



## EU SNS Safer Social Networking Principles

### Self-declaration Form

Stockholm, November 3rd, 2010

*Stardoll supports the EU Safer Social Networking Principles, the following self-declaration that will present Stardoll's compliance with the Principles.*

#### 1. About Stardoll

**Stardoll is the world's largest virtual entertainment and social gaming destination for girls and teenagers.** Stardoll is a virtual world where the users can become members and create a "MeDoll" (an avatar that the users design themselves) in their likeness, express themselves through design, dress up and interact with one another. Stardoll offers a fun-filled approach to fashion, creativity and making friends.

Stardoll currently has over 80 million members worldwide and users come to the site from 200 countries per week. The site and services are currently available in 18 languages (EN, FR, NL, DE, EL, AR, ES, CN- ZH, FI, SV, RU, PT, IT, PL, DK, GR, NO). There are plans to add more languages in the future. Approximately 50 percent of the users are residing in the EU. There is no minimum age or upper age limit, but a majority of the members are girls between the ages of 7 and 17.

Stardoll has its headquarter in Stockholm and offices in Los Angeles and London.

Stardoll's original name was Paperdollheaven.com, and started out as the hobby of the Scandinavian-born Liisa. Inspired by a childhood passion for paper dolls, Liisa started creating dolls and accompanying wardrobes and learnt web design. Her personal homepage rapidly became a popular destination for teens. In 2004, with the help of her son, she upgraded the site and called it Paperdoll Heaven. Although Stardoll has developed since, Liisa's description of the site is still up-to-date: "Most online sites are focused on violence and competitiveness", says Liisa. "I wanted to create a positive online environment for young girls who are creative and interested in fashion. They are looking for alternatives to shoot 'em up and kill 'em up games." Liisa is still an important part of the Stardoll company creating new dolls.

## 2. Stardoll's compliance with the Principles

### **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**

Stardoll applies a high level of protection of its members; the success of Stardoll is extremely dependent on the trust and confidence with parents and other carers of the members. We put efforts in educating and communicating with both our young members and their carers in an age-appropriate manner that is easy to access and understand. Stardoll is promoting a friendly and joyful atmosphere in a secure environment.

Located at the bottom of each page the following information is prominently displayed:

- **Privacy Policy**
- **Membership Terms**
- **Kids Privacy Policy**
- **Rules and Safety**
- **Parent Information Page**
- **Help Section.**

The texts are especially written for parents and carers, and include topics such as security and privacy (as indicated at the bottom of each page); <http://www.stardoll.com/en/help/>

Our overall experience is that many of Stardoll's young users are aware of the general ethics and security issues on the Internet. We however urge parents and carers to raise their child to become good online citizens, and to help Stardoll sustaining a safe environment. We suggest a number of topics for family rules at Stardoll's online security guide for parents, <http://www.stardoll.com/en/help/article.php?sectionId=15&articleId=12> . We also link to sites such as the American [www.safekids.com](http://www.safekids.com), the European [www.saftonline.org](http://www.saftonline.org) Safety Awareness, Facts and Tools and the [www.safekids.com/kidsrules.htm](http://www.safekids.com/kidsrules.htm), which we suggest parents to print out and display near the computer at home.

In our **Online Security Guide for Parents** as well as in all our e-mails to our users, we inform users never to give out identifying information (such information is also taken off the site, see more under 2.3 below on our moderation of the site).

When becoming a member at Stardoll one has to accept and comply with the Stardoll code of conduct called "One Stop Rules". The One Stop Rules strictly forbid the members to:

- Swear, use sexually graphic language or be racist
- Bully other Stardoll members or in other ways make them feel uncomfortable
- Ask other Stardoll user for their (or give out their own) password, email addresses or other personal information, including photos
- Type the password anywhere except in the log-in box on [www.stardoll.com](http://www.stardoll.com)
- Break the law at Stardoll or talk others into breaking it
- Claim to belong to the Stardoll Staff

## **Principle 2: Stardoll works towards ensuring that services are age-appropriate for the intended audience**

In addition to educating and urging the members to act safely and friendly on the site we apply a number of security measures to assure the safety of our members.

### **2.1 Limited access to other members' personal identifiable information**

Depending on the age of the members there are limits to the processing, posting and publishing of personal data at Stardoll.

When creating an account and becoming members, depending on the age, the members normally give Stardoll their first name, date of birth and email address. This information is not visible for other members. Other members can see the age, gender and country of other users but all users can make this information invisible for other users if they wish. Users are not allowed to use their own name but should create a nickname (pseudonym) on their account.

Users are not allowed to upload pictures of themselves nor of other persons and have to comply with the Image Upload Rules - <http://www.stardoll.com/en/help/article.php?sectionId=18&articleId=14>.

All images are pre-moderated before appearing on the site. To send private messages to other members, community members need to send a friend request which has to be accepted or can be rejected. Users can also block other members from sending them messages or visiting their page if they choose.

## **2.2 Different supply for different ages**

All members are required to read and accept the Membership terms

(<http://www.stardoll.com/en/help/termsOfUse.php>) together with their parents. The member actively clicks a box to accept the terms. If the member is under the age of 13 it will need parental consent to join Stardoll, a special box needs to be clicked to secure such consent and the parent's or carer's e-mail is required. To make sure that the parent/carer has consented, an e-mail is sent to the parent's address; in this email Stardoll informs about the site, how the security works and about the virtual currency used at Stardoll. The parent/carer (or the member itself) can at any time cancel the membership at Stardoll.

Members under the age of 13 are suggested to sign up for a Kid Safe-account where they can not participate in communication with other members, i.e. they have a limited access to the site's community areas. Such areas are in all instances securely moderated but Stardoll wishes to give parents and members an option beyond such security, our experience is that young members are more interested to play by themselves than communicate with others and this is a popular alternative among members, it also provides parents with a maximum of security where their children can not communicate at all with other members. The Kid Safe account means they have access to doll related games and features as well as access to other members' albums and dressed up dolls.

## **2.3 Moderation of the site**

Stardoll secures the site for its members by moderating the site and the interaction between members. The moderation 7 days a week of the site is based on the reporting by members and on the moderators own screening of the site. In addition Stardoll applies a text filter , which detects and replaces inappropriate words with asterix. The text filter is constantly updated and can detect written violations such as racist and sexual content as well as inappropriate language.

Stardoll has native speakers from all its available languages in the monitoring and customer service staff. The customer service staff and moderators are trained on appropriate responses to reports and flags and weekly meet to calibrate and discuss children's behaviour and the necessary actions to be taken.

## **2.4 Stardoll's policy for advertising aimed at children**

Stardoll applies a policy for advertising on the site. All advertisements on Stardoll need to respect the vulnerability of children. The advertisements have to be informative, they may not exaggerate the qualities of a product or service, they may not show children in dangerous or frightening situations and may not use children's credulity. Alcohol and tobacco advertisements are completely prohibited.

Stardoll does not allow direct action driven commercial messages to children. An example of such a message is to tell the children to "go buy the book" or to tell them to persuade their parents; "tell your mum to get it".

Stardoll has the right to send direct marketing towards the members, provided however that this does not include any transfer of personal data to third parties. Such marketing is carried out by Stardoll with great care, very seldom and only for marketing of Stardoll's own activities or of Stardoll partners. In certain EU territories children under the age of 16 will not be addressed with this kind of direct marketing.

Reference is made to Stardoll's advertisement policy in all contracts with advertisers and advertising agencies.

### **Principle 3: Stardoll empowers users through tools and technology**

Stardoll members have great powers to manage their own activities at Stardoll. They can produce their individual avatar and virtual home (individual rooms called "suite" on the site), they can write, produce their own design and show others what they produce. As described above, in terms of safety and security, Stardoll encourages members to report bad behaviour and other members' breaching of the One Stop Rules at Stardoll. Members are also informed and encouraged to block members that they do not wish to communicate with.

Online gaming is generally dominated by boys. Stardoll is proud to be one of few places on the Internet developed with an emphasis on girls' self-expression through fantasy play and creativity. Stardoll give its users the tools to learn technology and Internet by playing and meeting with other children from all over the world. We are amazed of how the children learn to design and produce their own creations at Stardoll, they become more and more technically advanced and are early adapters of new technological features.

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

Wherever on the site there is user-generated content in text form (chat, guestbook messages, text presentation, comments, site-wide broadcast messages etc) there are reporting tools that enable the user to report content to the Stardoll moderators and/or the possibility for a user to delete content themselves (for example an entry in the user's own guest book). A user can also block another user from future contact.

Reports and complaints are dealt with within a period of maximum 48 hours. The reports are categorized into the following categories:

- bad language
- threats
- showing/asking personal information,
- password,
- sexual language,
- scamming,
- bad nickname
- others

Depending on the severity of the violation, the reported user receives a warning or is expelled from the site and their member account is deleted. The customer service staff and moderators are trained on appropriate responses to reports and flags and the staff regularly meet to calibrate and discuss children's behaviour and the necessary actions to be taken.

**Principle 5: Stardoll responds to notifications of illegal content or conduct**

In case of lightly violating our One-Stop-Rules, the member in question will receive a warning and will be closely monitored by our staff using an internal warning list of reported members. In case the violation is severe the reported account will be deleted immediately. If further details are required as to the reason of deleting the account, a copy of the communication showing the illegal content or conduct will be sent to the reported user and further investigated by Stardoll customer service staff.

For more severe cases where crimes against law may be involved, we have established close contacts with the Swedish IT crime units (Rikskriminalpolisen) that help coordinate with law enforcement agencies all over the world.

## **Principle 6: Stardoll enables and encourages users to employ a safe approach to personal information and privacy**

In order to register as a member of Stardoll, we ask our users to provide us with the following personal data: first name, e-mail address, user name, age, gender and country.

The information and the terms in the agreement that we conclude with our members comply with the high standard of protection provided for in the European Union and in the United States. An overall principle is that we do not collect more information than is reasonably necessary for the children to participate in activities on Stardoll. As described above consent is collected and in cases of children under the age of 13 we require the parents to have consented whereby we e-mail the parents to control that such consent has been given in the registration procedure of such a member under 13 years old. These members and their parents/carers are also encouraged to sign up for a Kids Safe-account which prohibits the user from communicating with other members.

For all members, keeping their true identities protected is a high priority. Stardoll does not accept any identifying information being exchanged between members and such information is taken off the site. Members also run the risk of being expelled from the site in cases where they post such information.

Stardoll does not sell or transfer any personal data to third parties. Stardoll may assign third party processors to carry out services, for example, Stardoll marketing and technical services for the site. These companies can in certain cases gain access to personal data that they need in order to complete the assignment for Stardoll. In such cases the third party agreement explicitly includes personal data security and Stardoll always remains the controller of the personal data.

The same applies for partners of Stardoll who co-operate to provide members with interesting offers. Such partners of Stardoll do not have access to personal data. Stardoll handles e-mails, banner marketing and the like which members have consented to in the Membership terms. Stardoll remains the controller and the partners will not have the right to retain and use the data for any other purposes than the partnership with Stardoll.

In the US Stardoll is a participant and has been approved by the independent third party organisation Privo's Privacy Assurance Program. The Privo seal displayed on the Stardoll page indicates that Stardoll is COPPA compliant and has established privacy practices in accordance with the COPPA rules.

**Principle 7 : Stardoll's assessment of the means for reviewing illegal or prohibited content/conduct**

As described, Stardoll operates extensive moderation of the site with Stardoll customer service staff. Members are expelled in cases of breaching the One-stop rules, this is not just an empty threat but Stardoll expels members every day with the effect that members are truly anxious to comply with the Stardoll One Stop-rules and the Membership terms. Much like the children engage in each others behaviours at other places, for example in school, the members of Stardoll expect bad behaviour not to be tolerated and Stardoll conducts its adult responsibility seriously in a transparent, fair and consequent manner.