

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.

1. About the Social Networking Service(s)

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

Sulake is a social entertainment company focused on online social places and games.

Sulake’s main product **Habbo Hotel** is the world’s largest virtual community and social game environment for teenagers. Currently Habbo Hotel has users from over 150 countries and the service is available in 11 language versions. To date (November 2010), more than 188 million characters have been created and over 15 million unique browsers worldwide visit Habbo Hotel each month, spending a total of 45 million hours in the service.

Users join Habbo Hotel by creating a fully customized online character called a Habbo. From there, they can explore wide variety of spaces and millions of rooms created by other users in the virtual community, play a variety of games, connect with friends, decorate their own rooms, and have fun through creativity and self expression. The majority of Habbo users globally are between 13 and 16, equally boys and girls. The age limit to Habbo is 13 in most of the countries.

Habbo Hotel is not a typical “social networking service”, which means that certain best practices in the EU Safer Social Networking principles don’t apply to it. In Habbo Hotel, users can’t e.g. upload any real-life photos or videos, and sharing personal information, such as contact details, is prohibited. However, the users have their own Habbo profiles, they meet and chat with friends, like in other social networking sites. If a user connects to Habbo Hotel through Facebook, they can see the names of their existing Facebook friends also in Habbo. All other contacts remain anonymous in Habbo Hotel, even when using the Facebook login.

Safety is a high priority for Sulake and the company is committed to keep Habbo Hotel a safe haven for its users. Sulake uses a variety of vehicles that work together to help ensure a safe online experience for Habbos:

- (i) Empowering its users (both teens and their parents) through education and participation
 - a. House Rules “Habbo Way” clearly communicated to users
 - b. A lot of safety content and information available for users and their parents
 - c. Regular safety campaigns organized in Habbo
- (ii) Active moderation by trained adults
- (iii) Using advanced technology for content monitoring
- (iv) Using payment limits with different payment methods
- (v) Working with law enforcement around the world
- (vi) Working with external partners and governmental organizations (like Safer Internet Day) on player safety issues

Internet can never be fully moderated, and today's teens are using many internet services simultaneously. Even if Habbo Hotel would be the safest place on the internet, bad things can happen on other services, outside of Habbo Hotel. Threats are common for many internet services, also for Habbo Hotel. Thus, for safer internet usage, Sulake strongly believes in empowering our users and their parents through education and participation.

Sulake also owns and operates **IRC-Galleria**, which is one of Finland's leading social networking services. IRC-Galleria has currently close to 500 000 registered users.

IRC-Galleria is an interactive service where users can e.g. post and share their photos, blog entries and other material on their own customized pages, join different sub-communities and communicate with people in many ways. Currently the members are on average 21 years old and 60% of the registered users are over 18. The age limit to the site is 12. Basic usage of IRC-Galleria is free, but users have an option to purchase additional services and enhancements. The service can also be used with a mobile phone. The main characteristic for the service is that people are not supposed to act anonymously: everyone needs to have a clearly identifiable main profile picture. To fully register to the service the user needs to confirm his or her email address. User accounts can also be verified via Facebook / Windows Live / Gmail account.

IRC-Galleria safety approach in short:

- (i) Empowering its users through education and participation
 - Safety instructions and rules integrated to the community itself (e.g. upon registration and when uploading pictures)
 - Constant safety education on the site and through campaigns
 - Close cooperation with major goodwill / child protection partners including Save the Children, Mannerheim League of Child Welfare and the Youth Department of Helsinki
- (ii) Active moderation by real people in IRC-Galleria: 5 full-time moderators
 - Moderation is based primarily on user reports and contacts
 - The preventive approach has worked: e.g. the amount of photos, which are against the rules, has gone down from 1/500 to 1/1000 during the past three years
 - Service rules are also stricter than local law: i.e. abusive/bullying behavior towards other users and documenting use of drugs/alcohol among minors is prohibited
- (iii) Close cooperation with law enforcement units and authorities including the Police, Consumer Rights Organization and Finnish Communications Regulatory Authority.
 - Active presence of local police officer in the community
 - Pro-active reporting of serious material to police (i.e. violent threats)

2. How has the company considered these services in relation to the Principles?

The following is an outline of how Sulake 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.

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

Habbo Hotel: The virtual community “house rules” (The Habbo Way) have been created keeping in mind the young age of most of the Habbo users. The intention has not been to create alternative T&C, but to provide clear instructions for good and safe behavior inside the community. The Habbo Way is clearly communicated to players, and also enforced by moderators. All Habbo communities also have local parental guidelines, safety tips and they host regular campaigns on safety themes, which invite players to engage with the topic creatively.

Examples from Habbo.com:

The “Habbo Way”: <http://www.habbo.com/groups/officialhabboway>

Parent’s guide: <http://www.habbo.com/groups/officialparentsguide>

Safety tips: <http://www.habbo.com/groups/officialsafetytips>

IRC-Galleria has clear instructions and rules for the users, which are shown upon registration and which can be easily found in the site navigation. These instructions are clearly separated from the T&C. The instructions explain in an easily understandable language how the service should be used, the do’s and don’ts, safety tips, and a special section for under 18 year-olds. The basic idea of IRC-Galleria is clearly stated: people are not supposed to act anonymously, i.e. everyone needs to have a clearly identifiable main profile picture. Users also get safety messages when building their profile and using the community: e.g. when posting pictures users are reminded of what this means, i.e. once posted you might never get the content away from the Internet.

Working with law enforcement, governmental parties and external partners:

Sulake works hand-in-hand with local authorities and immediately reports any inappropriate behavior or people to these local authorities.

Sulake also co-operates with governmental organizations and campaigns like Insafe / Safer Internet Day on relevant player safety issues. Currently the company has over 20 goodwill/charity partnerships established around the world to teach teens about various topics including safe Internet usage, the dangers of drugs, bullying etc. Partners include Unicef, the Red Cross, Frank, Child Right, Power Child as well as many other country specific organizations.

Most of these partners use the award-winning *Infobus* in the Habbo community as a place where they can give short talks to users, make quizzes, and answer any questions. The Infobus is incredibly popular with Habbos - usually there are queues outside the bus even if there are no sessions going on!

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

Habbo Hotel is aimed mainly for teenagers, between the ages 13 and 18. All the local services have age limits, which vary a bit according to location. In most of the communities the age limit is 13. Younger users trying to register are denied access and in some countries it is not possible to register immediately from the same computer with a different birth date. Also, in some countries parental email is sent to parents informing about minors registering to Habbo Hotel.

IRC-Galleria has an age limit of 12. The service has lots of age-targeted content, i.e. campaigns, advertising etc. should always be suitable for the users.

However, as there currently are no reliable and generally used age verification systems, Sulake is not able to verify the users' ages. In both services moderators also monitor user behaviour and remove clearly under-age users from the services.

Principle 3: Empower users through tools and technology

Habbo Hotel has implemented a wide range of technical tools to assist the community management and moderation. The technology supporting human moderation include:

- Automatic monitoring tools: with the help of specially designed filters, alerts are automatically sent to moderators when the filter criteria is met, e.g. when personal information like phone numbers are asked
 - Chat log of the discussion is automatically saved
 - Filters are updated on a regular basis and contain hundreds of words and terms
 - Email addresses and phone numbers are filtered so they cannot be easily given out
- On top of automatic alerts, the system is able to automatically mute players who are engaged in inappropriate discussion e.g. of sexual nature
- Moderators are able to view, monitor and record real time chats and activities of any chosen player in any room within Habbo Hotel

Habbo users themselves also have tools, which they can use to limit people accessing their Habbo profile page or seeing when they are online. Users can also prevent others from sending friend requests, or prevent others from following them inside Habbo. Users also have tools to 'mute out' other player's chats and remove players from their private rooms temporarily or for longer periods.

IRC-Galleria offers many tools for its users to customize their user experience and privacy levels. Users can choose what information is visible in their profiles, they can prevent name searches and commenting to their profile and they can put other users (e.g. bullies) on black lists preventing them from commenting in their profile.

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

Habbo users have easy ways to report content, suspicious behavior or other issues taking place in the virtual community. Located in the main toolset inside the world is the “Call for help” button. By clicking on this button users can either get quick replies to most common questions or they can report abuse to a moderator. On the Habbo web (Habbo homepages, guest books, group discussion forums) users can report inappropriate content to the moderation staff, for review and possible removal.

Habbo Customer Support Portal (e.g. <http://help.habbo.com>) is a help tool, which contains a lot of useful information for players and their parents. Separate from the in-game call for help abuse reporting system, the help portal enables users to send help request regarding, e.g. account and payment related issues. In selected countries Habbo Hotel also has a telephone customer service.

IRC-Galleria has a one-click reporting tool in the community. “Report” button is easily findable in the main navigation. When reporting content users need to classify what the report is about: inappropriate images, copyright violation, unofficial advertising, terms violations by under aged users or harassing behavior. In other cases than reporting, the staff can be contacted through a contacting form through the site. IRC-Galleria also has three real-life policemen (Marko Forss, Jutta Antikainen and Mikko Mannila from the Helsinki Police) who are active and known persons in the community – they also get a lot of reports in local police matters.

Principle 5: Respond to notifications of illegal content or conduct

Sulake community staff, including Habbo Hotel and IRC-Galleria, deals with thousands of reports and help requests every week. Reports referring to illegal content and conduct are top priority and are handled urgently. Images, text or other content, which is illegal, are removed immediately upon notice and saved for possible police investigations. Sulake also works hand-in-hand with local authorities and immediately reports illegal content or conduct to them.

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

Habbo Hotel is a service where users are anonymous, i.e. they are not allowed to share real-life content (such as images or videos) or personal information. The users have their own Habbo profile pages where they can present their virtual identity, have friend lists and other content. For this reason, the privacy setting options in Habbo Hotel are simpler than in many social networking services.

Habbo Hotel can also be accessed with Facebook user name and password. Existing Facebook friends having also Habbo accounts will automatically show up on user's Habbo Hotel friend list. All other contacts will stay anonymous.

Generally the privacy options in Habbo Hotel include: users have the opportunity to choose whether their Habbo profile and online status is public or not. Users can also prevent others from sending friend requests, or prevent others from following them inside Habbo ("Follow me" option disabled).

Habbo users receive a lot of education on safety and privacy themes. Users are reminded constantly about the importance of keeping personal information safe – and not only in Habbo, but in the internet in general.

IRC-Galleria offers many tools for its users to customize their user experience and privacy levels. Users can choose what information is visible in their profiles, they can prevent name searches and commenting to their profile and they can put other users (e.g. bullies) on a black list preventing them from commenting in their profile.

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

Both Habbo Hotel and IRC-Galleria use human moderation supported by automatic tools to make sure that users in the communities obey the rules and the terms and conditions of the services. Community Management, moderation and player support functions are assessed regularly and a head quarters lead team constantly develops the procedures and ways of working. Even though our online environments are closely moderated and monitored at all times, the best way to maintain and develop user safety is through education. Sulake educates constantly its users about safety issues, such as keeping personal information safe at all times and how to deal with real-life contact requests.

Habbo Hotel has 24/7 (or always when the service is open) moderation done by experienced and trained adult moderators, whose backgrounds are checked when hired. The moderation is a reactive, post-moderated service and moderators can quickly react on system triggered or player created reports on suspicious behavior. Currently Habbo has around 150 moderators in all Habbo communities all together.

IRC-Galleria has an active moderation staff of 10 persons in Finland supported with a part time moderator team. IRC-Galleria moderation is based primarily on user reports, contacts and education. The preventive approach has worked: e.g. the amount of photos, which are against the rules, has gone down from 1/500 to 1/1000 during the past three years.

The IRC-Galleria moderation team consists of social media experts who have been trained to identify illicit activities inside the community i.e. false accounts, suspicious activities, bullying, threatening behavior and other relevant problematic situations users may encounter. The team has also vast experience in acting in a preventative way when handling e.g. privacy related issues. The team also educates users to use the Internet safely.

3. Other information

This section provides an outline of any other information that is relevant with regards how the company has considered the Principles.

For more information:

General inquiries: www.sulake.com/contact/

Press inquiries: www.sulake.com/press/contacts

This information can be published: Yes