

## Implementation Questionnaire

### 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
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
France, Poland, Spain, Romania , Slovakia, Belgium & Luxembourg
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 providers
<ul> <li>Online content provider</li> <li>Online service provider</li> </ul>
□ Other (please specify):
5. Person(s) completing the report
Name:Sandra James
Position:Senior Manager, Consumer Regulation
Email:Sandra.James@orange.com
Orange aims to be a trusted partner, helping our customers unlock the opportunities of a
responsible digital world. Through our offerings across the Group, we aim to support
families, providing them with advice on getting the best out of technology while staying
safe, and promoting digital inclusion through improving accessibility, providing support
and encouraging participation. We offer a range of responsible products and services and
work closely with industry partners, NGOs and national authorities across our footprint to
deliver education and advice, and appropriate safeguards to allow all of our customers to
make the best use of all that the digital world has to offer.
A key part of our Better Internet for Kids strategy (https://gallery.orange.com/rse/media/9e4d603c-b436-4885-ab3d-
(1112)(112)(112)(112)(112)(112)(112)(11
is our very successful #SuperCoders initiative, launched in 2014. These "introduction to
coding" workshops for children aged 9-14 have been made available across the Orange
Group in 20 countries, both in Europe and across the world. To date, over 30,000 children
have now taken part in these workshops, which are led by volunteer Orange employees,
external trainers and teachers, depending on the country.
(https://gallery.orange.com/CSR/media/a676995b-7e56-4309-b62a-
4f6759795f39/#v=Version1&l=en}). Each of our subsidiaries offering #Supercoders
workshops will adapt them according to local needs and situations.
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 (<u>https://www.thymio.org</u>). But the workshops are about more than just coding – they 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.

We also offer a range of videos, tutorials and practical advice for families on using both our own services and those available on the wider internet, and on hot topics such as screen time, fake news, hate speech and cyberbullying etc., as detailed in the rest of this report.

### **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?

□X Yes

🗆 No

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

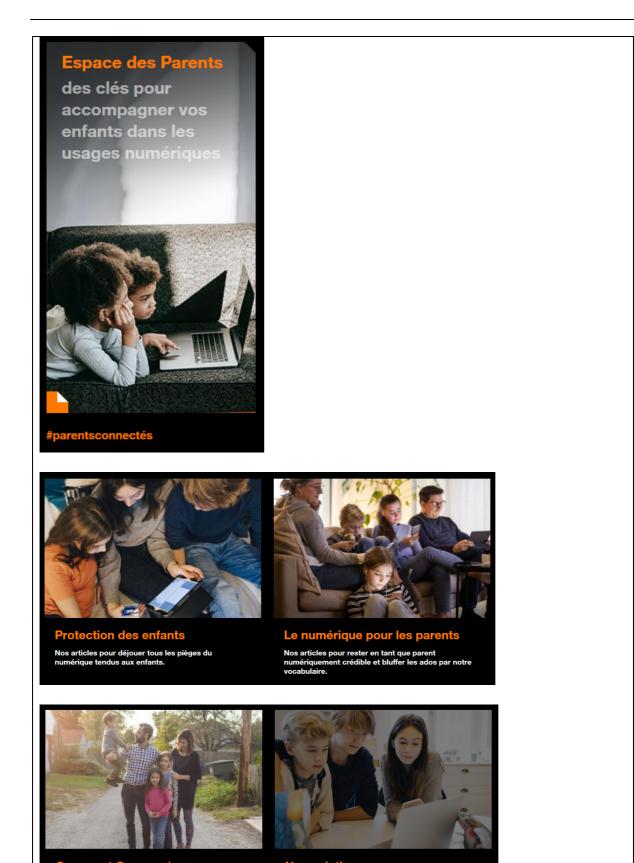
If yes, please provide details:

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 (<u>http://www.gsma.com/gsmaeurope/safer-mobileuse/european-framework</u>), 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 and/or parental control solutions. The solutions adopted to give effect to these 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 by our customer services teams.

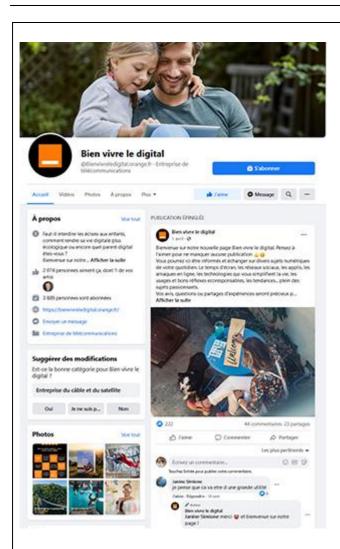
2. Do you offer a means *for restricting / blocking access* to potentially inappropriate content for users of your service or product?

X□ Yes □ No
□ Not applicable (please explain):
If yes, please provide details of mechanisms in place:
See under Principle 2 for details of our parental control offerings.
3. Do you provide any <i>information, educational resources or advice for users</i> 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
$X \Box$ How to report or flag content as inappropriate
$X \square$ Safe searching
$X \square$ 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.):
Examples of the resources provided by our European subsidiaries are outlined below.
Orange France has a free media website and a Facebook page called "Bien vivre le
digital", <u>https://bienvivreledigital.orange.fr</u> https://www.facebook.com/Bienvivreledigital.orange.fr
The purpose is to allow everyone to better understand the digital world and to protect from its dangers. It contains educational articles especially for parents via a dedicated section in the website, called "Espace des parents". It contains guidelines for content, parental control, advice on cyberbullying, guidelines for data privacy and a general charter about our commitments.

https://bienvivreledigital.orange.fr/hub/espace-des-parents/



Comment Orange s'engage Orange met à disposition des familles les outils nécessaires pour bien vivre le numérique et s'associe à des partenaires de référence sur les questions de la cécurité numérique ou de la partention des actionts Nos solutions Consultez nos ressources qui vous aideront à mieux vous prémunir des menaces numériques.

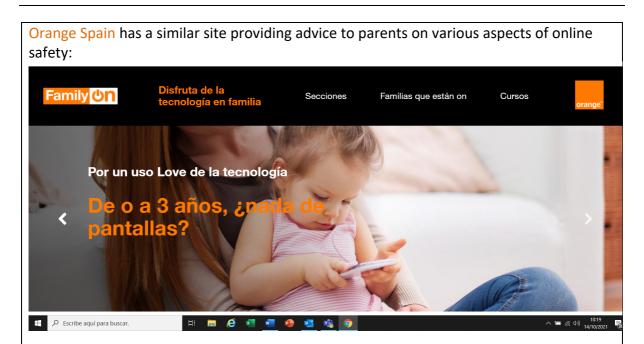


Orange France's child protection charter to inform about our company's policy in relation to children is available <u>here</u>.

We also have a special page to report inappropriate content here

In January 2020, Orange France, along with 31 other parties (institutional, AAI, industry players, associations), signed up to a protocol of commitments to prevent the exposure of minors to online pornographic content . A monitoring committee has been set up to develop:

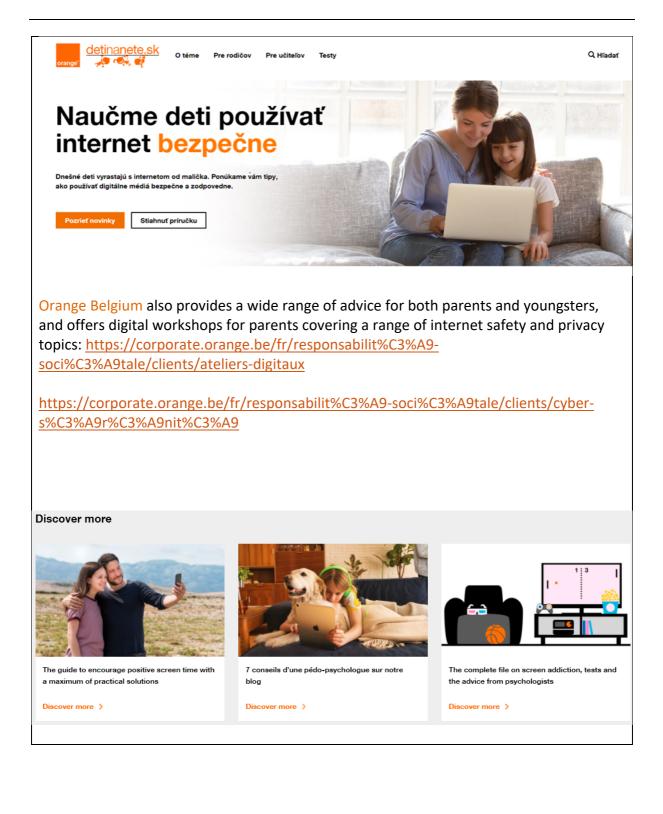
- a barometer with indicators to measure the installation and use of parental control software by users, and their evolution
- a common awareness-raising platform "jeprotegemonenfant.gouv.fr" which was put online on February 8, 2021, for Safer Internet Day (SID)
- a second protocol of commitments for a reasoned and reasonable use of screens by minors was signed on October 5, 2021 by 30 players including Orange

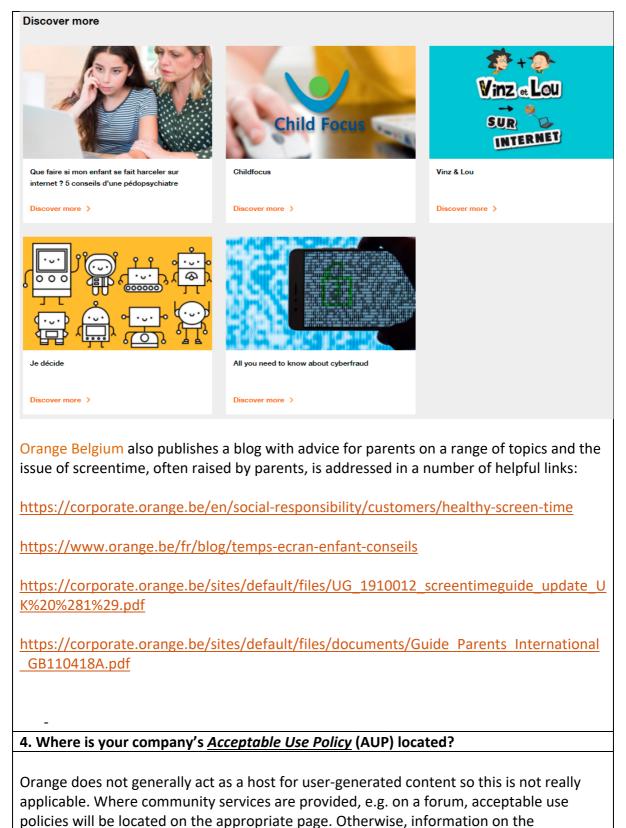


Similarly, Orange Poland offers the Together On-line internet platform, which includes advice for families on using the internet. We show how to prepare a child to use digital devices, we advise on when might be the appropriate time to give them their first phone and how to secure the device, and we signpost to inspirational websites. We've also given a lot of space to security and protection against various threats such as internet abuse, access to inappropriate content, hate or cyberbullying. As part of this initiative, we also organize webinars and live chats with opinion leaders and experts. https://www.orange.pl/razemwsieci

<u>https://cert.orange.pl/</u> is the website of Orange Poland's Computer Emergency Response Team, serving as an awareness and education centre as well as early warnings source (the latter together with official twitter account <u>https://twitter.com/cert\_opl</u>).

In Orange 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 that the internet offers through the online platform <u>www.detinanete.sk</u>. This platform consists of articles, blogs, videos, tests and workbooks for teachers. In the coming weeks the website <u>www.detinanete.sk</u> (Kids on the Net) will be replaced by a redesigned website <u>www.beznastrah.online</u>. The new website will be devoted to parents, with dedicated content prepared in cooperation with experts and psychologists. We plan to prepare a special communication tool for teenagers in 2022.





consequences of abusing our networks will be in the general Terms and Conditions. An example here from Orange Belgium regarding its Orange Tribe forum, prohibiting under-

13s from using the site:
Orange Tribe: https://community.orange.be/t5/custom/page/page-id/TermsAndConditions
"Les personnes de moins de 13 ans ne sont pas autorisées à créer de Compte
ou à utiliser le Service."
5. Does the AUP or separate give clear guidelines with which user generated content
must comply (including details about how users are expected to behave and what is not
acceptable)?
□ Yes
□ No
X Not applicable (please explain):
If yes, please identify relevant policy:
6. Do you provide notice about the <i>consequences for users</i> if they post content which
violates terms of service or community guidelines?
$\Box X Yes$
□ 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 <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:

We offer parental controls to protect children from inappropriate contents for mobile, PC, tablet and TV. Some are free and others incur a small charge. <u>https://assistance.orange.fr/mobile-tablette/tous-les-mobiles-et-tablettes/installer-et-utiliser/securite-mobile/le-controle-parental/proteger-et-accompagner-vos-enfants-dans-leurs-usages-numeriques- 69107-69929</u>

In Orange France, we also provide, for few euros a month, a complete digital coach for parents to help their children via an app called Xooloo. link



The Orange "Livebox" App allows parents to configure Wifi access times for their children for every device, and for each child. <u>link</u>

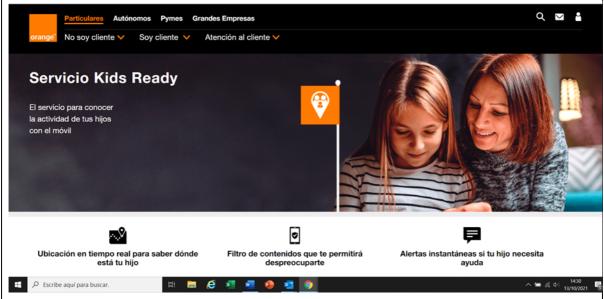


## Accompagner l'usage internet de vos enfants

 Limitez leurs horaires d'accès en paramétrant les restrictions internet et les coupures du wifi à la minute près pour chaque équipement de la maison
 Déclarez les membres de votre famille pour gérer plus facilement leurs équipements et leurs restrictions internet (Fonction disponible pour les Livebox 3, 4 et 5)
 Pause internet : créez des moments de déconnexion avec vos proches si vous êtes trop souvent distraits par vos écrans lors de vos moments de partage

Fonctionnalité disponible pour les Livebox 3, 4 & 5

Orange Spain also offers parental control options including a kids' tariff and the possibility to manage Wifi access times:



The service allows:

- Location in real time to know where your child is
- Content filter
- Instant alerts if children need help
- Control and blocking of the use of Apps at specific times
- Management of the hours that children can use the devices
- Report of the most searched websites and the most used apps

In Orange Poland, we offer our own Chroń Dzieci w Sieci (Protect Kids Online) parental control application, which allows parents to control how much time their child spends online, verifies the apps run by the child, and filters websites for inappropriate content. https://chrondzieciwsieci.pl/ Orange Poland also offers the Safe Starter (Bezpieczny Starter) product which allows children to use the internet on their phone more safely, and allows them to be in constant contact with the parent, even in the absence of funds in account.

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, and more.

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

## ESET Rodinný bezpečnostný balík

ESET Rodinný bezpečnostný balík Bezpečnostný balík ESET Mobile Security ESET Parental Control

Využite praktické aplikácie, ktoré ochránia vaše zariadenia pred vírusmi, škodlivým softvérom a hackermi. Rodičom pomôžu ochrániť deti pred nebezpečnými hrozbami pri používaní internetu vďaka aplikácii pre Android ESET Parental Control.

#### Produkty obsiahnuté v balíku Výhody balíka

- ESET Mobile Security pre Android
- Bezpečnostný balík
- ESET Parental Control pre Android
- ESET Smart TV Security

- licencia pokrýva až 4 zariadenia
- aktuálny stav svojich licencií si môžete vždy overiť
- komplexná ochrana vašich zariadení
- výhodná cena pri kúpe celého balíka
- aplikácie je možné kedykoľvek zmeniť, licencie sú flexibilné

#### Výhody od Orangeu

- bez viazanosti
- balík je možné kedykoľvek zrušiť

 pri aktualizácii aplikácie za dátový prenos neplatít

## Prima Kids

### Hovory, SMS, dáta a rodičovská kontrola

Prima Kids je služba na dobíjacej Prima karte. Funguje na základe prepojenia medzi zákazníkom s paušálom od Orangeu (rodičom) a predplatenej karty Prima (dietatom). 🕜

#### S kartou Prima Kids získa vaše dieťa:

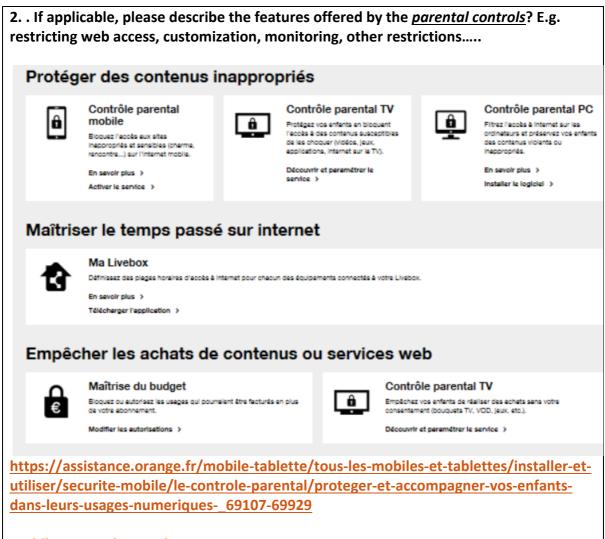
- f kredit už od 3 € mesačne
- 📞 volania na dve Orange telefónne čísla bezplatne aj po minutí kreditu
- SMS/MMS na dve telefónne čísla bezplatne aj po minutí kreditu
- ESET Parental Control na 2 mesiace zadarmo (2)
- dobíjaciu kartu úplne bez viazanosti
- možnosť aktivovať výhodné doplnkové balíky
- dátovanie v nailepšej 4G sieti

#### Jednotkové ceny

- Volania za 0,08 €/min. v SR a EÚ
- SMS/MMS za 0,04 € v SR a EÚ







#### Mobile parental control

This option is free.

The Mobile parental control option allows you to block access to inappropriate and sensitive websites (glamour, meeting sites ...), as well as video or voice calls to premium rate numbers.

#### Parental control for PC :

Orange Parental Control is free software, customizable and compatible with a Windows computer. It allows to block access to inappropriate sites and to define the time and hours of internet browsing.

#### Xooloo:

A complete service, available on all devices (mobile, tablet, computer) and whatever the network used (wifi and mobile network).

Everything is transparent, parents and children have access to the same information. So parents have a full vision of the past time of the uses of your children.

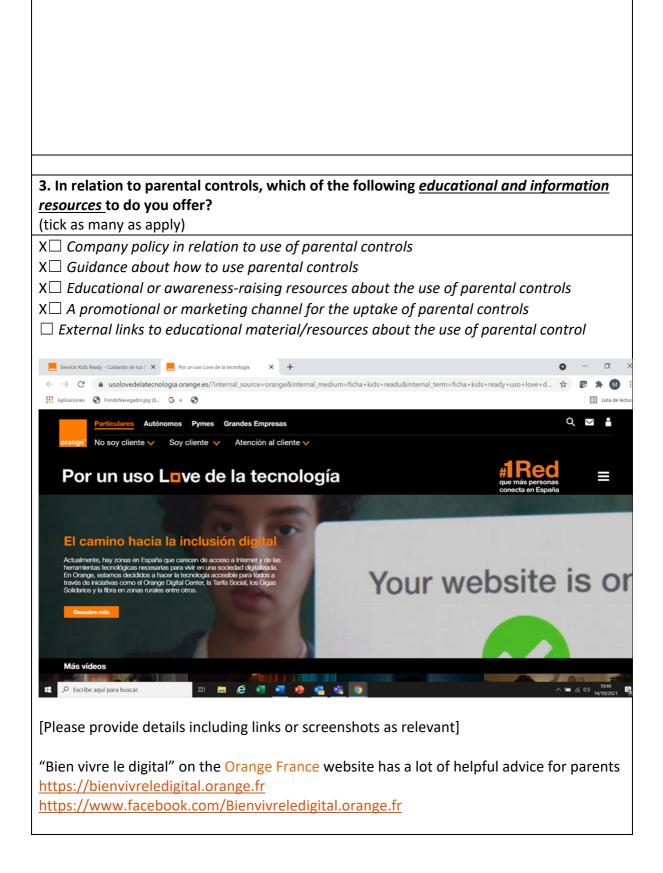
They see in real time the time spent in each application.

They can define the time slots during which the internet connection is authorized.

OS de l'appareil enfant Version minimum supportée	Android 4.0.3	iOS 8.2	Windows 7	macOS 10.9
Protection Web (Wi-Fi, 4G, 3G, 2G)	~	~	~	~
Liste des applications installées par les enfants	×	~	~	~
Blocage complet des applications	~	Par âge sur App Store	~	~
Blocage par plages horaires	~	Connexion Internet	¥	~
Notifications « A table I »	*	~		
Suivi du temps d'usage par catégorie ou application	~		~	~
Quota temps par catégorie ou application	~		~	×
Comparaison avec les moyennes de temps d'usage des enfants du même âge et du même sexe	~			
Blocage ou détection de la désinstallation	~		~	~

## My Livebox : App which allows parents to configure Wifi time access for their children for every device

10:42 🛛 🖬 🏓 🔹 🗟 👯 💷 75% 💼 ÷ **Restrictions internet** Paramétrez les restrictions internet de l'équipement PS4-83821T. Autoriser l'accès à internet Restreindre par plages horaires Définissez votre planification de > restriction internet sur la semaine L \_\_\_\_\_ м — Μ\_\_\_\_\_ : J v s -D -Besoin d'aide ? Limiter l'accès internet des enfants. Pourquoi, comment?





links to some articles

https://bienvivreledigital.orange.fr/parents/pour-votre-enfant-le-controle-parentalorange-fait-du-sur-mesure/

https://bienvivreledigital.orange.fr/parents/votre-enfant-adopte-son-premier-portable-presentez-lui-xooloo/

https://bienvivreledigital.orange.fr/parents/ma-livebox-lappli-qui-vous-permet-decontroler-lusage-internet-de-vos-enfants-meme-a-lautre-bout-du-globe/

We also inform our customers in many ways about the availability of this tools : via emailing, customer's on line account space, website dedicated to digital coaching, etc. We also inform our customers all along the sign-up process for a new line or smartphone and after it, about how to install parental controls.

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

### Accompagner vos enfants dans leurs usages numériques



Les enfants passent de plus en plus de temps sur les écrans (smartphone, tablette, ordinateur, TV). Ils peuvent tomber sur des contenus choquants or inappropriés, réaliser des achats sans votre consentement ou tout simplement manquer des moments de partage en famille.



Some more examples of advice on setting up parental controls here, from Orange Poland: <u>https://www.orange.pl/razemwsieci/kontrola-rodzicielska</u>

https://www.orange.pl/kid,4000377334,id,4000809279,title,Kontrola-Rodzicielska-,article.html

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

https://www.youtube.com/playlist?list=PLtBrxkdlmB1lC1LaezsS19nO-I7QYF5co https://www.youtube.com/watch?v=96Im7Ru\_mq0&list=PLtBrxkdlmB1lC1LaezsS19nO-I7QYF5co&index=7 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?

1 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 : <u>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</u>

2 Orange Telephone App can be uploaded for free, it has the ability to block direct sales calls and telephone scams.

### 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

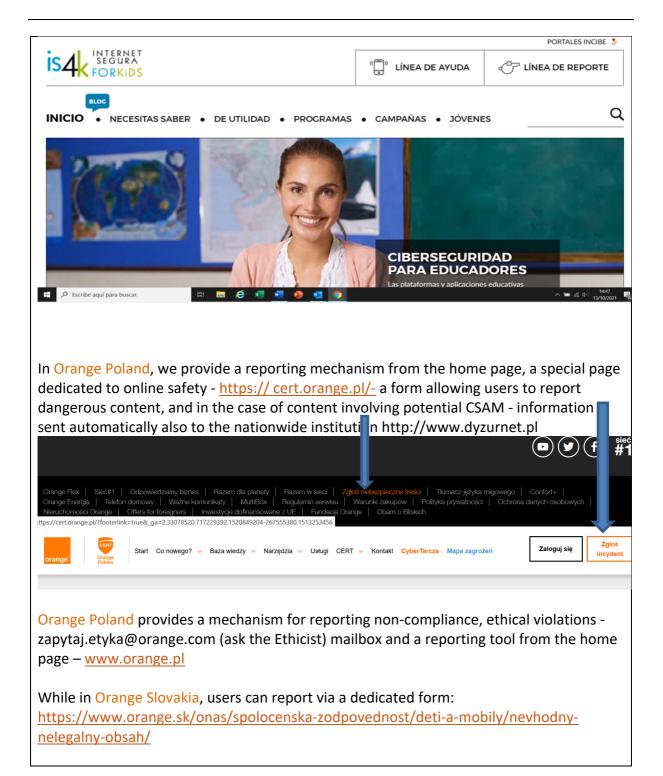
## **1**. Please provide details of <u>company policy relating to abuse</u> and misuse (involving images, videos, text and other content or behaviour) on your product or service.

All Orange businesses in Europe allow customers to report abuse or misuse either direct to Orange or to the appropriate national authorities. 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 hotlines through a direct link on our portals. The exact details of how we facilitate reporting will vary from country to country.

Information in this section also covers details of how we deal with online child sexual abuse material (Principle 4), so there may be some overlap.

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).

website accessible from every page of	an illegal content" in the footer of the Orange France the website. This link refers to an online form set up deration : <u>https://signalement.fftelecoms.org/</u>
Publicité <u>Signaler un contenu</u>	© Orange 2021
https://assistance.orange.fr/ordinateu	Orange France website to report illegal contents. urs-peripheriques/installer-et-utiliser/la- ls-et-reglementation/contenus-illicites- FFT online form.
	on/button at the foot of the Orange website which the Spanish government's IS4K Center for Internet
← → C	↓ · · · · · · · · · · · · · · · · · · ·
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Condiciones legales	Blog de Orange
Catálogo de accesibilidad	Comunidad Orange
Lectura accesible - Confort+ No + publi	Nobbot Pop TV
Resolución conflictos online	Marca eSports Orange
Compensación copia privada	Hablemos de empresas
Política de envíos y devoluciones	Revista Orange
	^
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stopline.sk	
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Polia označené * sú povinné.	REPORTS HAMER OF RECEIVED
Vložte adresu webu (URL odkaz), ktorý chcete nahlásiť: *	
Vložte prosím konkrétnu odresu webu (URL v odresnom riadku vášho internetového prehliadača), ktorý chcete nahlásiť. Napr.: <u>http://www.stranka-s-nevhodnym-obsahom.sk/?id=12345</u> alebo <u>http://www.stranka-s-</u> nevhodnym-obsahom.sk/deti/fotky/	
Miesto pre komentár:	
	STOPLINE.SK NA FACEBOOKU
Miesto pre komentár k nevhodnému obsahu, ktorý nahlasujete.	
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Where is the reporting button/ mechanism located         ck any that apply)         X On each page of the website/service         Close to the point where such content might be rep         In a separate location such as a safety page         In a browser extension         In a separate app for a connected device         Other (please specify):         Who may use such a reporting mechanism?         ck any that apply)         Only registered user/profile in which content is local         All registered users of the product/service?         XEveryone including non-users, e.g. parents/teached	l? orted 
Where is the reporting button/ mechanism located ock any that apply) X On each page of the website/service Close to the point where such content might be rep In a separate location such as a safety page In a browser extension In a separate app for a connected device Other (please specify):	I? orted 
Where is the reporting button/ mechanism located         ck any that apply)         X On each page of the website/service         Close to the point where such content might be rep         In a separate location such as a safety page         In a browser extension         In a separate app for a connected device         Other (please specify):         Who may use such a reporting mechanism?         ck any that apply)         Only registered user/profile in which content is local         All registered users of the product/service?         XEveryone including non-users, e.g. parents/teached	I? orted 

5. Which of the following <u>kinds of content</u> can users report?
In France, for example:
- Child sexual abuse material
- Violence
- Racial hatred
- Odious content accessible to children
- Terrorism
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
$\Box$ How reports are typically handled
Feedback to users
$\Box$ X Other website/external agency for reporting abuse/ misuse content?
Other (please specify):
7. Please provide details of any <u>other means</u> , 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
<u>not detailed above</u> that relate to abuse /misuse,

### **Principle 4 – Child Sexual abuse content or illegal contact**

### Requirements

Signatories should:

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

# 1. Which of the following mechanisms are provided on your product or service to <u>facilitate 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 Link or button for external national or regional INHOPE hotline
- □ Emergency services
- $X \square$  Law enforcement agency
- □ X Other external agency (please specify): ...For France:

https://signalement.fftelecoms.org/

## 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 have partnerships in place with the national 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 is a supporter of the Internet Watch Foundation and applies the IWF URL blocklist in Orange Slovakia. In Orange France, we apply the mandatory blocklist issued by French law enforcement.

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, depending on national legislation.

See previous section on Abuse and Misuse for examples of our reporting tools for potentially illegal content.

**3. Do you provide links to any of the following to enable users gain** <u>additional</u> <u>information</u> in relation to child sexual abuse content or illegal contact? (tick any that apply)

 $\Box$ X Links to relevant child welfare organizations/specialist providers of advice

□ X Other confidential helplines/support services

 $\Box$ X Law enforcement agencies

 $\Box$ X INHOPE

□ Other (please specify): .....

https://www.e-enfance.org/le-3018/

In France, we have a partnership with e-enfance, an association that fights against digital violence and provides children and those around them, with a helpline on 3018 They are here to assist and intervene with social networks to remove illegal content within hours. They can answer any questions regarding digital life.

4. Please outline briefly any additional procedure in place within your company <u>not</u> <u>detailed above</u> to ensure that you comply with local and/ or international laws with regard to child sexual abuse and other illegal content?

### **Principle 5 – Privacy and Control**

### Requirements

Signatories should:

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

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?

This Policy informs about how Orange France, its subcontractors and any partners process your personal data. https://c.orange.fr/pages-juridiques/donnees-personnelles.html

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

□ Yes	
X No	
□ Not applicable (please explain):	
If yes, please briefly outline available age-app including relevant links/ screenshots on your v	
Please identify default settings for each <u>age co</u>	n <u>tegory</u> of under 18s, as relevant:
Please identify any steps you have taken to en understand, prominently placed, user friendly	
3. Where are users able to view and change or tick any that apply)	update their privacy status?
$\Box$ On each page of the website/service	
$\square$ At each point where content may be posted	
$\square$ In separate location such as a settings/safety	y/privacy page
$\Box$ In a browser extension	
□ In a separate app for a connected device □ Other (please specify):	
[Please provide details including links or screen	shots as relevant]
4. Which of the following <i>information, resource</i> encourage users to make informed decisions a they share?	
"Bien vivre le digital" has a lot of advice relating https://bienvivreledigital.orange.fr	g to privacy
https://www.facebook.com/Bienvivreledigital.c	orange.fr
Some articles	
S réflexes à adopter avant de se la se	ancer
Bien informé, bien protégé	

### Nos conseils pour naviguer l'esprit serein

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: <a href="http://familyplace.orange.fr/">http://familyplace.orange.fr/</a>

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	🔤 Famil	y Plac	e				Premium	Aide	À propos
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	Google Play	📫 Гана	arger dans p Store		1				

 $\Box$  XTips/advice to users at the point of setting privacy options

 $\Box$  XFAQs

 $\Box$  XHelp or educational resources in a separate location of service

□ XLinks to any external NGO agencies offering education or awareness-raising related to privacy

 $\Box$ X 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), <u>not</u> <u>detailed above</u>, to ensure that personal information is protected, using reasonable safeguards appropriate to the sensitivity of the information.

### Principle 6 – Education and Awareness

### Requirements

Signatories should:

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

## **1.** Does your company provide its own <u>educational resources</u> aimed at any of the following groups?

- □X Younger children, i.e. under 13s
- □ XTeenagers <18s
- □ X Parents and carers
- □ XTeachers and other adults
- □ Others (please specify): .....

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

### (tick any that apply)

- □ XOnline safe behaviour
- □ X Privacy issues
- □ XCyberbullying
- □ XDownload and copyright issues
- □ XSafe use of mobile phones
- □ XContact with strangers
- □ Other topics (please specify) .....

3. With reference to any educational material you provide, <u>which of the following</u>
methods do you use?
(tick any as apply)         X Documentation provided with product/contract on purchase/first registration         X A required presentation by salesperson completing sale         X Displays/leaflets positioned prominently in stores         X Notification by email / on-screen statement / other means when product or contract         is purchased or first registered         X Prominent notifications, resources or pop ups on website         X Helpdesk (telephone or online)         Other (please specify):
4. Please provide details of any links to other <i>external organisations</i> , or relevant, independent and authoritative advice for parents/carers, teachers, and for children?
Some examples from across our EU footprint are given below:
<ul> <li>Orange Spain has partnerships with a number of organisations: Fundación Anar; Internet Segura for Kids and Incibe</li> </ul>
oranget No soy cliente 🗸 Soy cliente 🗸 Atención al cliente 🗸
móviles
Conce nuestro decálogo Carta de derechos digitales #Porunusolovedelatecnología € ♥ ♥
Entidades colaboradoras: Fundación ANAR Ayuda a "idea y idelescentes an l'argen Ayuda a "idea y idelescentes an l'argen Argenta a "idea y idelescentes an l'argent Argenta a "idea y idea y i
Para más información, te recomendamos visitar las siguientes páginas de interés:         Educalnternet       FamilyON       Quizz Súper Padres 3.0         Consejos para un uso seguro y responsable de la tecnología.       Distruta de la tecnología en tamila.       Espacio práctico donda apender sobre el mundo constando.
En colaboración con: Educalike Observatorio para la promoción del uso saludable de la tecnología
Politica de cookies Politica de privacidad
Orange Poland has long-standing links with the Empowering Children Foundation <u>https://fdds.pl/</u> - a non-governmental organization which provides comprehensive services dealing with the issues of the violence and sexual abuse of children, as well as with a number of other bodies:

https://edukacja.fdds.pl/course/index.php?categoryid=7

www.necio.pl www.sieciaki.pl www.numanuma www.digitalyuouth.pl www.116111.pl pl.sheeplive.eu and https://en.nask.pl/

NASK is a National Research Institute under the supervision of the Chancellery of the Prime Minister of Poland. **Cybersecurity and user protection** – our key activities involve ensuring security online and responding to network security violations occurring in Poland

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?

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.

In all of our European 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

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://www.facebook.com/watch/?v=1161468707661110

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



https://www.saferinternet.fr/

More recently, Orange France has developed links with a number of sporting federations :

Football :

Orange France has developed, in partnership with the French Football Federation and the 15,000 clubs of the Federation, a fun program to make young club footballers aware of the importance of their digital behavior and their benchmarks to avoid the risks of the Internet and become responsible digital citizens.

https://www.fff.fr/22-pef-education-au-numerique/516-presentation-du-projet-orangefff.html



### Rugby :

Orange France is committed to supporting the digital uses of young people and also offers workshops for junior teams including, alongside practical rugby tips, 20-minute training modules to provide the keys to a happy digital world and a positive use of social networks. https://api.www.ffr.fr/wp-content/uploads/2021/08/guide-pedagogique-orc21-22 bd-2.pdf



Orange Slovakia provides free workshops for teachers, children and parents about safer and responsible use of digital technologies. These workshops are conducted by experts and psychologists. Over 37.000 pupils have attended so far. Orange Slovakia's dedicated website: <u>www.detinanete.sk</u> (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. The website <u>www.detinanete.sk</u> has recently been redesigned and will be replaced in the coming weeks by the new website <u>www.beznastrah.online</u>. The new website will be devoted to parents, with special content prepared in cooperation with experts and psychologists. We plan to prepare a dedicated communication tool for teenagers in 2022.

The e-Schools for the Future grant program run by the Orange Foundation in Slovakia focuses on digital inclusion, safe and responsible use of digital technologies and media and critical thinking. 337 school projects have been supported in the last 7 years of the program, currently in its 8<sup>th</sup> year. Moreover, in 2021, Orange Foundation opened the new pilot grant program "Digital world for everyone" focused on digital education for vulnerable, excluded groups. We have supported 37 projects as part of this initiative. The Orange Foundation also has several strategic partners in the digital education field. Orange Slovakia also participates in the Digital Skills volunteer program, which is an employee volunteer program 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/%C5%A1kolenia-digital-skills

In Spain, some of the campaigns launched within the framework of the Orange project for Por un uso Love de la Tecnología https://usolovedelatecnologia.orange.es/ have been carried out in collaboration with the National Police, Spanish Agency for Data Protection, National Institute of Cybersecurity.....



The content of the campaign in the media reached 3,316,064 recipients. - <u>https://www.domowezasadyekranowe.fdds.pl/</u>

Orange Poland's longstanding cooperation with the Empowering Children Foundation offers many educational tools and materials such as e-learning and educational websites <a href="http://www.necio.pl/">http://sieciaki.pl/</a>, <a href="http://www.necio.pl/">http://sieciaki.pl/</a>, <a href="http://www.necio.pl/">http://sieciaki.pl/</a>, <a href="http://digitalyouth.pl/">http://digitalyouth.pl/</a>, <a href="http://www.necio.pl/">including online leaflets</a> 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 using of new media.

In 2020, our educational materials reached 984,029 children in Poland, and 133,000 people (teachers, educators, parents) used various educational tools and materials. As part of our joint campaigns, educational materials reached 174,917 parents, and the content of the campaign in the media reached 3,316,064 recipients. - https://www.domowezasadyekranowe.fdds.pl/

**MegaMission** is a nationwide educational programme for primary schools in Poland. It can be implemented as part of a regular classes or during free time spent in common rooms. It's aimed at children aged 6-10. Our goal is to raise the knowledge and digital competence of teachers, tutors and their students. We want children to be safe and aware multimedia users, and teachers to have access to proven materials that allow them to conduct interesting activities for children. MegaMission provides a solid base for children to be wise and safe users of new technologies. 2020/2021 - 630 schools, 12 940 children, 1255 teachers.

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

With Internet Sans Crainte, Orange France has added a new educational module to its long-running #Supercodeurs programme. This focuses on media literacy through "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 and this media literacy programme, #SuperCoders2021, aims to help them decipher what is behind their everyday digital life: apps, videos or games and how computer programs (algorithms) may be designed specifically to make them want to play. The #SuperCodeurs trainers gradually lead children to explore behind the scenes, by addressing the notions that can fuel a game such as frustration, dependence, and the issue of age-appropriate play. 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.

Orange Poland has also launched a separate module within the Supercoders programme, for children with special educational needs. The teachers participating in the programme are offered professional training and technical support from expert educators. In 2020, due to the closure of schools, a series of remote classes for children, 'Mornings with #SuperCoders', was also introduced. In 2020/2021, this reached 2,866 children and 280 teachers, in 140 schools.

Orange Poland has also launched a webinar for teachers on the topic of disinformation in social media and social attitudes https://www.youtube.com/watch?v=5RDKOsbga5U&feature=youtu.be With further education about fake news here: <u>https://fundacja.orange.pl/blog/wpis/fake-news-czym-jest-i-jak-go-rozpoznac</u>

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

In Orange Spain, all the campaigns launched within the framework of the project Por un uso Love de la Tecnología https://usolovedelatecnologia.orange.es/ are aimed at promoting dialogue between parents and children about the risks of the Internet and social media

Orange Poland's "Together On-line" digital platform – topics: Responsible parent - relations with a child and the internet, Network security rules, How to properly secure the device?, Parental control, Agreement with the child - https://www.orange.pl/razemwsieci



2. Scenariusze zajęć dla przedszkolaków i młodszych uczniów szkół podstawowych łecio

lecio.pl to projekt edukacyjny skierowany do dzieci / wieku 4–6 lat, którego celem jest nauka ezpieczeństwa w Internecie. Prowadzony jest



Scenariusz zajęć dla rodziców uczniów klas I- III. Bezpieczeństwo dzieci w internecie.

Zajęcia umożliwiają zapoznanie rodziców z zagrożeniami, z którymi mogą zetknąć się ich dzieci w internecie, pokazują rodzicom konsekwencje nadużywania internetu przez dzieci. Rodzice zarakluje pretkraze unekraźnie i dzierzego zagod



#### Scenariusz zajęć dla rodziców uczniów klas IV- VI. Bezpieczeństwo dzieci w internecie.

Zajęcia umożliwiają zapoznanie rodziców z zagrożeniami, z którymi mogą zetknąć się ich dzieci w internecie, pokazują rodzicom konsekwencje nadużywania internetu przez dzieci, zapoznają

### fundacja.orange.pl / Strefa wiedzy / Dla rodziców

### Dla rodziców



Poradnik: Dzieci i ekrany

Zastanawiacie się, jak postępować, gdy Wasze dzieci zaczvnaia korzvstać z technologii? Na co



Kurs internetowy Bezpiecznie Tu i Tam dla rodziców i opiekunów



Zagraj w karcianą grę edukacyjną!

Gra przeznaczona jest dla 2-4 osób, dla dzieci w wieku od 7 lat

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.

sh kureu noz

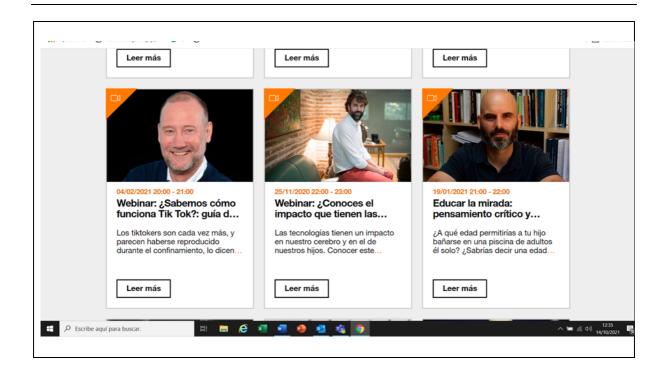
Orange France has developed an Escape game called Les magiciens du numérique for children under 12. In a fun form, this game teaches them the proper use of screens and to protect themselves against digital media. It can be deployed on demand by sending a backpack to a sports center.



Orange Poland provides a free hotline 0 800 100 100 to the Empowering Children Foundation - free and anonymous phone 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 behaviors.

Through Orange Spain's online platform Orange Digital Center we offer courses and webinars to parents, teachers and society in general on the responsible use of technology <a href="https://orangedigitalcenter.es/">https://orangedigitalcenter.es/</a>





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.