

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 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.

Nasza-klasa.pl is a social networking site gathering Internet users who want to find classmates. Thanks to nasza-klasa.pl it is possible to rebuild relations with colleagues from kindergarden, primary school, high school or college. Nasza-klasa.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 over 20 million profiles on this website. Every month nasza-klasa.pl users generate 15 billion pageviews (22.62 page/visit; 00:11:20 avg. time on site/visit)

Nasza-klasa.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.

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.

2. 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.

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

Nasza-klasa.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 nasza-klasa.pl community yet. In 3 steps we try to present basic features available on our websites and show how to explore and use nasza-klasa.pl properly. This explanation can be reached from the login page: <http://nasza-klasa.pl/> >> <http://nasza-klasa.pl/tour/1> and it is also an invitation to become familiar with our regulations.

Nasza-klasa.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 nasza-

klasa.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. **Some settings for users under 13 are service default settings, for example their photo galleries can only be visited by their portal friends.**

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

A special **Safety Section** on nasza-klasa.pl is in preparation. It will be divided into three parts dedicated to children, their parents/teachers/patrons, and to children and patrons at the same time. The content of these websites is being formed in co-operation with many different Internet safety specialist from: the police, GIODO (General Inspector of Personal Data), kidprotect.pl and helpline.org.pl

We will provide users with special materials and tools to help them navigate nasza-klasa.pl more safely as well as the Internet in general. For example, in the section for children we will create a cartoon/animation with Mr. Sponge in the main role (portal icon, good character) who will be fighting with Mrs. Chalk (bad character). Thanks to these allegorical fights we will be able to present basic Internet problems (phishing, cyberbullying, identity theft, etc.) and ways to cope with them.

In the case of the section for patrons - we will point out and underline law regulations connected with the most common Internet crimes, and tell patrons what they should do if they appear to be the victims/witnesses of a crime (institutions they should go to, documents required, etc.)

In the combined section we will run a competition for children and patrons at the same time. This competition will check the knowledge accumulated in the separate sections mentioned above. The final result and rewards will be equally dependent on the answers given by child and parents.

Outside the service: The Safety Department, which is part of the firm running nasza-klasa.pl, takes part in many meetings/workshops/trainings with police, lawyers, teachers and students. The impact of these meetings benefits both sides.

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

The Terms of Use clearly state that a person under 18 must have adult permission to use nasza-klasa.pl.

We will provide users with a special tool to connect profiles, related to the competition described above. Users under 18 will be able to select an adult with whom they want to take part in the competition with and whom they want to make their virtual guardian.

Principle 3: Empower users through tools and technology

Nasza-klasa.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 in the near future will be able to contact Customer Service using a special

Internet hotline.

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

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

Nasze-klasa.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 '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

Nasza-klasa.pl Customer Service works 24/7 to resolve problems and abuses reported by users. The number of people in this team is constantly growing.

The service co-operates closely with lawyers and police officers to develop their skills in legal matters. Moreover, nasza-klasa.pl will provide selected employees from Customer Service with training conducted by a psychologist. This training will be 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 nasza-klasa.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. Nasza-klasa.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 friends or unknown nasza-klasa.pl users can comment on their profiles and photos

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

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

Nasza-klasa.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'.

3. Other information

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