

## **PART C: THE INTERNET**

The recent study *Media in the Home*, carried out by the U.S.-based Annenberg Public Policy Center, reported that family Internet subscriptions are now outpacing newspaper subscriptions, and almost half of all families with children aged 2-17 have a television, a VCR, a computer and a video game player in the home. The Annenberg Public Policy Center also noted that while most parents (88 percent) report regularly supervising their children's use of television, only about half report regularly supervising their children's use of the Internet or video games (50 percent and 48 percent, respectively). Parents in focus groups reported feeling less comfortable with Internet technology than with television, and felt less able to provide adequate supervision of their children's Internet use (Annenberg Public Policy Center; June 26, 2000).

### **Canadian Families and the Internet**

Canadian families are facing the same challenges; in truth, the nature of the Internet makes these issues global ones. In its May 2000 survey of Internet use, *Canada's Children In A Wired World: The Parents' View*, the Media Awareness Network/Réseau Éducation-Médias and Environics Research Group examined the use of the Internet in Canadian families. The study looked at parents' perceptions of the Internet and their awareness of the benefits and risks associated with it.

That survey found that Canadian parents are active Internet users, and so are their children. Of the Canadian families surveyed, 82 percent said they have used the Internet, and 73 percent reported they have Internet access in the home. Those with access in the home said that 86 percent of their children use the Internet. According to Canadian parents, their children use the Internet for a wide range of activities: 65 percent use it for school work; 31 percent search out information; 29 percent play games; 28 percent use instant messaging; 28 percent spend time in chat rooms; 18 percent use e-mail actively; and 15 percent have met new friends on the Internet.

Sixty-six percent of parents said education is the biggest benefit of their children being on the Internet; 51 percent said their biggest concern with their children being on the Internet is inappropriate content. Further, 80 percent of parents said they think the Internet is the way of the future, and that if they and their family are not online, they will

be left behind. Nineteen percent think the Internet is more trouble than it's worth. Fifty-five percent think they have to take primary responsibility for the content that their children encounter online; 44 percent think others outside the home should take responsibility for the content that their children encounter online.

Seventy percent of Canadian parents have set rules for their children's Internet use while 67 percent said they check the bookmarks or browser history to see where their children go online. Sixty-one percent think their children usually do online searches with an adult 53 percent said that they provide a "great deal" of supervision for their children's Internet use in the home (compared to 41 percent for television viewing and 27 percent for computer games). Seventeen percent use blocking software (*Canada's Children In A Wired World: The Parents' View*, the Media Awareness Network/Réseau Éducation-Médias and Environics Research; May 2000; published at [www.media-awareness.ca](http://www.media-awareness.ca)).

### **Advertising and the Internet**

In 1997, advertising expenditures in Canada were estimated at between \$10 billion and \$15 billion. Of that, between \$2 million and \$5 million were spent buying ads on the Internet. Advertisers have discovered the Internet as an ideal vehicle for circumventing restrictive codes, which, until now, have regulated marketing to children in traditional media. Interactive advertising sites, disguised as children's entertainment, are proliferating on the World Wide Web and some marketers are using these sites:

- to monitor children's on-line activities and compile detailed personal profiles on them for future sales pitches;
- aim personalized advertising at individual children;
- blurring the line between education or entertainment content;
- encourage children to click on icons that transport them to advertising sites.

### **Driving Children to the Internet**

The media monitoring portion of this study by the Canadian Toy Testing Council found that the majority of toy companies now post their web addresses at the end of their TV commercials, in order to drive children to their site (see chart). Will they go? A U.S. study by Cyber Dialogue reported that about 24 percent of Internet users surveyed have accessed a website they saw advertised on TV (Cyber Dialogue study, cited on CNN;

October 29, 1998). In addition, accessing the Internet by computer at home, at school or at the public library is easier than ever. A recent study from A.C. Nielsen reported that 69 percent of Canadian households owned a personal computer in 2000, up from 61 percent in 1999 (A.C. Nielsen Canada, *The Globe and Mail*, April 13, 2001). Children know this, and they know exactly what “Barbie.com” means when they see it at the end of an ad.

The problem is, there is no piece of Canadian legislation that deals exclusively with the Internet. So far, the Internet has been treated as a communications medium like television and, as such, is covered under the *Telecommunications Act* and the *Broadcasting Act*. The use and misuse of the Internet, for hate propaganda, pornography and the publication of licensed works, is covered under other laws, such as the *Criminal Code* and the *Copyright Act*. In May 1999, the Canadian Radio-television and Telecommunications Commission (CRTC) released its *Final Report on New Media*, in which it stated that it would not attempt to regulate the Internet.

In recent years, the Canadian federal government has been attempting to pass and implement *Bill C-54*, an Act dealing specifically with issues of personal information and privacy on the Internet. To cover some of the areas where legislation does not exist, or where current legislation has not been amended to include the Internet, industry organizations have developed voluntary codes. One example of this is the *Canadian Association of Internet Providers' (CAIP) Voluntary Code of Conduct*.

In February 2001, the Canadian federal government launched its new strategy to address illegal and offensive online content, calling for increased public awareness of issues related to Internet use. *The Canadian Strategy to Promote Safe, Wise and Responsible Internet Use* was launched by Industry Minister Brian Tobin, Justice Minister Anne McLellan and Secretary of State for Multiculturalism Hedy Fry. The federal government plans to provide parents, teachers and librarians with access to a broad collection of tools and resources, highlighted in a 24-page booklet. The Media Awareness Network's Web Awareness Canada program was highlighted at the strategy launch as a rich resource for parents, teachers and librarians wanting to give children and young people the critical thinking skills needed to be safe and informed Internet users (Industry Canada, 2001; reported on [www.media-awareness.ca](http://www.media-awareness.ca)).

### **What Kids Will See**

As another part of this study, the CTTC visited the sites of manufacturers who posted their Internet (web site) addresses at the end of TV commercials, in order to see what children would find there. It was interesting to see the approaches taken by the various sites, and how the issues like privacy (i.e., name capture) and participation by children under 13 were handled. Most of the sites had an Online Privacy Policy posted, but that had to be done by clicking on a web link button to bring up the policy to read. If you were a child visiting the Bandai.com site (Digimon, Power Rangers and Gundam), which would you rather click on first--Free Digi-Cards or Privacy Statement?

The following describes what a child might see at various sites, which may change due to updates and upgrades (sites viewed Spring 2001).

**Hasbro.com** (Home of Action Man, Poo-chi, Scrabble, Monopoly, Pokemon, Tonka and other toys and games viewed on the TV commercials).

The visitor is greeted with a cheerful main page that has flashing brand names—Tiger, Milton Bradley, Galoob, Star Wars Episode One, and Monopoly. The message is “Welcome to Hasbro World: Making the World Smile!” The visitor clicks with the computer mouse to enter, and comes to another page that offers a number of options to click, although the first button to the left is to “Click ‘n Play Games”. There is an appealing picture of the millionaire character from Monopoly, and a list of “Surf Hasbro” links [Events & Promotions, Tiger Electronics, Hasbro Star Wars, Shoezies, Furby, Poo-chi, Transformers, Beast Wars, Action Man, Scrabble, Monopoly, POX, SuperSoaker, Pokemon, G.I. Joe, Wizards of the Coast, Tonka, eSpecially, My Barney, Get Together Games, Family Game Night, My First Games]. The page does feature an “ESRB Privacy Online Guaranteed/Click to Privacy Statement” box, with the word “Advertisement” appearing beside it. See also printed web site page (© 2000 Hasbro, Inc.) The text of that policy is as follows:

#### **HASBRO WEB SITE PRIVACY STATEMENT**

##### **WELCOME!**

This Hasbro Web site brings you the coolest information about the world of Hasbro and provides a first hand look at some of our games and toys. If you are a parent or guardian and are interested in knowing more about Hasbro's policy regarding the online collection of information from children, we recommend reviewing the Note To Parents below. Hasbro respects the privacy rights of its online visitors and is committed to providing you with a secure online environment. We have adopted a corporate wide Online Privacy Policy that guides how we collect, store and use the information you provide us.

This Privacy Statement and the certification seal located to your right confirms that Hasbro is a valid licensee and participating member in the Entertainment Software Rating Board's Privacy Online Program: ESRB Privacy Online. To protect your privacy, we have voluntarily undertaken this privacy initiative and all our Web sites have been reviewed and certified by ESRB Privacy Online to meet established online information collection and use practices. As part of this privacy program, we are subject to frequent audits of our sites and other enforcement and accountability mechanisms administered independently by ESRB.

ESRB Privacy Online is a third-party seal provider whose mission is to protect consumers' online privacy and make the Internet a secure, reliable, and private place to share information and conduct business. ESRB Privacy Online promotes and enforces established principles and guidelines for fair information practices that include requirements of full disclosure, notice, and informed consent.

Whenever you visit a Web site that displays the ESRB Privacy Online certification seal, you can expect to be notified of:

- Exactly what personal information may be collected;
- The consequences, if any, resulting from your refusal to provide personal information;
- Who, if anyone, is collecting your personal information;
- How this information may be used, including, with whom, if anyone, it might be shared;
- Whether a company uses cookies or tracks IP Addresses to collect information;
- What choices you have with regard to the use of your personal information;
- How a company ensures data security, quality, and integrity;
- How you can access and, if necessary, change the personal information a company collects and maintains;
- Where and how to ask questions or file complaints; and,
- Whether and how information is collected from children under 13.

If you have any questions, complaints, or comments regarding our privacy statement or policies, please contact the Privacy Policy Administrator at [registration@hasbro.com](mailto:registration@hasbro.com). You can also contact ESRB Privacy Online directly at (212) 759-0700 or by regular mail at 845 Third Avenue, New York, NY 10022. Please note, however, that this Privacy Policy applies only to sites operated by Hasbro, and not to Web sites operated by other companies or organizations to which we link. When you link to any other sites from the Hasbro Web sites listed above, this policy no longer applies and Hasbro does not control the activities of those sites.

#### **What information does Hasbro collect?**

Hasbro wants to give you the most exciting Internet experience possible. To help us figure out what you like and don't like about our sites, we may ask for your opinion from time to time. Hasbro may request and/or collect information from you on a voluntary basis when you: (1) register with us; (2) shop at any of our online stores; (3) participate in contests, events or promotions; (4) send questions or comments via email to Hasbro customer support; and/or, (5) submit your resume to us online. The requested information may include personal information such as your name, e-mail address, telephone number, and home address. In addition, we may collect demographic information such as your age, game platform, hobbies and game preferences.

If you are under the age of 13, you will need your parent or guardian's consent before you can provide any personal information to us. Kids, if you are ever unsure about anything you are

seeing on this site, ask your parent or guardian for help. See Note To Parents below for more information

### **Registration**

If you wish to register with one of our sites, you may be asked to supply personal information such as your full name and e-mail address, and demographic information such as your age, household income and collectibles of interest to you. Hasbro uses such information to periodically contact you about special events, news and announcements.

### **Online Store**

Visitors purchasing goods and services through our online store will need to provide a valid credit card number and expiration date, in addition to name, mailing address, phone number and e-mail address.

### **Promotions**

To participate in some of our promotions, you may be asked to provide an email address or screen name, so that we can let you know if you won a prize. Please do not use your real name for these promotions. For other Hasbro promotions, we may request your name and home address in order to send you products or information by regular mail.

### **E-mail**

By allowing you to send email to us, we are not attempting to collect any personal information about you. We will only use personal information (such as name, mailing address and e-mail address) contained in your email to respond to your specific inquiry or comments in the e-mail. Though we may retain your e-mail for a period of time, we will not use any personal information contained in your e-mail for any purpose other than responding to your specific inquiry or comments.

### **Resumes**

Some of our sites allow for the online submission of resumes. Personal information collected from resumes will be used solely for the purpose of accepting and evaluating candidate submissions for job postings. This information may be shared within the company. Whatever the activity may be, we will only collect information to the extent deemed reasonably necessary to fulfill your requests and our legitimate business objectives. If you do not want to submit personal information when requested, you will not be able to access certain areas on our site. However, you do not need to provide personal information to Hasbro in order to use our Web sites.

### **Who is collecting my information and how will it be used?**

The personal information you provide is collected by Hasbro. We will use the information you submit to our Web sites to send you advertising or promotional materials, including information about new products, contests, features and enhancements, special offers and other events of interest. We also use your personal information for our internal marketing and

demographic studies, so we can constantly improve the products and services we provide you and to better meet your needs.

From time to time, however, Hasbro may employ third-party vendors, such as Prospero Technologies, to operate some of the services we provide including free email and message board services. When requesting or partaking in these services, you may be asked to supply your name, telephone number, mailing address and email address. Although these third-party vendors, not Hasbro, collect the personal information you provide when requesting such services, Hasbro still requires that they adhere to Hasbro's stated privacy policies. The demographic information (e.g., hobbies) you provide us is collected by Hasbro and may be disclosed in aggregate to third parties. This aggregate demographic information cannot be used to personally identify you or your computer.

### **Cookies and IP Addresses**

Hasbro may use "cookies" to enhance your experience at our Web site. Cookies are pieces of information that we may place on your computer to help "personalize" your visit to the site. For example, a cookie will allow us to remember certain things about you, such as your screen name or where you left off in a game. Most major Web sites use cookies exactly for this purpose. We cannot tell who you are or where you are. The cookie only tells us that you have visited the site before and may contain certain information that will help us make your visit more enjoyable. Hasbro will never use cookies to retrieve information from your computer that was not originally sent in a cookie.

### **Opt-out**

If you do not want Hasbro to send you e-mail or regular mail about our products and/or services, you can opt-out at the time of registration or at the time of information collection. If you are receiving e-mails or regular mail and at a later date you choose to opt-out and have your name removed from Hasbro's database, you can do so by sending an e-mail to [registration@hasbro.com](mailto:registration@hasbro.com).

Safeguarding your personal information.

Hasbro will only collect personal information to the extent deemed reasonably necessary to serve our legitimate business purposes, and we will take the appropriate steps to ensure the security and integrity of any information you provided to us. Any information provided to us is housed in a secure datacenter, which can only be accessed via SecureID by Hasbro personnel.

### **Review, update and removal of personal information**

If you have registered with our site, you may at any time review and/or update the contact information we have for you or inform us that you want us to remove your information from our database by contacting us at [registration@hasbro.com](mailto:registration@hasbro.com). Please be sure to include in your message the name of the site at which you registered and the email address you used to register so that we can verify your request.

## **Questions and Complaints**

Any questions or complaints about Hasbro or this privacy statement can be resolved by contacting us at [registration@hasbro.com](mailto:registration@hasbro.com). We reserve the right to change this statement at any time, so visit this page from time to time to check for changes. For additional information about our Web site, please see our Terms and Conditions of Use.

Thanks. Have fun!

## **NOTE TO PARENTS**

Hasbro has developed its Web site to be an enjoyable experience for children (and adults) of all ages. Hasbro recognizes that some younger children may not understand some of the information contained on the Web site or how the site operates. That is the purpose of the Privacy Statement. Please discuss this statement with your children so that they will better understand how to use the site and the information they may be asked to provide. Hasbro strongly believes that providing its visitors with accurate and adequate notice about the Web site will lead to informed choices and decisions about how to use the site, as well as protecting its users' privacy. If you have any questions or comments about the Hasbro Web site, please feel free to contact us at [consumer\\_support@hasbro.com](mailto:consumer_support@hasbro.com) or send us a letter at: Hasbro Inc., Consumer Affairs - C-847, PO Box 200, 200 Narragansett Park Drive, Pawtucket, RI 02862-0200.

## **Children Under 13**

### **Parental Consent**

Children under 13 may not participate in online activities that require registration without the prior written consent of a parent or legal guardian ("parent"). This form must be signed by the child's parent or guardian and returned to Hasbro by fax at (401) 729-7000 or mail it to Hasbro Internet Registration, 1027 Newport Avenue, Mailstop A906, Pawtucket, RI 02861. Until we receive verifiable permission from a parent, a child under 13 may not submit or post his or her personal information on our site. In addition, we urge parents to instruct their children to never give out their real names, addresses or phone numbers, without permission, when using the Internet. Once we have obtained parental consent, we only ask the child for information that is reasonably necessary for the child to participate in our online activities. Parents also have the ability to consent to the collection of their children's information without consenting to the disclosure of that information to third parties.

### **Parental Access**

A parent who has given Hasbro permission to collect his or her child's information can, at any time, do the following: (1) view, correct or remove the child's personal information; (2) discontinue further use of the child's information and communication with the child; and/or, (3) revoke his or her earlier consent to collect the child's information. To do so, please contact us at [registration@hasbro.com](mailto:registration@hasbro.com) and be sure to include your child's name and email address, your

name and email address, and the name of the site at which your child is registered. We will check and update information as appropriate.

### **Teenagers (Ages 13-17)**

Hasbro collects personal information from children over 12 and under 18. When a Web user in this age category submits personal information, Hasbro notifies the parent via email of the child's activity.

This lengthy text is comprehensive, but daunting even for adults, let alone for children spurred to Hasbro.com to find out more about Action Man.

### **Tonka.com** (Home of Tonka trucks)

Clicking on Tonka.com from the Hasbro.com site brings you to a site devoted to Tonka trucks, which appears very sales oriented. While the images are bright and colourful, appealing to kids, upon closer reading, the text seems geared to adults. The first page shows Tonka trucks, noting that one is free with the purchase of another. Clicking on the icon of the Mighty Dump Truck brings up another page with a full-colour image of the truck, saying:

“Get the Tonka Mighty Dump Truck Free with the purchase of the Mighty Front Loader, Mighty Crane, or Mighty Backhoe TONKA's Mighty Dump Truck is a true Classic! Its the one you played with - now your little guy can too! Realistically styled, its sturdy steel tilt-back dump bed is designed for carrying and dumping big loads. Featuring lots of true-to-life details, the Dump includes rugged 4.5" diameter tires and heavy-duty steel construction. With a lifetime guarantee to back it up, the Mighty Dump offers real hauling fun, the rough, tough Tonka way! Available in major toy stores, prices at around \$15.99. Specifications: Guaranteed for Life; Made of Steel; Sturdy Construction; Outdoor Friendly - can be rinsed with water; Approximate Dimensions: 11" H x 17" L x 8" W; Ages: 3 and up.” See also printed web site page (© 2000 Hasbro, Inc.)

**Mattel.com** (Home of Barbie, Hot Wheels, Max Steel, Sing & Swing Angelica and other toys viewed on the TV commercials).

The visitor is greeted with an attractive main page that has a bouncy girl inviting the visitor to “shop with us on-line” as well as information of the company, service and site

map. The web page invites the visitor to visit any of its web sites or click on a brand for more information--Barbie, Cabbage Patch Kids, Matchbox, Hot Wheels, Tyco RC, Sesame Street, Fisher-Price, Winnie the Pooh, American Girl, Mattel Media, Nickelodeon and Disney. The page has a link to Mattel's Online Privacy Policy, which reads as follows:

Mattel is committed to protecting your on-line privacy when visiting any web sites operated by us or our family of companies, such as The Learning Company. We do not collect and keep any personal information from you unless you volunteer it and you are 13 or older. We also do not collect and keep personal information on-line from children under the age of 13 without their parent's consent. Please review the information below to familiarize yourself with our policies on web site privacy, so that you can take full advantage of all the fun stuff available at our sites for you and your family.

**A SPECIAL NOTE FOR PARENTS:** Mattel adheres to the Children's Online Privacy Protection Act of 1998 and the guidelines of the Children's Advertising Review Unit (CARU) of the Council of Better Business Bureaus, Inc. in each of our web sites for children. Parents, you can help by spending time online with your children and monitoring your children's online use. Please help us protect your child's privacy by instructing them never to provide personal information on this site or any other without your permission.

**IF YOU ARE UNDER 18, PLEASE BE SURE TO READ THIS POLICY WITH YOUR PARENTS AND ASK QUESTIONS ABOUT THINGS YOU DO NOT UNDERSTAND. CHILDREN UNDER 13 SHOULD GET YOUR PARENT'S PERMISSION BEFORE GIVING OUT YOUR E-MAIL ADDRESS OR ANY PERSONAL INFORMATION TO MATTEL - OR TO ANYONE ELSE ON THE INTERNET.**

**Does Mattel Collect Any Personal Information About Me if I'm 13 or older?**

Mattel doesn't require anyone to share any personal information about themselves in order to enjoy any of our web sites. That means you can visit our sites without any need to register with us. However, most of our sites contain special sections and privileges for members that register. We do not collect any personal information from you unless it is voluntarily provided, for instance when signing a guestbook, registering for contests, downloads, or free demos, completing our online customer surveys or purchasing products. The personal information we ask for is usually first and last name, mailing address, phone number and an e-mail address. See below for how we use this information. Remember, only people who are 18 or older may purchase products from our online

stores.

**Does Mattel Collect Any Personal Information About Anyone Under 13?**

On our websites for children, we do not collect personal information on-line from children under 13 without their parent's consent except in special, limited circumstances. If your child is under 13 and wants to use our children's sites with special activities, like scavenger hunts, personalized pages or clubs, we might ask your child to "register" by giving us a first name and their state. When we ask for your child's first name, your child is encouraged to use a "screen name" (not their real name) that only they know. Sometimes we will ask your child to make up a special password so that only they can see their customized areas on the site. With your verifiable consent, we may collect personal information from your child such as a last name, address or e-mail address when the information is necessary for a particular activity. We usually will ask your child for your e-mail or mailing address so that we get your permission for your child to provide the information. When we ask for your permission, we will tell you what we will do with the information your child provides us, and we will tell you how you can review your child's information and ask us to delete the information. We don't keep your (or your child's) e-mail address unless you tell us it is ok.

Mattel might collect some information from your child under 13 without your consent, but only in the following special cases:

- If a child under 13 sends a request to us, we keep their e-mail address for long enough to respond to them. Mattel deletes this information from our system after we answer their question.
- Occasionally, Mattel has special site activities or promotions like sweepstakes or contests which are open to children even if they are under 13. In these activities, we are not allowed to ask for more information from your child than what is necessary for your child to participate in the activity. For instance, we might ask for your mailing address so that we can send to you, for your child, any prizes your child wins or we might ask for your e-mail address or telephone number so that we can tell you when your child has won.
- We also might collect contact information where it is necessary to protect your child's safety when they join in activities like our chat rooms, message boards or e-mail services.

In the last two situations when we ask for information without your consent, we require your child to give us your e-mail address, too, so that we can tell you that they have registered in a promotion or for a service. Any information your child gives us in the above special circumstances will be deleted from our database once the promotion, program or activity is concluded, and after any legally required period for keeping such information is complete.

You can always ask to review the information your child has submitted to us by sending us a written request addressed to Consumer Relations, Attn: Children's Online Privacy Act – Information Request, 636 Girard Avenue, East Aurora, New York, 14052. You must include the address of your child, your child's password and any other information which will allow us to verify that you are the parent of the child whose information you are requesting. You can ask us to delete your child's information at any time and, you can ask that we do not collect any more personal information from your child, by sending us a written request addressed to Consumer Relations, Attn: Children's Online Privacy Act – Delete Request, 636 Girard Avenue, East Aurora, New York, 14052. However, if you ask us to delete your child's information, we may have to ask your child not to participate in our activities.

#### **What Does Mattel Do With the Information We Collect?**

We use the personal information we collect for the purposes indicated at the time you provide such information. For instance, if you register in a contest, we will use the registration information to notify contest winners, or if you purchase a product, we will use the information to fulfill the order.

Occasionally, and only with consent at the time we ask for information, we might also e-mail or mail you to provide information on upcoming Mattel products, web site updates and promotions. With your consent, we may also share information with other Mattel brands like Barbie and HotWheels and Mattel family companies so that they can let you and your family know about their products which might be of interest. If you want to stop receiving such updates and product information from Mattel or our affiliates at any time, just e-mail us at [service@mattel.com](mailto:service@mattel.com). Please type "Unsubscribe" in the subject line of the e-mail. Our mailings and e-mails will also include information allowing you to ask not to receive such information in the future.

#### **Does Mattel Share Information About Me With Others?**

If you consent, Mattel may provide your information to outside companies that offer products or services that may be of interest if you are a teenager (over 12) or an adult. Except for maintenance and security reasons, we never share personal information that we receive from children under 13 with other companies. We will remove your name from the list we provide to outside companies, if you just e-mail us at [service@mattel.com](mailto:service@mattel.com). Please note in the subject line "Outside Mailings." In special circumstances, Mattel may give other companies access to our information database, but only if necessary to allow them to provide database or server maintenance or security or other similar

services to Mattel. If we do provide access, we require those other companies to sign confidentiality agreements promising to keep secret any information they see. If Mattel believes that anyone's behavior on our sites may damage us or our sites or anyone else, we may disclose the relevant personal information in order to prevent this harm. In that case, we might try to identify the wrongdoer, contact them or bring legal action against them. We may also disclose personal information if we believe that the disclosure is required by law.

### **How Does Mattel Use Cookies?**

A "cookie" is a small file that we save on your computer's hard drive which contains non-personal information. Our cookies help to give you faster access to pages you have already visited; they allow you to personalize your pages; and they help you to participate in some activities or events on the site. For instance, some of our sites have scavenger or treasure hunts, and we need to use cookies to keep track of your progress. If you leave the site and then return, cookies will tell us what things you have already collected so that you do not have to start all over again. We also use cookies to help us figure out how many people visit our sites, which of our web pages they stop at and how long they stay there. This information helps us figure out which of our web features are a smashing success and what sites might need improvement! For administrative purposes, we collect IP addresses, which is the automatic number assigned to your computer when you surf the web. The IP address allows us to count total number of "hits" on our sites. However, your IP address and cookie is not connected to any personally identifiable or on-line contact information like a name and address, so you and your family remain anonymous.

### **Does Mattel Ever Collect Information without Consent?**

Mattel does not collect information passively through cookies or other tracking mechanisms except in the circumstances described above. Cookies DON'T contain any personal information about a specific user. We don't use cookies or other non-consensual methods to take personally identifiable or on-line contact information about you or your family off of your computer. Except for certain activities like treasure hunts, which we talked about above, Mattel doesn't use cookies for direct marketing or promotional purposes. Cookies are also not used to collect information specifically about you or your family for sharing with third parties.

### **And Finally...**

We want you and your family to have fun surfing all our sites and urge you and your family to follow common sense whenever disclosing personal information - on

this site or anywhere on the Internet.

Thanks for reading our privacy statement. We hope you have a better understanding of the many activities offered on our web sites and the ways in which we really are committed to safeguarding online privacy. Remember, we may change our policy from time to time to conform to changing legal requirements or to better protect your information. When this happens we will notify you of the new policy by posting it on our sites.

If you have any questions, please don't hesitate to e-mail us at [service@mattel.com](mailto:service@mattel.com).

Mattel, Inc.

Consumer Relations

636 Girard Avenue

East Aurora, NY 14052

In the U.S.: 800-524-TOYS (800-524-8697)

In Canada: 800-665-6288

For other contact information please visit:

[www.service.mattel.com](http://www.service.mattel.com) (©1999-2000 Mattel, Inc.)

**Barbie.com** (Home of Barbie, seven TV commercials viewed in study).

This Barbie-com site brings the visitor to an interactive page featuring the Barbie doll. It was interesting to notice that many of the sites listed at the end of the TV commercials reviewed in this study tended to reflect a specific brand like Barbie.com (note that the addressing language of <http://www>. etc. is not even needed for today's computer-savvy kids) rather than by specific manufacturer. These branded sites make it easy for children to use the computer to find web pages related to toys.

**Fisher-Price.com** (Home of Jammin Draw, Rocket Dog and other toys viewed on the TV commercials).

This site furthered these toys' slogan of , "Oh, the possibilities!" and was rather busy but looked informative. While this page offers "online fun for kids!", the Fisher-Price.com site (another branded site) is more obviously geared towards parents, who would be buying toys for their children from birth and up. In addition to links to a Little People Video Offer site and and Intelli-Table demo, the page offers a "grow-with-me" parenting

guide. Toy brands promoted on the site include Sesame Street, Power Wheels, Rescue Heroes, Fisher-Price Little People, Loving Family Dollhouse, Learning Buddies, and View-Master, etc. This site was particularly aggressive in trying to get the visitor to sign up for the e-mail newsletter. In addition to asking for the visitor's e-mail address in two places on the page, it also had a pop-up window appear that further insisted that the visitor join up.

**Bandai.com** (Home of Digimon, Power Rangers and Gundam viewed on the TV commercials).

This site says, "Welcome to Bandai.com—Have Fun!" and is immediately exciting to kids due to the offer of Contests/Free Stuff and Free Digi-Cards. The site did fulfill its promise of free stuff by providing the visitor with downloadable Digimon computer wallpaper and screensaver, and provided Digimon postcards that could be sent by e-mail. The privacy statement for Bandai.com reads as follows:

**Bandai America's Children's Online Privacy Policy**

We here at Bandai America Incorporated (BAI) take the safety and privacy of children as a top concern. As a result, we want to make sure you know just what information we collect from children under 13 and what we do with that information. This notice is being supplied in compliance with the Children's Online Privacy Protection Act. (COPPA) All the information collected at the BAI website is used only by Bandai.

You can contact BAI at:

Bandai America Incorporated, 5551 Katella Avenue, Cypress, California 90630

(714) 816-9560

[customerservice@bandai.com](mailto:customerservice@bandai.com)

While visiting the BAI website we may request and store personally identifiable information. Such information may include name, nickname, birth date, contact information (including address, phone number, and email address), gender, product interests, hobbies, and parental contact information. Any time this information is requested, the child has to specifically enter and submit the information.. None of this information is ever collected automatically and this policy will be easily accessible from each page that collects information. Additionally, we are careful to inform children that parental consent is required for this type of participation.

Additional information such as the web pages visited, links followed, and amount of time spent viewing content on the BAI website may be collected automatically and stored in a personally identifiable fashion, provided the child is a registered user of the BAI website. Other information may be automatically recorded by our web server to provide usage statistics and information so that we can provide a better experience at the BAI website. This information is not personally identifiable.

The BAI website may make use of cookies (small pieces of information placed on your computer by our website) for information collection purposes. The information provided by these cookies will be personally identifiable only in some circumstances and then only if the child is a registered user of the BAI website.

All the information we collect may, at times, be used for the following: Notification of contest winners and qualifiers Promotional, marketing, and informative mailings related to

- Bandai products
- Order or request fulfillment
- To provide a unique identifier and establish eligibility for online message forums
- BAI website tracking
- Marketing research
- Internal Bandai research

All information collected will be used solely by Bandai and not given, sold, or otherwise transferred to third parties in a personally identifiable form.

And, of course, we here at Bandai want to make sure everyone has fun, so we will not require children to surrender any information as a requirement to participate in any section of the website unless that information is essential to the function of that section.

If a child sends an unsolicited request for information or services, the information provided will be used solely for response to that specific request. Although the original request may be retained for a short time to better facilitate the fulfillment of the request, none of the information will be used outside the scope of the original request made by the child.

At any time, a parent may request to view the personal information collected by BAI related to that parent's child and may request a deletion and halt to further information collection related to the child. To initiate such a request, email [webmaster@bandai.com](mailto:webmaster@bandai.com) stating the full name the child used to register at the BAI website.

If you have any questions or comments on this policy, please feel free to email [webmaster@bandai.com](mailto:webmaster@bandai.com).

BAI reserves the right to modify this policy. If significant changes to the type of information collected or use of collected information occur, this policy will be emailed to the parents of registered users under 13 years of age. (© 2000, Bandai America Incorporated)

**Grand.com** (Home of X-Men, Starter Up Steve and other toys viewed on the TV commercials).

Less like a branded toy site, Grand.com appeared to be more like a corporate web site, with an invitation to view either in English or French, and two links to financial information. Upon entering the site, the visitor could access descriptions and pictures of the various toys, but these pages did not offer the type of interactive web site play specifically designed for child visitors. Participants in the media monitoring study did not record a posting for this site at the end of the commercials.

**Nintendo.com** (Home of Game Boy and other video games viewed on the TV commercials).

The visitor is greeted by a dynamic graphic of the Legend of Zelda game and the Online Policy Statement box. Upon entering the site, the visitor is offered a number of options to click, including Dr. Mario 64, Pokemon Stadium 2, Mickey's Speedway USA, Kirby Tilt 'n Tumble, and more, including newsletter sign-up. The Nintendo.com online privacy policy reads as follows:

**Nintendo of America Inc. Web Site Privacy Statement**

Nintendo of America Inc. respects the privacy rights of our online visitors and recognizes the importance of protecting the information we collect about you. We have adopted a corporate wide Online Privacy Policy that guides how we collect, store and use the information you provide to Nintendo of America Inc. Online. Please read this Privacy Policy carefully before you use any of Nintendo of America Inc.'s web sites. This Privacy Policy currently only applies to Nintendo of America Inc.'s Online information gathering processes. This Privacy Policy complies with North American (U.S. and Canada) best privacy practices and follows all known legislation in North American territories. Visitors to Nintendo of America Inc.'s web sites from outside of the United States and Canada are advised that Nintendo of America Inc.'s Privacy Policy does not necessarily follow the laws and regulations of your home country, so Nintendo of America Inc. recommends that you NOT provide personal information if you are not a resident of the United States or Canada.

This Privacy Statement and the certification seal located to your left confirms that Nintendo of America Inc. is a valid licensee and participating member in the Entertainment Software Rating Board's Privacy Online Program: ESRB Privacy Online. To protect your privacy to the maximum extent possible, we have undertaken this privacy initiative and all of Nintendo of America Inc.'s web sites have been reviewed and certified by ESRB Privacy Online to meet

established online information collection and use practices. As part of the privacy program, we are subject to frequent audits of our sites and other enforcement and accountability mechanisms administered independently by ESRB. ESRB Privacy Online is a third-party seal provider whose mission is to protect consumers' online privacy and make the Internet a secure, reliable, and private place to share information and conduct business. ESRB Privacy Online promotes and enforces established principles and guidelines for fair information practices that include requirements of full disclosure, notice, and informed consent.

Whenever you visit a web site that displays the ESRB Privacy Online certification seal, you can expect to be notified of:

- Exactly what personal information may be collected and by what means
- Who-- if anyone-- is collecting your personal information
- How this information may be used, including, who--if anyone--it might be shared with
- The consequences --if any --resulting from your refusal to provide personal information
- How you can confirm and, if necessary, change the personal information a company maintains
- How a company ensures data security, quality, and integrity
- Where and how to ask questions or file complaints

If you have any questions, complaints, or comments regarding our Online Privacy Policy statement or policies, please contact the Nintendo of America Inc. Online Privacy Policy Administrators at (888) 977-7627. You can also contact ESRB Privacy Online directly at <http://www.esrb.org> or by regular mail at 845 Third Avenue, New York, NY 10022, or you can call them at 212-759-0700.

Nintendo of America Inc. currently operates the following web sites:

[www.banjo-tooie.com](http://www.banjo-tooie.com)  
[www.banjo-kazooie.com](http://www.banjo-kazooie.com)  
[www.binkypinkerson.com](http://www.binkypinkerson.com)  
[www.bioniccommando.com](http://www.bioniccommando.com)  
[www.camphyrule.com](http://www.camphyrule.com)  
[www.carringtoninstitute.com](http://www.carringtoninstitute.com)  
[www.conker.com](http://www.conker.com)  
[www.cryptochronology.org](http://www.cryptochronology.org)  
[www.datadyne.com](http://www.datadyne.com)  
[www.diddykongracing.com](http://www.diddykongracing.com)  
[www.dkr.com](http://www.dkr.com)  
[www.donkeykong.com](http://www.donkeykong.com)  
[www.donkeykongcountry.com](http://www.donkeykongcountry.com)  
[www.excitebike64.com](http://www.excitebike64.com)  
[www.fzerox.com](http://www.fzerox.com)

[www.funtography.com](http://www.funtography.com)  
[www.gameboy.com](http://www.gameboy.com)  
[www.jetforcegemini.com](http://www.jetforcegemini.com)  
[www.kirby64.com](http://www.kirby64.com)  
[www.marioparty.com](http://www.marioparty.com)  
[www.marioparty2.com](http://www.marioparty2.com)  
[www.mariogolf.net](http://www.mariogolf.net)  
[www.mariotennis.com](http://www.mariotennis.com)  
[www.mickeysspeedwayusa.com](http://www.mickeysspeedwayusa.com)  
[www.nintendo.com](http://www.nintendo.com)  
[www.nintendo.ca](http://www.nintendo.ca)  
[www.nintendo.com/espanol/](http://www.nintendo.com/espanol/)  
[www.nintendopower.com](http://www.nintendopower.com)  
[www.nintendosports.com](http://www.nintendosports.com)  
[www.papermario.com](http://www.papermario.com)  
[www.perfectdark.com](http://www.perfectdark.com)  
[www.heyypikachu.com](http://www.heyypikachu.com)  
[www.pokemon.com](http://www.pokemon.com)  
[www.pokemoncardgb.com](http://www.pokemoncardgb.com)  
[www.pokemongold.com](http://www.pokemongold.com)  
[www.pokemonsilver.com](http://www.pokemonsilver.com)  
[www.pokemonpuzzlechallenge.com](http://www.pokemonpuzzlechallenge.com)  
[www.pokemonpuzzleleague.com](http://www.pokemonpuzzleleague.com)  
[www.pokemonsnap.com](http://www.pokemonsnap.com)  
[www.pokemonstadium.com](http://www.pokemonstadium.com)  
[www.radiozelda.com](http://www.radiozelda.com)  
[ridgeracer64.com](http://ridgeracer64.com)  
[rogue.nintendo.com](http://rogue.nintendo.com)  
[swracer.n64.com](http://swracer.n64.com)  
[www.smashbros.com](http://www.smashbros.com)  
[store.nintendo.com](http://store.nintendo.com)  
[www.starcraft64.com](http://www.starcraft64.com)  
[www.starfox64.com](http://www.starfox64.com)  
[www.theendtimes.net](http://www.theendtimes.net)  
[www.tightyellowshorts.com](http://www.tightyellowshorts.com)  
[www.yoshistory.com](http://www.yoshistory.com)  
[www.zelda.com](http://www.zelda.com)

www.zelda64.com

www.z-science.com

In addition, Nintendo of America Inc. owns several other domain names that point to the web sites listed above, and we will from time to time add new sites that may or may not be listed above.

Please note that this policy applies only to sites maintained by Nintendo of America Inc. or its subsidiaries (which include Nintendo of Canada Ltd.), and not to web sites maintained by other companies or organizations to which we link. This policy does not apply to Nintendo of America Inc.'s parent company, Nintendo Co. Ltd., nor does it apply to Nintendo Co. Ltd.'s other International subsidiaries or distribution partners. Furthermore, from time to time Nintendo of America Inc. may employ third parties who may collect personal information on Nintendo of America Inc.'s behalf. In such cases, such third parties will be instructed by Nintendo of America Inc. to comply with the Nintendo of America Inc. Privacy Policy as set forth herein.

What information is collected? Nintendo of America Inc. only collects personal information from our online visitors on a voluntary basis and only during (1) contest registration; (2) warranty registration; (3) newsletter registration; (4) surveys; (5) registration for games or special game-specific promotion participation; (6) when placing an order for goods or services on our web sites. Personal information collected may include your name, e-mail address, phone number, home address and birth date. We do not generally require this information to obtain access to any of our sites; however, there may be some areas of the site that you will not be able to access unless you register.

For example, our Online community areas and Nintendo Power "Members Only" areas will require you to register before you can access these areas. Nintendo also may collect demographic information from visitors, such as age, gender, geographic location, game genre interests, or what platforms you own. This information helps us improve our Online offerings and allows us to tailor information to your preferences.

Please note that information submitted to Nintendo of America Inc. in a business capacity (for example, resumes or applications to enter our Media Only site) is not covered by this Privacy Policy. Visitors purchasing goods and services through our Online store will need to provide a valid credit card number and expiration date, in addition to name, mailing address, phone number and e-mail address. Please note that you must be over the age of 18 to place orders Online. All financial information is transmitted by SSL protocol via Nintendo's secure server.

**A special note about children 12 years old and under**

Nintendo of America Inc. encourages parents and guardians to spend time online with their children. We urge parents to instruct their children to never give out their real names, addresses

or phone numbers, without permission, when using the Internet. We recognize a special obligation to protect personal information obtained from young children. In order for children 12 years old and under to participate in online activities that require registration, we require prior written permission from a parent or guardian (opt-in).

A copy of our permission form can be found at <http://www.nintendo.com/parentpermission.html>. This form must be signed by the child's parent or guardian and returned to Nintendo of America Inc. by fax at (425) 558-7300 or by mailing to Nintendo of America Inc., Online Privacy Policy Administrator, 4820 150th Ave. NE Redmond, WA 98052

### **What about cookies?**

Certain of our sites use cookies to keep track of your shopping cart, or to keep track of the fact that you have signed in so you don't have to continually enter your username and password. Also, we use cookies to deliver content specific to your interest and for other purposes. (Cookies are small files downloaded to your computer to track movements within web sites.) Most browsers are automatically set to accept cookies. You can disable cookies or set your browser to alert you when cookies are being sent. However some areas will not function properly if you do so. There are many sources for additional information about Internet cookies, and we encourage anyone concerned about the use of cookies to do more research on the topic so you can make an informed decision about accepting them from any site. Among the many sites devoted to information about cookies, one of the more thorough and informative ones we have found is Cookie Central (<http://www.cookiecentral.com>).

Please note that this site is not affiliated with or endorsed by Nintendo of America Inc. What happens to the information provided?

When you register on a Nintendo of America Inc. web site, you will be asked to provide personally identifying information. The information you provide will allow us to alert you to new products, features and enhancements; special offers; upgrade opportunities; and contests and events of interest. Such announcements are delivered via e-mail if you opt-in to this service. Nintendo of America Inc. does not sell personal information that we collect. However, from time to time, we are approached by companies and organizations that provide products or services that we believe may be of interest to you, and we may provide your personal information to such third parties, or we may send out notices on behalf of these companies. We see this as a value-added service helping you to find useful products or services. We strive to limit use of the information you provide to those offers that we think you would appreciate receiving. You must opt-in to receive information from Nintendo of America Inc.'s third party partners.

We may use your personal information for internal demographic studies, so we can improve our web sites and products to better meet our visitors' needs. In some cases, we may enhance and / or merge your personal information with data collected from other sources. In the

event we enhance and/or merge your personal information with data collected from other sources, we will take reasonable steps to maintain the integrity and quality of that personal information.

If you subscribe to Nintendo Power magazine Online, your personal information will be used by the printers of the magazine to address it so that it can be mailed to the address you provided. The printer has agreed to follow Nintendo of America Inc.'s privacy practices in handling this information.

If you opt-in to receive announcements by regular mail, your personal information may be sent to certain third parties so that they can send out this mail on Nintendo of America Inc.'s behalf. These companies have agreed to follow Nintendo of America Inc.'s privacy practices in handling this information. Nintendo of America Inc. occasionally uses outside agencies for job recruiting and marketing research, and provides these companies with your personal information. These companies have agreed to follow Nintendo of America Inc.'s privacy practices in handling this information.

**Email correspondence to Nintendo of America Inc.**

Nintendo of America Inc. will respond to e-mail correspondence if such correspondence includes a return e-mail address. Because an e-mail address is personal identifying information, Nintendo of America Inc. protects the privacy of the sender by limiting access to these e-mail messages and keeping them in a secure e-mail system. Most e-mail messages are deleted after they are responded to, however in certain cases hard copies or data from certain e-mail correspondence may be kept on file. Any such copies will also be stored in a secure location, and information from these messages will not be used for marketing purposes. In the event that Nintendo of America Inc. becomes legally obligated to disclose information obtained from consumers on its web site to another pursuant to legal or administrative process, Nintendo of America Inc. will take all reasonable steps to redact personal information from the data where possible.

**Opt-out and removal from Nintendo's e-mail list**

If you do not want Nintendo of America Inc. to send you e-mail or regular mail about our products and services, you can opt-out at the time of registration or information collection. If you have opted-in and at a later date you choose to have your name removed from our e-mail database, you can do so by sending an e-mail to [remove@mail.nintendo.com](mailto:remove@mail.nintendo.com) with the word "REMOVE" in the subject line. You may also call (888) 977-7627 or send a fax with your request to (425) 558-7300.

**Safeguarding your personally identifiable information**

We will only collect personally identifiable information to the extent deemed reasonably necessary to serve our legitimate business purposes, and we will maintain appropriate

safeguards to ensure the security, integrity and privacy of the information you have provided. In addition, we will take reasonable steps to assure that third parties to whom we transfer any data will provide sufficient protection of that personal information. (For example, if they are sending out an e-mail announcement on Nintendo's behalf.)

#### **Review and correction of information**

If for any reason you are concerned that the personal information maintained by Nintendo of America Inc. is not correct, please contact us at [privacypolicy@noa.nintendo.com](mailto:privacypolicy@noa.nintendo.com) or call (888) 977-7627 or send a fax to (425) 558-7300, and we will review or update your information as appropriate. Be sure to include the e-mail address that you used to register in your correspondence. Please be aware that you will need to provide the updated information to our Online Administrators; to protect your privacy, no information that we have on file will be given out.

Up until November 1999, Nintendo of America Inc. has personal information that it has collected from a variety of sources. In the event that you are receiving messages based on information collected previous to this date, please use the above contact information to remove or update your information.

By using this site, you signify your assent to the Nintendo of America Inc. Online Privacy Policy. If you do not agree to this policy, please do not use this site. We reserve the right to make changes in this policy. Please check back from time to time to ensure you are aware of any changes in our privacy practices. Your continued use of our site will signify your acceptance of these changes. (© 1999 Nintendo of America Inc.)

**PlayStation.com** (Home of PlayStation video games viewed on the TV commercials).

This site, more adult in design, greets the visitor with a visual of a Triple Play Baseball sports game and provides clicks to Quake and Revolution and 102 Dalmations. It also invites the visitor to leave a message on the Message Boards, buy a gift certificate for Dad or Grad, and to vote for his/her favourite PlayStation game. A Privacy Certified box appears at the bottom of the page, and clicking on it provides the following text:

PlayStation.com America uses a secure server to protect all information you send to us. We use standard encryption technology, SSL (Secure Socket Layer) to ensure safe and secure transactions over the Internet. SSL technology encrypts all the information you send to PlayStation.com America, so you can be confident that your information is protected while traveling over the Internet.

**SONY COMPUTER ENTERTAINMENT AMERICA AND PLAYSTATION.COM AMERICA  
PRIVACY POLICY**

Sony Computer Entertainment America ("SCEA") is committed to respecting the privacy rights of all visitors to our web site. We also recognize that our visitors, and the parents of children visiting our site, need protection of any personally identifying information they choose to share with SCEA. This privacy policy is intended to provide you with the information on how we collect, use and store the information that you provide, so that to make appropriate choices for sharing information with SCEA.

This Privacy Statement and the certification seal located to your right confirms that SCEA is a valid licensee and participating member in the Entertainment Software Rating Board's Privacy Online Program: ESRB Privacy Online. To protect your privacy to the maximum extent possible, we have undertaken this privacy initiative and our web site has been reviewed and certified by ESRB Privacy Online to meet established online information collection and use practices. As part of the privacy program, we are subject to frequent audits of our sites and other enforcement and accountability mechanisms administered independently by ESRB.

ESRB Privacy Online is a third-party seal provider whose mission is to protect consumers' online privacy and make the Internet a secure, reliable, and private place to share information and conduct business. ESRB Privacy Online promotes and enforces established principles and guidelines for fair information practices that include requirements of full disclosure, notice, and informed consent. Whenever you visit a web site that displays the ESRB Privacy Online certification seal, you can expect to be notified of:

- Exactly what personal information may be collected and by what means
- Who, if anyone, is collecting your personal information
- How this information may be used, including, who-if anyone-it might be shared with
- The consequences -if any- resulting from your refusal to provide personal information
- How you can access and, if necessary, change the personal information a company maintains
- How a company ensures data security, quality, and integrity
- Where and how to ask questions or file complaints

If you have any questions, complaints, or comments regarding our privacy statement or policies, please contact SCEA's Consumer Services Hotline at 1-800-745-SONY (7669). Additional mail contact information is provided below. You can also contact ESRB Privacy Online directly at (212) 759-0700 or by regular mail at 845 Third Avenue, New York, NY 10022. Address all ESRB Privacy Online correspondence to Marc E. Szafran, General Counsel. SCEA currently operates the following web sites:

[www.us.playstation.com](http://www.us.playstation.com)

[www.scea.com](http://www.scea.com)

[www.989sports.com](http://www.989sports.com)

In addition, SCEA owns several other domain names that point to the web sites listed above. From time to time we may add new sites that may not be listed above, but will provide a link to this policy.

This policy applies only to sites maintained by SCEA and information collected offline by or on behalf of SCEA or its subsidiaries. SCEA may create links to the web sites of its promotional partners and licensed software publishers. Although we will make every effort to link only to sites that meet similar standards for maintaining each individual's right to privacy, this policy does not apply to third party sites. Additionally, many other sites that are not associated or authorized by SCEA may have links leading to one of our sites. SCEA cannot control these links and is not responsible for any content appearing on these sites. SCEA does not require that visitors reveal any personally identifying information in order to access our web sites. However, visitors who do not wish to, or are not allowed by law to share personally identifying information, may not be able to access certain areas or participate in certain activities (like making a purchase or entering a promotion) which requires registration.

Although information may be required to participate in certain promotions or sales offered through our web site, participants provide information on a voluntary basis only. Generally, we may wish to collect personal information about you in connection with the following services:

- Participation in online contests, sweepstakes or other promotions
- Making purchases from our online store
- Questions or comments sent through our web site
- Subscriptions to the PlayStation Underground CD Magazine
- Inclusion in our online newsletter program
- Participation on our message boards
- Registration to become a registered user of our sites and a member of our PlayStation

#### **Underground club**

Collection of personal information for these services may include the collection of your name, address, telephone number, email address, date of birth, and/or credit card number. Visitors who opt-in to becoming members of our PlayStation Underground club, may also be asked for additional information about a variety of issues. See the section on PlayStation Underground Members below.

From time to time SCEA will offer users the chance to answer questions about their favorite PlayStation products and other issues. This general and demographic information is collected anonymously and will not be linked to any personally identifying information through cookies\* or other methods, without the approval of the user. (\*To learn more about what "cookies" are and how we may use them, please see the section titled "Cookies" below.) SCEA also offers users the opportunity to send "Picturegrams," postcards or similar items to their friends. These items are transmitted through an instant messaging system. Any information

a user submits to have a Picturegram sent is not collected. The Picturegram will be instantly transmitted to the email address provided and no information will be retained by SCEA.

Personally identifying information, which SCEA collects for a particular promotional purpose or sale from either online and offline methods, will be saved and used only for that purpose, unless the participant chooses to opt-in to one of the programs discussed below. Information obtained from customers who contact our consumer services department will be maintained by the consumer services department, so that SCEA may use it to assist these customers on future service issues.

When you have provided personally identifying information for a particular purpose, SCEA may disclose this information to certain third parties it has engaged to assist in fulfilling your request. This includes, but is not limited to, fulfillment houses, transaction managers, credit verification services and other service providers. Additionally, SCEA may disclose information to third parties as required by law.

SCEA offers all purchasers of our PlayStation product and visitors to our web sites the opportunity to become a member of the PlayStation Underground. Additionally, participants who are providing personally identifying information for a particular purpose will be given the opportunity to "opt-in" to being including on the PlayStation Underground mailing list. Membership in the PlayStation Underground is free and grants the member certain rights which may include, but are not limited to, discount offers, game news, free demo discs, access to restricted areas of our web sites, the opportunity to be a registered user or subscriber of our web sites or other services, and more. We may also share information collected from PlayStation Underground members with other Sony affiliates and subsidiaries, who we think will provide you with additional information you'll enjoy.

SCEA will give PlayStation Underground Members the opportunity to provide information about themselves on the registration materials, and will from time to time send out surveys or questionnaires for members to provide additional information. SCEA may also maintain information on PlayStation Underground members' purchase order history with us, and visits to our web sites as obtained through cookies and similar methods. We will use this information to update members' records and make their PlayStation experience more enjoyable.

We may also use your personal information for our internal marketing and demographic studies. We use this information to improve our web sites and products, to better meet your needs.

PlayStation Underground Members will have an additional option to "opt-in" to have their information shared with our promotional partners, licensed software publishers, licensed peripheral makers and other licensees. This will give us the opportunity to work its partners to provide you with additional material on PlayStation and related product, which we think you will enjoy.

Except as noted above, your personally identifying information will not be shared with outside parties unless participants choose this option.

SCEA will not collect personally identifying information through our web site from people 12 and under, without prior parental permission. We encourage parents to take an active role to protect the privacy of their children and to prevent inappropriate uses of information about their children. Parents should instruct their children never to give out real names or any other identifying information without first getting permission.

In some instances, SCEA will try to offer parents who would like to give permission online, to allow their children to participate in SCEA web site programs that collect personally identifying information, to do so.

When possible, SCEA will allow parents to authorize their child's participation by providing a valid credit card number. SCEA will not make any charges to this account and will keep only a portion of the account number on file as a record to authenticate the parental consent.

Parents who choose this option will have the same opportunities listed in the PlayStation Underground Members section noted above, to allow their child be included in the PlayStation Underground Club. In some instances, SCEA may find it is not appropriate to collect information from children under 13 through particular sections of our web site. In these areas, we may: (i) offer an opportunity for the child to participate through regular mail or telephone; (ii) we may ask the parent or guardian to provide his/her information in place of the child's; or, (iii) we limit access to the particular section to individuals over the age of 13.

Cookies are bits of electronic information which a web site can transfer to a visitor's hard drive to help tailor and keep records of his or her visit at the site. Cookies allow web site operators to better tailor visits to the site to visitor's individual preferences. The use of cookies is standard on the Internet and many major web sites use them. You can choose to set your browser to notify you whenever you are sent a cookie. This gives you the chance to decide whether or not to accept it. SCEA may use cookies in certain areas to improve your experience when visiting our web sites. For instance, cookies will be used to manage each session you visit our site to make moving around our site more efficient and enjoyable for you. Cookies will also be used to keep track of your shopping cart in our online store or may be used to provide you with specific content that meets your interests. Except as for PlayStation Underground Members (see above), information collected through cookies or similar techniques will remain anonymous and will not be connected to any user's personally identifying information without his or her consent.

We may sometimes use outside companies to display advertising for our products or sites. These ads may contain cookies. Cookies received with banner ads are collected by our ad company and we do not have access to this information.

Our message boards are a place where users can go to freely share their thoughts and ideas about all that's PlayStation. Bulletin Board participants must adhere to our standard web site terms of use, as well as additional terms and conditions which are posted in that section.

Any information SCEA collects for participation in the Bulletin Board section will adhere to this privacy policy. SCEA asks its users to respect the privacy of others. Posting of phone numbers, addresses, or other personal information in the Bulletin Board section, which may violate someone's privacy is prohibited.

Additionally, SCEA prohibits the posting by any user of his or her own personally identifying information. SCEA reserves the right to remove any postings that violate this rule or any other term or condition posted on this site.

Additionally, SCEA reserves the right to ban any user who has violated this requirement. SCEA will take appropriate steps to protect all information our visitors share with us. This includes setting up processes to avoid any unauthorized access or disclosure of this information. We will also use our best efforts to maintain accurate personal information collect from our web site visitors, as well as information collected from offline sources. SCEA collects personally identifying information to the extent deemed reasonably necessary to serve our legitimate business purposes. We maintain safeguards such as:

- (i) providing consumer access to data for purposes of verification and correction; and
- (ii) providing technical security measures to ensure the security, integrity, accuracy and privacy of the information you have provided. We also take reasonable steps to assure that third parties to which we transfer any data will provide sufficient protection of that personal information.

For further information on our privacy policy, or for questions on information that SCEA may have collected from you or your children, or should you wish to have your name removed from our records, please Contact Us to review, update or remove information as appropriate: either of the following methods

By Phone at: 1-800-MY.PS.COM (1-800-697-7266) live rep support M-Sat 6am-8pm, Sun 7am-6:30pm PST; auto support 24 hours per day, 7 days per week.

By Mail at: SCEA, Consumer Services Department, P.O. Box 5888, San Mateo, CA 94402-0888 (©2001 PlayStation.com (America) Inc.)

All these lengthy and diverse Privacy Statements make it clear that parents need to know what kids are up to when they are surfing the Internet. It is a Pandora's Box that has just been opened, and worthy of much more study and examination.

## **MEDIA LITERACY**

### **Advice to Parents about Media Literacy**

With Internet use on the increase by both parents and children--children who are learning to use the computer at younger and younger ages--it's important for parents to know about media literacy. Elizabeth Thoman, of the Center for Media Literacy, Los Angeles has defined media literacy as an overall term that incorporates three stages of a continuum leading to the media empowerment of citizens of all ages. She said that the first stage is simply becoming aware of the importance of balancing or managing one's media "diet," that is, making choices and managing the amount of time spent with television, videos, electronic games, films and various print media forms. The second stage is learning specific skills of critical viewing, learning to analyze and question what is

in the frame, how it is constructed and what may have been left out. The third stage goes behind the frame to explore deeper issues of who produces the media we experience; and for what purpose? In other words: Who profits? Who loses? And who decides? This stage of social, political and economic analysis looks at how each of us (and all of us together in society) take and make meaning from our media experiences and how the mass media drive our global consumer economy. This inquiry can sometimes set the stage for various media advocacy efforts to challenge or redress public policies or corporate practices. Although television and electronic media may seem to present the most compelling reasons for promoting media literacy education in contemporary society, the principles and practices of media literacy education are applicable to all media from television to T-shirts, from billboards to the Internet (Elizabeth Thoman, Operational Definition of Media Literacy, Center for Media Literacy, Los Angeles, CA, 1995.)

### **Become an Ad Detective**

In other words, parents have to become ad detectives, as the CTTC did, and take role in monitoring what their children are experiencing via the various media. Some parents are already taking on the role of ad detective. In a letter to the *Ottawa Citizen* newspaper, Gail Guthrie of Maberly wrote:

“My nine-year-old now sits in my kitchen with the remote control and changes channels when a rude or scary commercial begins. How intelligent of him to realize that some images are not worth viewing. How sad that he would have to learn this lesson from CBC television while his mum cooks supper nearby.” (Letters, “Please, no smut after school,” *Ottawa Citizen*, April 13, 2001).

Parents with a complaint about television advertising have somewhere to turn. The Advertising Standards Council (ASC) was set up to administer the advertising codes in 1966 by the CAF. Le Conseil des Normes de la Publicité handles self-regulatory issues in Quebec and all national French-language complaints. The Advertising Standards Council finds out about code violations by complaints from the public, industry and government. If parents feel that the codes have been violated, it is important to complain, as this is the only way that the ASC can set in motion the process of monitoring the standards set out in the codes.

All complaints are acknowledged. Complaints made to the Toronto or Montreal offices are handled by the Standards Division staff of the CAF. Other complaints are dealt with by six Regional Councils, in Vancouver, Edmonton, Calgary, Regina, Winnipeg and Halifax. Any complaints made to the Canadian Broadcast Standards Council about offensive advertising are also referred to and handled by the ASC. If an advertisement is found to violate the appropriate code, the advertiser must revise or withdraw the message. If the advertiser or complainant disagrees with the conclusions reached by the staff or regional councils, an appeal may be made to the National Council. The Council's decision is final. If the consumer is still not satisfied, complaints can be made to the Bureau of Competition Policy, Industry Canada. The complaints process takes, on average, one to two months from start to resolution.

The CBC maintains an Office of Advertising Standards to administer and screen advertisements to ensure their compliance with its ethical and gender portrayal guidelines. Complaints about offensive advertising on CBC should be directed to this office. If the consumer is not satisfied with the response, complaints should be directed to the ASC.

Parents with a problem ad should make the complaint as soon as possible. Regulations require stations and cable companies to keep tapes of their on-air content for four weeks only, and these are needed as proof. Parents should identify the station, approximate time of broadcast and the name of the product in the complaint. Provide a brief written explanation of how the message contravenes the codes. A complaint about a print advertisement should, if possible, include a copy of the advertisement. Complaints should be directed to the nearest Advertising Standards Council.

### **Monitoring the Internet**

With regard to the newest media frontier, the Internet, the American Academy of Pediatrics recommends that parents “set rules of the road” for their children. The Academy has advised that parents set limits on the amount of time a child spends online each day or week; parents should also consider using an alarm clock or timer to keep track of time. Make sure surfing on the Internet does not replace homework, playing outside or with friends, or pursuing other interests. Make sure the child knows that the people online are not always who they say they are, and that online information is not necessarily private. A child should be taught **never** to give out personal information

(including name, address, phone number, age, race, school name or location, of friends' names) without a parent's permission; **never** to use a credit card online without a parent's permission; **never** share passwords, even with friends; **never** arrange a face-to-face meeting with someone met online; **never** respond to messages that make the child feel confused or uncomfortable; and **never** use bad language or send mean messages online. (*The Internet and Your Family*, American Academy of Pediatrics, 1999).

The Canadian Toy Testing Council also recommends that parents visit the excellent web site maintained by the Media Awareness Network; [www.media-awareness.ca](http://www.media-awareness.ca). It is a bountiful resource of information on media literacy for parents, children and educators alike.