

EU SNS Safer Social Networking Principles

Self-declaration Form - Piczo

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

Piczo.com (“Piczo”), a unit of the Stardoll Network (“Stardoll”), empowers teens worldwide to creatively express themselves, build personal communities, and share ideas and experiences with their friends in a safe online environment. Since its launch, Piczo has roughly 6.5 million monthly unique visitors and over a 150 million monthly page views solely through the viral efforts of loyal members. Rave reviews from these members claim that Piczo is unmatched in the control, ease-of-use, and flexibility it offers them when building their websites.

Piczo's customizable content, colorful graphics, glitter text, video, and photo tools spotlight member creativity without requiring technical skills. Members share their life stories with friends by designing their sites with multiple pages featuring photos, graphics, videos, music, comment boards, games, and more. Each site can be linked to other friends' sites and members can interact with them and their friends, and meet new people online. And, the "first of its kind" Piczo Zone allows members to share their customizable content with the rest of the Piczo Community. The end results is a vibrant, creative community where members are given the complete freedom to make a site, make friends, or make whatever.

Piczo recently merged with Stardoll.com and PaperDollHeaven.com to form the Stardoll Network, with a combined reach of more than 20 million people a month, a majority of which are girls aged 5 to 20. Piczo, along with the Stardoll Network are based in Stockholm, Sweden with offices in London and Los Angeles.

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

The following is an outline of how Piczo has considered the EU Safer Social Networking Principles in relation to its Social Networking Service. 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

Providing Education

- A clear Terms of Service and Privacy statement along with a separate Acceptable Use Policy is located off the Homepage, on the Safety page, linked in the footer and called out during the registration process.
- A robust Safety education page is located off the Homepage, linked in the footer, and called out during the Registration process.
- Periodic Safety and Security campaigns are run on the Piczo service with partners including NSPCC/Childline in the UK, NCMEC in the US, and Cybermentors.
- Members are presented with Privacy options and information regarding those options before posting content and while using the service.
- All under 13s must review and accept Safety Tips when they register on the site.
- The Safety education page contains links for Parents and Care Givers including Tips for Parents, a Parent Safety FAQ, and a Parent's Guide to Piczo.
- There is a Report Abuse and/or Contact Us link on every page.
- Members are consistently encouraged not to post Personally Identifiable Information while using the service.
- Parents of under 13 members are given a parental dashboard to help monitor what their child is doing, who they are friends with, and what messages they are sending and receiving on the service.

Partnering with Non-Profit Organisations and Government Task Forces

- We contributed to the UK Home Office Taskforce's first UK Social Networking Guidance.
- We participate in the EU Safer Social Networking Task Force.
- We are a member of the UK Council for Child Internet Safety (UKCCIS).
- We cooperate with the National Center for Missing and Exploited Children (NCMEC) in the US.
- We are in a partnership with the National Society for the Prevention of Cruelty to Children (NSPCC) in the UK and their StopBullying and Childline programs.
- We are partnered with Cybermentors in the UK.

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

Accepting Under 13 Users

- Piczo segregates our members into over 13 and under 13, with our under 13 service being Children's Online Privacy Protection Act (COPPA) compliant.
- Under 13 members require parental approval prior to using the service. Parent's must validate their email address prior to their child use of the service.
- Under 13 member sites cannot be viewed by other members without being invited and made a friend of their site, and are permissioned to private in the service.
- Parents of under 13 members have monitoring tools available to them to monitor what their child is doing on the service.
- Piczo emails parents a daily log of their child's activity on Piczo.
- Piczo has a policy to cancel member sites if requested by a parent or legal guardian.

Protecting Users from Inappropriate Content

- Piczo uses state-of-art content moderation solutions to identify and remove any content or members that break our Terms of Service and Acceptable Use Policy (TOS).
- All hosted images are reviewed for compliance with TOS.
- Images that break our TOS are hashed to ensure they cannot be reuploaded.
- Inappropriate URLs and HTML codes are blocked from being posted on member sites.
- We capture the IP address and date and time when a new account is created.
- Piczo regularly cancels member accounts for excessive and/or repeat offences.
- Piczo maintains a strict acceptable use policy with our advertising partners. Advertising must be age appropriate (tweens and teens) and ads relating to drinking, gambling, dating services, and other adult products and/or services are not allowed on our service.
- Piczo only partners with third-party content providers that have best-in-industry content standards and moderation services.

Principle 3: Empower users through tools and technology

Protecting Younger Users from Inappropriate Contact

- All Member websites are private and not locatable when they first register. Members must take deliberate steps to alert others of their website address.
- Only under 16 members can invite under 13 members to be friends.
- Members can set their websites to one of 5 types of privacy settings; the world, the Piczo community, Friends Only, Password Protected, or Only viewable by site owner.
- Comment boards can be set to Friends only, require new posts be approved prior to going “live”, and delete unwanted posts.
- Members can block visitors from leaving posts in comment boards or block other Piczo members from their site as well as reject unwanted friend requests.
- These privacy controls are prevalent throughout the service.
- Under 13 members are set to the Friends Only privacy setting.
- Parents of under 13 members are alerted if a their child attempts to alter their Privacy setting.
- Under 13s cannot be indexed by search engines.

Providing Tools for all Members and Information for Parents

- Members can set their websites to Community only, Friends only, Password Protected, or Private.
- Members can make any section of their site Community only, Friends only, Password Protected, or Private.
- When contributing content to the community, members can do so privately.
- Members can set comments to pre-approve prior to being posted.
- Members can block other Members from contacting them or viewing their site.
- Members can hide their online status.
- Members can see the privacy setting for the site and any pages on theirs site in the page name list when editing. Members can quickly edit their privacy here as well.
- Members can enable right-click protection on images on their site.
- IM is set to Friends only. You must be a friend with a member before you can IM them.
- On the Parents Safety Guide, parents are provided with the benefits of using filtering tools and

recommendations on teaching children good Internet etiquette.

Security Features

- Piczo does not index member sites. Members must submit their site to be discoverable in search on Piczo or by other third-party search engines.
- Piczo does not directly map PII from members to their profile or any other area of our service.
- Piczo automatically blocks malicious code on our service and works continuously to keep our filters updated.
- Members have complete control of what types of emails messages they receive. They can turn off all email, with the exception of forgotten password email.
- Under 13 members must have a parental approval prior to using the service.

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

Reporting Inappropriate Content

- Piczo members have access to Piczo's report abuse page throughout our site. Members can report inappropriate content and/or other members to us directly.
- Members also have the ability to quickly flag inappropriate material without going through the entire report abuse process.
- Piczo provides our members with links to directly report inappropriate material or behaviour to several law enforcement agencies, including NSPCC, Children's Exploitation and Online Protection Center (CEOP), NCMEC, Inhope, and the Virtual Global Taskforce (VGT).
- Members are alerted when reports are received and can provide details on inappropriate content and/or behaviour they are reporting. All reports received are responded to.
- Piczo supplies links to several 3rd-party organizations throughout our service and actively recommend members reach out to these groups and their parents or guardians for support.

Principle 5: Respond to notifications of illegal content or conduct

Piczo Member Services

- Piczo Member Services responds to reports and flags expeditiously and with the utmost care and attention.
- Member Services agents are trained on appropriate responses to reports and flags and periodically attend calibration and additional training sessions to ensure understanding of TOS and Privacy policies as well as 3rd party reporting policies.
- Piczo provides a specific email address for members and parents (abuse@piczo.com) as well as a dedicated hotline for abuse and safety issues.
- Along with effective and robust reporting mechanisms Piczo also has established working reporting procedures in place with NCMEC and CEOP.

Partnering with Law Enforcement

- We provide ongoing support for local, state, federal, and international law enforcement in investigations and prosecutions.
- Piczo has created a dedicated page on our service for law enforcement that includes a separate contact form and a guidebook on how to contact Piczo for member information and relevant support inquires.
- A separate hotline for law enforcement with a 24/7 answering service is also provided.
- Piczo responds to requests from law enforcement with the utmost urgency and care.

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

See Principle 3 “**Protecting Younger Users from Inappropriate Contact**”, “**Providing Tools for all Members**”, and “**Application Information and Data Collection**” for information

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

See Principle 2 “**Protecting Users from Inappropriate Content**” and Principle 5 “**Piczo Member Services**” for information

Other information

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

Piczo, to the best of our ability, confirms that the information in this document is true and correct at the time of writing. Piczo reserves the right to update our website, our service, our policies and procedures, and this document at any time.

Requests for additional information can be sent to terms@piczo.com.

Additional options to contact Piczo can be located on our Contact Us page located at:

<http://pic1.piczo.com/go/public?view=/public/piczo2/piczoContact.jsp>