



Implementation Questionnaire

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:

KPN

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

KPN is based and operate in The Netherlands.

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

Fixed and Mobile services

4. Nature of activity

- Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles*
- Network operators and connectivity providers*
- Online content provider*
- Online service provider*
- Other (please specify):*

5. Person(s) completing the report

Name: **Brechtje Spoorenberg & Gert Wabeke**

Position: **Manager Corporate Social Responsibility & KPN Corporate Security**

Email: **brechtje.spoorenberg@kpn.com & gert.wabeke@kpn.com**

Principle 1 – Content

Commitments

Signatories should:

- Indicate clearly where a service they offer may include content considered not to be appropriate for children and display prominently options which are available to control access to the content. This could include, where appropriate for the service, tools to manage access to certain content, advice to users or a recognised system of content labelling.
- Display prominently and in an easily accessible location the Acceptable Use Policy, which should be written in easily-understandable language.
- State clearly any relevant terms of service or community guidelines (i.e. how users are expected to behave and what is not acceptable) with which user generated content must comply.
- Ensure that reporting options are in the relevant areas of the service.
- Provide notice about the consequences for users if they post content which violates terms of service or community guidelines.
- Continue work to provide innovative solutions able to support child safety protection tools and solutions.

1. Do you provide a mechanism for consumers to provide feedback, report an issue or file a complaint about the appropriateness of a piece of content?

Yes

No

Not applicable (please explain):

Complaints are handled via Kijkwijzer:

link to relevant site - <http://www.kijkwijzer.nl/complaints>

If yes, please provide details:

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

Yes
 No
 Not applicable (please explain):

If yes, please provide details of mechanisms in place:

- Internet based interactive TV: Interactive choice by the customer to block (only available with use of a pin-code) access to selected channels.
- Internet based interactive TV: Interactive choice by the customer to hide certain selected channels (not general available when switching channels)

3. Do you provide any information, educational resources or advice for users in any of the following areas?
 (tick as many as apply)

Content classification or labeling guidelines
 How to block or restrict access to content
 How to report or flag content as inappropriate
 Safe searching
 Information about your company's content policy in relation to children
 Not applicable (please explain):

If yes, please provide details including the format of any material provided (video, text, tips, games, FAQs, etc.):

With respect to the access of video channels, documentation is provided with the service and general available via our website (customer service).

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

The terms and conditions for interactive TV services are downloadable
<https://www.kpn.com/allevoorwaarden.htm>

The Acceptable User Policy are embedded in the Terms and conditions

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

- Yes
- No
- Not applicable (please explain):

If yes, please identify relevant policy:

Article 10.8 details how KPN will respond to complaints indicating allegedly unlawful information on the Internet from customers of KPN.

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

- Yes
- No
- Not applicable (please explain):

If yes, please identify relevant policy:

Notice and Take down code of conduct: https://noticeandtakedowncode.nl/wp-content/uploads/2018/12/NTD_Gedragcode_English.pdf

Principle 2 – Parental Controls

Commitments

Signatories should assist parents to limit their children's exposure to potentially inappropriate content and contact.

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

1. Please outline the availability of any *parental control tools and settings* across your product or service that allows parents to set appropriate levels of control? Include relevant links/ screenshots where available:

The general approach taken at group level, with emphases on the Netherlands is handled at: <http://corporate.kpn.com/voor-nederland/privacy-security.htm>

A white paper (downloadable from this site) details the police, incl. our attention to children as a special group.

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

In relation to Internet access (Fixed/Mobile), KPN offers the 'KPN-veilig' product <https://www.kpn.com/service/internet/veilig-internetten/kpn-veilig.htm>. The 'KPN-veilig' product offers support for laptop, computer, tablet and smartphone.

The 'KPN-veilig' product is (depending on contractual conditions) provided as included or as an additional feature

Information on the parental control functionality of 'KPN Veilig' is available on the KPN site: <https://www.kpn.com/service/internet/veilig-internetten/kpn-veilig.htm>

KPN Veilig is based on f-secure, more information on f-secure parental control function can be found at https://www.f-secure.com/en/web/home_global/digital-parenting

For children up to the age of 6, the KPN TV APP, "Veilig televisie kijken met de KPN Kids-omgeving", is available :

<https://www.kpn.com/beleef/gezin/veilig-televisie-kijken-met-de-kpn-kids-omgeving.htm>

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

(tick as many as apply)

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

[Please provide details including links or screenshots as relevant]

Information in relation to internet safety for children is provided for via the site: <https://www.kpn.com/prive/klantenservice/veilig-internetten/kinderen-en-internet.htm>

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

Principle 3 – Dealing with abuse/misuse

Requirements

Signatories should:

- Provide a clear and simple process whereby users can report content or behaviour which breaches the service's terms and conditions.
- Implement appropriate procedures for reviewing user reports about images, videos, text and other content or behaviour.
- Provide clear information to users on all available report and review procedures.
- Place and review regularly links to these reporting options in appropriate areas of the service (e.g. where users view user-generated content or interact with other users) and provide guidance on what to report.
- Place links to relevant child welfare organisations or specialist providers of advice (e.g. about anorexia or bullying) and other confidential helplines/support services in appropriate areas.
- Ensure that moderators who review user reports are properly trained to determine or escalate content or behaviour presented to them

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

Article 10.8 details how KPN will respond to complaints indicating allegedly unlawful information on the Internet from customers of KPN.

Complaints can be reported via the procedure / reporting mechanism detailed at: http://kpn-customer.custhelp.com/app/answers/detail/a_id/18303/~hoe-meld-ik-copyright-schending-of-verboden-content-aan%3F

It details the way KPN will assess information and deal with complaints. The Notice and Take down self-regulatory code of conduct is designed with help/support of KPN: <https://ecp.nl/activiteiten/werkgroep-notice-and-takedown/>

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).

Complaints can be reported via the procedure / reporting mechanism detailed at: http://kpn-customer.custhelp.com/app/answers/detail/a_id/18303/~hoe-meld-ik-copyright-schending-of-verboden-content-aan%3F

It details the way KPN will assess information and deal with complaints. The Notice and Take down self-regulatory code of conduct is designed with help/support of KPN: <https://ecp.nl/activiteiten/werkgroep-notice-and-takedown/>

Together and under responsibility of the ' <https://www.veiliginternetten.nl/> ' (KPN being one of the sponsors) a general reporting mechanism for the Netherlands has been designed build and made operational : <https://www.meldknop.nl/> .

Available background information: <https://www.meldknop.nl/over-meldknop-nl/>
 Details the way the reporting button can be added to your browser. The way you can find information and if needed get direct access to (professional) assistance (anonym). If desired and needed it can be leading to a report to the police.

Via this browser based mechanism it is available for all who are seeking help.

[Please provide details including links or screenshots as relevant]

3. Where is the reporting button/ mechanism located?
 (tick any that apply)

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

4. *Who* may use such a reporting mechanism?

(tick any that apply)

- Only registered user/profile in which content is located
- All registered users of the product/service?
- Everyone including non-users, e.g. parents/teachers who are not registered for the service
- Other (please explain):

5. Which of the following *kinds of content* can users report?

On the Internet you can encounter all kinds of problems. Examples of bullying via the internet or distribution of pictures or movies of you without your consent. Encounter discriminatory messages.

These are all examples of problems Meldknop.nl can help you with. Because sometimes you need such assistance to solve these problems. Meldknop.nl provides you with information and advice.

On this (meldknop) site you will find information and resources about internet problems. At any time of the day you can come to this website. They will give you information to see if you can solve your problem. Yourself or provide you with further assistance.

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

(tick any that apply)

- ✓ *Advice about what to report*
- ✓ *Advice about how to make a report*
- Pre-defined categories for making a report*
- How reports are typically handled*
- Feedback to users*
- ✓ *Other website/external agency for reporting abuse/ misuse content?*
- ✓ *Other (please specify): - Help in distilling the issue, listening to the problem and advice how to proceed*

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

Mentioned under 2

[Please provide details including links or screenshots as relevant]

8. Please outline briefly any other procedures or programmes offered by your service not detailed above that relate to abuse /misuse,

KPN supports and sponsors the EOKM foundation (<https://www.eokm.nl/>) responsible for the National Hotline 'Meldpunt kinderporno: <https://www.meldpunt-kinderporno.nl/>

Principle 4 – Child Sexual abuse content or illegal contact

Requirements

Signatories should:

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

1. Which of the following mechanisms are provided on your product or service to ***facilitate the notification or reporting*** of suspected child abuse content?

(tick any that apply)

- Company-own hotline reporting button or telephone number*
- Link or button for external national or regional INHOPE hotline*
- Emergency services*
- Law enforcement agency*
- Other external agency (please specify):*

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

Child Sexual Abuse content is illegal and a punishable event if looked at. For (amongst others) that reason all indications are being forwarded to our national hotline (Meldpunt Kinderporno).

3. Do you provide links to any of the following to enable users gain ***additional information*** in relation to child sexual abuse content or illegal contact?

(tick any that apply)

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

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

Beside the pro-active approach of notice and take down (within 24 h) in case of Child sexual abuse material, the judicial system can issue an official warrant to remove or seize certain material .

Principle 5 – Privacy and Control

Requirements

Signatories should:

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

1. Please provide details of your company’s published privacy policy in relation access, collection, sharing and further use of data from minors under the age of 18 when utilizing your product or service?

Products are not sold to people under the age of 18.

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

Yes

No

Not applicable (please explain):

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

As outlined under CONTENT, our interactive TV solution provides for content-appropriate privacy settings.

Please identify default settings for each age category of under 18s, as relevant:

For children up to the age of 6, the KPN TV APP, “Veilig televisie kijken met de KPN Kids-omgeving”, is available :

<https://www.kpn.com/beleef/gezin/veilig-televisie-kijken-met-de-kpn-kids-omgeving.htm>

Please identify any steps you have taken to ensure that these settings are easy to

understand, prominently placed, user friendly and accessible.

3. Where are users able to view and change or update their privacy status? (tick any that apply)

- On each page of the website/service
- At each point where content may be posted
- In separate location such as a settings/safety/privacy page
- In a browser extension
- In a separate app for a connected device
- Other (please specify):

[Please provide details including links or screenshots as relevant]

Via enclosed link customers are able to view and change or update their privacy status online : <https://www.kpn.com/algemeen/uw-gegevens.htm>

4. Which of the following information, resources or help features (if any) are provided to encourage users to make informed decisions about their privacy or the information they share?

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

[Please provide details including links or screenshots as relevant]

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

Principle 6 – Education and Awareness

Requirements

Signatories should:

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

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

- Younger children, i.e. under 13s
- Teenagers <18s
- Parents and carers
- Teachers and other adults
- Others (please specify):

We support and work together with dedicated professionals working in the field. By doing so the overall message becomes more important than just the company brand.

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

(tick any that apply)

- ✓ Online safe behaviour
- ✓ Privacy issues
- ✓ Cyberbullying
- ✓ Download and copyright issues
- ✓ Safe use of mobile phones
- Contact with strangers
- Other topics (please specify)

3. With reference to any educational material you provide, which of the following methods do you use?

(tick any as apply)

- Documentation provided with product/contract on purchase/first registration
- A required presentation by salesperson completing sale
- Displays/leaflets positioned prominently in stores
- Notification by email / on-screen statement / other means when product or contract is purchased or first registered
- Prominent notifications, resources or pop ups on website
- Helpdesk (telephone or online)
- ✓ Other (please specify):

Online information via our website.

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

KPN works together and supports the 'Safer Internet Centre' in the Netherlands: www.saferinternetcentre.nl
 Together a broad array of products (leaflets, educational programs and books) has been established over time. The Safer Internet Centre is part of a larger program on safety and skills, in which KPN is also closely involved in as main partner (see 7)

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?

Beside the partnerships in the Netherlands with the Safer Internet Centre, we are a (founding) member of the ICT Coalition. The cooperation, interaction with NGO's, Civil Society, etc. is explicit part of the ICT Coalition Forum meetings.

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

The contacts are divers, examples are linked to concrete initiatives. An example is KIDS CYBER DAY organized by KPN in cooperation with national Police and NGO's in the Netherlands.

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

KPN partnered in the Digibewust program <https://www.digivaardigdigiveilig.nl/>. In this partnership a broad array of products (leaflets, educational programs and books) has been established over time. This program changed and led to a new website www.veiliginternetten.nl, a website to provide information, tools and tips on safer internet for all kind of target groups, initiated by 2 ministries and in public private partnership with the main relevant private partners. KPN is one of the main private partners.

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.

The CEO of KPN was vice chair of the Cyber Security Council, in the Netherlands. The Cyber Security Council published an advice for the ministers of Justice and Education, underwriting the importance to invest in cybersecurity knowledge as part of the educational curriculum .

https://www.cybersecurityraad.nl/binaries/CSR_Advies_Cybersecurity_in_onderwijs_en_bedrijfsleven%20vDEF_tcm56-28303.pdf

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