



## Statement Sulake Corporation Oy Commitments – CEO Coalition to make the Internet a Better Place for Children

Following an invitation from Vice-President Kroes of the European Commission Sulake Corporation Oy signed up in December 2011 to join the CEO Coalition to make the Internet a Better Place for Children. Following the Statement of Purpose we have together with the other 30 signatories worked towards concrete measures on 5 Actions in 2011-2012.

In the last 12 months the CEO Coalition has worked on 5 Actions and has extensively discussed and analysed the areas of action. In the course of this extensive work, and with consultation of civil society, Coalition members have delivered concrete outcomes and identified sets of good practices which serve as recommendations to the ICT Industry. Based on these recommendations, Sulake Corporation Oy commits to/declares following concrete steps:

### Action 1 Simple and robust reporting tools for users

- *Sulake Corporation Oy has already in place:*

**Reporting tools** are available throughout the whole Habbo site including chat rooms, IM, My Page, forums and Pocket Habbo.

Users can report to moderators incidents such bullying, scam attempts or any other thing that might make them feel uncomfortable when online in Habbo. All sites are moderated during Hotel opening hours, 365 days a year.

Currently we have the following reporting tools:

#### 1. Room Reporting Tools:

- Top right corner “**Help**” button.

When that is clicked, a window opens up with all the help options. A report to a moderator can be sent by clicking “Get immediate help”.

- Top left corner “**Emergency Exit**” button.

Clicking the “**Emergency Exit**” will take you to the landing page and a window will pop up where users can report the incident to the moderators if they wish.

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## 2. IM/Pocket Habbo reporting Tools

Users can report any offensive chat directly from their Habbo instant messenger chat window by clicking the “report” button. This will open up a window where they can make their report for moderators to take further action.

## 3. My Page

Users can report any inappropriate content on other users’ personal pages by first clicking on “report” in the top right corner. Speech bubble icons will then open next to the content. Clicking those will take users directly to the reporting box.

Information about how to use reporting tools is also available on our home page: <http://www.habbo.com/groups/ReportingAbuse>.

Our code of conduct with information about what is allowed to do in Habbo and what should be reported to moderators is available on our [Habbo Way](#) page.

## 4. Hotlines and police reporting tools

For serious issues we might not be able to help our users with we have national hotlines and police reporting tools and contact information available in our [Safety Centre](#). In some countries we have specific spaces for hotlines or police reporting buttons. EG: [Protégeles](#) in Spain or [CEOPs](#) in UK.

**Reporting categories** are already available in all our reporting tools. We often test these to ensure that categories are easy for our users to understand and we try to educate them on how to use different tools and categories. Following categories are currently in use:

- Bullying: If you see others misbehaving, bullying, being cruel or not obeying the Habbo Way, report it and our Guardians will take a look at the issue.
- Sexual language: Someone is being sexually explicit, is asking for cybersex or asking another Habbo to go onto cam.
- Asking personal info: Someone is sharing personal details (like real name or phone number), or is asking to meet up in real life
- Other threat: Someone is being threatening or putting Habbos into other dangerous situations that need urgent attention

Most of the user content in Habbo is generated in rooms and Instant Messenger, and when a user reports something to us by using one of the reporting tools available there we send **feedback** between 10 minutes and 2 hours after the report has been made.



Following feedbacks are currently sent by moderators, depending on the report, once the issue has been reviewed and ticket has been closed:

1. “Thank You, your call has been reviewed and appropriate action taken”.
2. Individual messages to reporter if needed. EG: There is no evidence in the chat. Please report the incident from the room it is happening in, so we can take a look at the chat log.
3. Warning if reporter has sent an abusive report: “Please note that the Call for Help system is for reporting genuine abuse issues or account queries. We ask that you don’t use it rashly”.

If reports are done by [mail](#) feedback is provided within two working days.

***In 2013, Sulake Corporation Oy will:***

- Improve information available in our [Safety Center](#). Sulake will work together with hotlines and the police when and where possible.
- Improve feedback sent to users by adding more information about actions taken.

## **Action 2 Age appropriate privacy settings**

Even though Action 2 might not be relevant for Sulake Corporation Oy since our Habbo users are anonymous, and the real identity or personal information of the users is not disclosed anywhere in the service, you can find below privacy settings already available in our sites:

### **1. Avatars privacy settings**

Habbo users can control their account settings from <https://www.habbo.com/profile>:

- From “My preferences” tool users can:
  - . Control their online status: everybody or nobody can see if they are online.
  - . Select “Follow me” status: nobody or only their friends can follow them from room to room.

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. Decide if they want to receive friend requests from users and send friend requests to them or if they don't want to receive any friend request.

- From "Friend Management" tool users can delete a friend from the list if they don't want to talk to him/her anymore in Habbo.

## 2. "My Page" Privacy settings

From "My preferences" users can control who can view their homepage. Although there is no personal information displayed there, it can be set to visible to everyone or invisible to everyone.

## 3. Instant Messenger settings

By default users can only use Habbo instant messenger with their friends. Default settings cannot be changed.

## 4. Rooms privacy settings

Room settings can be found in the top right corner link "Room info" that shows up when you are inside your room:

- From "Access" tab: Users can choose access rights for the room. Open means everyone can enter their room; locked restricts access to Habbos with a password so owner needs to share the password with people he/she would like to visit the room; Private means Habbos have to ring room's doorbell and wait to be let in by the owner
- From "Moderate" tab: Users can choose the moderation settings that they want for this room. They can decide who can enter the room and kick (throw someone out of their room), mute (silence someone) or ban (throw someone out for a longer period of time) trouble-makers from the room.

## 5. "Habbo Groups" privacy settings

Group owners can decide if their Group is:

- Open: everybody can join
- Exclusive: group admins can approve membership requests
- Private: no members are accepted

Habbo also encourage our users not to share their personal information when online (EG: [Safety Tips](#) page) and sanctions users who are found sharing personal information that makes them or other people locatable.



### **Action 3 Wider Use of Content Classification**

Measures under Action 3 are not relevant for Sulake Corporation Oy business, because we don't host any content not suitable for people under 18. EG: sex, violence, promoting drug use etc.

Our target audience is teens between 13 and 17 years old and all the content available in our sites is suitable for that age group.

- ***In 2013, Sulake Corporation Oy will:***

Examine the different age-rating systems and analyze the possibility of adding a label to our main page to let people know before registering that content in Habbo may be suitable for ages 13 and older.

### **Action 4 Wider Availability and use of parental control**

Habbo users are teens between 13 and 17 years old. While effective for younger children, Sulake believes that parental control tools are often not fit for purpose for a teenage audience.

Taking into account our experience with teenagers we maximize our efforts working together with parents to educate our users on how to surf the internet safely.

***Sulake Corporation Oy already has:***

- Created a [Parental Guide](#) with useful information for parents about Habbo. Guide is placed in our home page under "Safety Tab" and also in a special section for parents in our FAQs.
- Organized Habbo's first [Parents Advisory Summit](#) last summer. We wanted to work together with our users' parents to find out what more we could do to help parents educate young users about the importance of responsible behavior on social media sites.
- Made Habbo part of local internet safety coalitions (e.g. Protégés committee in Spain). In some countries where we work together with parents associations. Habbo also visits schools to discuss internet safety with parents and teachers.

***In 2013, Sulake Corporation Oy will:***

- Improve the Parental Guide by including more specific information about how some Habbo features could be used to supervise their children's Habbo experience and as well as about how to contact hotlines or police if needed.



## **Action 5 Effective takedown of child abuse material**

Measures under Action 5 are not relevant for Sulake Corporation Oy, because we don't offer hosting services to our users. It is not possible to upload videos, images, photos etc. in Habbo.

If Sulake finds that a user is sharing a link to a site where child abuse material can be found, this link is immediately removed and we report the incident to the police or local hotline.