

We understand the legal and ethical responsibilities of handling the personal data of children and young people and take those responsibilities seriously.

The Information Commissioner's Office (ICO) has published a [Children's Code](#) (or Age-appropriate design code) that we commit to following.

1. **Best interests of the child:** The best interests of the child should have been a primary consideration when we designed and developed our products.
2. **Data protection impact assessments:** A full DPIA was completed at the start of the development process. We ensured all risks were assessed and mitigated.
3. **Age appropriate application:** We ensure that we are aware of the age of all individual users and work to effectively apply the standards of the code to child users.
4. **Transparency:** The data protection information we provide to users, and other published terms, policies and community standards, are written to be as concise and prominent as possible, and we use clear language suited to the age of our users.
5. **Detrimental use of data:** We will never use children's personal data in ways that have been shown to be detrimental to their wellbeing, or that go against industry codes of practice, other regulatory provisions or Government advice.
6. **Policies and community standards:** We commit to upholding our published terms, policies and community standards (including but not limited to data protection policies, age restriction, behaviour rules and content policies).
7. **Default settings:** Settings will be 'high privacy' by default.
8. **Data minimisation:** We collect and retain only the minimum amount of personal data needed to provide the elements of your service in which a child is actively and knowingly engaged.
9. **Data sharing:** We do not disclose children's data unless you can demonstrate a compelling reason to do so, taking account of the best interests of the child.
10. **Geolocation:** Switch geolocation options off by default (unless you can demonstrate a compelling reason for geolocation to be switched on by default, taking account of the best interests of the child). Provide an obvious

sign for children when location tracking is active. Options which make a child's location visible to others must default back to 'off' at the end of each session.

11. **Parental controls:** If you provide parental controls, give the child age appropriate information about this. If your online service allows a parent or carer to monitor their child's online activity or track their location, provide an obvious sign to the child when they are being monitored.
12. **Profiling:** Switch options which use profiling 'off' by default (unless you can demonstrate a compelling reason for profiling to be on by default, taking account of the best interests of the child). Only allow profiling if you have appropriate measures in place to protect the child from any harmful effects (in particular, being fed content that is detrimental to their health or wellbeing).
13. **Nudge techniques:** We do not use 'nudge' techniques to lead or encourage children to provide unnecessary personal data or weaken or turn off their data/privacy protections.
14. **Connected toys and devices:** N/A.
15. **Online tools:** We will ensure prominent and accessible tools are available on our website to help children understand and exercise their data protection rights and report concerns.