

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 Microsoft, including the services it offers that fall into the category of “social networking” as outlined in the Principles.

Founded in 1975, Microsoft (NASDAQ:MSFT) is the worldwide leader in providing software, services and solutions that help people and businesses realize their full potential. We have been operating in Europe for over 20 years and employ more than 13,000 people in the region. We have subsidiary offices in all EU member states.

Microsoft understands that the guidance provided by the EU Safer Social Networking Principles is not intended as a “one size fits all” solution. Accordingly, while providers should support all seven Principles, each provider should judge for itself where and how to apply the document’s specific recommendations.

Given that the Principles are not prescriptive or legally binding, we believe that the question of whether any of Microsoft’s services are or should be classified as “social networking” as a matter of any national law is outside the scope of this document. However, we do offer a number of services that combine the following features: promoting online social interaction between two or more persons; allowing users to create online personal profiles; engaging in communication and sharing information, files and gaming experiences.

Such Microsoft services include:

- **Xbox LIVE**, an online gaming and entertainment service that connects more than 17 million members across 26 countries. Details about this service can be found at www.xbox.com/live.
- **Windows Live**, a service that keeps users in sync with a range of services and applications that work together across the PC, phone and Web and allows individuals to decide how, when and where to use the services. More than 460 million customers around the world use Windows Live to share e-mail, messaging, photos and files within their networks of friends, family members, colleagues and others. Windows Live is available at www.windowslive.com.

In this declaration, we will outline our efforts to increase trust and safety online with a special emphasis on the two services described above.

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

The following is an outline of how Microsoft 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

While tools and technologies can help promote child safety on the Internet, educating parents and children is still the most important way to minimize online risks to children. Educational resources available to Microsoft customers and their families range from informational Web sites and Internet safety curricula to public information campaigns, including sponsorship of Internet safety awareness events around the globe.

On our Microsoft corporate Web site, we offer extensive information and guidance about online safety and personal privacy:

- Our main page, www.microsoft.com/protect/family, is available in every EU member state in the local language.
- Microsoft has developed awareness-raising Web sites for parents and children about social networking services, including www.microsoft.com/protect/yourself/phishing/socialnet.mspix and www.microsoft.com/protect/family/activities/social.mspix.
- The Xbox site dedicated to its family settings features can be found here www.xbox.com/familysettings.
- Xbox LIVE contains a dedicated Web page about healthy gaming at www.xbox.com/en-GB/playsmart/.

Beyond our family of sites, Microsoft invests significant resources to support family safety educational organizations and outreach programs, including:

- **Gaming safety Web resources.** In France, Microsoft is working with partners from the video gaming industry, government, gamers' associations, family organizations and child protection advocates to support a new educational Web site, PédagoJeux (www.pedagojeux.fr), which provides safe-gaming resources for parents and promotes the PEGI age-based rating system.

- **“Get Game Smart” campaign.** At Microsoft’s new “Get Game Smart” Web site (www.GetGameSmart.com), families can find information about game ratings, parental controls, strategies for managing screen time, online safety tips and expert advice about media use. Users can also enter to win prizes by participating in family safety activities.
- **GetNetWise.** Microsoft supports this public education organization and its Web site (www.getnetwise.org), which offers tips for safer Internet use.
- **Get Safe Online.** Microsoft is a founding sponsor, along with the UK government and other leading companies, of this campaign and Web site (www.getsafeonline.org), which teaches consumers and businesses about Internet security and safety.
- **Wired Safety.** Microsoft supported Wired Safety’s first international conference on cyberbullying in 2008, at which representatives from government, education, the media, the technology industry and others gathered to raise awareness about this important issue.
- **i-SAFE’s i-LEARN curriculum.** Microsoft is a sponsor of the free i-LEARN online curriculum for educators, parents, teens and law enforcement, which is available from the i-SAFE Internet safety organization at www.ilearn.isafe.org.
- **MSN online safety survey.** Microsoft conducted an online safety survey on its MSN portal and released the results on European Safer Internet Day in 2009. The survey asked teenagers aged 14 to 18 about their attitudes and experiences regarding online bullying and online privacy, including how they treat others online.
- **Employee volunteering.** Microsoft mobilizes its employees across Europe to visit schools and teach children about Internet safety. On European Safer Internet Day in 2009, 23 Microsoft subsidiaries across the region organized employee volunteer activities in partnership with NGOs. The activities included training and public awareness events at schools, street activities and mobile trainings. About 800 Microsoft employees participated and more than 50,000 people received training in online safety. Through Microsoft collateral materials and local ad campaigns, the efforts reached more than six million people across Europe.

We publish and provide links to acceptable use policies and codes of conduct for our “social networking” services. Our terms of use and codes of conduct work in concert to establish clear notice and guidance to users of our services about what constitutes inappropriate content or behaviour as well as the consequences of violating those rules.

- Links to our usage policies may be found at: <http://help.live.com/help.aspx?project=searchtou&market=en-gb> for Windows Live Services and at <http://www.xbox.com/en-GB/legal/xboxComTOU.htm> for Xbox LIVE.

We advocate for government support of industry and non-profit efforts to improve online safety. Government leaders are uniquely positioned to focus greater attention on children's online safety as a societal imperative, in addition to passing stronger laws and increasing resources to help stop criminals who use the Internet to harm children and others. Microsoft strongly advocates for the following types of government leadership and action:

- **Requiring Internet safety education as part of school curricula.** Safety experts cite education as the most effective means of protecting children from online risks, yet relatively few school systems have made Internet safety a required part of the curriculum. Microsoft believes that all students should learn how to avoid online dangers, protect their family computers and conduct themselves ethically on the Web. Internet safety education is also an area in which governments can forge partnerships with technology companies, online safety organizations and others.
- **Commissioning studies and funding research to advance Internet safety.** As the Web rapidly expands and evolves, so do online safety risks and the methods of targeting vulnerable children. To better protect children online, parents, educators, policymakers and business leaders need current information and insights on the changing Web landscape. Government funding is essential for academic and industry research on topics such as emerging Internet risks, trends in kids' online behavior and new ways of enhancing security, privacy and safety. Microsoft applauds the European Commission for its leadership in this area.
- **Supporting community events that promote Internet safety.** Governments can help educate children and adults about safer, more responsible Internet use by facilitating local events that present these topics in an engaging format. European Safer Internet Day is a great example of what governments can achieve in this area. Microsoft supported INSAFE's quiz quest for children aged 10 and 15 at the Safer Internet Conference in Luxembourg. We also helped to disseminate the video prepared by the European Commission called "Block Bullying Online!".

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

Generally speaking, Microsoft services with social networking capabilities are general-audience services and do not target particular age groups. In our view, parents and caregivers are in the best position to decide whether particular content or communication is age-appropriate for their children and to talk to them about online safety. To assist adults in this important role we provide tools (see Parental Controls section below) that help parents manage the content that their children view and the community of people they interact with while using these services.

Microsoft does not typically engage in the identification or active removal/management of underage users. We have written at length about identity management and the numerous challenges regarding verification of age claims submitted by users. We have similarly highlighted the policy issues that should be addressed before creating environments that would offer such authentication.¹

Parental Controls

Because opinions about what content is potentially harmful or inappropriate for young people can vary by culture as well as by individual, Microsoft believes that parents and caregivers should be empowered to determine the content their children can access. We have invested significant resources to develop parental controls, including, where possible, content rating systems that help identify suitable or potentially objectionable content.

Windows Live Family Safety (available from <http://download.live.com/familysafety>) seamlessly integrates family safety options for Windows Live services. Family Safety offers adjustable Internet content filtering, activity reports for each user in the family, and contact management features to help prevent children from interacting on Windows Live with individuals not approved by a parent. Parents can monitor online activity and update settings from any Internet-connected computer. Windows Live Family Safety can be used with Windows XP SP2 and later versions of the Windows operating system. It supports Windows Internet Explorer® 6 and later versions, as well as other browsers. Key elements of the service include:

¹ We contributed to the recent EU Safer Internet consultation on this question and take due note of its conclusions regarding age verification. See http://ec.europa.eu/information_society/activities/sip/docs/pub_consult_age_rating_sns/reportageverification.pdf. See also http://cyber.law.harvard.edu/sites/cyber.law.harvard.edu/files/Microsoft_ISTFTAB_submission.pdf (Microsoft submission to the U.S. technical task force on age verification). See also this letter (and http://download.microsoft.com/download/B/C/D/BCDC70F1-0CF7-4CBB-92AE-FD3570EDE80F/Hon_Blumenthal_Cooper_letter_12%20December_2008.pdf) that Microsoft wrote to the U.S. State Attorneys General regarding Child Safety and Online Technologies. In markets where privacy laws (such as the COPPA law in the U.S. cited in the Guidelines), we do take steps to obtain parental consent before collecting personally identifiable information from users who indicate that they are under a certain age threshold.

- **Contact management.** Online contact with strangers is a significant concern for parents because of the potential for harassment, inappropriate online interaction and contact with identity thieves and other predators. Parents can specify which individuals are allowed to communicate with their child using Windows Live services such as Windows Live Hotmail and Messenger, and which people have permission to see the child's social networking page or blog on Windows Live Spaces. The contact management settings apply even when a child logs on to Windows Live from a computer outside the home.
- **Content filtering.** Parents can specify unique filtering settings for each member of the family. These settings allow, block or display a warning for a range of content categories, which apply to all Web content viewing. Based on parents' feedback, the latest version of Windows Live Family Safety offers simpler filtering options based on categories for adult content, sex education, child-friendly content, Web chat and e-mail sites. Parents who want more specific options and a greater choice of categories can download additional filters from Microsoft's partners.

In Xbox LIVE, the online version of Microsoft's gaming technology, family settings help facilitate age-appropriate gaming for all users. They allow parents to set restrictions that apply to both offline and online play. The console recognizes game and video rating systems from countries around the world, allowing parents to specify categories of games and movies that their children can access.

For Xbox LIVE, the console can be configured to only allow online gaming and communication with approved friends and to require parental approval for new friends. It also allows users to report inappropriate use of the service.

In particular, Xbox 360 family settings allow parents to:

- Customize each child's playing environment;
- Specify how much time a child can spend playing games each day or each week;
- Specify which games a child can play, based on game rating;
- Create personal Xbox LIVE settings for a child's account that will be enforced on any machine used to access that account;
- Require parental approval of a child's list of online friends;
- Specify which types of online communication are allowed (i.e. text and voice, video);
- Limit exposure to content created by other members of the Xbox LIVE community;
- Limit sharing of personal profile information to friends only, or block all sharing of personal profile information.

Additional tools and settings are described under Principle 3.

Principle 3: Empower users through tools and technology

In addition to the tools and technologies described under Principle 2 that empower parents and caregivers, Microsoft offers a number of other privacy tools and safeguards that enable users to make informed choices for themselves and their family members regarding the use of our services and to better individualize each person's online experience.

For example, Windows LIVE services include additional safeguards and tools that allow users to:

- Create a manually selected list of allowed instant messaging contacts and be notified whenever someone tries to add them to their Messenger Contacts list. Users can also block a person from contacting them or seeing when they are online;
- Set their personal account filters so Windows Live Hotmail will deliver mail only from people in their contacts list and trusted senders;
- Block all e-mail from a particular e-mail address;
- Identify, based on color-coded alerts, whether an incoming message might be malicious or fraudulent;
- Make Windows Live social networking services completely private, available only to selected people or available to the public.

Windows LIVE services have additionally implemented select safeguards or defaults that are even more conservative for our younger audiences:

- Private profiles of users registered as under the age of 18 are not searchable
- Full profiles are set to private by default or to the users' approved contact list for those registering under the age of 18

When users visit their profile, they see their own view of their profile, which includes all of the information they have entered about themselves and lists all of their activities. They can decide who is allowed to see each piece of information on their profile, including their last name, e-mail address, mobile number, profile picture, age, occupation and so on.

Users can allow access to everyone, their own network, certain groups of friends or only certain individuals. They can specify who can post and view comments on their shared photos, files, blog posts or guestbook. Users can also specify who can tag people in the photos they share and which other people can tag them in photos.

As outlined under Principle 4, users can report inappropriate behavior or content throughout the Windows Live network of Internet services. For example, a "report abuse" button appears at the bottom of every Windows Live social networking service window.

XBOX LIVE account settings also implement select safeguards that by default are more conservative for younger audiences:

- Defaults for sharing a profile for under 13 year olds is blocked; friends only from 13–18;
- Adding new friends is blocked by default by both 13 year old and 13-18 year old groups;
- User created and purchasing content is blocked by default for under 13 year olds;
- Advertising, aside from internal Xbox banners, is blocked for those under 18;
- Mature rated content can be blocked in the marketplace and made non-discoverable for those under 18;
- Gamer tags can be searched but blocked profiles only return minimal information (gamer tag and gamer score).

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

All of Microsoft’s online properties employ robust, easy-to-use mechanisms for reporting abuse and/or violations of our terms of use or code of conduct. We respond quickly to all types of abuse reports following standardized internal handling practices and operate a complaint center where users anywhere in the world can report incidents of abuse on our sites.

Xbox LIVE specifically, provides two mechanisms that allow users to manage interaction with other users and report inappropriate content or behavior:

- Users can select the profile of someone they are in a game with or have recently played against and mute that player’s communication, or select other options to help avoid being matched with that person in future games, or block the player so Xbox LIVE will no longer match them with that person in a game.
- Users can complain about another user’s content or behavior, including profile content, language, cheating and “griefing” (making it hard for others to play, such as by driving a race car backward and crashing into others).

The Xbox LIVE Services Enforcement team reviews each complaint for accuracy (to determine, for example, whether the complaint is merely an attempt to get good players off the system). If the complaint appears valid, the team can take the following actions:

- Mute the offender;
- Suspend the offender for a day, a week, or some other period of time;
- Ban the offender’s account from Xbox LIVE permanently;
- Ban the offender’s console from Xbox LIVE permanently;
- Report egregious, potentially criminal offenses to law enforcement;
- Provide information for individuals to directly report potentially criminal activity to law enforcement.

We have also deputized certain trusted individuals to report on our behalf when they encounter inappropriate behavior on our services. Their reports automatically lead to a service penalty for that offender.

Principle 5: Respond to notifications of Illegal content or conduct

As mentioned earlier, Microsoft's online properties employ robust, easily identifiable mechanisms for reporting abuse. We also operate a complaint center where users anywhere in the world can report incidents of abuse on our sites. We respond quickly to reports of abuse, including those potentially involving illegal content or behavior and work in close cooperation with law enforcement and government agencies in response to lawful request.

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

Protecting customers' security and safety is a top priority for Microsoft. In 2002, we launched the Trustworthy Computing initiative (www.microsoft.com/twc), a companywide commitment to delivering secure, private and reliable computing experiences for everyone. In addition to strengthening our software development practices, Trustworthy Computing includes guidance for customers on security and privacy best practices and support for legislation that seeks to address criminal online conduct.

Our corporate policies, including a set of privacy principles released in 2007 relating to search and online advertising, reflect our long-held belief that customers should have the ability to control the collection, use and disclosure of their personal information. (Details on our privacy policies are available at <http://privacy.microsoft.com>.)

This concept is particularly important when it comes to Internet use by young people. From social networking sites to e-mail and online gaming, responsible user practices and technology safeguards are essential for helping to keep young Internet users and their personal information safe. Microsoft's Online Privacy Statement is readily accessible from every page of each major online service that we operate.

We also provide a range of privacy options with supporting information that encourages users to make informed decisions about the information they post online. As described under Principle 3, when users visit their profile, they see their own view of the profile, which always includes all of the information they have entered about themselves and a list of all of their activities. They can decide who is allowed to see each piece of this information, such as their last name, e-mail address, mobile number, profile picture, age, occupation and so on.

Information collected at registration is used to create a Windows Live ID. Other than the username selected for the Windows Live ID, the pieces of information in a profile remain separate, with no automatic mapping taking place.

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

Microsoft generally relies on users to identify and report issues that might violate our terms of use. In addition, we utilize a range of automated technologies to ensure the integrity of our services. When we become aware of a violation of our terms of use or code of conduct, we take prompt steps to quickly remove and take down illegal or prohibited content/conduct.

We have established and trained personnel on our global processes and standardized handling practices to ensure we respond in a consistent manner, and to meet all applicable laws and regulations worldwide related to this subject.

3. Other information

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

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