

Implementation Questionnaire

April 2019

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:
Orange Group
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
submission applies in which European markets does your company operate
France, Poland, Spain, Romania , Slovakia, Belgium & Luxembourg
Trance, Folding, Spain, Normania, Sievakia, Beigiani & Eaxembourg
3. Product(s) or services included within the terms of this submission
Mobile (voice, data and mobile broadband), fixed internet service provider and TV
services
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 providersOnline content provider
☐ Online service provider
☐ Other (please specify):Provider of online TV services
5. Person(s) completing the report
Names Candra James
Name:Sandra James
Position:Senior Manager, Consumer Regulation
Email:sandra.James@orange.com
Orange aims to continuously develop services which respond to the concerns of families, through initiatives which support parents and children in using digital technologies safely, and through the development of practices which encourage creativity, entrepreneurship and learning with, in particular, the launch of coding workshops across the Orange footprint.
Orange's ambitions are supported by the "Better Internet for Kids" programme, which aims to empower parents to provide the best of digital technology for their children.
More generally, Orange is working on defining and implementing a responsible marketing framework for offers likely to be used by children, including those related to the Internet of Things.
Orange has launched its family offers (LOVE) in Europe; LOVE connects homes using
landline, mobile and telephone solutions, all in a single offer, in Spain since December 2016, Belgium and Poland in February 2017, Luxembourg in March 2017, Slovakia and Romania in September 2017 and Moldova in October 2017.
In France, the OPEN package offer is specially designed for families: - up to four additional mobile subscriptions for family members,

- family subscriptions are managed from the Family Space in Orange&Moi

The offer includes exclusive services for families (Cinéday, special offers), a secure, private family network (Family place), solutions to go off-line as a family (setting time slots or switching off Wi-Fi), and solutions to protect younger children (parental controls on TV, PC,

mobile and tablet) as well as targeted information and advice to support families in their use of digital technologies (https://bienvivreledigital.orange.fr/espacedesparents

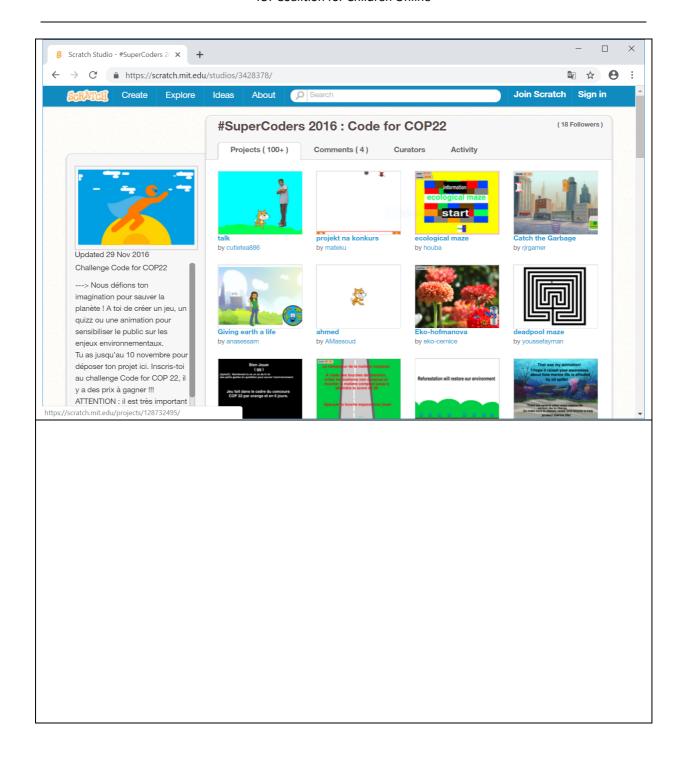
#Supercoders Launched in October2014, the #SuperCoders introduction to coding course (https://gallery.orange.com/media/a676995b-7e56-4309-b62a-4f6759795f39/#l=en&v=Version1&p=0) is now offered in 20 countries: France, Spain, Italy, Poland, Romania, Moldova, Slovakia, Ireland, Cameroon, Egypt, Tunisia, Ivory Coast, Morocco, Mali, Senegal, Sierra Leone, Guinea, Madagascar, the US and India. In all, over 30,000 children have taken part in these workshops https://oran.ge/2TZYin2.

Children participating in our free, fun workshops are invited to design games and short animations using Scratch software and to programme small Robots like Thymio (https://www.thymio.org/en:thymio). In some workshops, children also have the opportunity to share their creations with children from other countries through live video exchanges. The workshops aim both to train children to think logically and to teach them to work in teams. In addition, some workshops also offer children (and separately, their parents) awareness sessions on safe and responsible use of the Internet.

In France, the company has also introduced work experience opportunities for Year 10 students to experience what it is like to work at Orange. These placements last a week, half of which involves discovering the company and its job lines, and the other half, coding lessons and an introduction to robotics.

Code for the Planet

The Code for the Planet challenge is an initiative within the #SuperCodeurs project and the Better Internet for Kids programme. The project was launched in July 2017, during a pilot phase in France and Tunisia, as a way of offering children a pathway into stimulating and fulfilling opportunities and to show how coding can be used for a practical purpose. The children are invited to choose a mission related to the United Nations Sustainable Development Goals (SDGs). Each mission must address a real part of the child's daily life. For example: preventing food waste at the school cafeteria or finding ways to reduce pollution in the streets of their town. Children then devise a game or animation to highlight the issue they want to raise, upload it to the Scratch platform, and compete to win a prize. An example of a winning entry is here: https://scratch.mit.edu/projects/87838205/



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	
<u>a complaint</u> about the appropriateness of a piece of content?	
X□ Yes	
\square No	
□ Not applicable (please explain):	
If yes, please provide details:	
Orange is primarily a provider of mobile and fixed internet & telecom services, rather than a	
content provider. However, where we do provide our own content, we apply certain	
measures to ensure that children cannot access inappropriate material. For example, for our	
mobile services, Orange Group is a founder signatory of the GSMA Europe Safer Mobile	
Framework (http://www.gsma.com/gsmaeurope/safer-mobile-use/european-framework),	
under which we have committed to ensuring that our own and third-party commercial	

content is classified in line with existing national standards of decency and appropriateness (generally using accepted broadcasting, film or PEGI games classifications), and that we provide appropriate means for parents to control access to such content, via age-gating

commitments will vary from country to country between our operations, in line with local needs and national codes of conduct. Any reports or complaints would normally be handled

and/or parental control solutions. The solutions adopted to give effect to these

by our customer services teams.

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: As mentioned above, on our mobile services, we have voluntarily committed to put any of our own or 3rd party age-restricted content behind an 18+ barrier. The commitment is enforced with our 3rd party content providers via our contractual relations with them. Solutions vary from country to country, and adult content is not offered on our portals in some countries such as France and Luxembourg, but where it is offered, it may, for example require customers to authenticate their age via credit card/PIN number (as in Belgium, Poland, Romania, Spain). In Slovakia, if a user attempts to access over-18 content, they will be required to enter a phone number and a 4-digit code, which is assigned only on production of valid ID in a store, and then posted to the home address.	
3. Do you provide any information, educational resources or advice for users in any of the	
following areas?	
(tick as many as apply)	
X□ Content classification or labeling guidelines	
$X \square$ How to block or restrict access to content	
$X \square$ How to report or flag content as inappropriate	
$X \square$ 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.):	
Each country will have its own ways of providing these resources to our customers. Some examples are given below.	
Orange France's site "Bien vivre le digital" https://bienvivreledigital.orange.fr/	
and its dedicated Parent Zone (https://bienvivreledigital.orange.fr/espacedesparents)	
contains detailed information & expert advice for parents, including an interactive	
discussion forum, a "Superparent" quiz, step-by-step guides & videos with tips on how to	
set up parental controls and deal with issues around screen time, social networks, online	
reputation and video games.	
Orange France also offers free digital workshops, open to all, led by Orange coaching staff in	
its stores (https://bienvivreledigital.orange.fr/ateliers-numeriques)	
Moreover, Orange has offers and services tailored to the needs of the family, like Open	
(https://boutique.orange.fr/famille), which carry with them Orange's commitment to	
protecting children (free parental control included, links to the website "Bien vivre le	

digital », blocked or limited packages, an option to block online purchases or timer settings based on age).



The Orange "Livebox" allows parents to customise the times when internet access is available to their children via every device in the house, and the app "My Livebox" allows settings to be configured via the parent's smartphone or tablet.

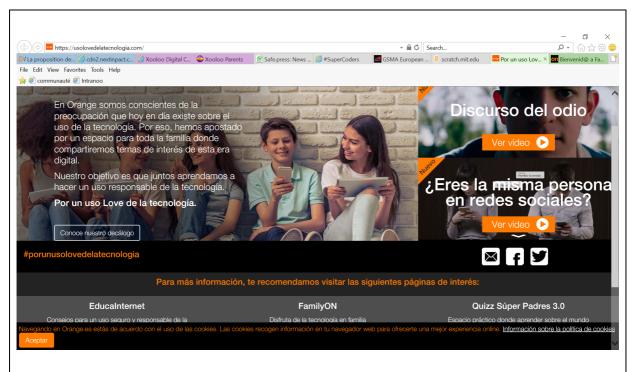
As an option, Orange offers the Xooloo Digital coach, a coaching app that aims to empower kids' digital independence to help them cultivate responsible digital habits on their own (https://boutique.orange.fr/mobile/options/xooloo-premier-telephone-ado) and Orange's own family social network "FamilyPlace" which allows the whole family to share photos, calendars, videos, location and messages in a private space without ads.

(http://familyplace.orange.fr/). Finally, Orange regularly organi

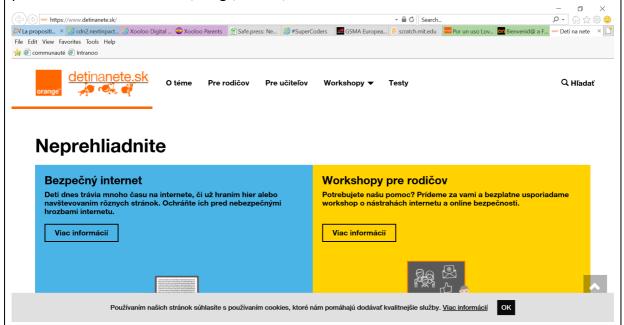
Finally, Orange regularly organizes information campaigns for families on all of its channels (orange.fr, Orange catalog, clips in stores, newsletters, trade marketing actions, etc ...) as well as on social networks, on Internet or during popular events in which Orange participates (eg Paris Games Week, Student Fairs, ...) or with its employees and particularly its sales force. Orange, as a responsible operator, encourages and shows the example of positive and responsible practices in its advertising and communications with its customers. Orange France is a partner of "Internet Sans Crainte" and participates in promoting Safer Internet Day.

Orange France's child protection charter for customers is here: https://bienvivreledigital.orange.fr/espacedesparents/charteprotectionenfants

In 2017 Orange Spain launched the platform website https://usolovedelatecnologia.com/ where each month we address a digital topic in video format in order to generate a debate between parents and children about the responsible use of technology; we have addressed topics such as sexting, cyberbullying, sharenting, viral challenges.... apart from the videos we offer pedagogical contents to families in infograph format about how to prevent and deal with these online risks https://usolovedelatecnologia.com/cyberbullying/que-es/

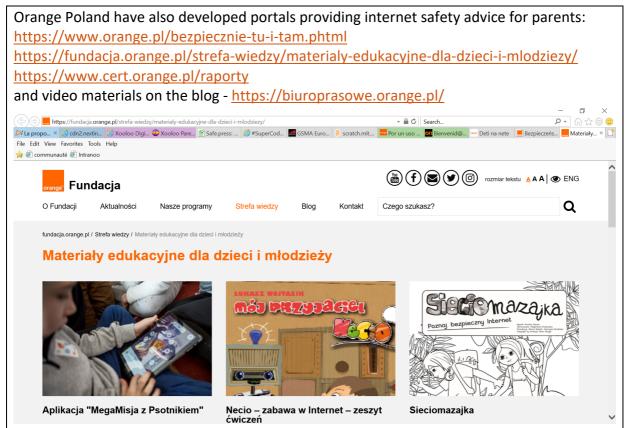


In Slovakia, we continue to educate kids, parents and teachers about the risks that children face when using modern communication technologies but also about the opportunities the internet offers. Content can be found on the online platform www.detinanete.sk. This platform consists of articles, blogs, videos, tests and workbooks for teachers.



We provide free workshops for teachers, children and parents about the better use of technologies. Workshops are conducted by experts and psychologists. Over 35 000 pupils have attended so far.

The e-Schools for the Future grant programme run by the Orange Foundation focuses on digital inclusion, safe and responsible use of digital technologies and media. 220 school projects have been supported in 5 years.



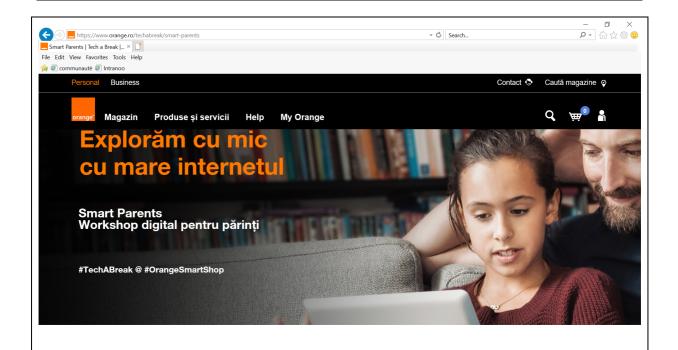
In addition, Orange Poland has provided a special e-learning course for parents and educators including information about harmful content, available here: https://fundacja.orange.pl/kurs/

Orange Poland has also developed a safe browser for children (BeST) and a list of safe applications for children under 6 years old, in cooperation with the local INSAFE node-Empowering Children Foundation (EChF)- http://fdds.pl/best/

Orange Polska is a partner of The Empowering Children Foundation - https://fdds.pl/oferta/oferta-edukacyjna/

In Romania, as part of a concerted campaign to help bridge the digital divide, Orange Romania has organized digital parenting workshops (SmartParents@Techabreak), providing tips on how to help children understand both the advantages and disadvantages of internet and technology. So far this has taken place in 12 towns and cities, with over 160 participants. The aim is to inform parents about responsible use of technology for children and generate awareness of digital parenting topics.

https://www.orange.ro/techabreak/smart-parents



4. Where is your company's <u>Acceptable Use Policy</u> (AUP) located?

Orange does not generally act as a host for user-generated content so this is not really applicable. Where community services are provided, e.g. on a forum, acceptable use policies will be located on the appropriate page.

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)	:
If yes, please identify relevant policy	y :
6. Do you provide notice about the	e consequences for users if they post content which
violates terms of service or commu	
X□ Yes	, ,
□ No	
\square <i>Not applicable</i> (please explain):	
If yes, please identify relevant policy	y:
Example from Orange France here:	
https://pages.perso.orange.fr/page	s-nerso-cgu
ittps://pages.perso.orange.n/page	<u>5 per 30 ega</u>
Each section of the Parent Zone on	Orange France talks about rights and responsibilities
	Nos conseils
	Parlor à votre enfant des bonnes pratiques sur leternet
	Parlez à votre enfant des bonnes pratiques sur Internet Etablissez ensemble des règles claires d'usage, comme les horaires d'accès à internet, les sites autorisés, les
	équipements qu'il peut utiliser à son âge. Apprenez-lui également l'importance de la notion d'e-réputstion et de vie privée pour qu'il fasse attention, qu'il préserve ses données personnelles et qu'il ne fasse pas aux autres ce qu'il ne voudrait pas subir, en particulier les moqueries ou insultes par 8M8, per vidéos ou sur les réseaux
	sociaux. Attention aussi aux images soumises à droits d'auteur, au téléchargement illégal, ou bien encore à la publication de photos « voiées » sur un biog ou une page perso. N'oubliez pas de lui rappeler qu'en tant que
	parent ou tuteur légal, vous seriez jugé responsable de ses infractions, et soumis à sanctions. Guides pratiques :
	per victo
	Les usages des jeunes sur internet et les plèges à éviter
involved in use of the internet, e.g.	

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 <u>parental control tools and settings</u> across your product or service that allows parents to set appropriate levels of control? Include relevant links/ screenshots where available:

In France, Orange has extended its parental control system (PC, mobile, TV) with more extensive and more flexible tools, such as the parental Games TV Pass from mid-July 2017 and the Xooloo Digital Coach option from mid-November 2017, a simple solution to teach children about how to start using digital technologies responsibly;

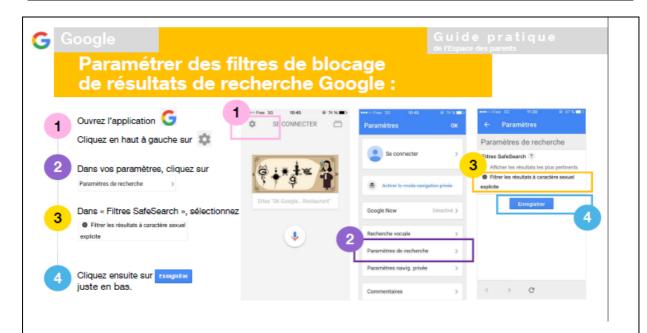
In France, our "Espace des Parents" pages include 28 step-by-step guides to how to set up parental controls on mobile phones, browsers, smartphones & tablets and Orange TV.



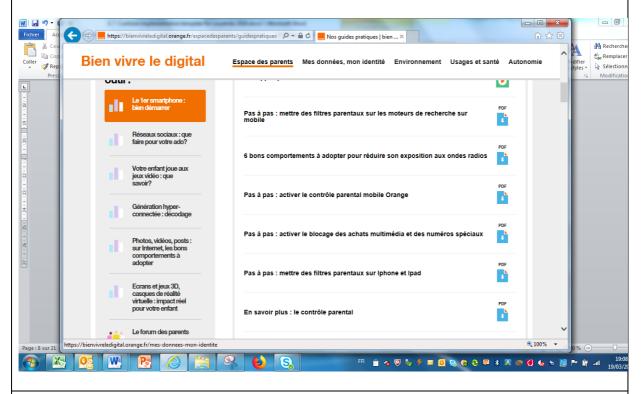


eg.





Moreover, the information on child protection tools that Orange offers and links to bienvivreledigital.orange.fr/espacedesparents are also highlighted in the e-shops, customer area and the help pages of Orange.fr, sosh.fr, and Orange et moi (Family Benefits section).



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

On its dedicated Parent Zone on bienvivreledigital.orange.fr, a section is devoted to the description of parental control tools provided by Orange:

https://bienvivreledigital.orange.fr/espacedesparents/serenitedigitale

On Orange.fr, there is a dedicated webpage:

https://boutique.orange.fr/informations/serenite-digitale/controle-parental/

Protéger des contenus inappropriés



Contrôle parental mobile

Bioquez l'eccès eux sites ineppropriés et sensibles (cherme, rencontre...) sur l'internet mobile.

En sevoir plus >
Activer le service >



Contrôle parental TV

Protégez vos enfents en bioquent l'accès à des contenus susceptibles de les choquer (vidéos, jeux, applications, internet sur la TV).

Découvrir et paramétrer le service >



Contrôle parental PC

Fitrez l'accès à internet sur les ordinateurs et préservez vos enfants des contenus violents ou inappropriés.

En sevoir plus > Insteller le logiciel >

Maîtriser le temps passé sur internet



Ma Livebox

Définissez des pieges horeires d'eccès à internet pour checun des équipements connectés à votre Livebox.

En sevoir plus >

Télécherger l'application >

Empêcher les achats de contenus ou services web



Maîtrise du budget

Bioquez ou autorisez les usages qui pourraient être facturés en plus de votre abonnement.

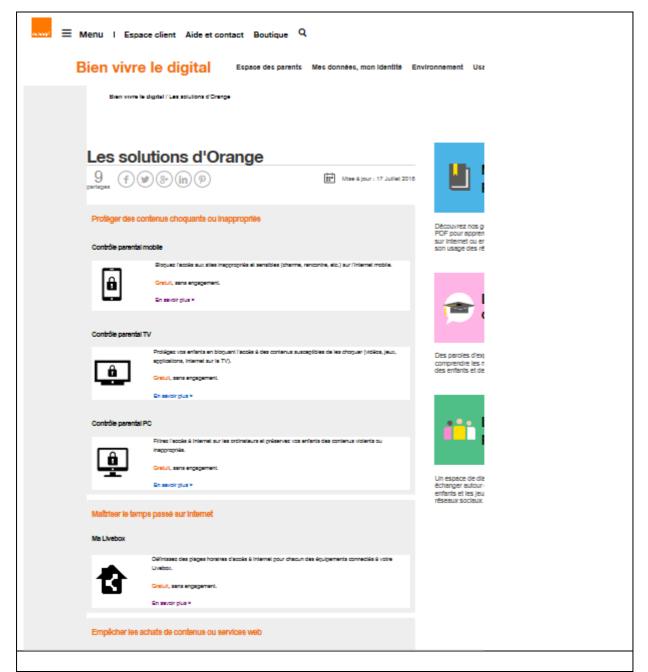
Modifier les autorisations >



Contrôle parental TV

Empêchez vos enfents de réaliser des achets sens votre consentement (bouquets TV, VOD, jeux, etc.).

Découvrir et paramétrer le service >



In Orange Poland we offer the Protect kids online (Chroń dzieci w sieci) - Parental control application, which provides comprehensive care of children who use smartphones and tablets; it allows you to control how much time your child spends online, verifies the apps run by the child, and filters websites for inappropriate content- https://chrondzieciwsieci.pl/ Parents can easily manage app settings from any location. The application works on Android, iOS, and Windows Phones and is available in two versions: Standard and Premium. In the Standard option the parents may manage two devices from their computer through an online panel to configure white- and blacklists. The Premium option allows parents to manage their children's settings on their smartphones and control 2 additional devices, with the option to set time management options.

For parents without any technical knowledge at all, interested in a solution that "just works", they can take advantage of "Bezpieczny Starter" (Safe Starter). It is a plug-and-play

solution, that filters internet traffic for child abuse material, pornography and gory content when the dedicated SIM card is inserted.

In Spain, in June 2018 we launched a tariff for kids

https://tiendaonline2.orange.es/store/tarifas/movil-

<u>contrato/go?internal_source=orange&internal_medium=home&internal_term=home+gene_ral+accesos+directos+tarifas+movil&internal_campaign=movil&AAC_PROMO_CODE=37038_</u>

that includes a parental control service called Kids Ready

<u>https://kidsready.orange.es/</u>. The Kids ready service is an app that includes geolocation (child's location and different alerts about zone, history, SOS button...) and parental supervision (content filters, control apps, usage report...)

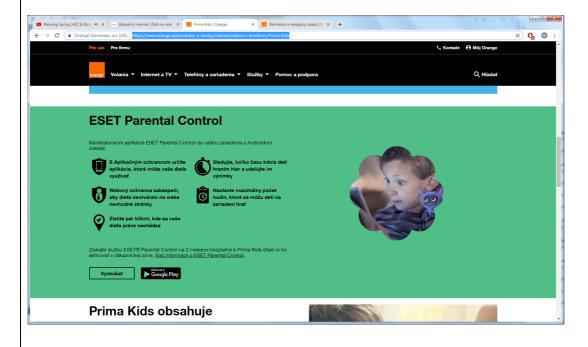
Orange Spain also provides a parental control tool in Orange TV to prevent kids from buying adult contents and an adult code to watch contents classified for adults +18

https://ayuda.orange.es/particulares/orange-tv/mi-servicio/540-como-activar-el-control-parental

Orange Slovakia offers the ESET Parental control and a special SIM card customized for kids. https://www.orange.sk/produkty-a-sluzby/bezpecnost/rodinny-bezpecnostny-balik https://www.orange.sk/produkty-a-sluzby/volania/volania-s-kreditom/Prima-Kids

The ESET Parental control features: monitoring location, app settings, web content blocking, screen and gaming time settings, other.

The Prima kids SIM for children offers a free emergency number, expenditure control, GPS location, parental control.



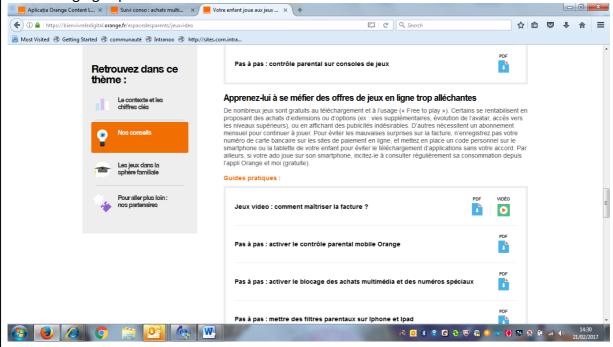
3. In relation to parental controls, which of the following <u>educational and information</u> <u>resources</u> to do you offer?

(tick as many as apply)

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

[Please provide details including links or screenshots as relevant]

Links to key advice pages are provided above. In addition to general advice on social networking, privacy, inappropriate content etc, Orange France also provides advice about online games, including age appropriateness, setting parental controls on games consoles and managing expenditure:



4. Please outline any additional safety tools or solutions <u>not detailed above</u> that relate to parental controls, including any planned implementation of new features or procedures?

In France, by default, multimedia and SMS + purchases are authorized for all Orange mobile subscribers, and blocked when they reach the maximum amount of 300 €. If you wish, you can, before reaching this ceiling, prohibit these uses and authorize them again. Here are the steps to follow: https://assistance.orange.fr/assistance-commerciale/la-gestion-de-vos-offres-et-options/connaitre-les-outils-pour-gerer-votre-offre/open-services-et-avantages-famille-dans-votre-espace-client_250578-792351

A tutorial is also provided at:

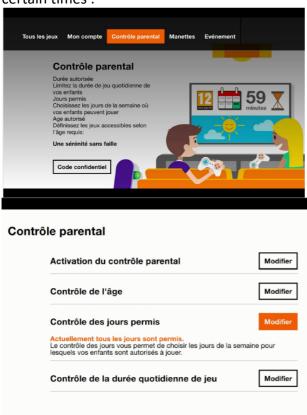
https://bienvivreledigital.orange.fr/espacedesparents/guidespratiques/Pasapasactiverleblocagedesachatsmultimediaetdesnumerosspeciaux

Moreover, since November 2018, Orange has implemented a new policy for our staff in Customer Services, on the Orange customer journey, to be able to determine whether the customer is making a purchase for a minor, and to enable them to give better advice to parents.

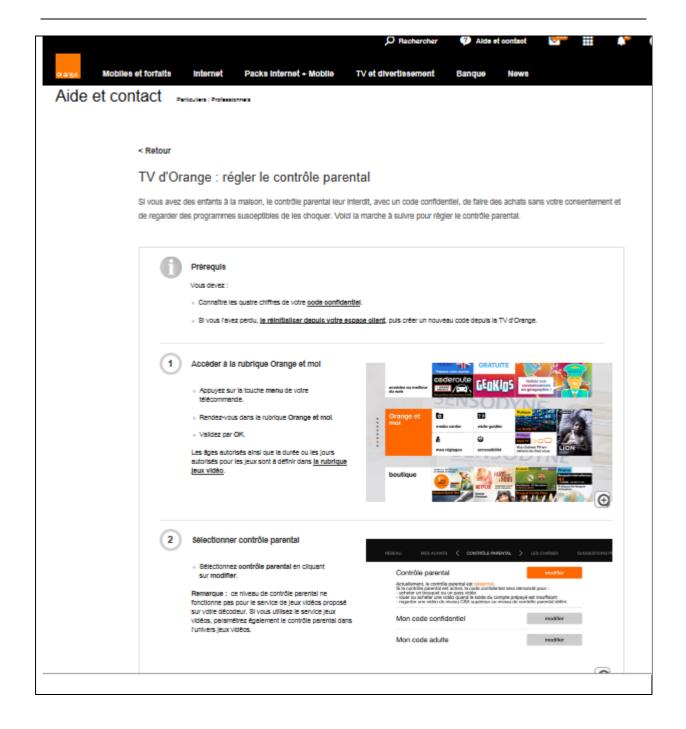
For example, for all new mobile subscriptions, Orange sales staff must determine whether the customer is giving the mobile line to a child, and if so, inform them about appropriate services, accessories and parental control solutions to ensure the customer is better supported.

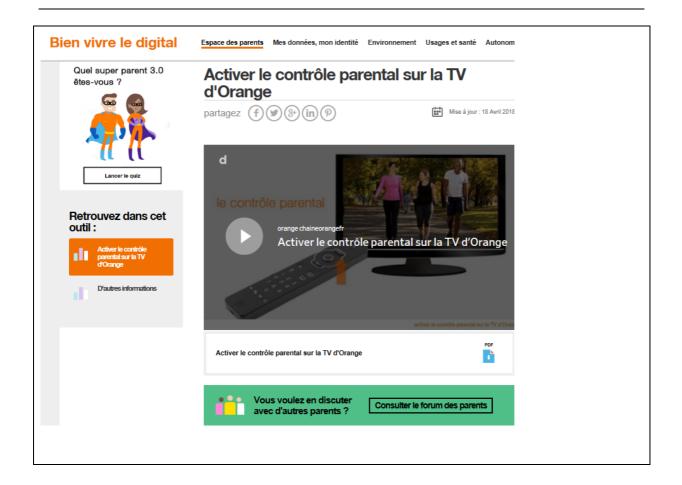
For parents who are taking out a mobile phone subscription for a child, Orange has set up an SMS double information service that simultaneously alerts the user and the owner of the line (the parent) to any important notifications concerning the user's line. Examples: out-of-package alerts, billing issues, option subscriptions / cancellations, purchases, etc. (This service can also be activated or disabled from the customer area).

Since 2017, on Pass Jeux Video by Orange, a parental control is included, with timer settings based on age, allowing for access to be permitted or denied on given days or between certain times:



On Orange TV services (available in France, Poland, Romania, Slovakia and Spain), the default adult access code and customizable parental control PIN enable parents to protect their children from restricted video content, to control Video-on-demand (VOD) purchases and subscriptions to pay-TV directly from the TV set, as well as to restrict access to VoD offerings – depending on the age of the child. An example is here:





DIY video tutorials on how to set up your devices are offered in other countries. An example from Orange Slovakia is here:

https://www.youtube.com/playlist?list=PLtBrxkdlmB1lC1LaezsS19nO-I7QYF5co

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 <u>company policy relating to abuse</u> and misuse (involving images, videos, text and other content or behaviour) on your product or service.

All Orange businesses in Europe allow customers to report abuse or misuse either direct to Orange or to the appropriate national hotline. Customers will always be able to report abuse/misuse of our own content or services to Customer Services in any of the countries in which we operate. In the case of content on the wider internet, we facilitate reporting of potentially illegal content to our INHOPE partners through a direct link on our portals. The exact details of how we facilitate reporting will vary from country to country.

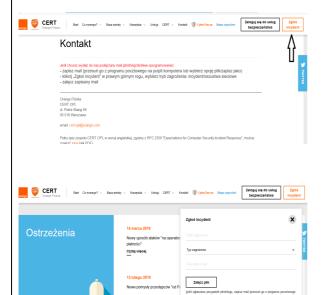
2. Please describe the <u>process or mechanism</u> available for users to report abuse/misuse (involving images, videos, text and other content or behaviour) on your product or service).

The approach varies from country to country. For example, all user-generated content available via the Orange France portal is moderated. Orange France customers wishing to report inappropriate content can do so via the Abuse unit

(https://assistance.orange.fr/ordinateurs-peripheriques/installer-et-utiliser/lasecurite/risques-et-prevention/phishing/la-cellule-abuse-presentation_40594-41412#2) or through customer services.

In Orange Slovakia, Inappropriate content can be reported on:

https://www.orange.sk/onas/spolocenska-zodpovednost/deti-a-mobily/nevhodny-nelegalny-obsah/, and in Orange Poland on https://cert.orange.pl/czym-jest-cert/kontakt



And in Spain, we provide a link to the official helpline and hotline of the Spanish Digital Ministry https://www.is4k.es/

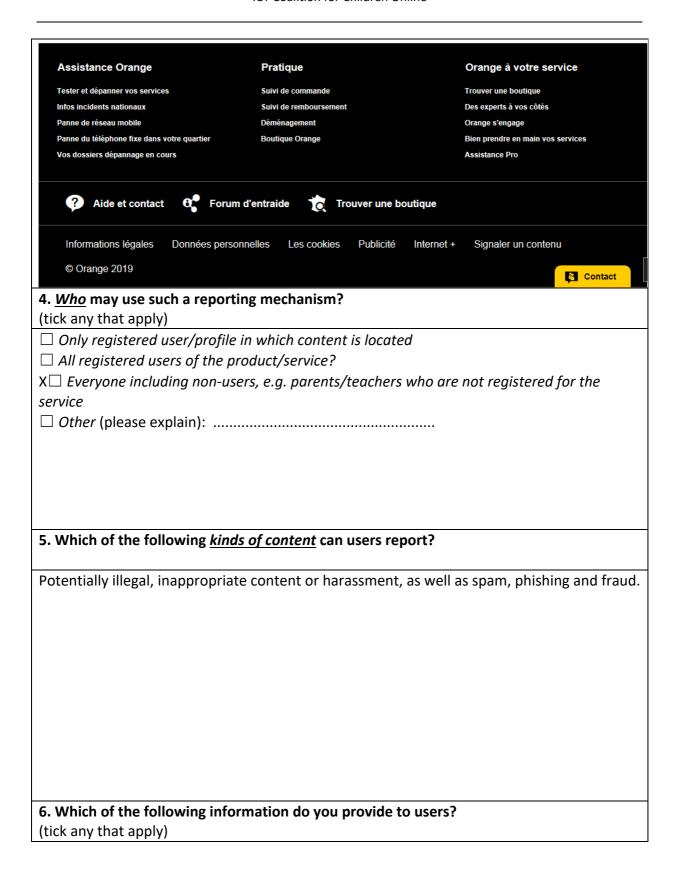
[Please provide details including links or screenshots as relevant]

3. <u>Where is the reporting button/ mechanism located?</u>

(tick any that apply)

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

A link to https://signalement.fftelecoms.org/ is provided in the footer of every page of the Orange France portal and is the hotline of the French Federation of Telecom Operators, linking to the French Interior Ministry Cybercrime unit. Any child protection issues reported to abuse@orange.fr will also be reported to the FFT hotline.



ICT Coalition for Children Online

X \square Advice about what to report
$X \square$ Advice about how to make a report
X \square Pre-defined categories for making a report
X How reports are typically handled
X 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 licen to
7. Please provide details of any <u>other means</u> , in addition to a reporting button/icon, to
renort content or nenavior which breaches volir service s terms and conditions
report content or behavior which breaches your service's terms and conditions
Customer services
Customer services
Customer services [Please provide details including links or screenshots as relevant]
Customer services [Please provide details including links or screenshots as relevant] 8. Please outline briefly any other procedures or programmes offered by your service <u>not</u>
Customer services [Please provide details including links or screenshots as relevant] 8. Please outline briefly any other procedures or programmes offered by your service <u>not</u>
Customer services [Please provide details including links or screenshots as relevant] 8. Please outline briefly any other procedures or programmes offered by your service <u>not</u>
Customer services [Please provide details including links or screenshots as relevant] 8. Please outline briefly any other procedures or programmes offered by your service <u>not</u>

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 <u>facilitate</u> <u>the notification or reporting</u> of suspected child abuse content? (tick any that apply)
$X \square$ Company-own hotline reporting button or telephone number
$X \square$ Link or button for external national or regional INHOPE hotline
X□ Emergency services
$X\square$ Law enforcement agency
☐ Other external agency (please specify):
2. Please outling by official and and the fallowed if illegal content ways to be
2. Please outline briefly the procedures to be followed if illegal content were to be discovered on your service.
Orange Group is committed to removing any illegal content in the rare eventuality of being notified by the authorities of such content being hosted on our services. We also aim to facilitate reporting to the appropriate authorities of any illegal content found elsewhere on the internet. We already have partnerships in place with the national INHOPE hotlines in all of the European markets where we operate, and are working to improve the visibility of reporting buttons so as to make it easier for users to make a report.
Orange Group is a founder member of the GSMA Mobile Alliance against Child Sexual Abuse Content.

The exact steps for reporting illegal content may differ slightly from country to country,

according to national legislation, but a typical scenario is outlined in the attached document prepared by mobile operator members of GSMA Europe as part of best practice sharing

under the EU Better Internet for Kids initiative. The same principles will apply in our role as
ISPs, where applicable. NTD transparency
paper May 2012.pdf
3. Do you provide links to any of the following to enable users gain <u>additional information</u>
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
$X \square$ Law enforcement agencies $X \square$ INHOPE
☐ Other (please specify):
Utilet (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?

In France, we are required to block sites figuring on a list of known child abuse content websites provided by the French law enforcement authorities.

Orange Slovakia has opted to voluntarily apply the Internet Watch Foundation blocklist to prevent access to URLs known to be hosting child sexual abuse material.

Orange Poland works closely with the "Your Affairs Foundation", a leading Polish "watchdog" organization, whose main aim is to protect children from sexual abuse and illegal content. Orange Poland also cooperates closely with the Polish governmental institution working on nationwide solutions to protect children from sexual abuse and online sexual content.

Orange Poland has provided a special e-learning course for parents and educators providing advice on how to proceed in case of child sexual abuse or online illegal content, available

here: https://fundacja.orange.pl/kurs/wyzwanie/4/video

Orange Polska is also a partner of a telephone helpline for children and young people, which celebrated its 10th anniversary in 2018. The operator of the telephone helpline is the Dajemy Dzieciom Siłę Foundation, which provides support to abused children, including sexual abuse. Over10 years there were over 1 million 160 thousand calls received, alongside 55 thousand online messages and 1,200 interventions in situations of immediate threat to the life or health of a child. Help on the Telephone Helpline for Children and Young People is provided 7 days a week - the phone operates from 12:00 noon until 2:00 AM.

And in Spain, we provide a link to the official helpline and hotline of the Spanish Digital Ministry https://www.is4k.es/

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 <u>privacy policy</u> in relation access, collection, sharing and further use of data from minors under the age of 18 when utilizing your product or service?

Not applicable – Orange does not knowingly collect data on minors.

Orange France's privacy charter for all customers is here:

https://bienvivreledigital.orange.fr/mes-donnees-mon-identite/charte-de-la-protection-des-donnees-personnelles-et-de-la-vie-privee



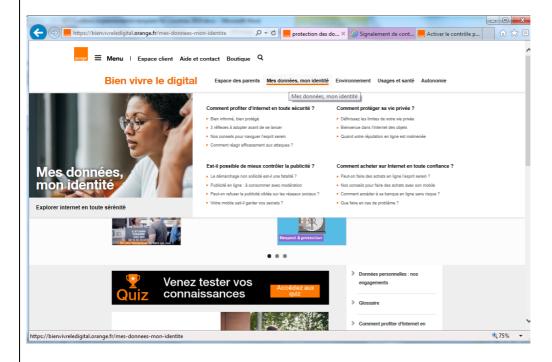
2. Are <u>distinct privacy settings</u> deployed to prevent access to information on for users under the age of 18?

☐ Yes ☐ No X☐ 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 <u>age category</u> of under 18s, as relevant:
Please identify any steps you have taken to ensure that these settings are <u>easy to</u> <u>understand, prominently placed, user friendly and accessible</u> .
3. Where are users able to view and change or update their privacy status? tick any that apply)
\square On each page of the website/service
\square 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?

X \square Tips/advice to users at the point of setting privacy options
$X \square$ FAQs
X \square Help or educational resources in a separate location of service
$X \square$ Links to any external NGO agencies offering education or awareness-raising related to
privacy
$X \square$ 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]

An example from Orange France of our dedicated privacy advice page:

https://bienvivreledigital.orange.fr/mes-donnees-mon-identite



5. Please outline briefly any additional policies or activities (existing or proposed), <u>not</u> <u>detailed above</u>, to ensure that personal information is protected, using reasonable safeguards appropriate to the sensitivity of the information.

As a highly-regulated provider of electronic communication services, Orange is subject to strict rules on the use of customer data in all of the markets in which it operates.

Orange Group's CEO has personally made a significant further commitment on privacy, by publicly signing a Charter which highlights Orange's commitment to protecting our customers' privacy and personal data. Our aim is to be recognized as a trusted operator by customers, users and partners.

https://bienvivreledigital.orange.fr/mes-donnees-mon-identite/charte-protection-des-donnees-personnelles-et-de-la-vie-privee

Orange is also a signatory of the GSMA Privacy Guidelines for Mobile Application Developers. These contain a specific section on privacy in relation to children which require,

for example, that applications intended for children and adolescents should be appropriate for the target age range and that apps intended for children must have a location default setting that prevents users from automatically publishing their precise location data. http://www.gsma.com/publicpolicy/mobile-and-privacy/design-guidelines

Orange has developed internal guidelines to put these GSMA principles into action – the Guidelines are available to product managers, together with a Best practices implementation guide, giving step-by-step advice to product managers and developers.

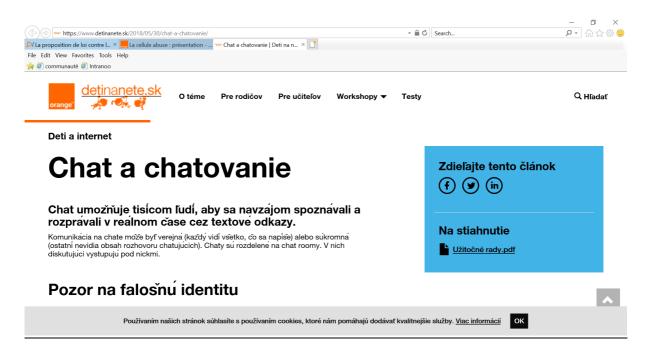
Orange has also developed its own family social network, free of ads, where members of a single family can share messages, photos, videos and other content in a private space:





Orange Slovakia provides information on the provisions of the GDPR here https://www.orange.sk/pomoc/gdpr. Children's data protection is discussed on the detinanete.sk platform, for example:

https://www.detinanete.sk/2018/05/30/chat-a-chatovanie/



Information on Orange Poland's privacy and data protection policies can be found here:

https://www.orange.pl/ocp-

http/PL/Binary2/1978292/politykaprywatnosci 4002392388.PDF?footerlink=true

Data protection

https://www.orange.pl/view/mojedane

Information for parents is also provided here:

https://fundacja.orange.pl/strefa-wiedzy/materialy-edukacyjne-dla-rodzicow/

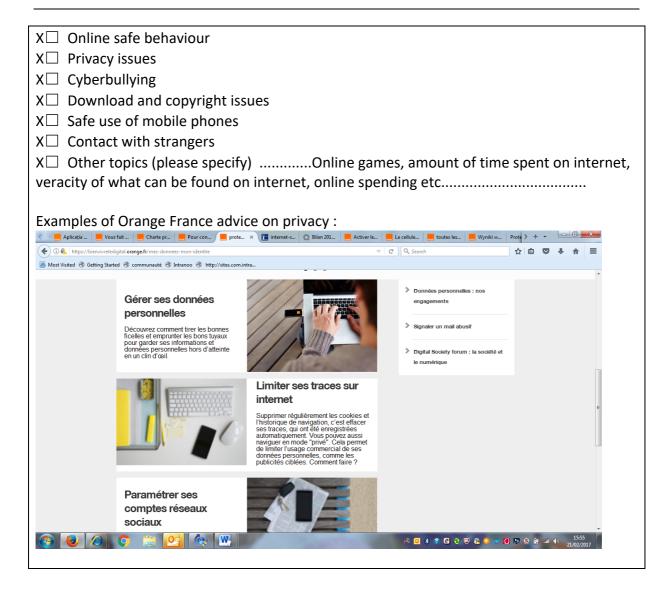
Principle 6 – Education and Awareness

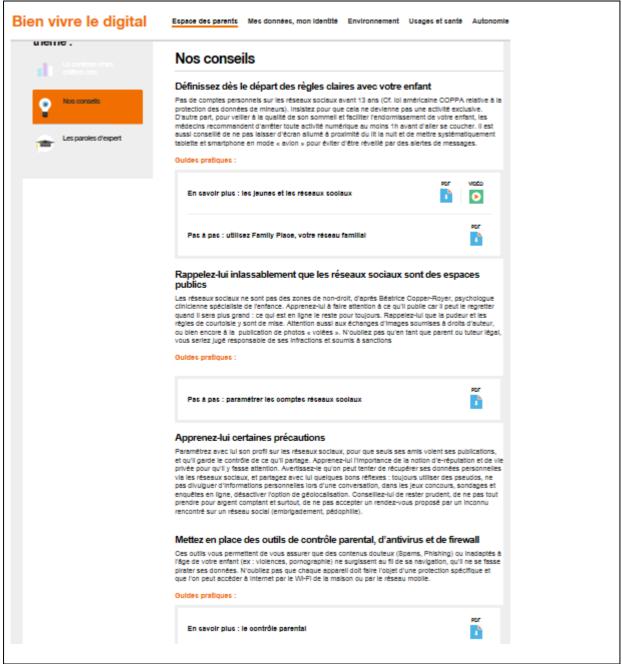
Requirements

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 <u>educational resources</u> 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
X□ Others (please specify):
Educational workshops on online safety and coding in schools. Please see Section 1 and below for full information on our #Supercoders workshops.
2. Which of the following topics are included within your own company educational
materials?
(tick any that apply)





3. With reference to any educational material you provide, <u>which of the following methods do you use</u>? (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 □ Helpdesk (telephone or online) X□ Other (please specify): Physical workshops on coding and online safety, for both children and, in some countries, for parents, together with educational sessions in schools. Inclusion of features on these topics in occasional emails sent with customer bills.
4. Please provide details of any links to other <u>external organisations</u> , or relevant,
independent and authoritative advice for parents/carers, teachers, and for children?
Examples from Orange Spain include: http://educainternet.es/ and family organisations: https://www.familyon.es/ https://www.anar.org/ https://empantallados.com/
5. Please provide details of any campaigns, or active involvement in <u>industry partnerships</u> on specific topics to raise public awareness of digital safety for children and young people?
In all of our markets, Orange has for many years worked closely with experts in the field of child protection, e.g. from the Safer Internet Centres, to raise awareness on these issues. As an example, Orange France lists its key partners in this area in the Parent Zone on our website: https://bienvivreledigital.orange.fr/espacedesparents/partenairesprotectionenfants
In 2017, Orange France developed a questionnaire for parents in conjunction with e- Enfance, on the occasion of Safer Internet Day, which has since been taken up and translated for use in 5 other markets.(https://bienvivreledigital.orange.fr/espacedesparents/quiz)



We also host seminars for parents on how to guide children in their use of screens and on cyber-bullying.

In April 2018, Orange France also developed Rézo, a free card game in collaboration with Okapi (a specialist in the youth press), e-Enfance and Internet Sans Crainte. The game Rézo invites players to ask questions about their habits when using social networks and more generally on their use of screens. It is played as a family, or with friends, in 2 teams and helps raise awareness of good practices and their transmission. Today, more than 17,000 card games have been distributed free of charge.



With Internet Sans Crainte, Orange France added an educational module to the Supercoder program. It focuses on "digital decoding", i.e. understanding what lies behind what we see on-screen, whether it can be trusted, where the information comes from etc.

Too often, children are mere consumers of digital. With #SuperCoders 2018, the ambition is to help them decipher what is behind their everyday digital life: apps, videos or games and how computer programs (algorithms) are designed specifically to make them want to play. The #SuperCodeurs animators will gradually lead children to explore behind the scenes, by addressing the notions that can fuel a game, such as frustration, dependence, and the question of the recommended age. Children can also discover new job possibilities focused on new technologies, including for example artificial intelligence, by programming Thymio robots and looking at the example of driverless cars.

Throughout the year, Orange organizes and broadcasts communication campaigns with

partners on its website, social networks, in its catalog or in its stores to inform its employees, the families and educate users. Eg. in 2018, we launched a video on cyberbulling: https://www.youtube.com/watch?v=G1Vexp2frRw and one on privacy: https://youtu.be/tCzlYaVY 30.

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

Each year, Orange France with e-Enfance has supported the fight against cyber-bulling on the occasion of the National Day Against Harassment at School

https://bienvivreledigital.orange.fr/actu/luttecontrelecyberharcelement

Orange France is also partner of "Internet Sans Crainte" program and has participated in Safer Internet Day activities for many years.

https://bienvivreledigital.orange.fr/espacedesparents/actu/safer-internet-day-2019

At the 9th session of the World Video Game Days, Orange France with Pédagojeux and UNAF raised awareness of the issues related to the playing of video games by children and offered parents educational resources.

https://bienvivreledigital.orange.fr/actu/3jourspourc%C3%A9l%C3%A9brerensemblelesjeux vid%C3%A9o

With Fondation pour l'Enfance, Orange France raises awareness of issues related to the early exposure of young children to screens :

https://bienvivreledigital.orange.fr/espacedesparents/actu/fondation-pour-l-enfance

Every year, Orange Poland participates in the "Safety Here & There" programme, in cooperation with the Empowering Children Foundation. The programme offers many educational tools and materials such as e-learning and educational websites

http://www.necio.pl/, https://sieciaki.pl/, http://digitalyouth.pl/

including online leaflets and guides for pupils, parents and teachers. Every year within the programme, pupils can take part in educational initiatives organized around Safer Internet Day and in summer educational picnics raising awareness about safe and responsible use of new media. During each school year hundreds of Orange volunteers teach children the principles of online safety in regular workshops.



Overall, in 2018 more than 872 636 Polish children and young people benefited from educational campaigns, events, and classes in online safety and e-learning tools, and advice on using social media. Educators and specialists also participated in conferences, seminars and workshops. Orange Poland created a special online interactive guide for parents and guardians teaching them how to protect their children online and better understand their fascination with the digital world: https://fundacja.orange.pl/kurs/ In 2018, 3654 educational institutions ran social programmes supported by Orange Polska

In Spain, as part of the campaign "Por un Uso love de la tecnología" https://usolovedelatecnologia.com/ Orange Spain has reached agreements with the National Police of Spain on the topic of viral challenges and with the General Traffic Direction for the topic of road safety

Orange Romania has a strong partnership with Save the Children Romania to support them in their campaign for Internet safety.

Orange Romania is also participating in a major campaign to bridge the digital divide, particularly for the many disadvantaged families in Romania. The Orange Romania Foundation was set up in 2012 and in 2015 carried out a research study to assess the use of digital in rural schools and identify the needs and attitudes towards digital technology and content. In 2016 Digitaliada was launched and currently, in 2019, runs its third edition in 40 schools in rural areas.

The purpose of the programme is to encourage the use of alternative teaching and learning methods in class to increase students' school performance and support their digital inclusion. As part of the programme:

- Rural gymnasium schools receive an equipped Digital Lab (,1150 tablets, 38 projectors, 41 laptops and 10 smart tables have been provided so far)
- Math& ITC Teachers are trained for digital teaching
- Teachers & pupils receive digital educational content (28 apps, 124 educational projects, 5 digital teaching guides provided)

Orange Slovakia's dedicated website: www.detinanete.sk (Kids on the Net) offers a range of resources for teachers and parents. Educational material was developed in cooperation with an expert child psychologist, and offers internet safety advice for both parents and children in the form of quizzes and videos, as well as teaching material and lesson plans for teachers (these are also sent directly to schools) at both primary and secondary level.

7. Please outline briefly any of your own company initiatives in <u>media literacy and ethical</u> <u>digital citizenship</u>, designed to help children and young people to think critically about the content consumed and created on the internet.

Our key initiative in this area is the highly successful #Supercoders programme of coding workshops for children, described at the beginning of this report, and which was awarded first prize in the Digital Skills for all Citizens category of the EU Digital Skills Award in December 2016.

The programme has now been rolled out to 20 Orange countries in Europe and Africa and has succeeded in engaging both the 30,000 children who have taken part, and over 1000 Orange volunteer coaches who give up their time to help children use the internet actively and creatively to develop the projects that interest them https://oran.ge/2TZYin2. Within the overall #Supercoders framework, different countries are free to adapt the way they conduct workshops — in Orange offices, libraries or public buildings, or in a more formal setting in conjunction with schools.

In France, for the 5th run of Supercoders in 2018, Orange began focusing on "digital decoding". Too often, children are mere consumers of digital. The ambition is to help them decipher what is behind their everyday digital life: apps, videos or games and how computer programs (algorithms) are often designed specifically to make them want to play more. The #SuperCodeurs coaches will gradually lead children to wonder what goes on behind the scenes, by addressing the notions that may drive a video game, such as frustration, dependence, and the question of the recommended age for that game. Supervised by volunteer coaches from Orange, the #SuperCodeurs get introduced to programming in a fun way, learn to sharpen their critical minds, and to apply good practice for responsible use of these technologies.

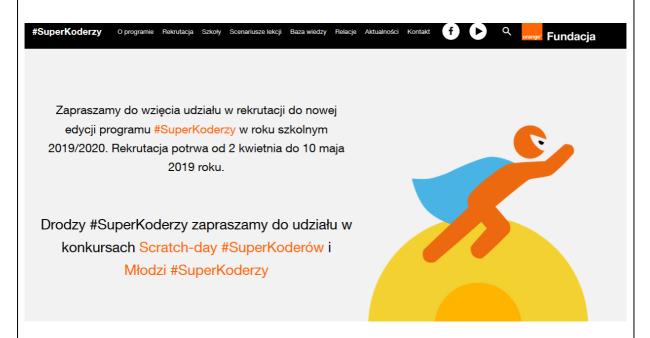
So at Orange, we see learning to code as also putting yourself in the shoes of those who design the games: developer, programmer analyst, game designer etc. As part of the SuperCoders programme, some of the coaches who work as developers take the opportunity to show some of what their work involves. With Thymio, the intelligent robot, they can introduce students to artificial intelligence and robotics, and demonstrate examples of applications such as the connected and driverless car. These workshops provide an opportunity for children to discover the digital jobs of tomorrow and hopefully, generate interest in possible future careers.

The workshops are offered throughout France all through the year and in particular, during

European Coding Week . In France, each year, 1,200 Orange volunteer employees have participated in this scheme, which is open to all of Orange's employees. https://bienvivreledigital.orange.fr/supercodeurs

Orange Poland launched a pilot version of #SuperCoders in 2016 and by 2018, the programme involved 170 schools and 3,366 primary school pupils aged 9-12. During the classes, children learn programming, the basics of robotics and learn about the world of new technologies not only in relation to computer science, but also using codes in support of their projects in nature, history, Polish language, English, music or mathematics lessons. Each school participating in the program receives a grant for the purchase of computer equipment and learning tools. In addition, the Orange Foundation provides two teachers from each school with professional training that prepares them for conducting classes and supports experienced educators.

The knowledge we acquired during the SuperCoders project allowed us to apply successfully for 9 EU regional grants, which enabled us to start Code the Future. In 2017-2018 over 1200 teachers and 19,000 pupils from primary schools (1st-3rd class) from small towns and villages all over Poland learned the basics of programming and how to use digital skills in practice. Teachers and schools receive tablets, robots, mechatronic sets and educational mats that will be used to teach programming in the coming years. Code the future is a partnership programme run with the Masters of Coding Association.



In Orange Romania's Smart shops, in April/May 2018, the second set of Fast SuperCoders programming workshops took place. 280 children aged 10 to 13 from 12 towns in Romania entered the exciting and current world of programming. They learned about loops, algorithms, and variables, made new friends and left with useful tips to carry on coding at home. See them hard at work here: https://www.orange.ro/techabreak/fast-supercoders

And here's an inspiring video of excited young participants in the Supercoders roadshow which travelled around Romania: https://www.youtube.com/watch?v=Fsgpl1KNmQl

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.

Included in all our educational materials, but a specific example is here, about the rights and responsibilities of the internet:

https://bienvivreledigital.orange.fr/espacedesparents/bonscomportements

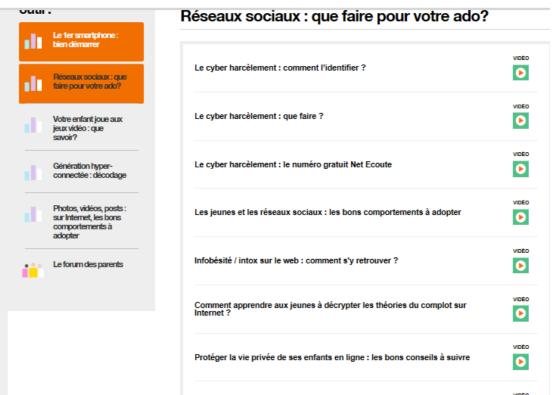


Orange France also provides advice about video games and the potential hidden costs of online games: https://bienvivreledigital.orange.fr/espacedesparents/jeuxvideo



To help adults address this issues with children or teenagers, we also provide 25 videos from experts that teach prevention and protection of minors and give advice (https://bienvivreledigital.orange.fr/espacedesparents/parolesexperts) eg.





Orange Slovakia continues to educate kids, parents and teachers about the risks that children face when using modern communication technologies but also about the

Les 10 conseils de la CNIL pour rester net sur le web

•

opportunities of the internet. Content can be found on the online platform www.detinanete.sk. This platform consists of articles, blogs, videos, tests and workbooks for teachers.

We provide free workshops for teachers, children and parents about the better use of technologies. Workshops are conducted by experts and psychologists. Over 35 000 pupils have attended so far.

e-Schools for the Future Orange Foundation grant program focuses on digital inclusion, safe and responsible use of digital technologies and media at schools. 220 school projects have been supported in 5 years.

Orange Slovakia also participates in the Digital Skills volunteer programme, which is an employee volunteer programme in cooperation with other tech companies. Digital education is provided for elementary school IT teachers on the Hour of Code platform and Internet safety.

https://sites.google.com/view/skolenie/z%C3%A1kladn%C3%A9-inform%C3%A1cie

In Orange Poland, our MegaMission after-school clubs offer a space where we can support digital education in an innovative way that supplements the core national curriculum. Since 2015 we have run a nationwide educational programme for primary schools called Mega-Mission. It is aimed at kids aged 6 to 10 and their teachers. Through this programme we expand educators' knowledge about the ten key areas of development of media, digital and IT competence. 200 schools and 5,000 children participated in the MegaMission classes in 2018. In 2018 we created the mobile application MegaMisja z Psotnikiem which helps to develop children's digital competences. The application was downloaded by 5,000 users

One of the most important issues for us is the safety of children and young people on the internet and preparing young people to use new media in a conscious way. Orange Poland's programme Safety Here and There addressed this issue by combining the educational activities of the Orange Foundation with all our services related to customer safety. This programme supports education on children's online safety in schools and kindergartens all around Poland. Every year the Orange Foundation, in cooperation with the Empowering Children Foundation, offers many educational tools and materials such as e-learning and educational websites, online brochures and guidelines for pupils, parents and teachers. In 2018 our educational materials reached 872,636 children. Adults (especially educators and specialists) can participate in conferences, seminars and workshops. In 2018, 1 104 682 adults (teachers, educators, parents) used different kinds of educational tools and materials



In Spain, Orange's campaign "Por un uso love de la tecnología" aims to promote a reflection within families about the use that is made today of the internet, social networks and smartphones. Orange launched the "Family On" website In 2017 to provide activities for families in order to enjoy technology and develop skills such as thinking critically, creativity....; the different activities are aimed at families with kids from 8 to 13 years old (Exploradores) and families with kids from 13 to 16 years old (luchadores) and are based on the use of very simple technologies .

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

Orange Poland provides an e-learning course for parents and educators including information about harmful content, available here: https://fundacja.orange.pl/kurs/

Orange Polska also provides the Empowering Children Foundation with a free infoline 0 800 100 100 – a free and anonymous telephone and online help for parents and teachers who need support and information in the field of preventing and helping children experiencing problems and difficulties resulting from problems and risky behaviours.

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.