

Principles for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU

Following the launch of the “Principles”, bwin.party digital entertainment plc. has been working to implement the provisions according to its services and/or products.

The Principles aimed to ensure that Signatories:

- Encourage the development of innovative approaches which enhance safe use of the technology by children and young people
- Encourage the empowerment of parents and carers to protect children and young people engaged in online activity through education and advice
- Promote users’ awareness of information and tools to help keep themselves safer online and of their obligations to behave responsibly towards other users
- Encourage the provision of easily accessible, clear and transparent information to help users understand in a timely way the conditions of use for the service they are using, including what is permitted in terms of acceptable behaviour and user-generated content
- Seek to promote users’ awareness of how – and to whom – to report abuse and concerns, including – where available – specialised external agencies and law enforcement bodies.

1. Content

The ICT Principles require under Section 1 – Content that 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

As a number of studies have unanimously shown, minors are clearly more vulnerable to the risk of developing gambling-related problems (Shaffer & Hall, 1996¹; Ladouceur et al., 1999²; Bondolfi et al., 2000³; Volberg et al., 2001⁴). It is thus of paramount importance to exclude minors from any gambling. As a consequence all gambling services offered by bwin.party have an age limit of 18 years or higher, if a higher age limit is required according to national gambling regulation.

Whereas terrestrial casinos or lottery outlets often have great difficulties protecting minors through appropriate controls, bwin.party pursues another strategy, one considered internationally to be very effective (Sparrow, 2009)⁵. This supposition also finds confirmation in empirical studies. For instance, Forrest (2010)⁶ was able to show that although the prevalence rate of pathological gambling among minors is often up to three times higher than for adults, this group displays virtually no use of regulated online gambling sites. This sector of the gambling industry has been able to establish an effective prevention strategy that goes far beyond simply pointing out that minors are prohibited from taking part.

bwin.party has implemented a layered system of protection measures, that aim not only at identifying underage persons and preventing them from playing, but also at discouraging minors from trying to get on our websites.

- 1) **Information for customers:** By means of prominent 18+/21+ signposting on all our websites, customers are informed about the legal age of gambling in their jurisdiction. They are required to provide their age during the registration process.

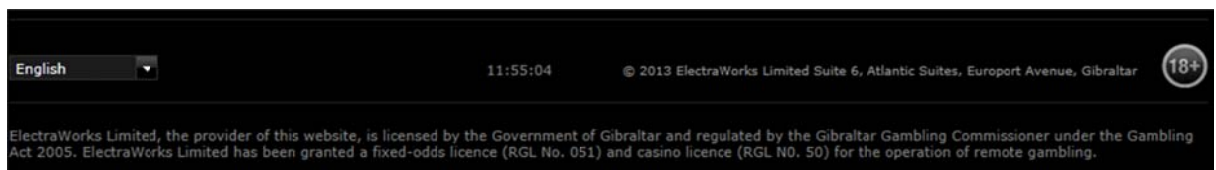


Figure 1. 18+ signposting in the footer.

¹ Shaffer, H. J.; & Hall, M. N. (1996). Estimating the prevalence of adolescent gambling disorders: a quantitative synthesis and guide toward standard gambling nomenclature. *Journal of Gambling Studies*, 12, 193-214.

² Ladouceur, R.; Boudreault, N.; Jacques, C.; & Vitaro, F. (1999). Pathological gambling and related problems among adolescents. *Journal of Child & Adolescent Substance Abuse*, 8, 55-68.

³ Bondolfi, G.; Osiek, C.; & Ferrero, F. (2000). Prevalence estimates of pathological gambling in Switzerland. *Acta Psychiatrica Scandinavica*, 101, 473-475.

⁴ Volberg, R. A.; Abbot, M. W.; Rönnerberg, S.; & Munck, I. M. E. (2001). Prevalence and risks of pathological gambling in Sweden. *Acta Psychiatrica Scandinavica*, 102, 250-256.

⁵ Sparrow, M. K. (2009). *Can Internet Gambling Be Effectively Regulated? Managing the Risks*. Boston: Harvard University.

⁶ Forrest, D. (2010). *Child Gamblers and Child Problem Gamblers*. Presentation to the Strategy Board, University of Salford.

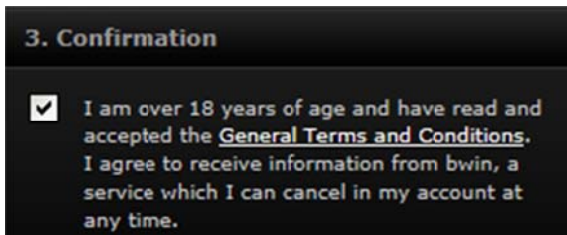


Figure 2. 18+ confirmation upon registration.

- 2) **Deterrence of minors:** Customers are informed that a payout of winnings is only possible to ID verified customers. This serves to deter minors from trying to get access to our products, by frustrating their hope of actually winning something.

- 3) **Identification of minors:** ID verification is the centrepiece of our efforts to prevent underage gambling. As the effectiveness of ID verification strongly depends on the availability of technical solutions for our different markets, we combine a number of automatic and manual methods to attain optimal results for each market. Based on a hierarchical approach, we
 - a. apply governmental or regulatory databases, where available;
 - b. co-operate with private database providers, where the empirically tested reliability of these resources is greater than 75%;
 - c. request scanned copies of picture ID documents in jurisdictions, where no sufficient means of automatic ID verification are available.

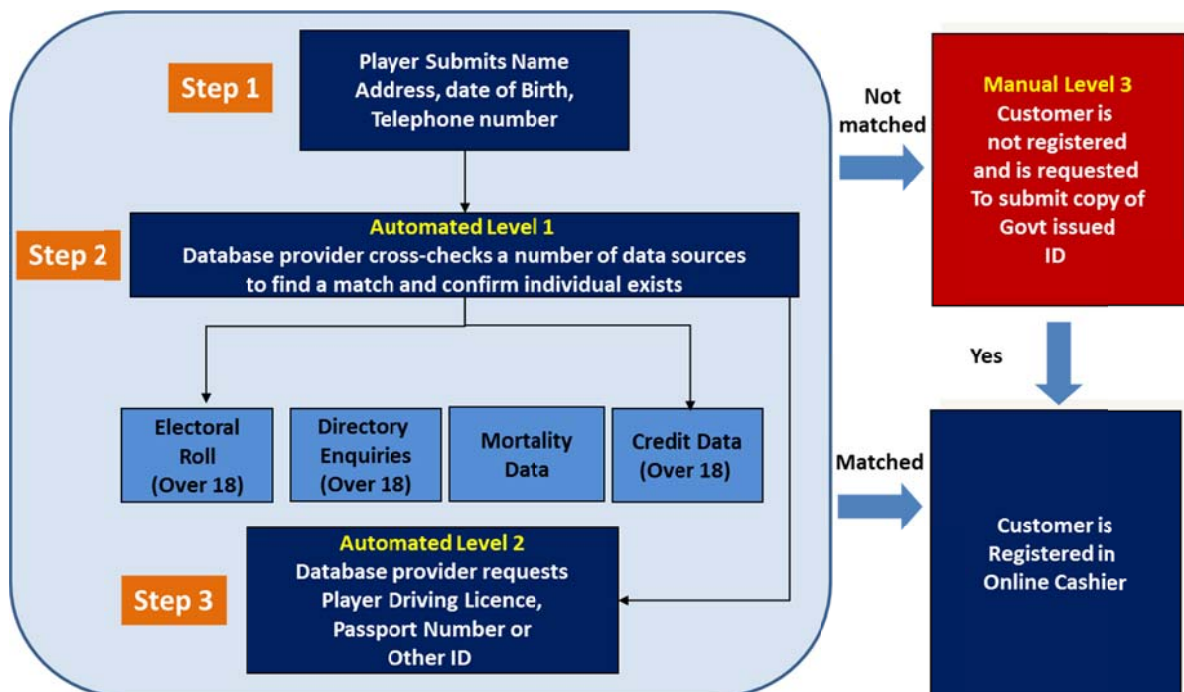


Figure 3. Schematic age-verification process upon registration.

Depending on national gambling regulation, parts of this process may vary.

- 4) **Rollback of gambling transactions:** In case a minor was able to register an account and to attain access to our products despite all preventive measures, we are able to rollback all transactions and to refund the minor. This is possible, because each gambling transaction is being tracked in the Internet. The low frequency of such cases (around 0.001% of the monthly active customers) demonstrates the effectiveness of the ID verification measures.

These same controls are also an effective protection to prevent people who have excluded themselves from gambling, or who had to be excluded from gambling on suspicion of pathological gambling, and are trying to open a new account under a fake identity.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. 18+ signposting and clarification in T&C and Responsible Gaming website	Completed	Responsible Gaming website ⁷
2. ID verification process	Completed; improvements in progress	
3. External audit of minor protection measures according to national gambling regulation	Completed	
4. External audit of minor protection measures according to the self-regulatory CEN standard CWA 16259	Completed	CWA 16259:2011 chapter 3.2 ⁸

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⁷ <https://www.bwin.com/en/p/about-us/responsible-gaming>

⁸ http://www.eesc.europa.eu/self-and-coregulation/documents/codes/private/143%20MARKT%202011%20CEN%20Responsible%20Remote%20Gambling%20Measures_Workshop%20Agreement_final_16259-2011.pdf

2. Parental controls

Signatories of the ICT Principles have committed, as relevant for their products or services, to assist parents to limit their children's exposure to potentially inappropriate content and contact. It is recognised that parental controls have limitations and cannot replace parents' engagement in their children's online use. Measures that are available or appropriate to each service/product will vary, but may include:

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

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

With regards to online gambling, parental control tools serve two purposes:

- 1) Helping parents to secure computers against accessing gambling websites
On the Responsible Gaming pages of our gambling websites we explain how parents can prevent their children from accessing gambling websites and provide links to commercial parental control tools.
- 2) Helping customers to protect their gambling accounts against the use by their children
Access to a gambling account is always secured by means of a login and password. While our customers are advised to keep them safe, as a second layer of protection, financial transactions (e.g. withdrawal of funds from the gambling account) are additionally protected by a security question.
As an additional control, upon each login, the time of the previous login is displayed. As a result of this, the legitimate account holders are in the position to notice unauthorized access.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. Link to parental control tools on the Responsible Gaming website	Completed	
2. Access to financial transactions is gated by the personal	Completed	

security question		
3. Previous login timestamp provided upon login	Completed	

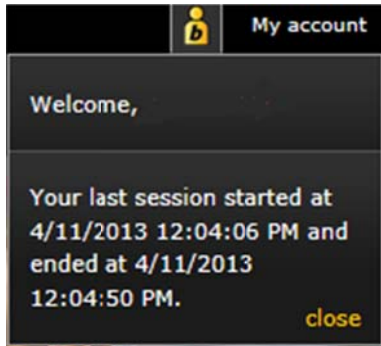


Figure 4. Last login timestamp upon login.

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3. Dealing with abuse/misuse

The Signatories have committed, when relevant for their services or products, to deal with all abuse/misuse related to content or conduct which may be illegal, harmful, offensive or inappropriate e.g. under a company's Acceptable Use Policy. Signatories commit to:

- 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;
- Place links to relevant child welfare organizations or specialist providers of advice 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

This goal does not apply to online gambling services offered by us, since customers are not able to post customer-generated content and since we do not allow minors on our gaming sites.

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4. Child Sexual abuse content or illegal contact

Under this section, the ICT Principles require that signatories, if relevant for their services and products, cooperates with law enforcement authorities and other agencies, as provide for in local law, on child sexual abuse content or unlawful contact. The Signatories shall:

- 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 notified by national law enforcement agency
- Provide relevant additional information and/or links to users so they can make a report or obtain information about appropriate agencies or organisations that users can contact about making a report or obtaining expert advice, at national and EU level.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

This goal does not apply to online gambling services offered by us, since customers are not able to post customer-generated content and since we do not allow minors on our gaming sites.

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5. Privacy and control

The Signatories have committed, when relevant for the services and products, to continue compliance with existing data protection and advertising rules and privacy rights as set out in the relevant legal dispositions. In addition, the Signatories if appropriate to their service/product, may also:

- 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

While privacy is a highly relevant factor for online gambling, an adaptation to the needs of underage persons is not necessary, as they are not accepted as customers and kept outside by means of ID verification mechanisms. While our advertising is not aimed at minors, we however need to make sure not to accidentally attract them.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. Privacy policy accessible from each page footer	Completed	⁹
2. External audit of privacy safeguards according to the self-regulatory CEN standard CWA 16259	Completed	CWA 16259:2011 chapter 3.4 ¹⁰
3. Internal review of promotional campaigns in line with standards of national regulatory bodies (e.g. UK ASA CAP/BCAP standards which are used as a general guideline)	Completed	ASA standards ¹¹

⁹ <https://help.bwin.com/en/general-information/security/privacy-policy>

¹⁰ http://www.eesc.europa.eu/self-and-coregulation/documents/codes/private/143%20MARKT%202011%20CEN%20Responsible%20Remote%20Gambling%20Measures_Workshop%20Agreement_final_16259-2011.pdf

¹¹ <http://www.cap.org.uk/Advertising-Codes/Non-broadcast-HTML/Section-16-Gambling.aspx>

4. External review of promotional campaigns as part of external self-regulatory audits (e.g. Certification of the UK charity GamCare)	Completed	
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6. Education and Awareness

The Signatories commit to raise awareness and provide appropriate information with the aim to:

- 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

As a gambling operator, we are mandated by national regulation, not to address minors with our communication. We believe that we are therefore not in the position to directly educate minors about gambling, which could be perceived as a conflict of interest. However, we have reached out to the research and counselling sector and support them to – amongst other things – strengthening the awareness about the risks gambling poses for minors and other vulnerable groups. We are since 2005 in a cooperation with the Division on Addiction of Harvard Medical School, who had been among the proponents of the College Gambling Awareness campaign¹². We also support counselling providers who have specialised in the prevention of problem gambling in European core markets.

	Supported organisation
Austria	Spielsuchthilfe
Denmark	Gambling Clinic of Aarhus University Hospital
UK	GamCare

¹² http://www.ncrg.org/sites/default/files/uploads/docs/publiceducation_outreach/a_call_to_action_executive_summary_92909.pdf

	Gambling Therapy
France	SOS Joueurs
Germany	Spielerambulanz der TU Dresden
Portugal	Jogo Responsavel
Spain	FEJAR

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. Information on parental controls and protection of login credentials provided on the Responsible Gaming page	Completed	
2. Dialogue and cooperation with research and counselling sector in relevant markets	Completed; expansion in progress	