parents with general safety and privacy information (see Principle 1).

*Main findings in relation to the website*

The SNS makes clear to users and potential users that 14 years old is the minimum age required to use the service. Reading the Privacy page, and the Terms of Use, Tuenti mentions that their support team is always looking for dissonances on profiles in order to avoid users under 14 to have a profile. SNS could ask a suspicious user for an official ID to check if they are as old as they claim to be. Tuenti publicly states that thousands of profiles are erased every day. Users are also invited to report a profile of an under aged. Besides this information and a registration form that prevents users from selecting an inappropriate age, no other mechanisms, e.g. cookies, are implemented to ensure that users are above the minimum age required. When an under 14 user wants to open a profile the only possible way to do that is by lying about their birth date, so breaching the terms of use of the SNS and risking termination. As the SNS relies too much on the user's self declaration of age, it is really easy for an under 14 years old, to open an account on the service, as was demonstrated by the test on the website.

The SNS does not rate content or services by age and all content is available to all users. Regarding the advertising content, Tuenti does not display conventional ad formats (like banners). Brands can create an event, that will be presented to users as reminders or offers they can decide to attend to or not. Besides that, brands can also create pages (non-personal profiles) where advertising (banners, video ads) could be part of the content. In searching results pages, the logos and links of the "official pages" (sponsors of the SNS) are presented to users. No inappropriate advertising content for minors was found during testing.

Tuenti does not offer parents any possibility for active parental control such as filtering software or other similar mechanisms.

As Tuenti is a closed network, and an invitation of an existing member is required to open a profile, a previous fake account created two years ago was used to send invitations to the testing profiles. To open this account, with research purposes, a university student and real Tuenti user, invited the tester to join the SNS.

### *Principle 3: Empower users through tools and technology*

*Main findings in relation to the self-declaration*

Tuenti claims that by default the profiles of users under 18 are set to "maximum privacy level" (= 'friends only') so that access to unknown users or even to "friends of friends" is not allowed. The default privacy setting described by Tuenti in its self-declaration is, thus, in line

with the concept of "private by default"[3] as defined in the Safer Social Networking Principles[4].

The self-declaration refers to a few mechanisms employed by Tuenti to assist children and young people in managing their experience on their service, particularly with regards to inappropriate or unwanted content or conduct, among others: privacy settings are very easy to control, users have the option not to receive messages from unknown users and to prevent others from downloading their pictures and the Help page includes relevant safety and privacy tips so that users (and non-users) can make informed decisions regarding the personal information they post online.

The self-declaration does not provide any further information on how Tuenti supports parents be aware of the existence of other available safety tools/information (such as filtering tools or parental controls) to help them protect young people online.

*Main findings in relation to the website*

As demonstrated by the test and, as opposed to what is stated in the self-declaration, even though the full profiles of minors in Tuenti are set to the maximum privacy level (= "friends only"), this privacy setting does not exactly correspond with the definition of "private by default"[5] suggested by the Safer Social Networking Principles. According to the latter, "setting a profile to private means that the full profile *cannot be viewed* or the user *contacted* except by 'friends' on their contact list". In the case of Tuenti, even though, the test confirmed that Tuenti does not index profiles of minors in external search engines like Google or Yahoo!, inside the service, profiles of minors (set to the maximum privacy level) are not only open to "friends" but also to other "non friends" registered users of the platform (including adults) who can contact them via private messages, ask for their friendship and even have access to a thumbnail of the profile picture, the full name, the name of the school and the city where the minor lives. Users, however, can easily reject a friendship request and also block other users. After registering, it is also possible to limit who can send private messages to "only friends", but this is not a default privacy setting for minors.

Users can block friends and non-friends, and then unblock them easily and they can delete unwanted comments in an easy way.

Tuenti does not offer any tool or information specifically addressed to parents/educators to help them protect minors online or to enable parental control.

***Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service***

*Main findings in relation to the self-declaration*

Tuenti self-declaration refers to only one basic mechanism to report inappropriate content, contact or behaviour, namely, sending an e-mail to the Tuenti support team

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[3] "Ensuring that setting a profile to private means that the full profile cannot be viewed or the user contacted except by 'friends' on their contact list".

[4] http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

[5] "Ensuring that setting a profile to private means that the full profile cannot be viewed or the user contacted except by 'friends' on their contact list".

(soporte@tuenti.com). Tuenti claims that not only the reports, but also other user`s queries and requests are analysed and acted upon expeditiously and that users are always provided with a confidential, "personal and individual reply". According to the self-declaration users can contact Tuenti in case of "breaches involving users, photographs and any other content". It is not clear from the self-declaration if any other reporting mechanisms are in place.

The self-declaration does not explicitly state if the procedure to report inappropriate content, contact or behaviour is *age-appropriate, easily understandable* for children and young people, or if it is *easily accessible* to users.

*Main findings in relation to the website*

As observed during the test and as opposed to the analysis of the self-declaration, Tuenti provides its users with more than one reporting mechanisms, namely a report button placed next to every picture and contacting the support team via e-mail. The reporting button mechanism is functional and user-friendly. Every time a user is tagged in a picture, the user can either remove the tag, or report it. When users initiate a report, they are advised about the consequences of fake reporting, and a link to the "Terms of Use" is offered to check the accuracy of the report.

As part of this study, a (fake) minor user reported that she had been bullied on this SNS. A realistic bullying situation was set up between the (fictitious) owners of profiles that were created for this assessment. The scenario consisted of one minor being bullied by two other minor users who posted a nasty comment on the wall of the "victim" and who uploaded and/or sent hurtful pictures. As the "victim" could not cope with the nasty comment put on her profile and the embarrassing pictures, she contacted the provider via a form that was filled in and sent to Tuenti explaining the situation and asking for help and advice. Four days after the message was sent the "victim" received a reply advising her to talk to their friends and solve the uncomfortable situation. The user asked to erase the nasty pictures, but Tuenti did not agree with the reasons provided by user and so, the bullying pictures remained on the site.

Reading the Terms of Use link, Tuenti offers an email address (soporte@tuenti.com) as a way of asking for help or contacting their support team. This information is hard to find for minors, and the user is advised to read carefully the Q&A to find the answer before sending a message. The Q&A clearly refers to all the available mechanism for users to control who can access the information they post online. It provides users with ideas and solutions for a wide range of safety and privacy issues, including when and how to send report or how to react to eventual inappropriate contacts or content. By doing this, Tuenti is consistent with its own philosophy of giving the user the control but also the responsibility of what they post online.

### *Principle 5: Respond to notifications of illegal content or conduct*

*Main findings in relation to the self-declaration*

In the self-declaration Tuenti claims that whenever "a user may be at risk involving a purportedly criminal offence" the issue at stake is dealt with "diligently" by the Legal and Privacy Department in charge of studying the case. If confronted with a criminal offence, Tuenti claims to file a complaint with the Police within 24 hours. Tuenti also claims to provide its users with expert legal support. The self-declaration does not provide specific information regarding how Tuenti deals with potentially offending content so it is not clear if

it is immediately deleted from the site, if it is saved for further investigations or if any other measures apply.

Because of ethical reasons, Principle 5 was not tested in the website.

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

*Main findings in relation to the self-declaration*

According to its self-declaration, users of Tuenti are provided with supporting information to help them make informed decisions about the information they post online. For instance, the Help Page and Privacy Centre provide clear and relevant information for 14-18 year olds (but also for their parents, teachers and non-users) on how to ensure online safety in general and on specific privacy issues, in particular. Tuenti also claims to raise awareness of privacy and safety issues by cooperation with local safety and governmental centres.

Apart from the plenty of information regarding privacy, the self-declaration does not provide detailed information regarding the actual privacy mechanisms and functionalities provided to users of Tuenti. It does mention, though, that the default settings for profiles of users under 18 are set to strict "private" settings by default and that users can always adapt their privacy settings via the user- friendly "privacy panel". Regarding the exchange of content, Tuenti claims that users have the option not to receive messages from unknown users and to prevent others from downloading their pictures. Further, no other specific functionalities are mentioned in the self-declaration. The self-declaration does not refer to if the service provider automatically maps information provided by users (during registration) onto their profiles or if users are made aware when this happens.

In sum, the self-declaration focuses on the privacy information made available on the site, but not on the functionalities that would actually *enable* a safe approach to privacy.

*Main findings in relation to the website*

As previously mentioned, the default profiles of users under 18 years old are set to the "maximum level of privacy" possible in Tuenti, but they are not "private by default". The following mandatory information is required of minors to open an account on the service: real first and last names, birth of date, name of school they attend, expected graduation year and place of residence. This information is displayed in the user profile page, although only friends have access to the whole profile. The rest of registered users, including adults, can only have access to a thumbnail of the profile picture, the minors` full name, name of school and place of residence. Profile editing is possible after registration, but mandatory information cannot be left blank.

Privacy settings are accessible at two steps from the profile page, which may make them a bit difficult to find especially for the youngest minor users. Users can control who (*only friends, friends of friends or everyone*) can see their profile, who can download their pictures, who can send them private messages, see their wall, or their phone numbers. Controls to block users, pictures, applications or games are also offered. The "Help" button is also always present in the page and is accessible at all times. Recommendations for a safer use of the SNS are presented to non-users and registered users in the Privacy page. Users 14-18 are advised, for instance, to "ask your parents if you have any doubts about a message or situation", or "before

publishing a picture, ask for permission of anyone included in it". A specific email address is offered to solve questions about privacy on Tuenti: privacidad@tuenti.com.

Finally, when a user wants to delete their account the first option Tuenti offers is to deactivate it. It clearly states that in this case, the information would only be "hidden" and that it would be possible to recover it at a later time if the user wished so. On the same page, Tuenti explains that the account could also be deleted. In this case the information would be permanently eliminated. In both cases, the user is asked about the reasons to quit the service.

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

*Main findings in relation to the self-declaration*

According to the self-declaration, the procedures employed by Tuenti to promote compliance with the Terms of Service are based on the user-generated reporting mechanism by means of which objectionable conduct or content can be identified. This process implies that all requests, queries and complaints submitted by users are reviewed by Tuenti user support. As stated in Principle 5, whenever criminal offences are spotted the Legal and Privacy Department studies the case and, if necessary, files a complaint with the Police.

It is not clear from the self-declaration how the service provider assesses the effectiveness of their services to identify potential safety threats in particular in relation to removing inappropriate and/or illegal content found on the site.

Principle 7 was not tested in the website.

## Summary of Results and Conclusions

Considering the self-declaration submitted by Tuenti we can conclude that the service provider has implemented all the Principles rather satisfactorily on its website. The testing on the website revealed some areas of attention, for instance:

- Even though the minimum age requirement is 14, visitors younger than 14 can easily register on the site.
- Although the privacy settings are set to "maximum privacy level" (= 'friends only'), still all registered users can contact minors via private messages. In other words, minors' profiles are not set to "private by default" as defined by the Safer Social Networking Principles.
- Even though Tuenti does not index profiles on search engines outside Tuenti, inside the service, all profiles are searchable by other "non friends" registered users of the platform with no limit of age.
- Even though the reporting mechanisms proved to be user-friendly, during the testing they did not work completely efficiently. Indeed, the " bullying victim" (created for this test) only got a reply four days after submitting her complaint and the bullying content (offensive pictures of the minor) remained on the site even after the "victim" asked explicitly for the pictures to be removed.

**Assessment of all the Principles in the Self-declaration**

| *Principle* | *Very satisfactory* | *Rather Satisfactory* | *Unsatisfactory* |
|---|---|---|---|
| 1 | | x | |
| 2 | | | x |
| 3 | | x | |
| 4 | | x | |
| 5 | | x | |
| 6 | | x | |
| 7 | | x | |

**Implementation of the Self-declaration on the SNS**

| *Principle* | *Very satisfactory* | *Rather satisfactory* | *Unsatisfactory* |
|---|---|---|---|
| 1 | | x | |
| 2 | | x | |
| 3 | | x | |
| 4 | | x | |
| 6 | | x | |

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