

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 ONE.LT, including a short description of the services it offers that fall into the category of “social networking” as outlined in the Principles.

ONE.LT is a social networking site serving over one million internet users in Lithuania as well as a sizeable Lithuanian-speaking internet user audience in other countries.

ONE.LT offers a variety of social features helping people express themselves and stay in touch with their real-life and virtual friends. ONE.LT enables users to create and accessorize online profiles, establish friend connections with other users on the site, exchange private in-site messages, upload and showcase photos, post notes to forums attached to individual user profiles and user groups, rate user photos, join public online clubs dedicated to specific themes or topics, send virtual gifts to friends and participate in other online communication activities of similar nature.

As of Q1 2009, ONE.LT is accessed by over 900 thousand unique users a month, generating nearly 1 billion pageviews a month.

While the significant majority of ONE.LT users are above 18 years of age, ONE.LT does provide services to younger users and considers its responsibility to work toward ensuring their safety, providing protection against abuse and inappropriate content.

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

The following is an outline of how ONE.LT 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

Seeking to raise awareness of safety education messages and acceptable use policies among users and parents, ONE.LT has implemented a series of measures as described further.

ONE.LT maintains a dedicated site section titled Your Safety (“Tavo Saugumas”), easily accessible from every page of the site, providing practical instructions and advice to users on ensuring their safety online. (Introduced in Q1 2008, an updated and expanded version schedules for release in Q3 2009.)

ONE.LT customer service team is sending periodic safety reminders to every user of ONE.LT, delivered in the form of administrative messages once every quarter, reminding the users of key safety guidelines and educating them about protecting themselves against new types of exploits as they are noticed by ONE.LT administrators. (Practice introduced in Q4 2008.)

Having become a partner in the Safer Internet program in Q1 2008, ONE.LT is continuously contributing to the country-wide safer internet usage campaigns run by the program in a number of ways, including but not limited to donations of significant amounts of advertising space to give broader visibility to the campaign sites (e.g. www.draugiskasinternetas.lt), showcasing Safer Internet program educational video materials on ONE.LT pages in prominent positions, assisting with development of online user quizzes that help raise awareness of online safety threats and educate users and parents about safe usage of online social networking sites and the internet in general, and sharing the costs of developing new educational video materials highlighting online safety issues and promoting safe usage practices.

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

ONE.LT is a social networking site serving all age segments, including young people, and has historically been putting significant efforts to ensure the site is safe for children. There are no sections on the site where adult-oriented content or other content unsuitable for children is allowed.

Minimum registration age. ONE.LT Terms of Use clearly state that only users 14 years of age or above can register on the site. Apart from the front page (login screen), no section of the site can be viewed by an unregistered user regardless of his/her age. A valid mobile phone number is required to be provided by the user at account registration stage, thus limiting the ability of young users to create multiple profiles at will and making parental control easier.

Age-appropriateness of services. ONE.LT has a long standing policy to offer no products, services or features that would be inappropriate for young users.

Visual content. As over 30 thousand new user profile images get uploaded to ONE.LT daily, it is not possible for the administrative team of ONE.LT to review and approve/reject every uploaded image individually. At the same time ONE.LT

has always been convinced an image review process is required to ensure that attempts to upload inappropriate visual content are identified in a timely fashion and infringing images are blocked before any minor users of the site could possibly be exposed to them. Therefore ONE.LT has designed and implemented a collaborative peer review process and supporting site functionality that effectively filters out 99.0-99.5% of inappropriate images at the upload stage, before they can be displayed to the site audience (effectiveness estimate based on internal ONE.LT research done in November 2007). Around 30 thousand adult registered users of ONE.LT are currently participating in the said collaborative peer review process, checking every profile image against a shortlist of approval/rejection criteria immediately after it is uploaded. Images not passing collaborative peer review successfully are rejected and prevented from being displayed on the site pages.

As a secondary line of protection, functionality allowing one-click reporting of any potentially inappropriate image found ONE.LT by any site user has been implemented. Images reported to be inappropriate are reviewed by ONE.LT content moderators that are part of the ONE.LT administrative team and have been properly trained to be able to evaluate the appropriateness of reported visual content.

Text content. ONE.LT has implemented site-wide filtering of inappropriate words and expressions in user messages and forum posts, preventing black-listed text strings from appearing on ONE.LT pages. The system has been functioning since Q2 2008 and is being continuously improved to address attempts to circumvent its filtering algorithms.

Content of advertisements. ONE.LT has a long standing policy of not allowing any advertisements for alcoholic beverages, tobacco products, gambling-related products or services, or any other adult-oriented products or services. A site-wide blanket ban on any such advertisements remains in effect, e.g. such advertisements are not allowed to be shown to any user of the site at any time of the day, regardless of his/her declared age.

Principle 3: Empower users through tools and technology

Functionality has been implemented on ONE.LT enabling any user of the site to respond to unsolicited, inappropriate or otherwise unwanted contacts from any other site user by (a) blocking the offending user entirely, thus preventing him/her from initiating any contact with the offended user in the future, or (b) reporting any unsolicited message received as spam to the ONE.LT administrative team.

Once a user account collects a certain number of “blocks” from other users of the site, his/her account is suspended and forwarded to the ONE.LT administrative team for review.

These measures allow effective prevention of escalation of cyber-bullying and dissemination of inappropriate materials.

Adult ONE.LT users are also empowered by enabling them to participate in collaborative peer review process targeted at identifying and filtering-out inappropriate visual content as described in the previous section.

Any unwanted messages posted to a user's profile forum by other users can be removed by the user at will.

Links to all user profiles can be discovered by using the internal profile search function, but the actual content of a given profile can only be viewed by people belonging to the user's extended circle of trust (friends, friends of friends). The user has full control over his personal profile data (age, phone number, email address), allowing or prohibiting it from being shown to his friends and/or other users of the site.

New friend connection invitations submitted by other users who have previously been blocked by a user are ignored and not displayed to the user.

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

A number of easy to use mechanisms for reporting inappropriate or TOS-violating behavior or content are in place at ONE.LT.

As noted previously, any ONE.LT user account may be "blocked" by any other user with a single mouse-click, preventing the blocked user from establishing any contact with the user who initiated the block.

Any user-uploaded image on ONE.LT can be reported as inappropriate by a single click of a button by any ONE.LT user, triggering a review of the image by ONE.LT administrative team.

Additionally, all ONE.LT users are encouraged to report suspected inappropriate behavior or content to ONE.LT administrative team by sending a message to the customer service with a link to such content. ONE.LT continuously reminds its users of this possibility via quarterly administrative messages and internal banner ads.

ONE.LT has installed direct hotlines connecting ONE.LT customer service staff on duty with the Networks and Information Security Division of the Communications Regulatory Authority of the Republic of Lithuania (CERT-RRT), a member of INHOPE, national Children's Rights Ombudsman institution, and with the Lithuanian Cyberpolice unit.

Principle 5: Respond to notifications of illegal content or conduct

ONE.LT has designed and implemented internal procedures for responding to and acting upon user or 3rd party notifications about illegal or inappropriate content or conduct observed within the site environment.

ONE.LT customer service employees utilizes custom site management interfaces to efficiently verify received reports and take appropriate action, including but not limited to, temporary suspension of user accounts, permanent removal of user accounts, review and removal of inappropriate or illegal visual content,

review and removal of inappropriate or illegal user groups or their components (photo albums, forum posts, etc.).

Any such actions done by ONE.LT customer service staff are tracked and recorded internally, with aggregate monthly reports being made available to senior management for the purposes of further optimization of respective procedures and policies.

In cases when potentially inappropriate or illegal conduct or content reported to ONE.LT customer service unit or found by the unit's staff independently is suspected to be in violation of criminal laws of the Republic of Lithuania, ONE.LT customer service staff follows internal procedures requiring such cases to be reported to respective law enforcement institutions. Such cases include, but are not limited to, attempts to distribute or collect content containing child pornography, attempts to distribute age-inappropriate content to underage users, and attempts to defraud users (both underage and adults).

Whenever ONE.LT administrative team receives a notification from a law enforcement institution about an initiated investigation into suspected criminal activities of a ONE.LT user, ONE.LT customer service staff follows internal procedures requiring preservation of user submitted content, behavioral data and any related information that might be required for the purposes of any such investigation.

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

The Your Security section of the ONE.LT site provides accessible instructions to users on the steps they are advised to take in managing their personal information and protecting their privacy while using the site.

At any time a ONE.LT user can easily change privacy settings for his/her profile data, including the user's age, phone number and email address, by indicating whether every specific bit of profile information should be shared with everyone, just first-level friends, or no one.

The Your Security section of ONE.LT site also provides practical advice on the importance of protecting the user's passwords and properly logging out of the site after finishing a usage session.

ONE.LT homepage has been designed to always require users to enter their personal username and password to gain access to their profile and all other parts of the site (e.g. ONE.LT never logs in its users to the site automatically). This policy has been introduced in order to create effective obstacles for identity theft and account hijackings.

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

ONE.LT is engaging in discussions with users, NGOs, government regulators and law enforcement to assure that its procedures and systems ensuring prevention of abuse and inappropriate content are continuously improved.

ONE.LT customer service staff tasked with reviewing suspected illegal or prohibited content and conduct is undergoing periodic internal trainings to ensure they are able to identify actionable cases and have the knowledge required for taking appropriate action in every case.

3. Other information

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

ONE.LT online social networking site is owned and managed by:

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This information can be published: Yes