Implementation Questionnaire

November 2016

Introduction

Notes/instructions on completing this template
- Please complete all sections and all questions as far as possible
- Where a question or section is not applicable, please mark as N/A
- Where is overlap – or no change – to information previously submitted in company statement of commitments, please simply enter "refer to self-statement"
- URLs or screenshots (with links) are particularly useful in illustrating individual points
- Please add any additional information/data relevant to the submission at the end of the appropriate Principle

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1. Name of the company on whose behalf this submission is made:
Telefónica S.A.

2. Country or primary markets where products/services are offered (in EU) to which this submission applies In which European markets does your company operate
Germany, Spain and UK.

3. Product(s) or services included within the terms of this submission
Commercial activity focused on customers: LTE, smartphones, fibre+VDSL, mobile contract and pay TV.

4. Nature of activity

☐ *Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles*
X *Network operators and connectivity providers*
☐ *Online content provider*
☐ *Online service provider*
☐ *Other* (please specify): ....

5. Person(s) completing the report

Name: ....Geert Paeman..

Position: Director of Sustainability and Intangibles Management........................

Email: geert.paemen@telefonica.com

Principle 1 – Content

<div style="border:1px solid">

Commitments

Signatories should:

- Indicate clearly where a service they offer may include content considered not to be appropriate for children and display prominently options which are available to control access to the content. This could include, where appropriate for the service, tools to manage access to certain content, advice to users or a recognised system of content labelling.
- Display prominently and in an easily accessible location the Acceptable Use Policy, which should be written in easily-understandable language.
- State clearly any relevant terms of service or community guidelines (i.e. how users are expected to behave and what is not acceptable) with which user generated content must comply.
- Ensure that reporting options are in the relevant areas of the service.
- Provide notice about the consequences for users if they post content which violates terms of service or community guidelines.
- Continue work to provide innovative solutions able to support child safety protection tools and solutions.

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1. Do you provide a mechanism for consumers to _provide feedback, report an issue or file a complaint_ about the appropriateness of a piece of content?

 X *Yes*

☐ *No*

☐ *Not applicable* (please explain):..

If yes, please provide details:

Telefonica has made it simpler for customers to report potentially illegal images of child abuse by ensuring the visibility of links to the national hotlines from its commercial websites.

Germany: In Germany, Telefónica is an active member of the Centre for Child Protection on the Internet, which is currently developing a nationwide reporting tool in cooperation with the German ICT-Industry.

https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/weitere-informationen.html

There is a button on the Telefónica company website www.telefonica.de/verantwortung/jugendschutz) where you can directly contact Telefónica Deutschland youth protection officer. Under the same link (www.telefonica.de/verantwortung/jugendschutz/weiterführende Informationen) there is information about the official nodes and how they can be reached. The same applies to all consumer portals (e.g. www.o2.de): the link "Jugendschutz" in the footer contains

brief information on youth protection measures and is linked with the afore mentioned company portal.

Spain: In Spain, we provide our customers or any other person have an icon to report the existence of these images or any other inappropriate or illegal contents in our customer website.

Spain has been the first country, in which all the relevant operators, belonging to the Mobile Code of Conduct, have implemented a reporting button for child abuse or harmful contents, making possible for users to report from commercial websites, mobiles or tablets.

It is a common icon for all platforms regardless operators' brands. Its collaboration and no competition what matters.

Having reporting buttons is the first goal of the CEO Coalition for a better internet for children. And it was implemented in Spain, before this goal was approved in the Coalition.

It fulfils all the requirements set (visible, easy to find, and available in all devices).

Initially the reports were sent to a hotline, but it closed as the Safer Internet Program stopped providing funds. Now, it's the Spanish gendarmerie (Guardia Civil), who have accepted this responsibility and are responsible to manage what users report, providing their own report template.

It can be accessible directly through its own domain:

http://familiadigital.net

Or through the commercial or institutional website:

https://www.telefonica.com/es/web/sostenibilidad/nuestros-compromisos/menores/presentacion

UK: Telefónica UK continues to actively support the work of the Internet Watch Foundation. We direct our customers to anonymously report websites that display child sexual abuse material at the Internet Watch Foundation website. (www.iwf.org.uk).

With regards to legal content, customers, website owners and other interested parties can check the classification of a website by visiting http://urlchecker18plus.o2.co.uk/. In addition, members of the public can request Telefónica UK reviews the classification of a site to ensure it is correctly classified. We invite people to email shieldav@o2.com with the details of the website. We'll work with our independent classification partner to review the site, and commit to inform them of our decision.

In other Latinoamerican countries, the information goes to the official nodes of Inhope, who attend to the complaint. At present, you can find this option on the websites in Germany, Brazil, United Kingdom, Colombia, Mexico and Peru, where the "Seguros en Internet" portal has received the National Award for Digital Democracy 2015.

2. Do you offer a means _for restricting / blocking access_ to potentially inappropriate content for users of your service or product?

X *Yes*

☐ *No*

☐ *Not applicable* (please explain): ....

If yes, please provide details of mechanisms in place:

Regarding blocking and taking into account the European legislation, as an operator there is no responsibility to know what our clients are doing while they navigate through the internet.

When we provide hosting or mail services, the law says that we won't be responsible for the content hosted, until there is actual knowledge, and once we have it, we act quickly (removing it, or making it impossible to access).

«Actual knowledge» is provided in three ways: Notification from a competent authority, IWF lists client's notification (always after legal services supervision).

For several years now, we proactively proceed to block images of sexual abuse on the Internet following the guidelines and the lists provided by the Internet Watch Foundation. At Telefonica we perform this block in nine of the countries in which we operate.

Telefonica has been a member of the GSMA Mobile Alliance Against Child Sexual Abuse Content since 2008 in order to reduce the exposure and dissemination of these contents in the mobile networks, counting with the support from the European Commission, the United Nations and the European Telecommunications Union. As a result of its commitments, Itt works with national law enforcements and national hotlines to enable reporting and removal of images of child abuse (except in Germany due to local legislation)

Germany:
We are offering an age verification system for our own o2 portal:
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/jugendschutz-auf-dem-o2-portal.html

UK: UK: To protect children, young people and vulnerable people, we block access to 18+ rated content that is classified according to the British Board of Film Classification's (BBFC) framework, in accordance with the industry code of practice and UK and EU regulation.

If a site has been rated 18+ customers won't be able to access it without giving us proof of age first. For more information: http://www.o2.co.uk/help/safety-and-security/age-restricted-content-and-age-verification and https://ageverification.o2.co.uk/

In addition, for several years now, we proactively proceed to block images of sexual abuse on the Internet following the guidelines and the lists provided by the Internet Watch Foundation. Telefonica currently has the following covered by the license: Chile; Costa Rica; Ecuador; Guatemala; Nicaragua; Peru; Spain; UK; Uruguay and Venezuela

If illegal content were to be identified on servers hosted by Telefonica, it would be removed quickly, in accordance the relevant notice and take-down provisions. Telefonica has been a member of the GSMA Mobile Alliance Against Child Sexual Abuse Content since 2008 in order to reduce the exposure and dissemination of these contents in the mobile networks, counting with the support from the European Commission, the United Nations and the European Telecommunications Union. As a result of its commitments It works with national law enforcement and national hotlines to enable reporting and removal of images of child abuse (except in Germany due to local legislation).

3. Do you provide any _information, educational resources or advice for users_ in any of the following areas?
(tick as many as apply)

☐ *Content classification or labeling guidelines*

X *How to block or restrict access to content*

X *How to report or flag content as inappropriate*

X *Safe searching*

☐ *Information about your company's content policy in relation to children*

☐ *Not applicable* (please explain): ....

If yes, please provide details including the format of any material provided (video, text, tips, games, FAQs, etc.):

Telefonica supports several educational campaigns in Germany, UK and Spain. For example:

Germany: TEF Germany is currently working on an integrated strategy for the protection of minors (https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz.html), drawing on the vast experience of Telefonica Deutschland Group in its development and realization. The strategy includes media education approaches, technical precautions and transparent pricing. We promote also media skills with initiatives such as our Think Big youth scheme. (www.think-big.org)

We observe the strict legal provisions of youth media protection in all of our activities, products and applications, and this is monitored by our youth protection officer. We are also a member of Freiwillige Selbstkontrolle Multimedia- Diensteanbieter e.V. (Voluntary Self-Monitoring of Multimedia Service Providers, FSM e.V.) and have been subject to voluntary self-regulation of youth media protection in mobile telephony since 2007.

In 2016 w published a fully revised mobile-phone guide for children and parents together with Deutsches Kinderhilfswerk e.V. (German Children's Fund) for the third time. The child-friendly brochure introduces young mobile-phone users to important questions regarding the safe use of smartphones and mobile communication in an entertaining and age-appropriate way. As of 2016 the mobile-phone guide is now available for the first time in a dual-language version in German and Turkish, in cooperation with the Telefónica brand AY YILDIZ: www.dkhw.de/shop/handyguide-deutsch /

Spain: In Telefonica we strive to provide an environment which encourages responsible and secure use of the digital services among young people through initiatives such as Digital Family (www.familiadigital.net).
A global project with a forward-looking approach to promote digital education and to encourage a better use of the Internet and technologies by children, parents and educators.

In response to this objectives, Telefonica released the following initiatives:

- The awareness and educational programme: "Pilar y su celular" with the aim to offer children and parents advice on the responsible use of the mobile phone (www.pilarysucelular.com). The programme, in partnership with Pantallas Amigas, includes:

- o   A guideline of good online privacy practices.
- o   10 animated videos related to the responsible use of Smartphone.
- o   A guideline and an animated video to know how to protect the environment with our Smartphone.

- The first face-to-face meeting to discuss with parents about the challenges of the digital family life.

- A new collaboration: Telefonica and Policia Nacional have launched Ciberexpert@, an educational program to help children to understand how to manage the use of the devices connected to Internet (www.ciberexperto.org).

UK: In O2 UK we have developed an approach to child safety in partnership with high profile UK charity NSPCC. It includes commitments to raising awareness, offering advice and training, delivering community outreach programs and the development of specific products and services that help to keep children safe online.

4. Where is your company's _Acceptable Use Policy_ (AUP) located?

All our policies are always placed on the bottom of the websites.

Links:

Germany: https://www.o2online.de/recht/agb-und-infos/

Spain: http://www.movistar.es/particulares/aviso-legal/

UK:
http://www.o2.co.uk/termsandconditions/other-products-and-services

5. Does the AUP or separate give clear guidelines with which user generated content must comply (including details about how users are expected to behave and what is not acceptable)?

☐ *Yes*

☐ *No*

X *Not applicable* (please explain): Telefonica do not provide services where users can generate their own content.

If yes, please identify relevant policy:

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6. Do you provide notice about the _consequences for users_ if they post content which violates terms of service or community guidelines?

☐ *Yes*

☐ *No*

X *Not applicable* (please explain): Telefonica do not provide services where users can generate their own content.

If yes, please identify relevant policy:

Principle 2 – Parental Controls

Commitments

Signatories should assist parents to limit their children's exposure to potentially inappropriate content and contact.

- Manufacturers should optimise hardware design to provide products which simply and clearly help parents to set appropriate levels of control on devices.
- Network providers should provide necessary tools and settings across their services to enable parents to set appropriate levels of control.
- Service and content providers should make available the necessary tools and settings across their services to enable parents to set appropriate levels of control.

1. Please outline the availability of any _parental control tools and settings_ across your product or service that allows parents to set appropriate levels of control? Include relevant links/ screenshots where available:

We develop parental controls for all types of devices connected to the Internet, as a tool to help parents to enable their children to make responsible use of the technology.

We currently provide this commercial offer in:

Germany: O^2 protect: program for greater technical security**.**
We are offering an age verification system for our own o2 portal:
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/jugendschutz-auf-dem-o2-portal.html

Spain: We develop parental controls for all types of devices connected to the Internet, as a tool to help parents to enable their children to make responsible use of the technology.

We currently provide this commercial offer in:

Movistar Protege: A innovative tool that provides total protection for children in every device (PC,mobile, tablet) and in every network.

We are the only operator in Spain providing this advanced solution (software) for families, which goes further as it contains a panic button that can be used when children are in danger that informs their parents where they are.
Children are not only protected from accessing to inappropriate content, but also to apps. It can manage online time (browsing or using applications) and help parents with the social network activity of their kids.

Canguro Net: It's a parental control tool provided in the telecom network, so it only protects devices connected from the wifi. Users don't need to install anything in the devices.

Besides for the audiovisual contents that are provided as a pay TV platform, Telefonica provide several tools easily handling by families in order to effectively protect minors (i.e. channel blocking, parental control pin, purchase pin features in addition to parental control pin). Besides it exist a separate catalogue for those contents that should not be accessible for minors (adult content).

UK: See O2/ NSPCC hub and O2 parental control for mobiles.

2. . If applicable, please describe the features offered by the _parental controls_? E.g. restricting web access, customization, monitoring, other restrictions…..

Spain:

Movistar Protege is a comprehensive child safety solution that allows parents to protect kids online and also offline.

Features:

- Protect kids from inappropriate content and applications. See what your kids do online.

- Inspects pages and not just top domain.

- Deep Social Network monitorization.

- Shield kids from harmful contacts (call/SMS).

- Manage kids' online time (browsing and applications).Set usage allowance schedules.

- Set specific protection profiles for each kid across all devices.

- Manage centrally the service and check questionable activity from anywhere.

- Let your kids ask for help and know where they are (panic button).

- Intuitive and complete dashboard.

- Accessible from anywhere at any time.

- Works with all popular platforms.

https://www.movistar.es/particulares/tienda/servicios-digitales/protege?sem=sem-brand_product_protege:brandproductprotege&gclid=Cj0KEQiAjZGnBRCOuJOUo9Xd0sUB EiQAPbicN1x69tnOzEA-jaVsEErahuwIGkuzsmUe2_v83tRmo-saAog98P8HAQ&dclid=CMaN19-768MCFY6UwgodmzEAVg

Canguro Net is a web based service that controls every single device connected to the WIFI at home. The service blocks harmful URLs, advertising and downloads.

http://www.movistar.es/particulares/internet/seguridad/canguro-net-plus/

For the Audiovisual contents, we provide information to our customers of the information related to the content, age rating and specialized channels offering a specialized children programming different from the generalist channels.

UK: O2 parental control for mobiles is a service we offer to help parents to protect their children while they're online. It enables us to restrict children's web access via their mobile to a limited number of sites which are suitable for children.

https://parentalcontrol.o2.co.uk/

Germany: O² protect: programme for greater technical security. With the O2 protect programme, we help our mobile-phone customers and their children to be better prepared for potential risks online. Our antivirus protection is based on the McAfee Antivirus & Security app and was a Stiftung Warentest (a well-known German consumer organisation) test winner in 2013. This all-round solution simultaneously protects up to five smart¬phones, tablet PCs or PCs from unauthorised access. In addition, parents can activate a child safety lock in order to determine where and for how long their children are allowed to surf.

https://www.o2online.de/apps-services/sicherheit/o2-protect/

3. In relation to parental controls, which of the following _educational and information resources_ to do you offer?
(tick as many as apply)

☐ *Company policy in relation to use of parental controls*
X *Guidance about how to use parental controls*
X *Educational or awareness-raising resources about the use of parental controls*
X *A promotional or marketing channel for the uptake of parental controls*
X *External links to educational material/resources about the use of parental control*

[Please provide details including links or screenshots as relevant]

Spain:

Guidance about how to use parental controls
http://www.movistar.es/particulares/tienda/servicios-digitales/protege?utm_source=movistar-col_ventas_desarrollo-youtube&utm_medium=referral&utm_content=mov-referral-protege-youtube-0-20150609_video1&utm_campaign=protege

Educational or awareness-raising resources about the use of parental controls:
http://familiadigital.net/resources/uso_controles_parentales

A promotional or marketing channel for the uptake of parental controls

Movistar Protege: http://protege.movistar.es/Identificacion
Canguro Net: http://www.movistar.es/particulares/internet/seguridad/canguro-net-plus/

http://familiadigital.net

Germany:

In 2017 we published a fully revised mobile-phone guide for children and parents together with Deutsches Kinderhilfswerk e.V. (German Children's Fund) for the third time. The child-friendly brochure introduces young mobile-phone users to important questions regarding the safe use of smartphones and mobile communication in an entertaining and age-appropriate way. As of 2016 the mobile-phone guide is now available for the first time in a dual-language version in German and Turkish, in cooperation with the Telefónica brand AY YILDIZ: www.dkhw.de/shop/handyguide-deutsch /

Additonally, we offer the advice of the o2 Gurus in the stores. (https://www.telefonica.de/verantwortung/leben-in-der-digitalen-welt-staerken/digitale-inklusion/o2-gurus.html

Written information to various issues is available on our websites: https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/informationen-fuer-eltern.html

UK: We have launched a dedicated section on our website (http://www.o2.co.uk/help/nspcc) that contains articles on topics such as online bullying to the apps that children are using. Each article follows the same structure. First, we explore and explain the topic. Then we give tips on how to talk about it with children. We give parents some ideas on ground rules that they might want to agree. Then help parents with how to manage technology to keep their children safe.

And if parents need more help on anything, from setting up parental controls to reporting online bullying, they can call our free helpline on 0808 800 5002, or visit an O2 Guru in one of our stores.

If parents need help finding a site that's right for their child we recommend Net Aware, a site O2 has developed with NSPCC. It's packed with reviews from O2 staff and customers, advice and recommendations from children themselves, and other parents. If parents have younger children, we recommend setting up their accounts with them as a great way to explore, set boundaries and start having conversations together. This is also a good opportunity to explain to children what parental controls are in place.

4. Please outline any additional safety tools or solutions _not detailed above_ that relate to parental controls, including any planned implementation of new features or procedures?

Spain:

Pack Protección Online is an insurance that offers digital protection to families.

https://www.packprotecciononline.es/

https://www.telefonica.com/es/web/sala-de-prensa/-/zurich-y-telefonica-lanzan-la-primera-solucion-del-mercado-que-protege-integramente-la-vida-digital-de-toda-la-familia

Three digital protection solutions:

Personal Protection
- Legal defense (theft of identity)
- Alerts and caseworkers
- Online reputation
- Digital erasing
- Vulnerability scanning
- Electronic certification and evidence acquisition

Junior Protection
- Legal defense (cyber-bullying)
- Psychological care
- Online reputation
- Digital erasing
- Parental protection
- Vulnerability scanning
- Electronic certification and evidence acquisition

Integral Protection

- Legal defense (theft of identity)
- Legal defense (cyber-bullying)
- Psychological care
- Alerts and caseworkers
- Online reputation
- Digital erasing
- Parental protection
- Vulnerability scanning
- Electronic certification and evidence acquisition

We provide our customers with a multi-device platform, with 24x7 assistance for both contracting and attention (phone, chat and e-mail).

Germany: Preparing customers for life in the digital world:
Those wishing to use digital knowledge need to be able to handle personal data and digital media securely. This is something we work towards by means of various programs. The O2 Gurus, for example, assist our customers online, over the phone and in many of our O2 shops. These trained experts offer tips on how to use digital technologies correctly in free workshops which are also open to non-customers. Parents learn, for example, how to create "kids' corners" on their smartphones, where their little ones can only access safe applications such as games and music. Schoolchildren and students are offered advice regarding risk-free Internet surfing and the safe use of social networks. Since 2014 we have reached some 4,000 people at more than 1,000 workshops and, since 2015, our events have also been hosted online as webinars that take place several times a month, addressing topics which are continuously updated. Our portfolio is rounded off by videos, chats and blogs that provide additional information (www.o2online. de/guru).

UK: Get free help and advice. We know your phone is more than just a phone. And our expert Gurus are dedicated to helping you get the most out of it. From backing up your data, to advice on taking amazing photographs. Hundreds of Gurus are available to give you free advice in store, online, and over the phone.

http://www.o2.co.uk/help/guru

Principle 3 – Dealing with abuse/misuse

Requirements

Signatories should:

- Provide a clear and simple process whereby users can report content or behaviour which breaches the service's terms and conditions.
- Implement appropriate procedures for reviewing user reports about images, videos, text and other content or behaviour.
- Provide clear information to users on all available report and review procedures.
- Place and review regularly links to these reporting options in appropriate areas of the service (e.g. where users view user-generated content or interact with other users) and provide guidance on what to report.
- Place links to relevant child welfare organisations or specialist providers of advice (e.g. about anorexia or bullying) and other confidential helplines/support services in appropriate areas.
- Ensure that moderators who review user reports are properly trained to determine or escalate content or behaviour presented to them

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1. Please provide details of *company policy relating to abuse* and misuse (involving images, videos, text and other content or behaviour) on your product or service.

Germany: all relevant information can be found on our websites:

https://www.o2online.de/business/meta/daten-und-jugendschutz/datenschutz/

https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/datenschutz-und-informationssicherheit/datenschutz-auf-dem-portal

2. Please describe the *process or mechanism* available for users to report abuse/misuse (involving images, videos, text and other content or behaviour) on your product or service).
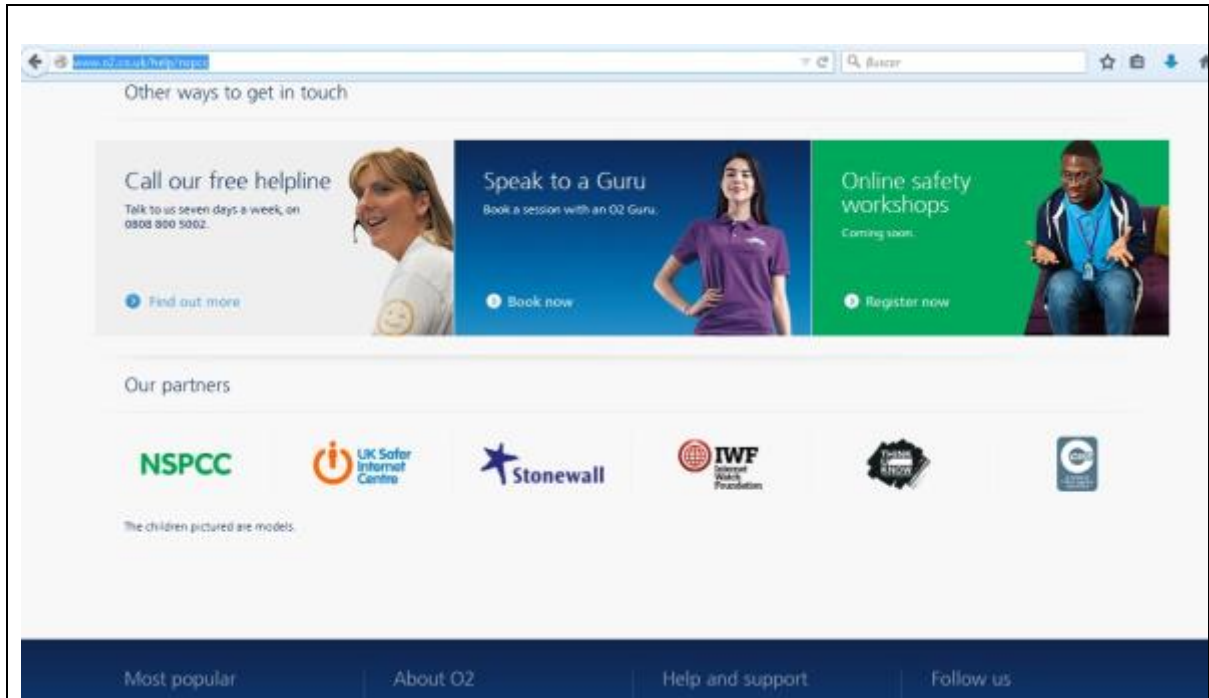
Spain: In Telefonica Spain we have a service called Nemesys http://www.movistar.es/nemesys. It's an internal , todepartment to provide information to customers related with any misuses of the services of Telefonica and in which customers can report in order to remove the inappropriate contents on our servers.

We also include a link to our national reporting system with the Guardia Civil (included in Familia Digital) http://familiadigital.net

Germany: In Germany, we include a link to the national hotline on the website: https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/weitere-informationen.html

UK: we include also on the website a link to the national hotline: http://www.o2.co.uk/help/nspcc

[Please provide details including links or screenshots as relevant]

3. _Where_ is the reporting button/ mechanism located?
(tick any that apply)

☐ *On each page of the website/service*
☐ *Close to the point where such content might be reported*
X *In a separate location such as a safety page*
☐ *In a browser extension*
☐ *In a separate app for a connected device*
☐ *Other* (please specify): ....

The reporting button is placed on the microsites related with child protection.

Our businesses in Spain, Germany and UK carry links to the national hotline on their commercial websites.

(see answer to the previous question)

4. _Who_ may use such a reporting mechanism?
(tick any that apply)

☐ *Only registered user/profile in which content is located*
☐ *All registered users of the product/service?*
X *Everyone including non-users, e.g. parents/teachers who are not registered for the service*
☐ *Other* (please explain): ....

5. Which of the following *kinds of content* can users report?
In Spain, users can report anything that they think may be illegal or harmful for kids. **In UK** Telefónica UK continues to actively support the work of the Internet Watch Foundation. We direct our customers to anonymously report websites that display child sexual abuse material at the Internet Watch Foundation website or hotline. (www.iwf.org.uk). **In Germany** the hotline allows users to report potentially illegal images of child abuse.

6. Which of the following information do you provide to users? (tick any that apply)
☐ *Advice about what to report* **X** *Advice about how to make a report* ☐ *Pre-defined categories for making a report* ☐ *How reports are typically handled* **X** *Feedback to users* **X** *Other website/external agency for reporting abuse/ misuse content?* ☐ *Other* (please specify): .... In the services handle by Telefonica, it is sent a notification to the person who has reported to inform about the reception of the report and its outcome. In those cases where the icon is linked to national hotlines law enforcement agencies (Guardia Civil), reports are anonymous and Telefonica is not responsible for handling or giving feedback of the report

7. Please provide details of any *other means*, in addition to a reporting button/icon, to report content or behavior which breaches your service's terms and conditions
See answer in Principle 3 Section 2   [Please provide details including links or screenshots as relevant]

8. Please outline briefly any other procedures or programmes offered by your service *not detailed above* that relate to abuse /misuse,

Principle 4 – Child Sexual abuse content or illegal contact

Requirements

Signatories should:

- Co-operate with law enforcement authorities, as provided for in local law, regarding child sexual abuse content or unlawful contact.
- Facilitate the notification of suspected child sexual abuse content to the appropriate law enforcement channels, in accordance with existing laws and data protection rules.
- Ensure the prompt removal of illegal child sexual abuse content (once it has been confirmed as illegal by the relevant public authority) in liaison with national law enforcement.
- Provide relevant additional information and/or links to users so they can make a report or obtain information about appropriate agencies or organizations' that users can contact about making a report or obtaining expert advice, at national and EU level (e.g. law enforcement agencies, national INHOPE hotlines and emergency services).

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1. Which of the following mechanisms are provided on your product or service to _facilitate_ _the notification or reporting_ of suspected child abuse content?

(tick any that apply)

☐ *Company-own hotline reporting button or telephone number*

X *Link or button for external national or regional INHOPE hotline*

☐ *Emergency services*

X *Law enforcement agency*

☐ *Other external agency* (please specify): ....

Germany: In Germany, Telefonica is an active member of the Centre for Child Protection on the Internet, which is currently developing a nationwide reporting tool in cooperation with the German ICT-Industry.

https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/weitere-informationen.html

Spain: In Spain, we have an icon to report the existence of these images or other inappropriate or illegal contents to the Guardia Civil, responsible to answer what users report.

http://familiadigital.net

https://www.telefonica.com/es/web/sostenibilidad/nuestros-compromisos/menores/presentacion

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UK: Telefónica UK continues to actively support the work of the Internet Watch Foundation. We direct our customers to anonymously report websites that display child sexual abuse material at the Internet Watch Foundation website or hotline. (www.iwf.org.uk).

2. Please outline briefly the procedures to be followed if illegal content were to be discovered on your service.

Following our internal policy:

In the event that Illicit Content is found on sites owned by Telefonica in the space assigned or contracted with the customer, or in any other way, upon consultation and authorization from the Legal General Secretary, Telefonica:

(i)   Shall immediately inform the Competent Authority of the facts, whenever this is appropriate under the Applicable Legislation, giving notice that the Illicit Content is to be removed;

(ii)   It shall remove this Content in the shortest possible amount of time and in any case within 72 hours following assumption of Actual Knowledge, unless the Competent Authority or the Applicable Legislation indicates otherwise.

Whenever there is no room for doubt that the customer, or the relevant party in question, has been the victim of an attack by a third party (for example, in the case of a hacker using the customer's account to upload Illicit Content) Telefonica shall report the incident to the customer stating that he should rectify it himself. This message will notify him that his site could have been manipulated by third parties and that should 72 hours elapse and no correction be observed, then steps will be taken to safeguard and Remove the Content.

3. Do you provide links to any of the following to enable users gain _additional_ _information_ in relation to child sexual abuse content or illegal contact?
(tick any that apply)

X *Links to relevant child welfare organizations/specialist providers of advice*
X *Other confidential helplines/support services*
X *Law enforcement agencies*
☐ *INHOPE*
☐ *Other* (please specify): ……………..

Principle 5 – Privacy and Control

Requirements

Signatories should:

- Manage privacy settings appropriate for children and young people in ways that ensure they are as safe as is reasonably possible.
- Offer a range of privacy setting options that encourage parents, children and young people to make informed decisions about their use of the service and the information they post and share with others online. These options should be easy to understand, prominently placed, user friendly and accessible.
- Take steps, where appropriate and in accordance with legal obligations, to raise user awareness of different privacy controls enabled by services or devices and enable users to use these as appropriate.
- Make reasonable efforts to raise awareness among all parties, service, content, technology and application providers, including public bodies, of industry good practice in relation to the protection of children and young people online

1. Please provide details of your company's published _privacy policy_ in relation access, collection, sharing and further use of data from minors under the age of 18 when utilizing your product or service?

Germany: https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz.html

Handyguide for minors and parents

Transparency regarding our Price Policy

Media Pedagogy Principles

Technical Safeguards

Other initiatives: Think Big https://www.think-big.org/

Spain: In the attention and commercial channel's calls, in the processes of register/portability / extensions of contract, we request information associated with the personal data. The first information requested is if you are of legal age. If not, the hiring is rejected.

All customers who accept the register, we will carry out the following checks:

• They must be of legal age.

• They must provide your full name and your ID card as the line owner.

• They must provide the ID card and name of the company's representative

Likewise, when the Company detects a child's voice, It suspends the call without answering it.

For In-store contracting and Prepaid Services:

In the "optional data" section, the date of birth becomes "mandatory data" in the event that a purchase by a minor of a mobile prepaid. However, parents or legal guardians must authorize that purchase.

Sólo se podrán registrar los mayores de 18 años. Sin embargo, en caso de solicitar un registro un menor, se indicará que la identificación corresponde a un menor de edad, indicando la fecha de nacimiento.

Datos Personales

|	
Documento Identificación:	CEDULA DE IDENTIDAD 323342
Nacionalidad:	ANDORRA
Estado:	REGISTRADA
Nombre:	
Apellido 1:	
Apellido 2:	¿Cliente menor de edad?: Si ☑ No ☐
Fecha Nac. Menor:	08/02/2012
Código Postal:	
Causa Motivo:	ALTA IDENTIFICACIÓN ▾

Aceptar   Continuar   Cancelar

Si el sistema identifica por la fecha de nacimiento que se trata de un menor de 14 años, se emite el siguiente mensaje:

Mensaje de página web   ✕

⚠ El cliente menor de edad debe ser mayor de 14 años.

Aceptar
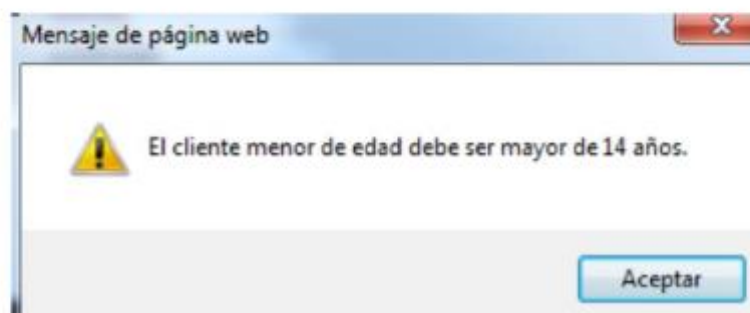
Y no se debe continuar con el registro.

In the event that we suspect an identity theft by a minor instead an adult, we have an incident resolution area but the Legal area does a last assessment about the case..

Irregular Agreements:
Minors:
These cases include complaints concerning the minority of the contractor, usually carried out by the parents or guardians of them.

In the case of irregular agreements, the premises to be complied are following:

• Minors, it is essential that the complainant sends a copy of the ID card of the owner of the line. The complaint will be accepted when the person who had signed was minor.

• If the register has been processed when the person was a minor but they pay a bill when they obtain once the majority age, the complaint will be closed with "No Proof of identity theft " and notified to the mailbox TE_ReclamacionesSIFraude 2

UK: http://www.o2.co.uk/termsandconditions/privacy-policy

2. Are _distinct privacy settings_ deployed to prevent access to information on for users under the age of 18?

☐ *Yes*

x *No*

☐ *Not applicable (please explain)*: ....

If yes, please briefly outline available age-appropriate privacy settings (Provide details including relevant links/ screenshots on your website)
Two factor authentication when value added services are bought

Please identify default settings for each _age category_ of under 18s, as relevant:

Please identify any steps you have taken to ensure that these settings are _easy to understand, prominently placed, user friendly and accessible_.
Integrated in the footer of our websites and the special website for youth protection:
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz.html

**3. Where are users able to view and change or update their privacy status?
tick any that apply)**

Germany: YES: every contact point allows this. Also users that use the online service can manage every permission:

Verwendung der Bestandsdaten für ähnliche o2 Produkte

O₂ verwendet Ihre personenbezogenen Kundendaten, deren Erhebung für die Begründung, inhaltliche Ausgestaltung, Änderung oder Beendigung des Vertragsverhältnisses erforderlich ist (für Vertragszwecke erhobene Bestandsdaten), auch für Marktforschung und um Ihnen Produkte von O₂ zu empfehlen, bei denen wir Ihr Interesse aufgrund der Ähnlichkeit zu Ihren bereits bestellten Produkten annehmen dürfen, und zwar per

☐ SMS/MMS

☐ E-Mail

Verwendung der Verkehrsdaten für o2 Produkte

☐ Ich bin einverstanden, dass O₂ meine Verkehrsdaten im erforderlichen Maß und Zeitraum verwendet, um bedarfsgerechte Telekommunikationsdienste zu gestalten und mir solche - soweit ich der Kontaktaufnahme zugestimmt habe - anbieten zu können.

Verwendung der Bestandsdaten für alle o2 Produkte

Ich bin einverstanden, dass O₂ meine Bestandsdaten während der Laufzeit meines Vertrages und bis zu sechs Monate darüber hinaus auch verwendet, um mich über Produktangebote von O₂ (Telekommunikationsdienstleistungen/-geräte, Software, Multimedia-/Unterhaltungsinhalte) zu informieren und zwar per

☐ SMS/MMS

☐ E-Mail

☐ Telefon

☐ Brief

Verwendung der Bestands- und Verkehrsdaten für Partnerprodukte

Ich bin einverstanden, dass O₂ meine Bestands- und Verkehrsdaten (siehe oben) auch verwendet, um mir Produktangebote von Telefónica Konzerngesellschaften und ausgesuchten O₂ Kooperationspartnern (z.B. Einkaufsgutscheine; O₂ Kooperationspartner und deren Produktportfolios finden Sie unter www.O₂.de/goto /kooperationspartner) zu unterbreiten und zwar per

☐ SMS/MMS

☐ E-Mail

☐ Telefon

☐ Brief

X *On each page of the website/service*
☐ *At each point where content may be posted*
X *In separate location such as a settings/safety/privacy page*
☐ *In a browser extension*
☐ *In a separate app for a connected device*
☐ *Other (please specify):* ....
Users can contact the hotline or manage their privacy settings via their online account

[Please provide details including links or screenshots as relevant]

4. Which of the following _information, resources or help features_ (if any) are provided to encourage users to make informed decisions about their privacy or the information they share?

GERMANY:
Privacy policy of each website. For example:
o2online.de : https://www.o2online.de/recht/daten-und-jugendschutz/
Blau.de : https://www.blau.de/recht/datenschutz/

☐ *Tips/advice to users at the point of setting privacy options*
  1. Information for parents:

https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/informationen-fuer-eltern.html
  2. technical safeguards:

https://www.o2online.de/apps-services/sicherheit/o2-protect/
https://blog.telefonica.de/2014/09/das-neue-o2-protect-sicherheitspakete-noch-individueller/

☐ *FAQs*
  1. https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz.html

  2. Each user or customer can use the community forum to inform himself about such topics or ask questions that might interest him:

https://hilfe.o2online.de/
  3. Direct contact to our Youth Protection Officer via a contact form

https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/kontakt/jugendschutz-anfrage.html

☐ *Help or educational resources in a separate location of service*
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/weitere-informationen.html

☐ *Links to any external NGO agencies offering education or awareness-raising related to privacy*
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/weitere-informationen.html

☐ *Links to governmental or EC agencies (Office of Data Protection Commissioner, ENISA etc.) in relation to privacy and data protection*
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/weitere-informationen.html

☐ *Other (please specify):* Youth Protection Officer
https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz/kontakt.html
[Please provide details including links or screenshots as relevant]

5. Please outline briefly any additional policies or activities (existing or proposed), _not detailed above_, to ensure that personal information is protected, using reasonable safeguards appropriate to the sensitivity of the information.

Principle 6 – Education and Awareness

Requirements

Signatories should:

- Educate children and young people and give them up to date information to manage their access and settings in relation to content, services and applications, adding support where possible to existing initiatives and partnerships.
- Provide advice about features of the service or functionality that are available to allow parents to improve the protection of children, such as tools to prevent access to certain types of content or service.
- Provide links to other sources of relevant, independent and authoritative advice for parents and carers, teachers, and for children.
- Provide access to information that will help educate parents, carers, teachers and children about media literacy and ethical digital citizenship, and help them think critically about the content consumed and created on the internet.
- Encourage parents and teachers to use this information and talk to their children/pupils about the issues arising from the use of online services, including such topics as bullying, grooming and, where relevant, cost management

1. Does your company provide its own _educational resources_ aimed at any of the following groups?

X. Younger children, i.e. under 13s

X Teenagers <18s

X Parents and carers

X Teachers and other adults

☐ Others (please specify): ....

Spain: http://www.familiadigital.net

Germany: https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz.html

UK: http://www.o2.co.uk/help/nspcc

2. Which of the following _topics_ are included within your own company educational materials?
(tick any that apply)

X Online safe behavior

X Privacy issues

X Cyberbullying

X Download and copyright issues

X Safe use of mobile phones

X Contact with strangers

X Other topics (please specify): personal data, mobile apps, digital identity, digital education, social networking, what to share online, online strangers…

…………………………………………..

Spain: http://familiadigital.net

UK: http://www.o2.co.uk/help/nspcc

Germany: https://www.telefonica.de/verantwortung/verantwortungsvoll-wirtschaften/jugendschutz.html

3. With reference to any educational material you provide, _which of the following methods do you use_?

(tick any as apply)

☐ Documentation provided with product/contract on purchase/first registration

☐ A required presentation by salesperson completing sale

X Displays/leaflets positioned prominently in stores

☐ Notification by email / on-screen statement / other means when product or contract is purchased or first registered

X Prominent notifications, resources or pop ups on website

X Helpdesk (telephone or online)

X Other (please specify): ………………………………………

Spain:

Digital Family portal (www.familiadigital.net): On 11 February 2014, taking advantage of Safer Internet Day, we launched this interactive portal for families and educators, whose purpose is to promote digital education and contribute to creating a better Internet for children and teenagers. It enables parents, experts and educators to share experiences and good practices, in addition to bringing ideas for helping their kids to get the most out of ICT.

At Telefonica, we have developed Talentum Schools (http://talentumschools.com/Inicio), an initiative that seeks to promote digital vocations in young children. It is carried out through courses which take place in Company shops. These courses are designed to teach children the basic principles of technology in a fun way.

The children study coding, app development, robotics, augmented reality and so on; they learn basic programming concepts, without realizing it, by playing games. They are also able to create and modify programs in order to design comics, cartoons, interactive games and so on; they even design small apps which can then be tested on a tablet or smartphone.

Fundación Telefónica's publications are in digital format, so that research on technology and society are just one click away from everyone and free of charge. This publications

are the result of our research work, specialised workshops and discussions on the impact of ICT on the various sectors of society: education, finance and health, among others.

https://en.fundaciontelefonica.com/publications/publication-details/itempubli/540/

Germany:
Developing media skills with school materials
As part of the "Medien in die Schule" project (Media to Schools) we support the development of materials for schools dealing with the topic of young people and the Internet. These openly available teaching materials focus on data protection aspects and content dealing with the practical use of media; these can be found at www.medien-in-die-schule.de. In particular, we help teachers to show their pupils the options they have and to encourage pupils to use media creatively and skilfully. In addition to this project, we actively subscribe to the work of the Zentrum für Kinderschutz im Internet (Online Child Protection Centre, I-KiZ), a think tank created by Germany's Federal Ministry for Family Affairs.

"Using mobile phones – the guide for children and parents"
We are publishing a fully revised mobile-phone guide for children and parents together with Deutsches Kinderhilfswerk e.V. (German Children's Fund) for the third time. The child-friendly brochure introduces young mobile-phone users to important questions regarding the safe use of smartphones and mobile communication in an entertaining and age-appropriate way. As of 2016 the mobile-phone guide is now available for the first time in a dual-language version in German and Turkish, in cooperation with the Telefónica brand AY YILDIZ: www.dkhw.de/shop/handyguide-deutsch /

Think Big: developing young people's digital skills
Together with the Deutsche Kinder- und Jugendstiftung (German Children and Youth Foundation), we are involved in the Think Big programme, which has Germany's Federal Minister for Family Affairs, Manuela Schwesig, as its patron. The programme helps young people to independently realize their own ideas learning how to use digital media. In additional workshops they learn were the chances and the challenges of the internet and digital technology are. In 2015 alone, we were able to reach more than 5,800 schoolchildren by means of a seven-week roadshow that stopped at 35 schools. In total, more than 3,200 projects of over 75,000 young people have be en realised thanks to Think Big since 2010. www.think-big.org.

Preparing parents for life in the digital world
Those wishing to use digital knowledge need to be able to handle personal data and digital media securely. This is something we work towards by means of various programmes. The O**2** Gurus, for example, assist our customers online, over the phone and in many of our O**2** shops. These trained experts offer tips on how to use digital technologies correctly in free workshops which are also open to non-customers. Parents learn, for example, how to create "kids' corners" on their smartphones, where their little ones can only access safe applications such as games and music. Schoolchildren and students are offered advice regarding risk-free Internet surfing and the safe use of social networks. Since 2014 we have reached some 4,000 people at more than 1,000 workshops and, since 2015, our events have also been hosted online as webinars that take place

several times a month, addressing topics which are continuously updated. Our portfolio is rounded off by videos, chats and blogs that provide additional information (www.o2online. de/guru)

UK: We have developed an approach to child safety in partnership with high profile UK charity NSPCC. It includes commitments to raising awareness, offering advice and training, delivering community outreach programmes and the development of specific products and services that help to keep children safe online.

Our partnership with the NSPCC includes:

- Providing training and support to O2 employees through the provision of an e-learning programme.
- The joint development of a helpline for parents and O2 people which will provide support on e-safety related issues.
- Offering parents practical advice and support in store and signposting them to further sources of support including the O2/ NSPCC Net-aware website.
- Rolling out workshops in schools and workplaces to educate and empower families.
- Dedicated online resources available on O2 and NSPCC websites: http://www.o2.co.uk/help/nspcc

4. Please provide details of any links to other _external organisations_, or relevant, independent and authoritative advice for parents/carers, teachers, and for children?

Telefonica has strategic allies in the whole of society in order to ensure that children can browse with comprehensive safety guarantees. We collaborate with Inhope, Insafe, IWF, Unicef, Pantallas Amigas, NSPCC, UK Internet Safe Centre, Stonewall and law enforcement agents, among others.

5. Please provide details of any campaigns, or active involvement in _industry partnerships_ on specific topics to raise public awareness of digital safety for children and young people?

Spain:

- Telefonica works together with other operators to develop online safety initiatives and to promote the collaboration with the State Law Enforcement and Security forces to fight against illegal content on the Internet.

- Telefonica Spain and Policia Nacional have launched Ciberexpert@, an educational programme to help children to understand how to manage the use of the devices connected to Internet (www.ciberexperto.org).

- The launch of the service *Pack Protección Online* in partnership with Zúrich Seguros: an insurance that provides tools for a better Internet experience (www.packprotecciononline.es).

UK: We actively support industry partnerships such as the Internet Watch Foundation (https://www.iwf.org.uk/), The Royal Foundation Cyber-bullying taskforce (http://royalfoundation.com/duke-cambridge-launches-cyberbullying-taskforce/)

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6. Please provide details of any partnerships with *NGO, civil society or other educational agencies* or campaigns to raise public awareness of digital safety for children and young people.

Spain:

Examples of partnerships with local NGOs& educational agencies to raise awareness:

- The educational programme: "Pilar y su celular" with the aim to offer children and parents advice on the responsible use of the mobile phone (www.pilarysucelular.com). The programme, in partnership with Pantallas Amigas, includes:
    - A guideline of good online privacy practices.
    - 10 animated videos related to the responsible use of Smartphone.
    - A guideline and an animated video to know how to protect the environment with our Smartphone.

- There is nothing better than a story to transmit best online practice to kids. That is what we do through the books "La Gran Decisión de Digipato"(in partnership with Childnet) and "Y tu kn ers?". This friendly stories helps us to provide children with the necessary resources to enable them to understand the need to do a good use of the technologies.

http://familiadigital.net/resources/lre_content_5

Germany:

As part of the **"Medien in die Schule"** project (Media to Schools) we support the development of materials for schools dealing with the topic of young people and the Internet. www.medien-in-die-schule.de/

We partnered with the initiative of the European Commission "**Safer Internet Day"** and hosted an event for pupils around the topic "Internet Security". https://blog.telefonica.de/2015/02/safer-internet-day-bei-telefonica-sicheres-surfen-fuer-kinder-und-jugendliche/

We are also partner with "**Sicher online gehen" (**"Go online safe".) www.sicher-online-gehen.de

UK: We have joined forces with the UK charity, the National Society for the Prevention of Cruelty to Children (NSPCC, nspcc.org.uk) to provide parents the tools, knowledge and confidence that they need to help their children navigate the digital world safely.

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7. Please outline briefly any of your own company initiatives in _media literacy and ethical digital citizenship_, designed to help children and young people to think critically about the content consumed and created on the Internet.

Spain: We also focus on teenagers, and have set up a specific workshop for them in collaboration with Universidad de Alcalá. The aim in this case is to look for strategies to make youths active producers of the messages that are sent by the digital media. (link)

Germany:
Think Big: developing young people's digital skills
Together with the Deutsche Kinder- und Jugendstiftung (German Children and Youth Foundation), we are involved in the Think Big programme, which has Germany's Federal Minister for Family Affairs, Manuela Schwesig, as its patron. The programme helps young people to independently realize their own ideas learning how to use digital media. In additional workshops they learn were the chances and the challenges of the internet and digital technology are. In 2015 alone, we were able to reach more than 5,800 schoolchildren by means of a seven-week roadshow that stopped at 35 schools. In total, more than 3,200 projects of over 75,000 young people have be en realised thanks to Think Big since 2010. www.think-big.org.

UK: N/A

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8. Please provide details of any advice and supports _to encourage parents or teachers to talk to their children_/ pupils about the opportunities and risks arising from their use of the internet.

For Telefonica teaching the future generations to make positive use of the Internet is essential to ensure their online safety. Therefore, we support families in the challenge of educating young people in responsible use of the Internet and technologies, as well as providing them a secure digital environment enabling better development of minors.

In response to this objectives, Telefonica released the following initiatives:
In Spain:

- The first face-to-face meeting to discuss with parents about the challenges of the digital family life.
- The first guide on the Digital Identity of teenagers for Spain and Latin America.

Also, as part of our commitment to a digital future which benefits everyone, Telefonica has created Digital Family, an online resource centre where everyone can find answers to the questions about ICTs and children. The platform is also a place to share experiences and testimonies and to overcome the challenges and difficulties which both children and adults face due to technological changes and the constant appearance of new applications and services (www.familiadigital.net).

Germany:

"Using mobile phones – the guide for children and parents"
For the third time Telefónica Deutschland publishes in cooperation with the German Children's Fund e.V. a completely redesigned mobile guide for children and parents. The child-friendly brochure leads the readres in a fun and age-appropriate manner to important questions about the safe use of smart phones and mobile communication. 2016 the first bilingual version available in German and also in Turkish cooperating with the Telefónica brand Ay Yildiz. www.dkhw.de/shop/handyguide-deutsch

UK:
Keeping kids safe online
This website will help you understand the online world so you can be confident when you talk to your children. We've got a whole range of top tips, guidance and advice. If you need more support, you can call our helpline on 0808 808 5002.
We all understand the dangers children face in everyday life, and help them stay safe. But keeping children safe online can seem much harder. That's why we've joined forces with NSPCC. We want every family in the UK to talk about their child's online world, just as they would their day at school, so they can understand it. We want to bring families together so they can explore, create and play safely online.
http://www.o2.co.uk/help/nspcc/child-protection

9. Please outline any additional activities or initiatives _not detailed above_ that relate to education and awareness-raising offered by your service or product.

In addition to information submitted related to implementation of the ICT Principles, the following supplementary information supplied in either written form or in discussion with companies provides valuable context and information about the functioning and effectiveness of child safety provision.

1. In respect of ICT Principle 1, that companies should "continue work to provide innovative solutions able to support child safety protection tools and solutions", please elaborate on company investment in child safety measures, including research. Elaborate also, where possible, on planned future implementations.
2. Any further data that companies may be able to provide regarding the functioning of child safety features would be an extremely valuable outcome of this assessment.   **Where possible, please provide any available summary data in respect of the following elements. (Stipulate where data should only be presented in anonymised form).**
Take up or frequency of use of parental control tools on your product or service?   Incidence of reporting use/misuse, categorization and frequency of reports on your product or service? How many? By whom? Which problem?   Kinds of actions taken by the provider for different categories of reports. What was the outcome?   How do you evaluate the effectiveness of response to reports?   Privacy settings: the percentage of children who have private profiles, and those who have changed default privacy settings (and how/what did they change), by age, gender and country   Use of location-based services by children   Take up and use of education and awareness raising activities undertaken for your product or service?
3. Please detail any additional measures adopted to evaluate the effectiveness of child safety features.