Implementation Questionnaire

11 October 2013

Centre for Social and Educational Research
Dublin Institute of Technology

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
- In case you have different solutions in EU markets, please provide examples in the relevant sections

Contact details for any clarification or any assistance in completing this template:
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1. Name of the company on whose behalf this submission is made:

bwin.party digital entertainment plc

2. Country or primary markets where products/services are offered (in EU) to which this submission applies. Please indicate all EU-markets in which your company operates

3. Product(s) or services included within the terms of this submission

Online Sports Betting
Online Poker
Online Casino Games
Online Bingo

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4. Nature of activity

☐ *Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles*

☐ *Network operators and connectivity providers*

X *Online content provider*

☐ *Online service provider*

☐ *Other* (please specify): ....

5. Person(s) completing the report

Name: Joachim Haeusler

Position: Responsible Gaming Manager

Email: joachim.haeusler@bwinparty.com

Principle 1 – Content

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 labeling.
- 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, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

All gambling content is deemed unsuitable for children. As a consequence participation in our products is subject to ID verification and authentication procedures. Age limits for gambling content are subject to gambling regulation which prevails over self-regulatory classification systems. However if national online gambling regulation is lacking or provides age thresholds lower than 18+, we impose an 18+ threshold based on self-regulatory practices of the CWA 16259 standard. In specific markets we impose higher age limits for specific products (e.g. 21+ for Casino Games in Belgium) based on national legislation.

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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?

☐ *Yes*

☐ *No*

X *Not applicable* (please explain): Minors are excluded from the content. See chapter 4.6 of attached Responsible Gaming Concept.

If yes, please provide details:

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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:
On our Responsible Gaming website we provide access to parental Control tools that can support parents in securing their IT against undesired gambling content.
https://www.bwin.com/en/p/about-us/responsible-gaming/basic-principles

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*
☐ *How to report or flag content as inappropriate*
☐ *Safe searching*
X *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.):

https://www.bwin.com/en/p/about-us/responsible-gaming
Responsible Gaming website
Tutorial

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

18+ signposting on all websites.
T&C and Policies are linked from the footer of every page on the gaming portal.

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

☐ *Yes*

☐ *No*

X *Not applicable* (please explain): There is no user-generated content.

If yes, please identify relevant policy:

6. Do you provide notice about the _<u>consequences for users</u>_ if they post content which violates terms of service or community guidelines?

☐ *Yes*

☐ *No*

X *Not applicable* (please explain): There is no user-generated 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

Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.
Policies regarding parental controls are uniform at a corporate level. While access to our offers by minors is prevented by means of ID verification and authentication, we support parents if they choose to prevent possible exposure to gambling-related content in the Internet. Based on this approach we actively promote software that allows households to filter our website and other gambling websites from Internet content.
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:
As for parental control, we offer the filtering of our complete website by means of third party software, as it is unsuitable for minors as a whole.
2. . If applicable, please describe the features offered by the _parental controls_? E.g. restricting web access, customization, monitoring, other restrictions…..

As minors should not be exposed to gambling, differentiated parental controls would not make sense for our product offer. By means of ID verification and authentication software we prevent minors from gaining access to our product offer, which is located after a login procedure. For parents, who want to block access to our landing page before the login procedure, we offer third party parental control software.

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_
☐ _Guidance about how to use parental controls_
X _Educational or awareness-raising resources about the use of parental controls_
☐ _A promotional or marketing channel for the uptake of parental controls_
X _External links to educational material/resources about the use of parental control_

http://www.partypoker.com/responsible-gaming/basic-principles.html

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?

Timestamp of last login to help parents monitoring, whether their credentials have been used by other persons (e.g. their children).

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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Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

Principle 3 does not apply, as there is no user generated content.

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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.

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).

[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*
☐ *In a separate location such as a safety page*
☐ *In a browser extension*
☐ *In a separate app for a connected device*
☐ *Other* (please specify): ....

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?*
☐ *Everyone including non-users, e.g. parents/teachers who are not registered for the service*
☐ *Other* (please explain): ....

5. Which _kinds of content_ can users report?

6. Which of the following information do you provide to users? (tick any that apply)
☐ *Advice about what to report* ☐ *Advice about how to make a report* ☐ *Pre-defined categories for making a report* ☐ *How reports are typically handled* ☐ *Feedback to users* ☐ *Other website/external agency for reporting abuse/ misuse content?* ☐ *Other* (please specify): ....
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
[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 organisations 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).

Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

Principle 4 does not apply, as there is no user generated content and there are no minors to be targeted on our sites.

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*
☐ *Link or button for external national or regional INHOPE hotline*
☐ *Emergency services*
☐ *Law enforcement agency*
☐ *Other external agency* (please specify): ....

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

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)

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

4. Please outline briefly any additional procedure in place within your company _not detailed above_ to ensure that you comply with local and/ or international laws with regard to child sexual abuse and other illegal content?

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

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Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

We do not offer services to underage persons. Our privacy policy relates to data collected from adult users.

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?

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

However all points of the policy refer to data of 18+ users.
Data usage is also strongly restricted:
We use the Personal Information we collect to deliver Our Services, to provide customer support, to undertake necessary security and identify verification checks, to process online transactions, to assist participation in third-party promotions, meet certain business requirements and for any other purpose related to the operation of the Services.

As such there is no disclosure of information to other users or third parties that is not directly linked to the functioning of our gambling product.

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

☐ *Yes*

☐ *No*

X *Not applicable (please explain)*: There are no users under the age of 18.

If yes, please briefly outline available age-appropriate privacy settings (Provide details including relevant links/ screenshots on your website)

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_.

3. Where are users able to view and change or update their privacy status?
tick any that apply)
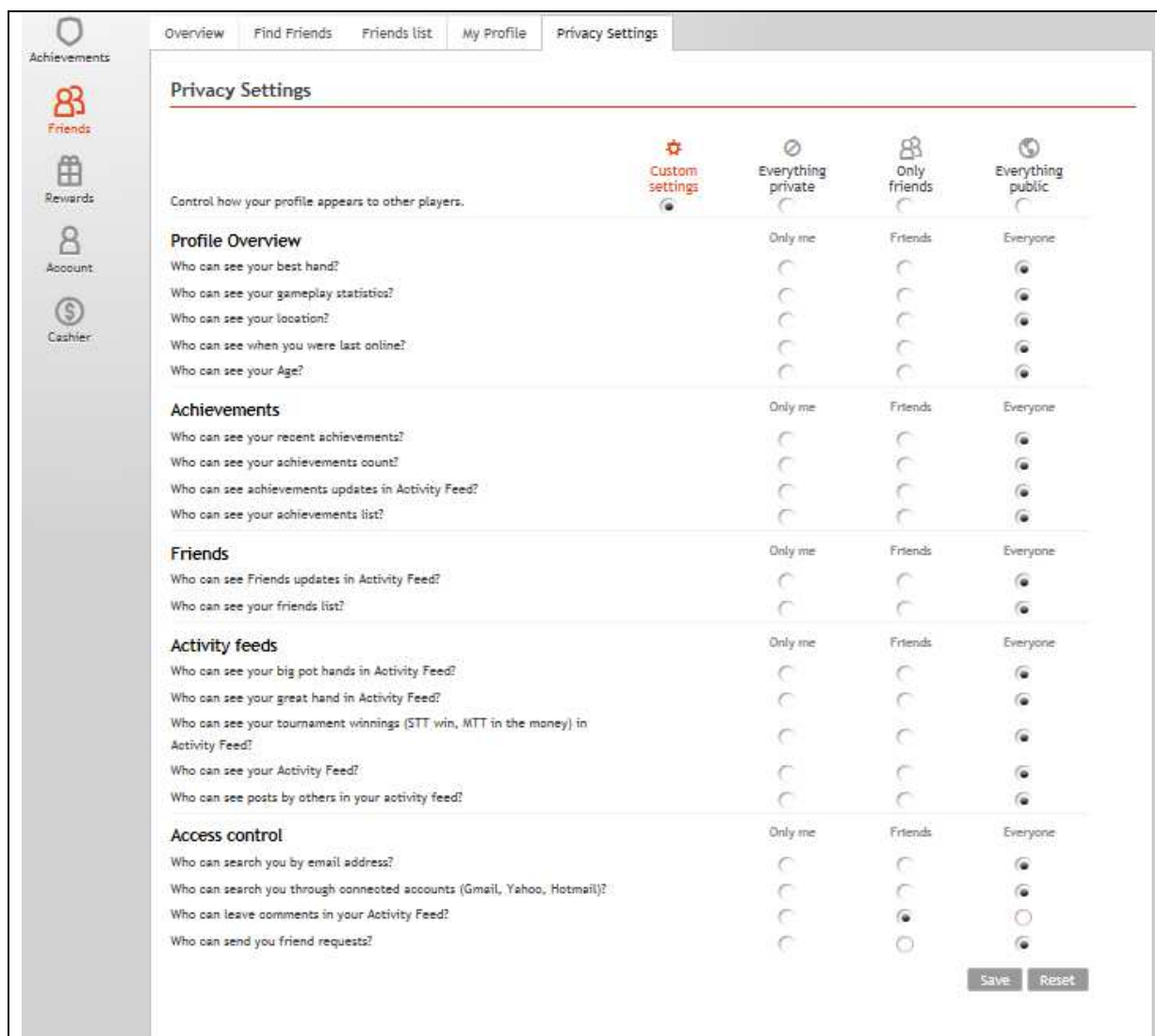
☐ *On each page of the website/service*

☐ *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):* ....

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?

☐ *Tips/advice to users at the point of setting privacy options*
☐ *FAQs*
☐ *Help or educational resources in a separate location of service*
☐ *Links to any external NGO agencies offering education or awareness-raising related to privacy*
☐ *Links to governmental or EC agencies (Office of Data Protection Commissioner, ENISA etc.) in relation to privacy and data protection*
☐ *Other (please specify):* ....

[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.

See chapter 4 of CWA 16259.

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

Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

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

☐ Younger children, i.e. under 13s

☐ Teenagers <18s

X Parents and carers

☐ Teachers and other adults

X Others (please specify): Adult customers.

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

X Online safe behaviour

X Privacy issues

☐ Cyberbullying

☐ Download and copyright issues

☐ Safe use of mobile phones

☐ Contact with strangers

☐ Other topics (please specify) ....

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

☐ Displays/leaflets positioned prominently in stores

X 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)

☐ Other (please specify): ....

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

See chapter 8.4 or Responsible Gaming Concept.

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?

http://www.egba.eu/en/about/us

and its code of conduct:

http://www.egba.eu/en/consumers/conductcode

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.

See Harvard Whitepaper.

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.

Not applicable. This could be considered as an improper and unethical promotion of our brands if we were to engage in initiatives directed at minors.

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.

Not applicable. This could be considered as an improper and unethical promotion of our brands if we were to engage in initiatives directed at minors.

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

ANNEX

COUNTRY	PRODUCT/SERVICE	STATUS	COMMENTS
Austria			
Belgium			
Bulgaria			
Croatia			
Cyprus			
Czech Republic			
Denmark			
Estonia			
Finland			
France			
Germany			
Greece			
Hungary			
Ireland			
Italy			
Latvia			
Lithuania			
Luxembourg			
Malta			
Netherlands			
Poland			
Portugal			
Romania			
Slovakia			
Slovenia			
Spain			
Sweden			
United Kingdom			