



## LESSON PLAN

**Level:** Grades 6 to 9

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# Online Marketing to Kids: Protecting Your Privacy



This lesson is part of *USE, UNDERSTAND & CREATE: A Digital Literacy Framework for Canadian Schools*: <http://mediasmarts.ca/teacher-resources/digital-literacy-framework>.

## Overview

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This lesson introduces students to the ways in which commercial websites collect personal information from kids and to the issues surrounding children and privacy on the Internet. It begins with a guided discussion on what type of information is valuable to marketers, and the methods that they use to collect this information online. Students also compare Canadian voluntary guidelines to American legislation for the protection of children's privacy online. Activities include a survey of privacy practices on popular children's websites; a letter-writing activity to voice concerns about online privacy; and an exercise where students learn to recognize "smoke and mirrors" in privacy policies for children's websites.

## Learning Outcomes

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Students demonstrate:

- an awareness of the methods used by online marketers to elicit personal information from children.
- an understanding of the Internet's unique capacity to mine data and track individual users.
- an understanding of the issues surrounding the protection of children's privacy on the Internet.
- familiarization with the voluntary guidelines that are being used by some commercial websites.

## Preparation and Materials

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- Print teacher's copy of the handout *Top 15 Most Popular Kids' Sites*. Photocopy student handouts:
  - *Protecting Your Privacy on Commercial Websites*
  - *The Children's Advertising Review Unit Guidelines for Children's Advertising: Guidelines for Interactive Electronic Media*
  - *Children's Online Privacy Protection Act Guidelines*
  - *The CMA's Marketing Guidelines for Children and Teenagers*
- For Activity 1, photocopy the *Privacy Checklist*



- For Activity 2, photocopy *Voice Your Opinions: Online Marketing to Children* and *How to Write an Effective Complaint Letter*
- For Activity 3, photocopy the *CyberZone Privacy Policy* and *Kids' World Privacy Policy*

### The Lesson

Begin by asking students:

- How many of you visit sites for fun on the Internet?
- What types of sites and activities do you enjoy best?
- Have any students ever been asked to submit personal information, such as their name, age, address, hobbies, favourite colour, etc., to a website?
- When and why did they have to submit it?
- What information was requested?
- Did they mind submitting this information? Why or why not?

### Guided Discussion

Privacy is a big issue on the Internet, especially when it comes to kids. In 2010 the *Wall Street Journal* researched the information-gathering methods of 50 children's sites and found that they were more likely to track their users' behaviour than websites aimed at adults.

Brainstorm:

- What kinds of "personally identifiable" information are collected by websites?
- How is this information collected?
- What might marketers do with this information?

Write the following types of personal information on the board:

ages & birth dates    hardware & software information  
interests            hobbies  
email addresses    names  
postal addresses    phone numbers  
gender

Ask students to rank this information, from items they think are most often solicited on kids' commercial websites, to those they believe to be least often solicited by online marketers. Discuss the types of information that students believe to be most often requested. Why might this information be valuable to marketers?



Students should be aware that personal information is a valuable commodity. Some kids' sites are supported through the selling of information gathered from young visitors to third parties such as marketing firms. Others use their understanding of kids' insecurities, preferences and lifestyles to maximize the marketing potential of their sites.

Distribute the student handout *Protecting Your Privacy on Commercial Websites* and review the main points with students. Encourage them to share similar situations that they may have encountered while online.

- Regarding privacy policies, have any students ever read a privacy policy on a website? (Most likely, many students have not.)
- For those that have read Web-based privacy policies, which sites were they on? Were there any surprises?
- Why are privacy policies important?
- Are there any additional points that students feel kids should know about when they visit commercial children's sites?

### Differences between the United States and Canada

In the United States, the *Children's Online Privacy Protection Act Guidelines* (COPPA) came into effect in April 2000. This law requires commercial websites to provide clear notice of how they collect information on their sites and places restrictions on the type of information that can be collected from kids under the age of thirteen. In addition, many American websites for kids also adhere to the Children's Advertising Review Unit (CARU)'s *Guidelines for Interactive Electronic Media*, which stipulates how marketers can market products to children.

Canada has no laws specifically relating to children's privacy and the Internet. The *Personal Information Protection and Electronic Documents Act* (PIPEDA) does not refer specifically to youth, but does require that corporations get "meaningful consent" before collecting personal information. The Office of the Privacy Commissioner's policy position on Online Behavioural Advertising states that "Given the practical obstacles to obtaining meaningful consent from children, especially implied consent, organizations should avoid knowingly tracking children and tracking on websites aimed at children."

Canada has no laws relating to children's privacy and the Internet. In Spring 1999, the CRTC (the government agency charged with regulating Canada's broadcast industries) ruled that they would not attempt to regulate the Internet. Instead, Canadian companies are expected to follow voluntary guidelines.

In Canada, the Canadian Association of Internet Providers (CAIP) has created a voluntary privacy code for the Internet. Although these principles don't specifically apply to children, it's assumed that kids are covered by them. The Canadian Marketing Association's *Marketing Guidelines for Children* (which are also voluntary) includes a few stipulations that relate to the collection, transfer or request of personal information from kids by marketers.

Distribute the CARU's *Guidelines for Interactive Electronic Media* (used in the United States) and the CMA's *Marketing Guidelines for Children and Teenagers* (used in Canada) so that each student gets one of the two handouts. Have each student read their handout and then pair with another student who received the same handout to create a summary of the handout.

Using a blackboard or interactive whiteboard, compile a summary of each document for the whole class to use. Then distribute the handout *The Children's Online Privacy Protection Act (COPPA)*, go through it with the class and create a summary of it on the blackboard or whiteboard.



Review the main points with students and discuss the following questions:

- Which of these documents does the best job protecting children's privacy? Why do you think so?
- Which of these would you prefer to see in Canada? Why?
- What are some of the disadvantages of voluntary regulation? What are some of the advantages?
- Take a close look at the COPPA Guidelines. Even though this is law, what challenges might the U.S. government face in implementing these rules?
- Some of these documents apply only to children, and some to children and teens. Which is the better approach and why? What might be some disadvantages of focusing specifically on children (for instance, some sites popular with "tweens", such as Facebook, define themselves as "adult" sites to avoid having to comply with COPPA.)
- Why is the Internet so difficult to regulate?

*The first activity for this lesson requires Internet access. For the second and third activities, a computer is not needed.*

**Activity 1: Online Survey of Commercial Sites for Kids** *Internet access required*

- Distribute the *Privacy Checklist* to students.
- Divide the class into groups.
- Assign each group five website addresses from the *Top 15 Popular Kids' Websites* (or sites suggested by students that have been vetted and approved by the teacher).
- Using their checklists, have each group record the methods that are used on these sites to elicit personal information from children. They should also note any privacy infringements they may encounter (i.e., no privacy policy or one that is vague, incomplete or misleading; a statement telling kids "to go and ask Mom or Dad" before filling out a survey, with no means of verifying parental consent).
- Each group will report their findings to the class.
- Each group will submit a written report on their findings, including a ranking of their sites from most, to least, respectful of kids' privacy.

**Activity 2: Taking Action** *No computer needed*

Distribute the student handouts *Voice Your Opinions: Online Marketing to Children* and *How to Write an Effective Complaint Letter*.

Part of being a good "Netizen" is taking action when you encounter questionable content such as invasive online marketing practices. Using their findings from Activity 1, have students write a letter to a children's website that infringes on the privacy rights of children. If the students did not find any sites that infringe on children's privacy rights, have them write a letter advocating changes to one of the three documents on children's online privacy that they read.



**Activity 3 Privacy Policies** *No computer needed*

- Have students review the *Children's Online Privacy Protection Act* Guidelines and the handout *Protecting Your Privacy on Commercial Websites*.
- Distribute the mock privacy policies for *CyberZone* and *Kids' World*.

Ask students to review and compare the privacy policies from two fictitious commercial kids' websites. Students must assess the strengths and weaknesses of each of these policies; noting any privacy infringements, vague or misleading language, or omissions. Students will write a report on each of these privacy policies in order to determine which of these sites is most respectful of the privacy of children.

**Assessment/Evaluation:** Students may be evaluated on their understanding of privacy issues based on the letter they wrote in Activity 2 and/or the report they wrote in Activity 3.



## Protecting Your Privacy on the Internet

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The Internet provides marketers with many opportunities to elicit personal information from children. Kids love playing on the Web, and commercial sites for children are continually ranked as top online destinations.

However, as kids register with websites to play games, win prizes, engage in chat or join clubs, they may also be compromising their privacy. Here are some of the ways:

- **Online registration forms**, that ask kids to sign up in order to become club members or access "fun" areas on a site
- **Quizzes and surveys** that are used to determine the preferences and attitudes of young consumers
- **Contests**, in which kids are required (or encouraged) to submit personal information to enter or win prizes
- **E-cards**, where friends' email addresses are submitted to a website so that the company can send them e-cards and greetings
- **Chat environments**, where children may be asked for personal information in order to join a chat room, or where children may inadvertently post personal information while chatting
- **Cookies**, files that track users when they enter a site and record the areas they visit; these files can be used by marketers to create customer profiles and deliver customized information to young visitors, and in some cases even track you after you leave the site

### Privacy Policies

Privacy Policies outline the privacy terms and conditions of a particular site. However, many privacy policies are vague, misleading or non-existent. When you read a Privacy Policy, you want to know:

- What information from young visitors is being collected or tracked, and how this information will be used
- How parents can change or delete any data that has been collected about their children
- What steps are being taken to safeguard children while they participate in chat rooms, message boards and email activities on the site
- Whether it adheres to the industry guidelines for selling to, and collecting data from, children on the Internet
- What methods are used to ensure that verifiable, parental consent is obtained before a child releases any personal information online
- How you can contact and/or find out more about the company hosting the website

### What You Can Do

**Limit what you give out.** Avoid quizzes, contests and anything else that asks you to give up personal information. That's especially true in social networks, where doing a quiz can give advertisers access to your whole profile. You can also disable Bluetooth and GPS on mobile devices when you're not using them.



**Opt out of advertising.** Several online services, such as Google and Yahoo, allow you to opt out of targeted advertising. This can usually be done through Ad Preferences, Privacy Settings or the service’s privacy policy.

**Choose services that don’t track you.** Some services, like the search engine DuckDuckGo and the social network Ello – do not track users. Don’t assume, though, that a service that claims it keeps you private isn’t tracking you: Snapchat, for instance, which appeals to users’ desire for privacy with its “self-destructing” posts and photos, still uses cookies to track and profile them. Always consult a service’s Privacy Policy to find out what it’s collecting about you.

**Use private browsing mode, a privacy plugin or an IP proxy.** Most Web browsers have a “private browsing mode” that keeps your computer from accepting cookies while it’s activated. However, different versions work differently, and not all prevent websites from tracking you. For more privacy, you can use a browser plugin such as Privacy Badger that’s designed to block tracking software. If you don’t want to be tracked at all, use an IP proxy tool that assigns you a new, random Internet Protocol number each time you use your computer.



## The Children's Advertising Review Unit Guidelines for Children's Advertising: Guidelines for Interactive Electronic Media

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In the United States, the Children's Advertising Review Unit (CARU) has created a series of voluntary guidelines for marketing to children on the Internet. These guidelines apply to online activities which are intentionally targeted to children under 13, or where the website knows the visitor is a child. They outline the terms for selling to children online and the rules to protect the personal privacy of young visitors.

### Advertising Websites

Advertisers that create or sponsor an area in cyberspace, either through an online service or a website, must prominently identify the name of the sponsoring company and/or brand in that area.

### Making a Sale

Ideally, advertisers must do their best to prevent children from buying goods online without the permission of a parent or guardian. Advertisers selling to children on the Internet must clearly state the costs of online transactions and provide ways for parents to cancel any orders that kids make without permission.

The CARU guidelines state that:

Children should always be told when they are being targeted for a sale. Advertisers must take into account children's age when deciding if it's clear that something is an ad.

On websites directed to children, if an advertiser integrates an advertisement into the content of a game or activity, then the advertiser should make clear, in a manner that will be easily understood by the intended audience, that it is an advertisement.

Any online ordering instructions must clearly state that a child must have a parent's permission before ordering.

When kids order goods or services online, websites must provide parents with ways to cancel any orders made by their children.

### Data Collection

Marketers love the Internet because its interactive nature allows them to collect information on potential customers (i.e., through online registration forms, surveys, games and contests). But young children might not understand that any information they give to a site could be used by marketers. When marketers ask for personally identifiable information from children (i.e., full names, addresses, email addresses, phone numbers) this creates special privacy and security concerns.

Because of this, advertisers have to follow specific guidelines when collecting information from children under 13 years of age:





Websites must include a *privacy policy* or *letter to parents* that clearly states:

- What information is collected from kids and *why* it is being collected.
- What methods are used to track visitors while they are on the site (for example, some sites use 'cookie' software to track which areas kids visit).
- How any information collected from kids will be used.
- How any information that has been collected from kids can be removed or corrected.

Making sure that parents are aware what information is being collected from their children is an important step in protecting the online privacy of young people. CARU states that *verifiable* parental consent must be obtained in the following situations:

- When kids are asked to submit "real world", personally identifiable information – like a street address or phone number – which would permit a company to contact them off-line.
- When personally identifiable information about kids will be shared or distributed to third parties that are not connected to the company or website.

When personally identifiable information – such as email addresses and screen names – will be publicly posted to enable other people to communicate with the child, or the child to communicate with others.

Parents must also be informed if a child contacts a site with a question or request, and in doing so, discloses personal information like a name or return email address.

The company must tell parents what they intend to do with this information, and must provide instructions for removing or correcting any information that has been submitted to the site.

Advertisers also have to ensure that kids understand when information is being collected from them. The CARU guidelines state that:

- Advertisers must remind children to ask for parental permission before submitting personally identifiable information about themselves or others to a site.
- Advertisers have to tell kids, in a language that they can understand, why any information is being requested (i.e., "We'll use your name and email address to enter you in this contest and also add it to our mailing list".)
- Advertisers have to tell kids whether the information is intended to be shared, sold or distributed outside of the company that is collecting the information.
- If information is collected from children through "passive means" (i.e., navigational tracking tools or browser files) parents and children must be told what information is being tracked, and how it will be used.
- Advertisers should encourage kids not to use their real names when they participate in any activities involving public postings where anyone can see the information (like chat rooms or message boards).
- If the information requested by a site is optional, and not required to engage in an activity, kids need to be told this in clear, simple language (i.e., "You don't have to answer this question to play the game.") Once again, kids must be told what will be done with any information they submit and advertisers should only ask for reasonable amounts of information.



- Part of the Internet's appeal to marketers, is that they can contact kids directly through email. But if an advertiser does this, there should be an opportunity with each mailing for the child or parent to choose to discontinue receiving them.

Online contests or sweepstakes should not require the child to provide more information than is reasonably necessary.

### **Age-Screening**

On websites aimed at children, advertisers should use age-screening mechanisms to determine if users are under 13. Websites aimed at children should not link to websites that do not comply with these guidelines.

Source: *The Children's Advertising Review Unit Self Regulatory Guidelines for Children's Advertising*. The complete CARU Guidelines for Children's Advertising can be viewed on the [Better Business Bureau](#) website.



## The Children's Online Privacy Protection Act (COPPA)

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In the United States, commercial websites must provide clear notice of their information gathering practices and obtain prior parental consent when eliciting personal information from children under 13. This is not a voluntary code – it's the law.

According to COPPA, website operators must:

### **Post their privacy policy.**

Websites directed to children or that knowingly collect information from kids under 13 must post a notice of their information collection practices that includes:

- types of personal information they collect from kids - for example, name, home address, email address or hobbies.
- how the site will use the information - for example, to market to the child who supplied the information, to notify contest winners or to make the information available through a child's participation in a chat room.
- whether personal information is forwarded to advertisers or other third parties.
- a contact at the site.

### **Get parental consent.**

In many cases, a site must obtain parental consent before collecting, using or disclosing personal information about a child.

Consent is not required when a site is collecting an email address to:

- respond to a one-time request from the child.
- provide notice to the parent.
- ensure the safety of the child or the site.
- send a newsletter or other information on a regular basis as long as the site notifies a parent and gives them a chance to say no to the arrangement.

### **Get new consent when information practices change in a "material" way.**

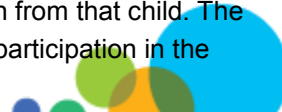
Website operators need to notify parents and get consent again if they plan to change the kinds of information they collect, change how they use the information or offer the information to new and different third parties.

### **Allow parents to review personal information collected from their children.**

To do this, website operators must verify the identity of the requesting parent.

Allow parents to revoke their consent, and delete information collected from their children at the parents' request.

Parents can revoke their consent and ask that information about their children be deleted from the site's database. When a parent revokes consent, the website must stop collecting, using or disclosing information from that child. The site may end a child's participation in an activity if the information it collected was necessary for participation in the website's activity.



## CMA Marketing Guidelines for Children and Teenagers

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Although there are no marketing guidelines that specifically address online marketing to children in Canada, Sections K and L of the Canadian Marketing Association's *Code of Ethics and Standards of Practice* do provide guidelines for marketing to children and teens.

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### K. Special Considerations in Marketing to Children

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#### K1 Age

For purposes of this Code, the term child refers to someone who has not reached his or her 13th birthday.

#### K2 Responsibility

Marketing to children imposes a special responsibility on marketers. Marketers must recognize that children are not adults and that not all marketing techniques are appropriate for children.

#### K3 Consent

When marketing to persons between 13 years and the age of majority, marketers are strongly cautioned that children may be exposed to these communications and, in such cases, these interactions with children are governed by the following guidelines concerning consent. See also Section L3 of this Code regarding *Consent in Marketing to Teenagers*.

**K3.1** Except as provided for below in Section K4 of this Code, *Contests Directed to Children*, all marketing interactions directed to children that include the collection, transfer and requests for personal information require the opt-in consent of the child's parent or guardian.

**K3.2** Where the child, parent or guardian withdraws or declines permission to collect, use or disclose a child's information, marketers must immediately delete all such information from their database.

#### K4 Contests Directed to Children

Subject to applicable laws, marketers may collect personal information from children for the purposes of contests without obtaining the parent or guardian's opt-in consent, only if the marketer:

- collects a minimal amount of personal information, sufficient only to determine the winner(s);
- deals only with the winner(s)' parent or guardian and does not contact the winner(s);
- does not retain the personal information following the conclusion of the contest or sweepstakes;
- makes no use of the personal information other than to determine the contest or sweepstakes winner(s); and
- does not transfer or make available the personal information to any other individual or organization.

#### K5 Credulity

Marketing to children must not exploit children's credulity, lack of experience or sense of loyalty.

#### K6 Age-Appropriate Language

When marketing to children, marketing communications must be age appropriate and presented in simple language, easily understood by children.



## **K7 Commercial Transactions**

Marketers must not knowingly accept an order from a child without a parent or guardian's opt-in consent. Marketers must not pressure a child to urge their parents or guardians to purchase a product or service.

## **L. Special Considerations in Marketing to Teenagers**

By definition, Section L of this Code applies to consumer marketers only.

In addition to the rest of this Code, when marketing to teenagers, marketers must adhere to the following requirements.

### **L1 Age and Application**

For the purpose of this Code, the term teenager refers to someone who has reached their 13th birthday but has not yet reached the age of majority in their province or territory of residence.

These guidelines do not apply to teenagers living independently of their parents or guardians and who by federal, provincial or territorial statute or regulation are deemed to be adults.

### **L2 Responsibility**

Marketing to teenagers imposes special responsibilities on marketers. Marketers will use discretion and sensitivity in marketing to teenagers, to address the age, knowledge, sophistication and maturity of teenagers. Marketers should exercise caution that they do not take advantage of or exploit teenagers.

**L2.1** Marketers must not portray sexual behaviour or violence that is inconsistent with community or industry standards.

**L2.2** Marketers must respect the parent/guardian-teenager relationship and must not encourage the teenager to exclude parents or guardians from a purchase decision.

**L2.3** Marketers must not solicit, collect or knowingly use personal information from teenagers as a means of acquiring further household information.

### **L3 Consent**

This section enables marketers to establish communication with teenagers in defined stages, according to the sensitivity or type of information, the teenager's age and the nature of the consent to be provided.

**L3.1** Marketers must obtain the opt-in consent from a teenager under the age of 16 for the collection and use of their contact information. See *Glossary of Terms* of this Code for a definition of "contact information".

Marketers must obtain the opt-in consent of the parent or guardian prior to the disclosure of a teenager's contact information to a third party.

Marketers must obtain the opt-in consent of the parent or guardian for the collection, use or disclosure of personal information of a teenager under the age of 16.

**L3.2** Marketers must obtain the opt-in consent from the teenager for the collection, use and disclosure of their personal information.

**L3.3** Where the teenager, parent or guardian withdraws or declines the permission required to collect, use or disclose a teenager's information, marketers must immediately delete all such information from their database.



**Summary of Consent Provisions for Marketing to Children and Teenagers**

Age	Type of Information	Opt-in Consent Requirement
Under 13	Any personal information	Parent or guardian
13, 14 and 15	Contact information only	Teenager
13, 14 and 15	Personal information beyond contact information	Teenager and parent or guardian
16 and over	Any personal information	Teenager*

\*Note: As per Section L3.3 of this Code, a parent or guardian can withdraw consent to use or disclose personal information for teenagers of all ages, including 16 years of age and over.

**L4 Exposure to Children**

When marketing to teenagers, marketers are strongly cautioned that children may be exposed to these communications and in such cases, these interactions with children are governed by the guidelines concerning consent in Section K of this Code, *Special Considerations in Marketing to Children*.

**L5 Credulity**

Marketing to teenagers must not unduly exploit teenagers' impressionability, or susceptibility to peer or social pressures. Marketers must not imply that possession or use of a product or service will make its owner superior to others, or that without it the individual will be open to ridicule or contempt.

**L6 Age-Appropriate Language**

Marketers must use language that is age-appropriate and easy to understand when marketing to teenagers.

**L7 Commercial Transactions**

Marketers must be aware that transactions with teenagers may not be legally enforceable against the teenager, or his or her parent or guardian.



## Privacy Checklist

Select four or five popular kids' sites from *Top 15 Most Popular Kids' Sites*. As you visit each site, use the following checklist to record any online activities that may infringe on children's privacy.

### What marketing techniques are used to collect information?

	Online registration forms
	Quizzes & surveys
	Contests
	E-cards
	Chat rooms
	Cookie files
	Other activities

### What information must children submit to participate in various activities on the site? (In each box, list the kinds of information you're asked to give.)

Online registration forms	
Quizzes & surveys	
Contests	
E-cards	
Chat rooms	
Other activities	

If there are quizzes or surveys, do any of them ask for information that you don't have to give? How do the quizzes/surveys show what information is required and what is optional?



Other important privacy questions are:

	Is any of the registration information available to others? Who?
	Does any personal information appear in the chat postings?
	Does the site attempt to obtain verifiable parental consent <i>before</i> the child releases personal information? If so, how is this done?
	Does the site link to any other sites that are not aimed at children?
	Outside of the Privacy Policy, does it explain, in language that's easy for kids to read, why information is being collected and whether it will be shared or sold outside of the company that runs the website?

Where Cookie files are used, note the following:

	Does the site clearly state what information is tracked, and how it will be used?
	Are you offered the option of disabling Cookies?

Privacy Policy

	Is it easy to access?
	Is it clearly stated?
	Does it detail what information is collected from children and how this information will be used?
	Does it outline the company's procedures and safeguards to protect children's privacy on the site?
	Does it explain how parents can change or delete any data collected from their children?
	Does it provide contact information for the company hosting the website, including an email address, company name, phone number and street address?





## Voice Your Opinions: Online Marketing to Children

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It's important to speak out in support of good quality children's sites and to comment about questionable online marketing and information collection practices. This page provides tips on effective letter-writing skills and suggests where to direct your concerns.

### Getting started

Make sure that your intended audience clearly understands your message. Whether you're sending a letter, fax or email, ensure that you are concise, and that your tone is not accusatory. How to Write an Effective Comment Letter ([http://www.aba.com/Compliance/Pages/Comply\\_EffectiveCL.aspx](http://www.aba.com/Compliance/Pages/Comply_EffectiveCL.aspx)) and the Better Business Bureau's sample complaint letter (<http://webhostalliance.net/test/Sample%20Complaint%20letter.pdf>) can help you to set the right tone.

### Sending your message

There are several places where you can send your letter.

#### Directly to the company involved:

If you are concerned about the advertising techniques or privacy policy of a certain company, send your comments directly to that company. As a customer, you are important to them; your letter, fax, or email carries a lot of weight. You may be surprised by the company's willingness to address your questions. Check out the company's website or call their switchboard to find out who to direct your comments to. Most medium-to-large sized companies have customer service representatives who will take your complaint.

#### To an industry association:

If you have tried to contact the company in question, and have received no indication that it is willing to acknowledge your concerns, a good next step is to contact the appropriate industry association.

Many companies belong to advertising, marketing or business associations that subscribe to voluntary codes of conduct. Many of these codes have been rewritten to set standards for online advertising and marketing aimed at children.

Industry associations have also established procedures for dealing with complaints about members who contravene such codes.

#### To a consumers' rights group:

A consumers' rights group (or an advocacy group) will welcome your concerns and will respond with advice or advocate on your behalf.

#### To Canada's Privacy Commission and/or provincial privacy commissions:

Many concerns which arise from online advertising to children are related to **privacy**. If these concerns are related to the public sector, your complaint can be directed to the Privacy Commissioner of Canada ([http://www.priv.gc.ca/index\\_e.asp](http://www.priv.gc.ca/index_e.asp)) or provincial privacy commissioners. The federal *Privacy Act* ([http://www.priv.gc.ca/leg\\_c/leg\\_c\\_a\\_e.asp](http://www.priv.gc.ca/leg_c/leg_c_a_e.asp)) clearly states the rules for disclosing, collecting or disposing of personal records.



## How to Write an Effective Comment Letter

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### 13 Steps to an Effective Comment Letter

By *MediaWatch*. Adapted with permission

1. Write as soon as possible - The information will be fresh in your mind and you will be taking advantage of the energy from your initial reaction. Encourage friends and family to write also.
2. Direct your letter to the appropriate contact.
3. Identify yourself - Name, address, city, province, postal code, phone number.
4. Identify the medium and format - website, Facebook page, etc. Include appropriate URLs.
5. Write persuasively - Think of your objection letter as a negotiation in which you are trying to sway the reader to be open to your point of view. Ultimately, you want the reader to respect your view and take action.
6. Criticize constructively - Focus criticism on the issue, not the organization or individual, and be specific about what you find offensive and why.
7. Give praise where it's due - If you can find something positive to say about the service or product, the presentation of which you are objecting to, please add these details; the reader is more likely to be receptive to your criticism.
8. Be clear - Explain your position in a clear and concise manner and try not to assume that the reader observes the same negative aspects that you do. Some say that handwritten letters carry more weight than typed ones because they have a personal touch. Whichever method you are comfortable using, personalize your letter whenever possible.
9. Suggest alternatives - If you can think of an alternative image or reference that you would find acceptable, describe it. Some people are genuinely unaware of the issues we deal with, and appreciate positive and specific suggestions.
10. Remind the recipient of what's at stake - You, your family and friends are an important market that the advertiser or company wants to reach. If you are considering a boycott of the company or product involved, mention it in your letter.
11. Ask for a response - Follow up with another letter or phone call if necessary.
12. Copy and circulate - Ask yourself who else might be interested: a school board, a retail store, a trade union, a professional association, an MP or MLA, a community group, etc.
13. Pat yourself on the back. You have taken an important action as a responsible member of your community.



## CyberZone Privacy Policy

We Love Kids! So much, in fact, that we decided to create a fun, safe and educational website, just for children ages 4 to 12.

Our mission is to create a fun environment where kids can surf safely and have a good time. It's been a challenge, but with the support of our sponsors, and feedback from people like you, we're getting close to achieving our dream.

Who are we? We're a dedicated team of people who believe that kids deserve quality environments on the Net. With the financial support of companies who also care about kids, we've set out to create the best place on the Net for young people. And the teachers, parents and kids that have visited our website seem to agree. Just look at some of the comments about *CyberZone* that we've received:

<p><b><i>What a tremendous place for kids! My students have really enjoyed your "friends around the galaxy" e-pal activities.</i></b></p> <p><i>J. Smith, Ottawa, Canada</i></p>	<p><b><i>I love your games -- the "Intergalactic Olympics" game is my favorite!</i></b></p> <p><i>Sara, age 10, Montreal, Canada</i></p>	<p><b><i>At last... a website where I can turn off the Net Nanny and let my kids have fun! Thanks, CyberZone!</i></b></p> <p><i>F. Tallim, Vancouver, Canada</i></p>
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We like to think that in our own small way, we are helping kids around the world share friendship and experiences that will last a lifetime.

**Online safety** We believe that nothing is more important than the safety of your child.

Anyone can participate in *CyberZone*. But kids do have to register if they want to post anything to the site, join in our "Friends Around the Galaxy" e-pal program, collect prizes or join the *StarZone Club* for special newsletters and activities.

When registering, we ask kids to give us their name, date of birth, city/province/postal code and email address, as well as any other fun details that kids have asked us to include. This gives us a better idea of who is visiting us and how we can keep improving the content of our site to meet the needs of our young visitors.

*Note: We respect the safety and privacy of your children. We do not ask for home street addresses, telephone numbers, names of schools or any other information that could jeopardize their safety.*

We *do* ask kids for some additional information before they can collect the nifty prizes that they've earned playing games on our site. **This is a purely optional activity.** Kids *aren't* required to fill out our *CyberZone Survey* to enjoy other parts of *CyberZone*. And don't worry – we tell kids to get their parents' permission to participate, because we want to make sure that parents are aware that their children are sharing information with our website. Why do we ask these questions? The *CyberZone Survey* lets us understand the issues that are important to kids and they also help other companies learn about kids. The results of any surveys we do with kids – whether for ourselves or for others – always are reported in general, or aggregate, terms. For example, we will not release a specific child's response, like "Johnny Britten says this." Instead, we report that 11-year-olds feel one way while 7-year-olds think something else. We never disclose information that can identify individual children.

We want to make *Kids' World* the best site ever. We welcome your comments, questions and suggestions. Contact us by email at "Star-bright Productions" and we'll be sure to get back to you.



## Kids' World Privacy Policy

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### Privacy Policy

Kids' World is committed to keeping kids safe on the web. We have worked very hard to provide a fun, healthy, and enriching experience for kids.

To make sure we respect our young visitors, we adhere to the Children's Online Privacy Protection Act (COPPA) and the Children's Advertising Review Unit's *Self Regulatory Guidelines for Children's Advertising: Guidelines for Interactive Electronic Media*.

**Personal Information** Registering with personal information to play in Kids' World is not required. Any kids, whether they've registered or not, can join the "Bugland Band" and play virtual instruments in "Bugs on Parade," be a bug detective and find the missing burgers in "The Bugland Burger Game," check out letters sent to "Dear Ziggy," or voice their opinions in our weekly Bugland Poll. All of these activities (and more) can be experienced and enjoyed without sharing any personal information.

**Voluntary Submissions** Kids who want to participate in special Kids' World activities, like free email accounts, joining chat rooms, and prize-winning contests are asked for minimal personal information.

To obtain a bugmail account, each user is asked to provide their parents' email address. We use this address to let their parents know that their child has registered with us. We don't do anything else with parents' email addresses. And we don't sell bugmail addresses to third parties. We ask users to tell us whether they'd like to receive a free Kids' World email newsletter. If they say No, then that's fine.

To participate in chat rooms, we ask users to make up a screen name and password and to provide their birthdate and gender. The age and gender information is used only in the aggregate form, so that we can calculate the typical gender and average age of our audience.

If kids want to be eligible to win free prizes, we ask them to give us their full name, mailing address, and parents' email address. We collect this information so we know where to send any prizes they might win. Should a child win a contest, parents will be contacted directly.

As well, for kids who state that they are under 13, we require parental permission before they can participate in these special activities. We've set up a 1-800 phone number that their parents can call to let us know that it's ok. Or, parents can also download and sign our [email consent form](#) and fax or mail it to us. We want parents to know what their kids are doing, so any time kids give us personal information when they sign up for activities on the site, we send an email to the parent's email address just to let them know.

Kids' World doesn't track visitors to our site, and doesn't share their information with any of our partners, sponsors, advertisers, or friends.

No matter what information is given to us, it is our policy never to post more than a user's screen name, home town, state, and age.



**Updating and Deleting Personal Information** Kids' World members and their parents can view, correct, update, and delete personal information from our database at any time, as long as they have the correct ID number and corresponding password. (Visit the Kids' World "[sign-up zone](#)" for more information on how to do this.) As well as being password-protected, our database is encrypted to keep kids' information secure and all transfers or personal information are done over a secure connection.

**Cookies** Cookie are small text files that we send to your computer. They help us improve your experience of our games (by marking how far you got, and what your score was), and they help us administer our email service and our chat rooms. Cookies are not used for gathering information. However, if you are concerned about the use of cookies, you will find information on how to disable cookies on your browser [here](#).

If you still have questions about our policy, feel free to email us at [parents@kidsworld.com](mailto:parents@kidsworld.com) or call 1-613-389-1234. Our real-world address is: Kid's World Inc., 1023 Spruce Ave., Rome, New York 154578.

Kids' World



## Top 15 Most Popular Kids' Websites

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According to MediaSmarts' *Young Canadians in a Wired World* survey, these are the top 15 websites among Canadian kids in grades 4 to 11:



1. **YouTube**  
([www.youtube.com](http://www.youtube.com))



2. **Facebook**  
([www.facebook.com](http://www.facebook.com))



3. **Google**  
([www.google.com](http://www.google.com))



4. **Twitter**  
([www.twitter.com](http://www.twitter.com))



5. **Tumblr**  
([www.tumblr.com](http://www.tumblr.com))



6. **Instagram**  
([www.instagram.com](http://www.instagram.com))



7. **Minecraft**  
([www.minecraft.net](http://www.minecraft.net))



8. **Miniclip**  
([www.miniclip.com](http://www.miniclip.com))





9. Hotmail  
([www.hotmail.com](http://www.hotmail.com))



10. Wikipedia  
([www.wikipedia.org](http://www.wikipedia.org))



11. Y8  
([www.y8.com](http://www.y8.com))



12. Netflix  
([www.netflix.com](http://www.netflix.com))



13. Pinterest  
([www.pinterest.com](http://www.pinterest.com))



14. Friv  
([www.friv.com](http://www.friv.com))



15. Webkinz  
([www.webkinz.com](http://www.webkinz.com))



## Privacy Policies – Teacher's Guide

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### **Cyberzone Privacy Policy:**

- No links to COPPA or to the CARU or CMA guidelines
- Does not require parental consent for data collection
- Does not explain what will be done with children's information
- Does not explain how parents can change or delete the data
- Does not explain how children's information is safeguarded
- Does not identify tracking tools such as cookies used on the site
- Does not provide contact information

### **Kids' World Privacy Policy:**

- Links to COPPA and CARU guidelines.
- Notifies parents and requires parental consent for data collection.
- Explains what will be done with children's information
- Explains how parents can change or delete the data
- Explains how children's information is safeguarded
- Identifies tracking tools and cookies used on the site
- Provides contact information





## Task Assessment Rubric: Letter/Report

	<b>Learning Expectations</b>	<b>Achievement</b>
<p><b>Use</b></p> <p>Skills and competencies that fall under “use” range from basic technical know-how – using computer programs such as word processors, web browsers, email, and other communication tools – to the more sophisticated abilities for accessing and using knowledge resources, such as search engines and online databases, and emerging technologies such as cloud computing.</p>	<p><i>Privacy and Security:</i></p> <p>demonstrate awareness that he/she has a digital footprint and that this information can be searched, copied, and passed on, and that he/she can take some control based on what he/she posts online</p> <p>demonstrate strategies for guarding against identity theft and scams that try to access his/her private information online</p> <p>use privacy tools and settings to control who accesses the information collected about them online</p> <p><i>Consumer Awareness:</i></p> <p>understand the technologies he/she is using at a level that is sufficient to underpin good privacy decisions</p>	<p>Insufficient (R);</p> <p>Beginning (1);</p> <p>Developing (2);</p> <p>Competent (3)</p> <p>Confident (4)</p>
<p><b>Understand</b></p> <p>Understand includes recognizing how networked technology affects our behaviour and our perceptions, beliefs and feelings about the world around us.</p> <p>Understand also prepares us for a knowledge economy as we develop information management skills for finding, evaluating and effectively using information to communicate, collaborate and solve problems.</p>	<p><i>Privacy and Security:</i></p> <p>understand the concept of privacy in their everyday lives, and as it relates to using the Internet</p> <p>understand the concepts of persistence, replicability and searchability in networked technologies</p> <p>understand the security implications of computer networks and client/servers</p> <p><i>Consumer Awareness:</i></p> <p>understand the ways websites and companies influence consumers' privacy habits, as well as consider companies' motives in doing so</p> <p>show an understanding of the roles and responsibilities of different stakeholders in relation to online privacy</p>	<p>Insufficient (R);</p> <p>Beginning (1);</p> <p>Developing (2);</p> <p>Competent (3)</p> <p>Confident (4)</p>



	<b>Learning Expectations</b>	<b>Achievement</b>
<p><b>Create</b></p> <p>Create is the ability to produce content and effectively communicate through a variety of digital media tools. It includes being able to adapt what we produce for various contexts and audiences; to create and communicate using rich media such as images, video and sound; and to effectively and responsibly engage with user-generated content such as blogs and discussion forums, video and photo sharing, social gaming and other forms of social media.</p> <p>The ability to create using digital media ensures that Canadians are active contributors to digital society.</p>	<p><i>Privacy and Security:</i></p> <p>understand the benefits of sharing information online and the potential risks of sharing inappropriate information</p> <p><i>Community Engagement:</i></p> <p>create a work (letter or report) that clearly communicates their understanding and/or expresses their opinion on the issues relating to online gambling</p> <p>identify and participate responsibly in discussions that foster positive community</p>	<p>Insufficient (R);</p> <p>Beginning (1);</p> <p>Developing (2);</p> <p>Competent (3)</p> <p>Confident (4)</p>

