



Implementation Questionnaire

April 2017

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

1. Name of the company on whose behalf this submission is made:
Telenor Hungary Ltd
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
Hungary
3. Product(s) or services included within the terms of this submission
Telenor Hungary is a mobile operator, we provide mobile voice and data services
4. Nature of activity
<input type="checkbox"/> <i>Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles</i> <input checked="" type="checkbox"/> <i>Network operators and connectivity providers</i> <input type="checkbox"/> <i>Online content provider</i> <input type="checkbox"/> <i>Online service provider</i> <input type="checkbox"/> <i>Other (please specify):</i>
5. Person(s) completing the report
<p>Name: Gabor Egyed</p> <p>Position: Consumer PR group manager / SC</p> <p>Email: gaegyed@telenor.hu</p>

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 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.

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

Not applicable (please explain):

If yes, please provide details:

We create Blog content and accept feedback in social media where Social Media CS team handle the questions

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

Yes

No

Not applicable (please explain):

If yes, please provide details of mechanisms in place:

A parental control solution can be ordered by the parents to restrict children's online activities by a white list. (free of charge)

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
- How to block or restrict access to content
- How to report or flag content as inappropriate
- 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.): [On our website we have a web page describing the parental control tools we provide, how they work, how to order them \(they are free of charge\). At this webpage we also provide information about and a link to the Internet Hotline, maintained by the National Communications Authority, where inappropriate content found on the internet can be reported by anybody. <http://www.telenor.hu/vallalati-felelossegvallalas/tarsadalom/tudatos-biztonsagos-internethasznalat> \(only in Hungarian\)](#)

We developed an educational material for children on safety internet usage, appropriate digital media understanding (see more in Chapter 6).

4. Where is your company's *Acceptable Use Policy* (AUP) located?

[On www.telenor.hu](#) in the footer – there is a direct link to AUP.
Website usage policy, conditions, rules, data security, etc

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
- Not applicable (please explain):

If yes, please identify relevant policy:
[We maintain social media platforms, there on Facebook we released the “rules of the house”. <https://www.facebook.com/telenorhungary/app/189341874510393/>](#)

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

Yes

No

Not applicable (please explain):

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:

A parental control solution can be ordered by the parents to restrict children's online activities by a white list. (free of charge)

2. . If applicable, please describe the features offered by the *parental controls*? E.g. restricting web access, customization, monitoring, other restrictions.....

Parents are able to set up a walled garden on their children's subscription > it allows only the websites from the white list.

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

Educational or awareness-raising resources about the use of parental controls

A promotional or marketing channel for the uptake of parental controls

External links to educational material/resources about the use of parental control

[Please provide details including links or screenshots as relevant]

Only in Hungarian:

On parental controls and safe Internet use in general: <http://www.telenor.hu/vallalati-felelossegvallalas/tarsadalom/tudatos-biztonsagos-internethasznalat>

On the use of the HelpApp promoted by Telenor through its cooperation with UNICEF: http://www.telenor.hu/vallalati-felelossegvallalas/tarsadalom/unicef_egyttmukodes

Akik fontosak nekünk Vállalati felelősségvállalás > Társadalmunkért > UNICEF-Telenor együttműködés – központban a jövő generáció

Társadalmunkért
Egészségesen
Biztonságosan

UNICEF-Telenor együttműködés –
központban a jövő generáció

Telenor a gyermekek tudatos és biztonságos internethasználatáért!

Egy telefon a társadalom szolgálatában

UNICEF-Telenor együttműködés –

Az internet terjedése nemcsak a gazdaság növekedéséhez járul hozzá, de tudatos használata életminőségünket is jelentősen javítja. A hasznos és kényelmi funkciók mellett ugyanakkor a cyberbűnözéssel kapcsolatos esetek és az online közösségi terek árnyoldalai is egyre gyakrabban kerülnek középpontba. Az UNICEF és a Telenor arra szeretné felhívni a figyelmet, hogy a jelenség a szakemberek számára ismert, sőt, a két szervezet együttműködése hozzájárul a gyermekek védelméhez. 2013. november 20-án, a gyermekjogok világnapja alkalmából az UNICEF és a Telenor együttműködési megállapodást írt alá.

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?

As market trends shows we focus on education instead of developing further control solutions.

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

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).

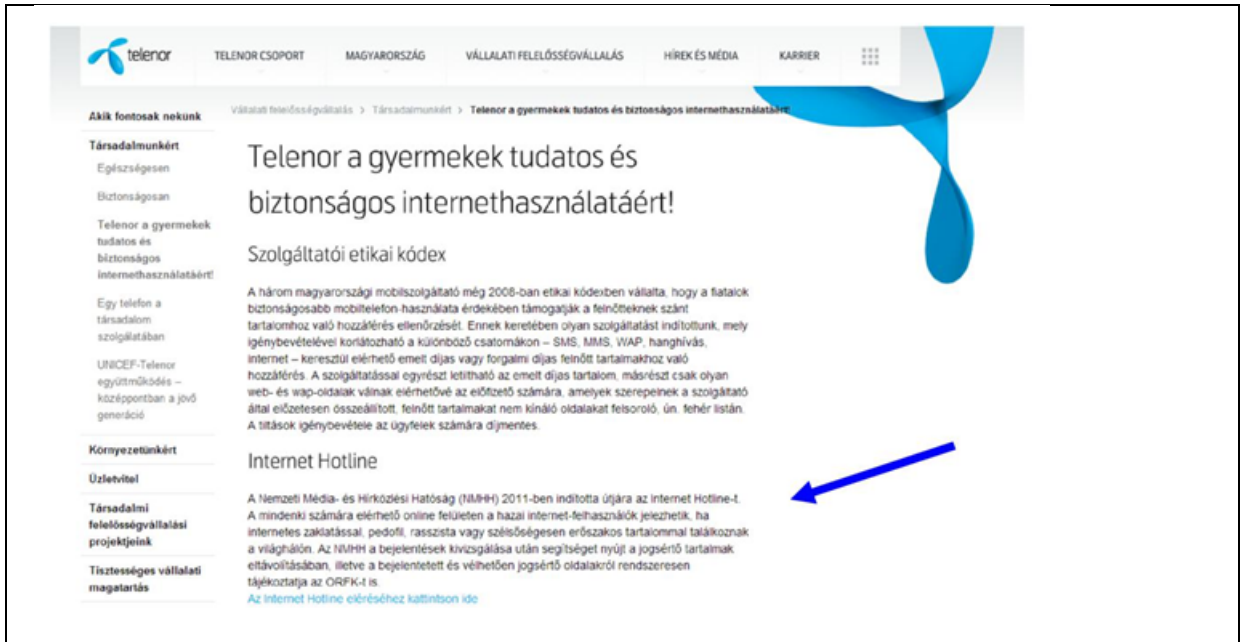
Telenor Hungary does not host either professional or user-generated content and does not provide platforms to share content. In social media (on our pages and channels) we have a "house rule" mainly on moderating processes. On the other hand we avoid people share their personal data public (on our social channels).

[Please provide details including links or screenshots as relevant]

See above. We promote the reporting mechanism of the Internet Hotline operated by the National Communications Regulatory Authority on our website.

www.internethotline.hu

<http://english.internethotline.hu/reporting/>



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 of the following kinds of content can users report?

Users can report any content that they find inappropriate, especially, harassment, pedofile, racist or extremely violent content.

6. Which of the following information do you provide to users?

(tick any that apply)

[X 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

Feedback to users

[X Other website/external agency for reporting abuse/ misuse content?](#)

Other (please specify):

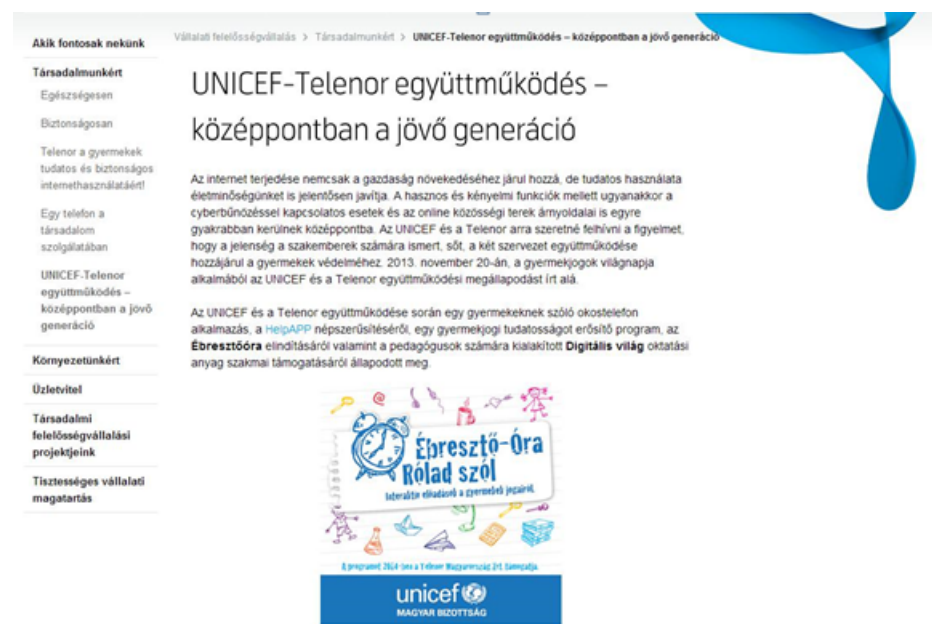
7. Please provide details of any *other means*, in addition to a reporting button/icon, to report content or behavior which breaches your service’s terms and conditions

[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,

[We support 2 school programs called Digital World and “Wake-up time!”](#)

Telenor HU signed in Nov 2013 a cooperation agreement with UNICEF to support the Wake-up time! program - a UNICEF campaign to promote awareness of children’s rights – and the HelpAPP. HelpAPP is a smartphone app, helping children to handle unwanted situations e.g. make emergency calls and calls to social services, and to send their location data in case they are in trouble. http://www.telenor.hu/vallalati-felelossegvallalas/tarsadalom/unicef_egyttmukodes



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).

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):
- [We provide a link to the reporting surface of the Internet Hotline maintained by the regulatory authority. The authority manages all the additional steps: they investigate, assists in notice and take-down, and contacts the police if the reports point to illegal content.](#)

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?

[We maintain a child sexual abuse filter on our whole internet network, blocking sites contained in the Interpol's list.](#)

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?

[Hungarian EULA on our website](#)

<https://www.telenor.hu/jogi-kozlemeny>

EN: <https://www.telenor.hu/en/legal-notice>

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

Yes

No

Not applicable (please explain):

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
- 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):

[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?

- 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.

On our website www.telenor.hu we have general privacy related topics for the visitors and special rules for our subscribers and further provisions for those who register to different services such as MyTelenor.
Our safe internet education material and lessons PLUS Wise-up lessons with UNICEF contains education part about data privacy

Telenor has initiated a major program to become compliant with the General Data Protection Regulation, which comes into effect 25 May 2018. The regulation includes provisions drawing specific attention to the vulnerability and needs of children (including recitals 38, 58, 75).

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?

Younger children, i.e. under 13s

Teenagers <18s

Parents and carers

Teachers and other adults

Others (please specify):

2. Which of the following topics are included within your own company educational materials?

(tick any that apply)

Online safe behaviour

Privacy issues

Cyberbullying

Download and copyright issues

Safe use of mobile phones

Contact with strangers

Other topics (please specify)

sexting

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
- Notification by email / on-screen statement / other means when product or contract is purchased or first registered
- Prominent notifications, resources or pop ups on website
- Helpdesk (telephone or online)

X Other (please specify):

We maintain Hipersuli our digital education program that contains safe internet lesson part. We regularly organize school visits and on voluntary base we reach thousands of children every year. The safe internet lessons are available online for everyone. Above that we support NGOs who reach children with this topic.

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

www.hipersuli.hu
www.digitálisvilag.hu
www.unicef.hu

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?

In Hipersuli we work with Microsoft Hungary to educate teachers on digital tool usage and our part is safe internet (among other topics).

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.

We also cooperate with UNICEF in promoting their childrens' rights campaign "Wake-up time!", in promoting the HelpApp and in distributing the Digital World program.

Telenor Hungary cooperated with MediaSmart Hungary to develop and promote Digital World educational program. In November 2013, Telenor Hungary – in cooperation with MediaSmart Hungary – announced a contest for teachers "The teacher of the Digital world" to facilitate the incorporation of the Digital World educational program into kindergarden and school curricula.

<http://www.mediatudor.hu/>

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.

We work with partners NGO partners – see the initiatives above Hipersuli, Digital World and UNIEF’s Wise-up lessons.

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.

Safe internet lessons are available on Hipersuli.hu for everyone, where we communicate in press about safe internet we reach and encourage people to get involved.

9. Please outline any additional activities or initiatives *not detailed above* that relate to education and awareness-raising offered by your service or product.

We also promote on our website services providing general assistance to children with problems, missing children’s hotline, etc:

In English: <http://www.telenor.hu/en/phone-calls-for-social-causes>

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.