

EU SNS Safer Social Networking Principles Self-declaration Form

In the interests of transparency, providers supporting the EU Safer Social Networking Principles agree to self-declare how they have considered the Principles in relation to the Social Networking Services they offer, using the form below.

- **About the Social Networking Service(s)**

The following is a brief outline of nasza-klasa.pl declaration, including a short description of the services it offers that fall into the category of “social networking” as outlined in the Principles.

Nk.pl (short name of nasza-klasa.pl) is a social networking site gathering Internet users who want to find their friends. Thanks to nk.pl it is possible to rebuild relations with colleagues from kindergarten, primary school, high school, college - in a word – from the past and also - to contact ones present friends and/or family. Nk.pl was created by four students: Maciej Popowicz, Paweł Olchawa, Michał Bartoszkiewicz and Łukasz Adziński and has been operating since 11th of November 2006. Today there are almost 14 million active profiles on this website (active means that each month each User at least once visits nk.pl).

Nk.pl offers many social features which help people 'stay in touch'. Users can create their own profiles, join school and class profiles, gather their friends, send internal messages, upload photos, leave comments on profiles and under photos and chat with friends via the forum, the internal instant messenger and the microblogging tools.

Almost 80% of nasza-klasa.pl users are adults, but this number doesn't change the fact that we try to protect our younger visitors.

- **How has the company considered these services in relation to the Principles?**

The following is an outline of how nasza-klasa.pl has considered the EU Safer Social Networking Principles in relation to its Social Networking Service(s). This section will make reference to the recommendations made in the Principles document, where they are applicable and outline how they are applied.

Principle1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner

Nk.pl offers every Internet user access to a **simple explanation** of how our website works. It is mainly dedicated to these users who are not part of the nk.pl community yet. In 3 steps we try to present basic features available on our websites and show how to explore and use nk.pl properly. This explanation can be reached from the login page: <http://nk.pl/>>http://nasza-klasa.pl/tour/1>

and it is also an invitation to become familiar with our regulations.

Nk.pl has established clear **Terms of Use** and **Privacy Policy**, where it is emphatically stated which content and conduct is approved and which is not. Some key parts of these regulations are repeated in strategic places of our service - for example on the page which is used to upload photos there is a short reminder of which photos we must not publish on nk.pl: 'In consideration of our youngest users' welfare, we remind you that obscene photos and photos that violating manners and morals will be removed from your gallery'. In turn, the Privacy Policy underlines our service's care of users' personal data and encourages them to set, according to their needs, the privacy settings. In the nearest future a modification of **Terms of Use** and **Privacy Policy** is planned. This modification will accent nk.pl duties as SN provider. Our Users will get consolidated document with new regulations. There is also a preparation of vademecum of Terms of Use dedicated to the youngest foreseen. Vademecum will be created in a age-appropriate manner.

Some settings for users under 13 are service default settings. We have decided to block by default any crucial information that youngsters put on their profiles (age, self-declaration, present activity, phone number, name of present school, photos, comments on profile and photos, etc.) This information is only visible for people who are listed on youngster's friends list. The blockade doesn't allow these "alien Users" on any activity connected directly with youngsters, e.g. they cannot observe, comment, favour youngsters' status updates on nk.pl microblogging platform.

The Terms of Use and Privacy Policy are placed at the footer of nk.pl and can be reached from any page of the service.

A special **Safety Section** on nk.pl has been implemented and it has been instantly developing since last year's autumn. It is divided into seven main parts dedicated to children, their parents, and to children and patrons at the same time. There also sections in which Polish Police Department, GIODO (General Inspector of Personal Data), foundations such as: kidprotect.pl and helpline.org.pl give youngsters and their parents advices how to safely use the Internet and where to seek for help in case of any abuse. In the nearest future this section will be supplemented by sites especially dedicated to teachers.

We provide users with special materials and tools to help them navigate nk.pl more safely as well as the Internet in general. For example, in the section for children we have created a cartoon characters called: Sekurion and Protekta (their "personal" account address: http://nk.pl/sekurion_i_protekta) who alarm children about any new information in Safety Section and visit their profiles (at least one per each quarter) in order to leave safety tips. Thanks to these journeys via profiles, nk.pl is able to present facts about basic Internet problems (phishing, cyberbullying, identity theft, etc.) and ways to cope with them.

Outside the service: The Safety Department, which is part of the firm running nk.pl, takes part in many meetings/workshops/trainings with police, lawyers, teachers and students. The impact of these meetings benefits both sides. One of the most significant co-operation in this matter is the one with foundation Kidprotect.pl and e-commerce platform – Allegro.pl.

Common action called "Click with your head":

<http://nk.pl/#bezpieczenstwo/bezpiecznklasa/klikajzlowa> is dedicated to teenagers from junior high schools and consecutively takes place in several dozen of Polish cities.

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

The Terms of Use clearly state and will state that a person under 18 must have adult permission to use nk.pl.

As the biggest Polish SNS, nk.pl feels responsible for its Users, especially the younger ones. Therefore access to their profiles is restricted. This is also the reason why “an alien User” cannot provide any actions on their accounts (both cases widely described in the chapter above). There is an opportunity to find child’s profile via nk.pl search engine (we do not want to deprive potential friends the possibility of finding each other) but in this situation only basics facts are given to the seeker (name, town, main picture). Moreover, none action directly connected with child’s personal data can be done as long as “an alien User” is not at minor’s friends list or as long as our child keeps service default settings. In Security Section we inform what kind of connections children should avoid.

We have also implemented some mechanisms which are not visible from User’s point of view, but they work to protect them. For example “Wrong Links Validator” deactivates dangerous links and “Family Filter” helps to find and remove swear-words from nk.pl public pages. In the nearest future another development of this tool is foreseen. We will be automatically removing to the black list quasi-friends of a child who put swear-words on its private profile. (Black list it is a portfolio of accounts which are not allowed to any form of contact with the blocker.)

Principle 3: Empower users through tools and technology

Nk.pl provides many necessary tools for minors which let them control relations they make through our service. Young users can **reject friend requests, put unwanted guests on the 'black list' (block them), remove unnecessary comments, quickly report photos that violate the Terms of Use** and are able to easily contact nk.pl Customer Service (in our CS there is a special line dedicated to children only).

Moreover, profiles which belong to younger users are, by default, more private than the adults' profiles – as it was mentioned above. They can also hide their profiles and make them **invisible for search engines**.

We also encourage minors to create safe logins and passwords, tell them about problems they may experience while using Internet, explain basic Internet terms. The most important topics are detailed in a movie called: “Make the Internet a safer place”, where in main roles children can see their peers: <http://nk.pl/bezpieczenstwo/dzieci/bezpiecznyinternet>. Parallel movie, which in a tricky, juvenile way shows why ones should properly behave while using Internet, was also created for teenagers: <http://nk.pl/bezpieczenstwo/mlodziez/dobrazabawa>

Nk.pl has additionally developed its help center. Users have gained simpler configuration of the most important assistance topic. A special search engine which seeks for the answers that fit to Users’ questions connected with using our website has been implemented. Dedicated movie has also been prepared to explain how to navigate the whole help corner: <http://nk.pl/#pomoc>. This

part of nk.pl is accessible even for those Internet Users who are not logged in the service.

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

Nk.pl provides easy-to-use mechanisms to report inappropriate/unacceptable content or conduct:

- button 'block user' placed in every profile
- button 'report abuse' placed under every picture published on any website
- button 'report abuse' placed under every comment to each single post on nk.pl official channels, such as: <http://nk.pl/blog/portal>
- button 'report abuse' placed next to each microblogging post and comment
- button 'remove comment' in every profile, 'remove post' in every forum
- link 'contact' reachable from every page in service and a short blank to notify problem

Principle 5: Respond to notifications of Illegal content or conduct

Nk.pl Customer Service works 24/7 to resolve problems and abuses reported by Users. When a User sends to our CS any kind of request he gets the following information: "Hello! Thank you for your e-mail. Your request has reached its destination and a proper specialist will contact you. Usual time of waiting for the actual answer is less than 48 hours. For your recollection, you has just written: [text of User's e-mail]. Your message has gotten this number: [number of User's e-mail]. Please do not erase this number nor change the topic of your request. You will get an answer on your address given in your contact details on nk.pl. Best regards, nk.pl team". In case of any kind of abuse the actual reaction time is less than couple of hours. If there is a suspicion of committing a crime our specialists report it to the adequate civil services.

The number of people in nk.pl customer team is constantly growing accordingly to the increase of the number of active Users. The service co-operates closely with lawyers and police officers to develop their skills in legal matters. Moreover, nk.pl provides selected employees from Customer Service with training conducted by a psychologist. This training is valuable in dealing with 'tough cases' (how to respond, how to act with sympathy, how to effectively console).

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

The Privacy Policy of our service describes what data is collected, why and how it is collected, and where and when Users can manage it.

During the registration process Users can hide all information about themselves. While using nk.pl it is always possible to change one's privacy settings. There are 3 main privacy settings: open profile, private profile, and closed profile, as well as an opportunity to customize individual

privacy settings. Nk.pl Users can decide:

- whether their profile is visible to everyone, only friends, or to no one
- whether their personal data (name, surname, age, phone number) is visible to everyone, only friends, or to no one
- whether their photo gallery is visible to everyone, only friends, or to no one
- whether their schools/classes are visible to everyone, only friends, or to no one
- whether their posts on microblogging platform are visible to everyone, only friends, or to no one
- whether their friends or unknown nk.pl Users can comment on their profiles and photos
- whether their friends or unknown nk.pl Users can mark with pins and grades their photos
- whether their friends or unknown nk.pl Users can follow their microblogging posts

They can, for example, also define whether they want to:

- be seen by their friends as being on-line while logged in
- be seen in the results of searching in our internal search engine
- allow other Users to pin their profiles to different photos (this option is blocked by default in case of the youngsters)
- be seen in suggestions of new connections

Privacy settings are placed at the top of nk.pl and can be reached from any page of the service.

Nk.pl not only gives their Users new tools to manage their personal data but also encourage them to treat these issues seriously. Therefore there are some specific, periodic steps taken, such as:

- above mentioned campaign “Click with your head” (<http://klikajzglowa.pl>, <http://nk.pl/#bezpieczenstwo/bezpiecznaklasa/klikajzglowa>, <http://nk.pl/#blog/portal/wpis/333>) – in progress
- campaign “You have the right” addressed to wide target of Users with main message: “You have the right to remain safe in the Internet” – project in preparation
- dedicated actions with using commercial surface in the service (especially surface on the main page - its right part – as it is the most popular nk.pl site)
- written and multimedia materials which are published via nk.pl communication channels: <http://nk.pl/#blog/portal/wpis/171>, <http://nk.pl/#blog/portal/wpis/158>, <http://nk.pl/#blog/portal/wpis/287>, <http://nk.pl/#blog/portal/wpis/352>, etc.
- actions organized by Sekurion and Protekta (http://nk.pl/sekurion_i_protekta)

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

Nk.pl uses human and automated forms of moderation.

Customer Service scans the portal to find potentially illegal or prohibited content (e.g. obscene photos, comments containing swear-words) and remove them as soon as possible.

We utilize technical tools such as filters to catch illegal comments, data, and subtitles. We also employ user-generated reports which are made thanks to special buttons such as 'report abuse'.