

## **Principles for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU**

Following the launch of the “Principles”, Unibet Group Plc (Unibet) has been working to implement the provisions according to its services and/or products.

Unibet is one of the largest providers of online gambling and digital content in Europe and has more than 7 million customers worldwide. The products offered by Unibet consist of sports betting, casino, poker and bingo and other digital content such as live streaming of football matches. Over the last years, Unibet has invested more than 200 million euros in developing a reliable and secure consumer platform. Unibet is audited on a regular basis by, amongst others, PWC, NMI and eCOGRA on complying with the CEN WP58 standard on consumer protection and responsible gambling.

The Principles aimed to ensure that Signatories:

- Encourage the development of innovative approaches which enhance safe use of the technology by children and young people
- Encourage the empowerment of parents and carers to protect children and young people engaged in online activity through education and advice
- Promote users’ awareness of information and tools to help keep themselves safer online and of their obligations to behave responsibly towards other users
- Encourage the provision of easily accessible, clear and transparent information to help users understand in a timely way the conditions of use for the service they are using, including what is permitted in terms of acceptable behaviour and user-generated content
- Seek to promote users’ awareness of how – and to whom – to report abuse and concerns, including – where available – specialised external agencies and law enforcement bodies.

### **1. Content**

The ICT Principles require under Section 1 – Content that 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. 18+ signs implemented on every page	Completed	<a href="http://www.unibet.com">www.unibet.com</a>
2. when clicking on 18+ redirected to information that Unibet only accepts customers over 18	Completed	<a href="http://www.unibet.com">www.unibet.com</a>
3. advise about parental blocks so that gambling websites are password protected	Completed	<a href="http://www.unibet.com">www.unibet.com</a>
4. extensive training given to employees	Completed	See annual report on CSR and Responsible Gambling <a href="http://www.unibetgroupplc.com">www.unibetgroupplc.com</a>

## 2. Parental controls

Signatories of the ICT Principles have committed, as relevant for their products or services, to assist parents to limit their children's exposure to potentially inappropriate content and contact. It is recognised that parental controls have limitations and cannot replace parents' engagement in their children's online use. Measures that are available or appropriate to each service/product will vary, but may include:

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

- Service and content providers making available the necessary tools and settings across their services to enable parents to set appropriate levels of control.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
<p><b>1. this information is given on the responsible gaming page (indicated on screenshot below)</b></p>	<p><b>Completed</b></p>	<p>Screenshot below</p>
<p>Unibet is one of the largest providers of online gambling and digital content in Europe and has more than 7 million customers worldwide. The products offered by Unibet consist of sports betting, casino, poker and bingo and other digital content such as live streaming of football matches. Over the last years, Unibet has invested more than 200 million euros in developing a reliable and secure consumer platform. Unibet is audited on a regular basis by, amongst others, PWC, NMi and eCOGRA on complying with the CEN WP58 standard on consumer protection and responsible gambling</p>	<p><b>completed</b></p>	<p>See annual report  <a href="http://www.unibetgroupplc.com">www.unibetgroupplc.com</a></p>

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## Help is always available

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Unibet only accepts customers who are over 18 years of age. We try our best to diminish the chance of underage gambling by asking for identification and documentation when we suspect that a customer may be less than 18 years old. Although we dedicate a lot of time and resources ensuring that there are no minors playing on our site, this prevention should be a two way process between Unibet and the minor's parents and/or guardians. Thus, underage customers should not be acceptable in any case, even under the supervision of a parent/guardian.

In case you are worried that someone underage is using our site, please do not hesitate to contact us, and we will take the necessary steps. One may also decide on using internet filters in order to reduce the chances of underage gambling:

- ▶ [CyberPatrol](#)
- ▶ [Contentwatch](#)
- ▶ [Netnanny](#)
- ▶ [Netmom](#)

For any other questions regarding responsible gaming please [contact us](#).

Finally, UNIBET is a member of the EGBA and the RGA and we are proud to be a strong and active advocate of responsible gaming. The EGBA and RGA promotes a Code of Conduct to which we are required to adhere that encourages safe, responsible online gaming.

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### 3. Dealing with abuse/misuse

The Signatories have committed, when relevant for their services or products, to deal with all abuse/misuse related to content or conduct which may be illegal, harmful, offensive or inappropriate e.g. under a company's Acceptable Use Policy. Signatories commit to:

- 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;
- Place links to relevant child welfare organizations or specialist providers of advice 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. not applicable. Unibet operates a zero tolerance policy as to any kind of fraudulent and illegal activity	Completed and daily practise	See CEO statement on <a href="http://www.youtube.com/watch?v=vE5Pr9MkVu8">http://www.youtube.com/watch?v=vE5Pr9MkVu8</a>
2. see NMI audit report against the CEN WP 58 standard on consumer protection (CWA 16259)	completed	<p>Proactive responsible gaming strategies are integrated into Unibet's back-office systems to prevent and restrict problems such as gambling addiction. For example, Unibet monitors all its customer communications so that any potential at-risk gamblers are detected. The analysis of this communication is assessed with a sophisticated scoring system that highlights irregular gambling activity, enabling Unibet to provide early assistance, or intervene at the first potential signs of problem gambling.</p> <p>Unibet's customer service department is equipped with approximately 100 customer service agents who provide support in over 27 different languages, 24/7 and receive in excess of 700,000 contacts per year through calls, emails and live chat. Responsible gaming issues account for approximately four per cent of the total customer communication. Although this figure is low, all customer service agents receive thorough responsible gaming training from both internal and external providers.</p> <p>As a founding member of the European Gaming and Betting Association (EGBA) and the European Sports Security Association (ESSA), Unibet takes its commitment to responsible gaming seriously. The group demonstrated, through interview with employees, that it has responsible gaming embedded in its culture and is dedicated to providing a trustworthy and progressive environment where all its players can enjoy gaming responsibly. In addition to responsible gaming strategies and guidance policies, Unibet also works closely with Gambling Therapy, a provider of online support and counselling in 39 languages for anyone experiencing or affected by problem gaming issues.</p> <p>(NMI audit report, 28 May 2012, p3)</p>

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#### 4. Child Sexual abuse content or illegal contact

Under this section, the ICT Principles require that signatories, if relevant for their services and products, cooperates with law enforcement authorities and other agencies, as provide for in local law, on child sexual abuse content or unlawful contact. The Signatories shall:

- 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 notified by national law enforcement agency
- 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
not applicable. Unibet operates a zero tolerance policy as to any kind of fraudulent and illegal activity		
<p>As a truly customer-centric company, Unibet takes its responsibility towards its customers very seriously. With a holistic approach to Player Safety, Unibet ensures that the digital entertainment experience it provides to its customers remains as safe, secure and customer supportive as possible.</p> <p>As part thereof, Unibet focuses on identifying potential problematic gambling behavior at an early stage and preventing that behavior from becoming compulsive. The measures Unibet offers as part of its preventive approach are:</p> <ul style="list-style-type: none"> <li>• A 24/7 professional customer support service that pays special attention to responsible gambling;</li> <li>• Actively warning customers that participation in online gambling without moderation can be harmful;</li> <li>• Providing advice and guidance on responsible participation in online gambling;</li> <li>• Enabling customers to exclude themselves from gambling or opt for a temporary exclusion;</li> <li>• Providing a clear link to the websites of professional organisations providing problematic gamblers with professional aid;</li> </ul>		

• Making available a number of efficient tools such as deposit limits or cool-off periods.		
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## 5. Privacy and control

The Signatories have committed, when relevant for the services and products, to continue compliance with existing data protection and advertising rules and privacy rights as set out in the relevant legal dispositions. In addition, the Signatories if appropriate to their service/product, may also:

- 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1.see above.	Completed	See terms of use on <a href="http://www.unibet.com">www.unibet.com</a>
Audit reports, notably against CEN WP 58 standard	completed	NMI and eCOGRA audit report

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## 6. Education and Awareness

The Signatories commit to raise awareness and provide appropriate information with the aim to:

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

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

<b>Company measure</b>	<b>Status: indicate if Completed, in progress or In Planning</b>	<b>documentation Links/ screenshot/ examples</b>
1.not applicable in general. Parents do receive advise and information in relation to content control (see above)		See above