

“A Safer Internet for Minors”

Alliance to Better Protect Minors Online

Individual company statement

Template

Members of the Alliance agreed to submit a list of specific commitments and timeline for implementation to the European Commission within three months of endorsing the Alliance Statement of Purpose (7th February 2017). This template is intended to help formulate your actions and transmit them to the European Commission in a harmonised format.

Name of the company:
Sulake Corporation Oy
Please provide a brief description of services/products your company offers to minors.
Sulake is a social entertainment company focused on providing a safe and fun online service for self-expression through our product, Habbo. Habbo is an online vintage pixel-art style virtual community where you can create your own avatar, make friends, chat, build rooms, design + play games and so much more! Almost anything is possible in this strange place full of awesome people.
Countries where products/services targeting (used by) minors are offered by your company.
Habbo provides a global service.

SECTION 1. USER-EMPOWERMENT

1. Identifying and promoting best practice for the communication of data privacy practices.		
Measures		Timeline for future actions
Current	Future	
<p>Although Habbo users are anonymous, and the real identity or personal information is not disclosed anywhere in the service, they can manage their profile settings for even more control over their privacy:</p> <ul style="list-style-type: none"> - Online status: Users can decide if they want their friends to see when they are online or they can enable the "Nobody can see me" settings if they want to use the service in a ghost mode. - "Follow me" settings: only your friends are able to follow you from room to room inside the Hotel. Nevertheless if you want a quiet moment to yourself, you can click Nobody in these settings. This way nobody will know where you are. - Friend requests: setting can be disabled so nobody can send you any friend request. - Control Access to rooms. There are options to help our users control access to their rooms: <ul style="list-style-type: none"> *Open – Any user may enter the room * Password – The room is locked with a password. Only users who have the password can enter. *Doorbell – Users will need to ring the doorbell and your child decides who gets to come in. * Invisible - Users without room rights cannot see the room in the navigator. <p>Users can make changes to room access settings by clicking Room Info icon to the bottom left of the screen, which opens the control panel.</p> <p>Safety Lock: helps users to better protect their account from unwanted access. If you think your account has been compromised, we'll block it. All main features such as trading items will be disabled until the account has been unblocked. You can activate the safety lock in Account settings.</p> <p>Information about how to protect your privacy available through the entire site.</p>	<p>Safety Lock feature improvements.</p>	<p>Q3 2017</p>

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2. Providing accessible and robust tools that are easy to use and to provide feedback and notification as appropriate.		
Measures		Timeline for future actions
Current	Future	
<p>Reporting tools are available throughout the whole Habbo site including chat rooms, IM, navigator, avatars, and group forums and when accessing the site via pc, tablet or mobile. Reporting categories are also available in all our reporting tools to make it easier for users to categorize different in game behaviours. When a user reports something to us we send feedback once we have received the issue and once the ticket has been reviewed and closed. Habbo encourage our users to report any incident not respecting the <u>Habbo Way</u> such as someone bullying them in game, or trying to get them to reveal their password or other confidential information. This type of behaviour should not be happening and should be reported using the <u>Call for Help</u> tool.</p> <p>Users can find information about how to report a user throughout our site and in the <u>Help Page</u>.</p> <p>Helplines: If users are feeling sad or want to talk to someone for advice or need help about things outside Habbo, they can find country helplines contact info in our <u>Help Center</u>.</p> <p>Habbo Help Tool: Users can also contact us via email through our <u>Help Tool</u>. All the tickets are tracked and users receive feedback every time the ticket is updated from our side.</p>	<p>Sulake is driven by the safety by design concept and we are continuously working on improving reporting tools and on making it easier for users to report the content that makes them feeling uncomfortable.</p>	On-going

3. Promoting users' awareness and use of information and tools to help keep themselves safer online and of their responsibility and duty to behave responsibly and respectfully towards others and foster trust, at the same time promoting minor's digital empowerment.

Measures		Timeline for future actions
Current	Future	
<p>Habbo is committed to a cooperative education programme to empower users to safely interact online.</p> <p>Tools: On Habbo you're in control. To help you make your stay in the Hotel a safe and enjoyable one, we've created a number of tools for you to take control of each and every situation. Here's how they work.</p> <p>Room Moderation tools: in addition to Habbo reporting tools, we have provided our users with an easy to use set of room moderation tools so they can also control what happens in their rooms. This way they can get rid of troublemakers from their own spaces if needed. Also they can let their friends to moderate in their private spaces so they can help when they are not around.</p> <p>This allows teens to play an active part in Habbo moderation and contribute to a safer and more enjoyable community.</p> <p>They have the following tools at their disposal:</p> <ul style="list-style-type: none"> - Kick: This tool removes a user from a room. - Mute: This tool mutes a user in the room. You can choose to mute a user for 2, 5 or 10 mins. - Ban: This tool lets you ban a Habbo from your room for a period of time. You can choose between 1 hour, 1 day and permanent. - Remove ban: This tool serves to remove a ban previously imposed. If you think you may have been a little harsh and now there's no one left in your room, this tool will soon sort it out. - Mute Room: this tool works in the same way as mute, but here all Habbos in a room will be muted. - Room Filter: Serves as an addition to the official Habbo filter, also known as bobba filter. Through room filter settings users can control what words or phrases they don't allow others to say in their rooms. They can set and edit the room filter differently in each of their rooms. 	<p>On-going process. Habbo has more than 17 years' experience providing a secure and creative environment for teenagers to interact, and will continue working with users on improving current processes.</p>	<p>On-going</p>

Ignore button: If another user is bothering you, or you simply do not want to listen to what somebody says, you can silence this person by using the Ignore button. To do this, click on the avatar of the person you want to silence. The Ignore button will appear and once you click on it, the speech from the user in question automatically becomes invisible.

Empowerment programs:

Ambassadors: are a group of experienced users chosen by Hotel staff that:

- Act as big sisters and brothers.
- Have proved a spirit of service.
- Encourage safe online behaviour.
- Guide new users about how they should act in the Hotel.
- Can warn, kick or mute misbehaving Habbos in public rooms.
- Host safety-themed events together with Hotel staffs.

Users can easily identify Ambassadors in a room because they either have a special badge or they have an icon above the username.

Guardians: As Guardians, Habbos will be able to help us moderate and keep safe the Habbo community, making it easier and faster to deal with bullying and other situations, while at the same time enabling our moderation team to focus on the most severe problem users. The Guardians let Habbos create a safer, more positive and active community.

Citizen talent track: Is a way for users to get to know all the ins and outs of the Hotel by completing achievements and earning badges until they have become fully Habbo Citizens.

We have added the Habbo way (code of conduct) to the first level of the track as a non-intrusive way to remind users that playing by the rules puts the fun in Habbo too.

Other: On Habbo users are in control. We encourage our users to host activities to help others make their stay in the Hotel a safe and enjoyable one. EG: users in habbo.it and habbo.fr have created the Red Bus program, a virtual bus where users can chat to other users and partner organizations and get help on a whole range of topics including internet safety.

<p>Habbo strongly believes in education and we work every day to create a community that is conscious of its responsibilities. Habbo thinks that player education is one of the most effective ways to maintain a good safety level in a virtual world. Safety tips and guidelines on how to use Habbo and internet safely are available in all our sites. EG:</p> <p>-Safety Tips: https://www.habbo.com/playing-habbo/safety</p> <p>- Habbo Way: https://www.habbo.com/playing-habbo/habbo-way</p> <p>- How to deal with a problem: https://www.habbo.com/playing-habbo/help</p> <p>- Account security & personal safety: https://help.habbo.com/hc/en-us/sections/204788248-Account-Security-and-Personal-Safety</p> <p>- Tools to safely surf Habbo: https://help.habbo.com/hc/en-us/articles/221642468-What-tools-do-I-have-to-safely-surf-Habbo</p> <p>- All about safety: https://help.habbo.com/hc/en-us/articles/221642208-All-about-Safety</p>		
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4. Promoting the use of content classification when and where appropriate.		
Measures		Timeline for future actions
Current	Future	
N/A not relevant for Sulake business since doesn't host any content not suitable for people under 18 years old.	N/A	N/A

5. Promoting the awareness and use of parental control tools.		
Measures		Timeline for future actions
Current	Future	
N/A. Parental control tools are often not fit for purpose for a teenage audience and Sulake strongly believes in education. We maximize our efforts to educate our users on how to surf the	N/A	N/A

internet safely. <u>Information for parents</u> to learn about Habbo is available in all the sites.		
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SECTION 2. ENHANCED COLLABORATION

6. Intensifying cooperation between ourselves and with other parties such as Child Safety Organisations Governments, education services and law enforcement to enhance best practice-sharing.		
Measures		Timeline for future actions
Current	Future	
<p>Sulake works hand-in-hand with local authorities and immediately reports any inappropriate behaviour.</p> <p>Sulake co-operates with governmental organizations and has goodwill/charity partnerships established around the world to teach teens about various topics including safe Internet usage, the dangers of drugs, bullying etc. Partners include Save the Children, Help Wanted, Fil Santé Jeunes, Ditch the Label as well as other country specific organizations.</p> <p>Most of these partners use Infobus public room to talk to users, a virtual bus placed in the Habbo Park. A professional counsellor spends time in the bus, depending on the organization availability, and gives advice on a chosen topic. The Infobus is incredibly popular within Habbos.</p>	<p>On-going. We have been working with local NGOs and local organizations for 17 years.</p>	On-going

7. Identifying emerging developments in technology such as connected devices and with the support of the Commission, engage with other parties who also have a role to play in supporting child safety online.		
Measures		Timeline for future actions
Current	Future	

<p>Sulake is driven by the safety by design concept and we are using cut edging technology in Habbo for content monitoring.</p> <p>Sulake often discusses with other gaming companies and other stakeholders to share thoughts around best practices.</p>	<p>Sulake will continue following new technology developments and it is open to discuss with all stakeholders.</p>	<p>On-going</p>
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SECTION 3. AWARENESS-RAISING

<p>8. Supporting the development of awareness-raising campaigns about online safety, digital empowerment, and media literacy through both ad hoc and ongoing initiatives.</p>		
<p>Measures</p>		<p>Timeline for future actions</p>
<p>Current</p>	<p>Future</p>	
<p>Online safety is a high priority for Habbo and we are an official supporter of the Safer Internet Day. Every year we celebrate the date worldwide with our users. Habbo SID activities in 2017 can be checked here.</p> <p>Habbo also works with different NGOs supporting their campaigns. E.g. UK Ditch the Label campaign "Gamers unite for a better internet" on June 2017".</p> <p>Habbo encourages the users to host activities to help others make their stay in the Hotel a safe and enjoyable one, so we are also supporting users initiatives and campaigns on the safety theme, which invite players to engage with the topic creatively.</p>	<p>On-going</p>	<p>On-going</p>

9. Promoting children's access to diversified online content, opinions, information and knowledge.

Measures		Timeline for future actions
Current	Future	
N/A. Habbo is one of the few platforms that does not allow posting or sharing of video or photos between users.	N/A	N/A

SECTION 4. OTHER TYPES OF ACTIVITIES

10. Other types of activities concerning online safety for minors.

Measures		Timeline for future actions
Current	Future	
N/A	N/A	N/A