

## ENTERTAINMENT SOFTWARE RATING BOARD

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March 5, 2010

Donald S. Clark  
Secretary  
Federal Trade Commission  
Room H-135 (Annex E)  
600 Pennsylvania Avenue, NW  
Washington D.C. 20580

### **Re: iSAFE Safe Harbor Proposal – P094504**

Dear Mr. Secretary:

The Entertainment Software Rating Board (ESRB), which operates the ESRB Privacy Online program, and Privacy Vaults Online, Inc., d/b/a Privo, which operates the Privo Privacy Assurance Program, submit these comments in response to the Federal Trade Commission's (FTC) notice and request for public comment concerning proposed self-regulatory guidelines submitted by i-SAFE, Inc., under the safe harbor provision of the Children's Online Privacy Protection Act (COPPA). 75 Fed. Reg. 1734 (January 13, 2010). We appreciate the extension granted by the FTC so that we might submit these comments. As two of the four certified COPPA Safe Harbor programs presently operating, we believe we can provide especially informed insights in this area, given our unique understanding of the environment in which COPPA safe harbors operate. Having reviewed i-SAFE's application and proposed Guideline Requirements, we have significant concerns regarding: i-SAFE's acceptance of federal funds while operating as a safe harbor program; the failure of i-SAFE's website to conform to COPPA standards; several aspects of i-SAFE's proposed requirements for participating companies; and the timing of i-SAFE's application for safe harbor certification. We address each of these concerns below.

#### **1. i-SAFE's Funding**

It seems clear to us that there is a conflict of interest between i-SAFE's status as a recipient of government grants and its role as an independent provider of COPPA safe harbor services. i-SAFE is a nonprofit that is dependent on government funding to provide the services it offers members and others who visit its site for information. These government grants are a key source of funding that support i-SAFE's day-to-day operations; without these funds it is not clear i-SAFE could pursue its mission statement or engage in other organizational initiatives. If a COPPA safe harbor provider is to be a truly independent entity -- which we believe it should be -- its requisite independence is potentially compromised where the source of its funding, the United States Government, also functions as the overseer of COPPA.

The existing safe harbor providers do not receive funding from government sources to deliver their COPPA services. There is thus no conflict of interest concern with respect to any of the four certified safe harbor programs. All operating funds for these existing providers are generated by their own independent operations, without assistance from any

government entity. Moreover, monetary assistance provided to i-SAFE by the United States government not only raises the specter of a conflict of interest, it also provides i-SAFE with an unfair advantage over other safe harbor providers. This may result in i-SAFE having a distinct advantage in terms of the level of fees it must charge to provide its services and remain in business, as well as a potential for the recognition of net income that cannot be matched by other safe harbor providers. We submit that i-SAFE's nonprofit status is irrelevant, as long as some portion of its operations continues to be funded by the government, providing it with a distinct marketplace advantage.

## **2. i-SAFE's Website is not COPPA Compliant**

One of the factors to consider in certifying any company as a COPPA Safe Harbor is whether that company complies with the very standards it promulgates as requirements in its own safe harbor program. The most logical approach by which to assess a company's dedication to compliance is to review the online practices of that company. Before addressing, however, the issue of i-SAFE's COPPA compliance (or lack thereof), we will briefly address i-SAFE's possible claim that COPPA's requirements are not applicable to it.

The Children's Online Privacy Protection Rule promulgated by the FTC (16 C.F.R. Part 312, hereafter "COPPR") makes it clear that COPPA only applies to commercial websites (COPPR §312.2 – *Operator* definition). Perhaps it is this carve-out for nonprofits that leads i-SAFE to believe it can operate a website that is not COPPA-compliant while still requesting certification as a safe harbor. However, the FTC states in COPPR FAQ #17: "Although nonprofit entities generally are not subject to COPPA and the Rule, the FTC encourages them to post privacy policies on their websites and provide COPPA protection to their child visitors." In light of this recommendation and i-SAFE's desire to operate as a safe harbor, it should, at a minimum, ensure that its website protects the privacy of its youngest visitors. Even a cursory review of the i-SAFE website, however, shows that it does not approach full COPPA compliance.

i-SAFE might also claim that another COPPA exception applies to its site, relying on the FTC's published COPPR FAQs, specifically FAQ #55, which addresses whether COPPA applies "to website operators that contract with schools to provide online services involving the collection, use or disclosure of students' personal information." Although i-SAFE may provide services to schools and school districts around the country or even the world, its website is not directed solely to schools and educators. (On the homepage, there is a tab labeled "Kids & Teens," *see screen shot #1.*) The above-referenced FAQ states: "COPPA does not apply to the website operator's collection of personal information from participating children where a school has contracted with an operator to collect personal information from students for the use and benefit of the school, and for no other commercial purpose." But as detailed in our analysis below, i-SAFE engages directly with kids and teens, collects their personal information, and even permits children to create videos or other materials that i-SAFE uses to promote its services (i.e., for their commercial benefit). *See screen shot #2.*

Our review of i-SAFE's website revealed that it is not compliant with COPPA, CAN-SPAM, several state laws, or E.U. privacy laws. Below we detail the specific areas of non-compliance, particularly as they relate to COPPA. ESRB Privacy Online conducted a Privacy Risk Assessment (PRA) of the i-SAFE website, in essence doing precisely what is done to assess the compliance level of any company that applies to join ESRB's Privacy

Online program. The PRA provides a “report card” grade for a website’s compliance level at the time of review. While it is clear that i-SAFE has taken some positive steps to respect users’ privacy interests (e.g., providing a privacy policy), a number of i-SAFE’s current practices violate COPPA as well as other federal and state laws. The PRA grade reflected below encompasses the full panoply of privacy issues evidenced on i-SAFE’s website; for purposes of this submission, however, we highlight primarily COPPA-specific issues.

### **i-SAFE Privacy Risk Assessment Grade: C- or D**

Grade key:

A+ =	Meets all federal and state laws; conforms with ESRB and industry best practices
A/A- =	Meets all federal and state laws; does not conform with ESRB and industry best practices
B+ =	Meets most federal and state laws, but contains at least one violation
B/B- =	Meets most federal and state requirements, but contains at least four violations
C+ =	Meets most federal and state requirements, but contains at least six violations
C/C- =	Meets some federal and state requirements; contains more than ten violations
D =	Does not meet most federal or state requirements
F =	Violates significant number of federal or state laws

#### Compliance with Federal and State Laws

##### **COPPA Compliant? NO**

i-SAFE’s current procedures do not adequately prevent collection of personally identifiable information from users under 13, and consequently violate COPPA.

Under the heading of “Children” in i-SAFE’s privacy policy, found online at [http://www.isafe.org/channels/sub.php?ch=ai&sub\\_id=privacy](http://www.isafe.org/channels/sub.php?ch=ai&sub_id=privacy), it specifically states that “When a child or young adult under the age of 13 attempts to register with i-SAFE, we ask them to obtain their parents’ consent.” (*screenshot #3*) However, the i-SAFE enrollment process, [https://auth.isafe.org/reg/register1.php?ref\\_url=http%3A//www.isafe.org/](https://auth.isafe.org/reg/register1.php?ref_url=http%3A//www.isafe.org/) collects information qualifying as personally identifiable (first name, last name and email address) as defined under COPPR (§312.2), yet does not employ an age-gate or any other method of determining an enrollee’s age. Furthermore, the site does not request a parent or legal guardian’s email address (or any other form of contact information) to provide notification to the parent or legal guardian of the child’s enrollment; nor does the site appear to employ any of the required methods of obtaining parental consent as defined under COPPR (§ 312.5(c)(1)). (*screenshots # 4a-e*) If it is i-SAFE’s intention to argue that by **not** implementing an age-gate or similar technology to determine a user’s age it therefore does not acquire actual knowledge of a user’s age, such argument would be nullified by the language in its existing privacy policy. But beyond the dictates of the law, there appears to be a clear contradiction between i-SAFE’s mission statement and its online practices. The front page of i-SAFE’s website clearly states that i-SAFE is “... *dedicated to protecting the online experiences of youth everywhere. i-SAFE incorporates*

*classroom curriculum with dynamic community outreach to empower students, teachers, parents, law enforcement, and concerned adults to make the Internet a safer place. Please join us today in the fight to safeguard our children's online experience." (See screen shot #5) It would seem prudent for a company in the business of protecting children in the online environment to make best efforts to determine which visitors are actually children before engaging them in any website activities.*

§ 312.4(b) of COPPR requires that a link to i-SAFE's privacy policy be present on the home page of its website, as well as any page that collects personally identifiable information. While a link to the privacy policy does appear on the home page, as well as many of the purely informational pages, no such links appear on site enrollment pages, or on the checkout page of i-SAFE's online store. Examples of some of the pages in question include:

[https://auth.isafe.org/reg/register1.php?ref\\_url=http%3A//www.isafe.org/](https://auth.isafe.org/reg/register1.php?ref_url=http%3A//www.isafe.org/)  
<http://auth.isafe.org/reg/register2.php>  
<http://auth.isafe.org/reg/register3.php>  
<http://auth.isafe.org/reg/register4.php>  
[http://auth.isafe.org/reg/submit\\_reg.php](http://auth.isafe.org/reg/submit_reg.php)  
<http://auth.isafe.org/store/checkout.php>

(screen shots # 6a-b)

§ 312.4(b)(2)(i) of COPPR requires that a privacy policy include full contact information for the website operator, i.e. company name, address, telephone number and email address. None of this information appears in the privacy policy posted on i-SAFE's website at [http://www.isafe.org/channels/sub.php?ch=ai&sub\\_id=privacy](http://www.isafe.org/channels/sub.php?ch=ai&sub_id=privacy).

As of this submission, the i-SAFE chatroom is temporarily closed <http://xblock.isafe.org/chat.php>, but it does appear that i-SAFE intends to resume the chatroom function on the site (screen shot # 7). For purposes of this analysis, and based on the fact that i-SAFE has not implemented age-gates anywhere else on the site, or utilized any other technology that would determine the age of a user, we suspect there would be no age-gate in place for the chatroom either. As a result, nowhere on the website -- in i-SAFE's privacy policy or in the chatroom section -- is there any disclosure regarding how old a user must be to engage in the chat function, the types of information users may exchange in a chatroom, or whether the chatroom is being monitored.

**State Privacy Law Compliant? NO**

In conducting business over the Internet, i-SAFE will be presumed to be soliciting business or information from residents of all fifty states. Consequently, i-SAFE would be liable for violations of any given state's privacy laws.

Currently, California and Massachusetts are the only two states with laws specific to the online collection and use of their residents' personal information. Both states require specific notice, data collection guidelines and opt-in abilities for their state

residents. Currently, i-SAFE does not comply with California privacy law (California Civil Code Section 1798.83) or Massachusetts (201 CMR 17.00). Although compliance with these state laws is expected irrespective of a company's state of incorporation or residence, the fact that i-SAFE is a California-based company only makes its failure to comply with California law more egregious.

### Analysis of Privacy Policy

A strong privacy policy should provide consumers with detailed information about a company's policies regarding collection, protection, use, and disclosure of users' personally identifiable information. In addition, it should be consistent with a website's Terms of Use agreement, easy to read, and should not contain conflicting or confusing language. We have found that the strength of a company's privacy policy is, often times, an indicator of how great a priority a company places on compliance. Following is a detailed analysis of i-SAFE's privacy policy. Although much of this analysis is not specific to COPPA, it does highlight i-SAFE's failure to provide its users with a comprehensive, transparent privacy policy.

i-SAFE's current privacy policy, posted online at [http://www.isafe.org/channels/sub.php?ch=ai&sub\\_id=privacy](http://www.isafe.org/channels/sub.php?ch=ai&sub_id=privacy), does not satisfactorily meet the requirements of federal and state laws, which require more information and disclosure than i-SAFE's policy provides. Examples of information that is lacking include:

**Contact Information.** As stated above, a privacy policy is required to have complete contact information. This includes an email address, postal address, and phone number.

**Identity of Organizations collecting Personally Identifiable Information.** A privacy policy should identify any organization that is collecting Personally Identifiable Information through that website. This includes an email address, postal address, and phone number.

**Supplementing of Personally Identifiable Information with data from other sources.** A privacy policy should state whether Personally Identifiable Information collected on the website is supplemented with information gathered from other sources.

**Notice that any information posted by users in online bulletin boards, chat rooms, news groups or other public forums may be publicly displayed.** A privacy policy should provide notice that any information posted by users in online bulletin boards, chat rooms, news groups or other public forums may be publicly displayed.

**Include 'Last Updated' Notice.** A Privacy Policy should include a notice of when the privacy policy was last updated. To ensure that the notice is conspicuously posted, it should be placed at the top of the privacy policy.

**Terms of Use.** References to other controlling documents (such as the Terms of Use, Terms & Conditions or Terms of Service) should be hyperlinked to that specific document.

**Data Security and Protection.** A privacy policy should contain specific information disclosing how i-SAFE intends to protect users' personal information. Examples include SSL or other encryption methods, firewalls, antivirus solutions, etc.

**Opt-in.** A privacy policy must state whether the company maintains an opt-in or opt-out policy. Best practices dictate that opt-in be the default policy. Opt-in means that a user will need to affirmatively give consent to receive newsletters, allow their information to be shared with third parties, etc.

**Data Retention.** A privacy policy should disclose i-SAFE's data retention policy. As a best practice, data not necessary to ongoing operations should be purged within six months.

### Analysis of Terms of Use/Services

A Terms of Use/Services agreement should be consistent with i-SAFE's business practices and its privacy policy. It must also comply with privacy laws, both state and federal.

I-SAFE's site does not currently include a Terms of Use agreement, and therefore may well violate relevant online privacy and business laws.

### Assessment of Online Relationship with Third Parties, Including Vendors

Under COPPA, the COPPR, various state laws, and general best practices, site operators are required to take appropriate measures to ensure that third parties, including vendors and affiliates, protect users' personal information. Depending on how the information will be used by third parties, a company may be required to notify parents or obtain verifiable parental consent, as well as provide a means for users to opt out.

Although i-SAFE's current privacy policy adequately notifies users of i-SAFE's relationship with third parties, the privacy policy does not state whether third parties, including vendors and affiliates, are contractually required to protect users' personal information. (*screen shot #8*)

In sum, this PRA outlines the clear weaknesses in i-SAFE's own online privacy practices and behavior. Before certifying any company as a COPPA Safe Harbor, it is critical that the company demonstrate its **own** commitment to COPPA. Even if i-SAFE could demonstrate that it is legally exempt from compliance with COPPA, the fact remains that, to date, its website and its online practices do not reflect a strong commitment to the principles underlying COPPA, or an effort to meet its minimum standards.

### **3. Concerns with i-SAFE's Proposed "Guideline Requirements"**

**(a) Monitoring Process and Communication with Participants:** Particularly in

light of the FTC's recent settlement with ControlScan, in connection with charges concerning the frequency with which "seal" sites were monitored by the seal provider and misrepresentations with respect thereto, we think i-SAFE's intended monitoring practices and the frequency with which they will be undertaken are far too ambiguous. Its application references "periodic" unannounced monitoring, and also indicates that participants must submit to monitoring reviews that may be "quarterly, semi-annual, annual, or bi-annual, which shall be determined and conducted by i-SAFE at its sole and complete discretion." *i-SAFE Application Section I(B) at pp.4-5 and Guideline Requirement #7, Section II at p. 24.* It is truly unclear from its submission whether i-SAFE in fact has a plan with respect to monitoring, or has identified the criteria by which it will determine how frequently to monitor each particular participant, and how its "discretion" in this regard will be discharged.

Additionally, it appears from i-SAFE's application that participants do not actually receive a written report when monitoring has been completed. The application states: "Periodic monitoring reviews are memorialized in written reports and maintained by i-SAFE Harbor for a period of three (3) years." *i-SAFE Application Section I(B) at p.5, Section II(B) at p.21.* It does not say these reports are transmitted to the participant. Guideline Requirement #7 suggests they are not. It describes a practice whereby violations discovered during "periodic monitoring" will be noted in the monitor's report, and then a communication (not the report) will be sent to the participant telling it of the monitor's findings, if there is a potential violation described in the monitor's report. *Guideline Requirement #7, Section II at pp.24-25.*

It seems sensible that companies which join a safe harbor program, and pay for the monitoring/auditing of their privacy practices, would want a "paper trail" (i.e., regular monitoring reports) to demonstrate their historical compliance record, should issues subsequently arise with the FTC or other State regulatory authority. But beyond that, if reports are not provided indicating that monitoring has taken place, along with the results of that monitoring, how is a participant to know if their site is compliant (and it therefore did not receive any communication from the safe harbor), or if the safe harbor simply hasn't done any monitoring of its site? The provisions in i-SAFE's application relating to monitoring and reports are simply too ambiguous to warrant certification as a safe harbor.

**(b) Participant's Display of i-SAFE's Emblem/Seal:** The materials submitted by i-SAFE reference a trademarked logogram, termed the i-SAFE "emblem," that participants will be authorized "to display and use in accordance with the provisions of the i-SAFE Harbor Participant License Agreement." *Guideline Requirements, Definitions at p.5.* Presumably this seal is to designate, for the benefit of consumers, websites that are under the i-SAFE Harbor umbrella, and which are monitored for compliance with COPPA. But the submitted materials do not indicate when, where, or even if participants will be required by i-SAFE to display this emblem anywhere on their website(s). **Allowing** a participant to display the Emblem if it is in good standing is quite different than requiring it to be displayed at designated locations.

Given, as indicated above, that i-SAFE's own privacy policy does not contain contact information, one is left to wonder how consumers who have issues with an i-SAFE Harbor participating company might know to contact i-SAFE with regard to their issue, if there is no requirement that participating companies prominently display the i-SAFE emblem. i-SAFE does require that participants' privacy policies state that they are a participant in the i-SAFE Harbor program and include i-SAFE's contact information

(*Guideline Requirement #1, Section III.C*), but the vast majority of consumers will more easily notice a seal than text that may be buried within a privacy policy. Without the emblem clearly displayed on participants' websites, it is less likely consumers will know to contact i-SAFE with their complaints or concerns.

**(c) Requirements for Participants' Privacy Policies:** When a participant's online information practices change, i-SAFE does not require that a revised privacy policy, consistent with those changed practices be approved by i-SAFE. Similarly, when a participant makes a material change to its privacy policy, there is no requirement that such changes be considered and approved by i-SAFE prior to its use. These are certainly best practice requirements under COPPA. It is also unclear -- due to i-SAFE's use of the word "should" on page 10 of the *Guideline Requirements* rather than "must," which appears otherwise throughout -- whether certain information (e.g., a description of security procedures) will be required to appear in participants' privacy policies or if the inclusion of such information is simply a recommendation. *See Guideline Requirement #1, Section III.C.* Best practices would require the inclusion of all the information listed in the aforementioned section.

#### **4. Timing of the i-SAFE Application**

In addition to the foregoing concerns, now is simply not the right time to certify a new COPPA safe harbor. With review of the COPPR imminent, there could be significant changes to this Rule or even the underlying legislation. COPPA could be wrapped into broader federal privacy initiatives. New legislation may be passed. Program requirements of existing safe harbors and the very nature of the programs each administers may need to be massaged, modified, or perhaps significantly altered. While existing safe harbor programs are well-situated to roll with any changes to the Act or the FTC Rule and to swiftly advise clients on the implementation of any necessary changes to their online practices and/or privacy policies, we do not believe an untried and untested safe harbor is in as good a position to do so (particularly one still working through its own compliance issues).

Moreover, changes to the current COPPA environment may require modifications to the business plans of existing safe harbors, and have unanticipated financial impacts. We believe all the existing safe harbors can attest to the difficulties involved -- even for the non-profits -- in keeping revenues consistent with expenditures, given the significant efforts required to fully discharge a safe harbor's responsibilities. Certainly, operating a safe harbor program is rarely a profit-making exercise. Given the uncertainty surrounding the future COPPA landscape, combined with the tenuous economics and i-SAFE's lack of experience in this particular area, we submit that this is decidedly not the right time to certify i-SAFE as another safe harbor.



**5. Conclusion**

While the problems with i-SAFE's current online practices, as enumerated above, could of course be remedied, we believe the current status of its website, i-SAFE's questionable commitment to espouse and enforce not only minimum standards, but best practices, and the specific timing of this application for safe harbor status require that it be denied at this time.

Respectfully submitted,

**ESRB Privacy Online**

By: \_\_\_\_\_  
Evie C. Goldstein  
Senior VP, Legal Affairs

By: \_\_\_\_\_  
Dona Fraser  
Director, Privacy Online

**Privacy Vaults Online, Inc.  
d/b/a Privo**

By: \_\_\_\_\_  
Denise Tayloe  
President

# SCREEN SHOT #1

i-SAFE Inc. - Windows Internet Explorer

http://www.isafe.org/

File Edit View Favorites Tools Help

Home Page Safety Tools

i-SAFE Inc.

# iSAFE™

*The Leader in e-Safety Education*

Username:   
Password:


[Create Account](#) | [Forgot Password?](#)

[About i-SAFE](#) [Kids & Teens](#) [Educators](#) [Outreach & Parents](#) [Law Enforcement](#) [Get Involved](#)


### Welcome to i-SAFE

i-SAFE Inc. is **the worldwide leader in Internet safety education.** Founded in 1998 and endorsed by the U.S. Congress, i-SAFE is a non-profit foundation dedicated to protecting the online experience of youth everywhere. i-SAFE incorporates classroom curriculum with dynamic community outreach to empower students, teachers, parents, law enforcement, and concerned adults to make the Internet a safer place. Please join us today in the fight to safeguard our children's online experience.


### Assessments



### E-Rate Information




### i-SAFE Store



### i-SAFE Subscriptions

More than 21 million students have been taught i-SAFE lessons. Now, access to i-SAFE's e-Safety curriculum is through subscription and license ONLY. There are three license and subscription packages to choose from: Gold, Silver or E-Rate. Which of the i-SAFE subscriptions is right for your school or district? [Click here for more information.](#)

### News

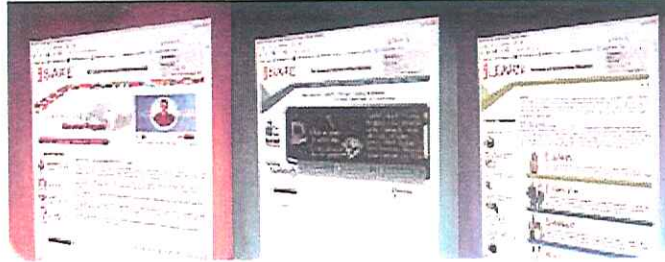


### Quick Links

**News from i-SAFE**  
Newsroom  
i-EDUCATOR Times  
i-PARENT Times  
Kewl Timez

**Join i-SAFE's Mission**  
i-SAFE on eBay  
Calendar of Events  
Web Banners  
Donations

### International Virtual Training I-LEARN Online



[I-LEARN ONLINE](#)

# SCREEN SHOT #2

X-BLOCK: i-DRIVE TV - Windows Internet Explorer

http://xblock.isafe.org/drive.php

File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery


X-BLOCK: i-DRIVE TV

Home Page Safety Tools


# X-BLOCK

[i-Mentors](#) [i-Mentor Training](#) [i-Drive TV](#) [Get the 411](#) [Contests](#) [Chatroom](#)

Username:

Password:  


[Create an Account](#)



Lights . . . Camera . . . Action!

i-DRIVE TV is high-tech TV made for students, by students. It's a cutting-edge, half-hour television show featuring student interviews, discussions with experts, profiles of the latest techno gadgets, and real-life Internet stories.

[View Vodcast](#) [Vodcast Archive](#) [Assignment](#)



Send us your videos!! i-DRIVE TV is seeking talented "Digital Correspondents" who want to tell their cyber stories. If you're a student filmmaker, on-air talent, a producer, a director, or a cameraman, this is your chance to get your voice heard!

We're accepting video submissions from talented students. i-DRIVE TV producers will select top students to join its production team. If selected, you will be put on assignment to create new material for an i-DRIVE TV episode or vodcast. Follow the steps below, and learn how to become a "Digital Correspondent."

Submit a video:  
Create an account on the X-Block Web site, and log in.  
Download and read the [i-DRIVE TV tool kit](#).  
Click on the ["Assignment"](#) link to receive information about what you need to film.  
Shoot, edit, and produce a video segment for i-DRIVE TV.  
Send your projects and forms to i-DRIVE TV.  
All music, photos, and video must be original work, or permission must be obtained to use copyright material. Send to i-SAFE Inc., 5900 Pasteur Ct., Ste. 100, Carlsbad, CA 92008.

Done Internet 100%

# SCREEN SHOT #3

i-SAFE Inc. - Windows Internet Explorer

http://www.isafe.org/channels/sub.php?ch=ai@sub\_id=privacy

File Edit View Favorites Tools Help

Home Page Safety Tools

i-SAFE Inc.

Law Enforcement  
Get Involved  
i-SAFE In Your State

Contact/FAQ  
i-SAFE Store

**SUBSCRIBE**  
TO I-SAFE  
Learn More

- i-SAFE collects and compiles statistical information about all visitors to our web site, even if they haven't registered. The information used to compile statistics is passed from a visitor's computer to our server each time a page is requested. This statistical information is logged and provides long-term usage data and trends that help i-SAFE allocate resources and better meet demands during peak usage. This information is not linked to the end user and is not considered personal information. The information collected includes:
  1. the type and version of your Operating System and Web Browser;
  2. your computer's IP address;
  3. the date and time of your visit;
  4. what page you visited; and
  5. what page you came from.
- When you register with i-SAFE, you are no longer anonymous. Your registration information is used to deliver i-SAFE education and outreach program material and to help i-SAFE develop future program material. Certain statistical information gathered from our subscribers is used to generate reports for governmental agencies. We must report this information because i-SAFE receives Grant money from the U.S. government. i-SAFE does not identify you by name in these reports; it only reports information in the aggregate.
- i-SAFE often collects information from people who attend i-SAFE activities or events or who our staff members meet during the course of their duties. If we believe these people may be interested in the i-SAFE program material, we elect to subscribe them. If so, we notify them via e-mail and ask whether or not they want this material.

**Children**

- When a child or young adult under the age of 13 attempts to register with i-SAFE, we ask them to obtain their parents consent.
- i-SAFE will not ask a child or young person under the age of 13 for more information than is reasonable in order to provide that student with the appropriate Internet Safety information on Youth Empowerment which i-SAFE offers.

**Project Safe Childhood Tool Kit**

- Information collected for the "Project Safe Childhood Virtual Toolkit" will be used to verify that the submitter is from the US Attorney's Office.
- Information collected for the "Project Safe Childhood Virtual Toolkit" will be sent, upon request, to other prosecutors and law enforcement officials in the state to wish to collaborate and partner with Project Safe Childhood team members.

**Information Sharing and Disclosure**

- Other than the following instances, i-SAFE does not rent, sell or share personal information about you with any other person(s) or organization(s):
  - i-SAFE may share your information with outsourced service providers in order to provide the materials you requested. For example, to fill an order for training materials, your name, address, and phone number may be provided to a third-party order filling agency so they can ship you the materials.
  - When the law requires i-SAFE to respond to subpoenas, court orders, or other legal process, i-SAFE provides the

Done Internet 100%

# SCREEN SHOT #4a

https://auth.isafe.org/reg/register1.php?ref\_url=http%3A//www.isafe.org/ - Windows Internet Explorer

https://auth.isafe.org/reg/register1.php?ref\_url=http%3A//www.isafe.org/


File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery

https://auth.isafe.org/reg/register1.php?ref\_url=htt...

Home Page Safety Tools

## Registration



Select Country\*

UNITED STATES or

\* If you are a DoDEA school please select United States as your country.

### Membership Type

- Kids & Teens If you are a Kid or Teen, you have access to our chat rooms and clubhouses. If you want to become a mentor, please visit the "Mentors" section.
- Education Higher If you are a Higher Education professional or student, you may gain access to Internet safety training and materials to utilize in your courses.
- Educators If you are a Teacher or other School Official, you can get access to materials used to teach your students about Internet safety.
- Homeschool If your child/children are Homeschooled, you can get access to our i-LEARN Online training and materials used to teach you and your children about Internet safety.

# SCREEN SHOT #4b

i-SAFE America - Protecting Children Online - Windows Internet Explorer

https://auth.isafe.org/reg/register2.php

File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery

i-SAFE America - Protecting Children Online

Home RSS Mail Print Page Safety Tools

**iSAFE.** Wednesday Mar 3, 2010

## Registration

Personal Information

Title  First Name  Last Name

State

Email Address

Confirm Email Address

Account Info

Username

Password

Confirm Password

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Done Internet 100%

# SCREEN SHOT #4c

i-SAFE America - Protecting Children Online - Windows Internet Explorer

https://auth.isafe.org/reg/register2.php

File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery

i-SAFE America - Protecting Children Online

Home Page Safety Tools

**iSAFE** Wednesday Mar 3, 2010

**Registration**

Confirm Information

Email Address: chefdawn63@yahoo.com  
Username: chefdawn

< Back Next >

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# SCREEN SHOT #4d

i-SAFE America - Protecting Children Online - Windows Internet Explorer

https://auth.isafe.org/reg/register1.php

File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery

i-SAFE America - Protecting Children Online

Home Page Safety Tools

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**iSAFE** Wednesday Mar 3, 2010

**Registration**

**Personal Info** Dawn Miller  
chefdawn83@yahoo.com  
Username: chefdawn

**Membership Type** Kids & Teens

**Organizational Info**  
School/Organization/Company Name   
School Level (if applicable)

**Newsletters**  
i-SAFE Newsletters  Sign up for the i-SAFE Newsletters and receive email updates.

**Finish**

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# SCREEN SHOT #4e

https://auth.isafe.org/reg/submit\_reg.php - Windows Internet Explorer

https://auth.isafe.org/reg/submit\_reg.php

File Edit View Favorites Tools Help

★ Favorites | ★ Suggested Sites | Free Hotmail | Web Slice Gallery

https://auth.isafe.org/reg/submit\_reg.php

Home Page Safety Tools >>

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**iSAFE** Wednesday Mar 3, 2010

Thank you for setting up an account with iSAFE.

**What's Next**  
You will be receiving an e-mail that contains information about your account. You are now able to log into the web site and access content only available to iSAFE accounts. Please remember that your username is your email address.

**SPAM notice**  
Auto-generated e-mails such as ours sometimes may be considered spam by your email provider. If you do not see our e-mail in your inbox, please check your spam or junk mail folder before contacting us. Also add @isafe.org to your approved sender list to insure timely receipt of all future communications.

[Continue](#)

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Done Internet 100%

# SCREEN SHOT #5

i-SAFE Inc. - Windows Internet Explorer

http://www.isafe.org/

File Edit View Favorites Tools Help

★ Favorites | Suggested Sites | Free Hotmail | Web Slice Gallery

i-SAFE Inc.

Home | Page | Safety | Tools

# iSAFE™

## The Leader in e-Safety Education

Username:   
Password:


[Create Account](#) | [Forgot Password?](#)

[About i-SAFE](#) | [Kids & Teens](#) | [Educators](#) | [Outreach & Parents](#) | [Law Enforcement](#) | [Get Involved](#)


### Welcome to i-SAFE

i-SAFE Inc. is the worldwide leader in Internet safety education. Founded in 1988 and endorsed by the U.S. Congress, i-SAFE is a non-profit foundation dedicated to protecting the online experiences of youth everywhere. i-SAFE incorporates classroom curriculum with dynamic community outreach to empower students, teachers, parents, law enforcement, and concerned adults to make the internet a safer place. Please join us today in the fight to safeguard our children's online experience.


### Assessments



### E-Rate Information




### i-SAFE Store



### i-SAFE Subscriptions

More than 21 million students have been taught i-SAFE lessons. Now, access to i-SAFE's e-Safety curriculum is through subscription and license ONLY. There are three license and subscription packages to choose from: Gold, Silver or E-Rate. Which of the i-SAFE subscriptions is right for your school or district? [Click here for more information.](#)

### News



### Quick Links

<a href="#">News from i-SAFE</a>	<a href="#">Join i-SAFE's Mission</a>
<a href="#">Newsroom</a>	<a href="#">i-SAFE on eBay</a>
<a href="#">i-EDUCATOR Times</a>	<a href="#">Calendar of Events</a>
<a href="#">i-PARENT Times</a>	<a href="#">Web Banners</a>
<a href="#">Kewl Timez</a>	<a href="#">Donations</a>

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# SCREEN SHOT #6a

i-SAFE Store - Windows Internet Explorer

https://auth.isafe.org/store/checkout.php

File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery

i-SAFE Store

or telephone (760) 603-7911 Ext. 14

FAQs

### YOUR CART

Item	Qty	Total
i-Buddy Doll	2	\$96.00

Sub-Total: \$96.00  
Shipping: \$39.99  
(Shipping costs quoted are for UPS Ground only)  
Total Cost: \$135.99

**Credit Card Information**

First Name:

Last Name:

Card Type:

Card Number:

Expiration:

Card Verification Code:  
(This is the 3 digit code at the back of the card for Visa, Mastercard & Diners Club OR the 4 digit code on the front of )

**Billing Address**

Address:

City:

State:

Zip:

**Shipping Address**  
(if different than billing address)

Address:

City:

State:

[Help](#) | [Shipping Information](#) | [Return to isafe.org](#)

GoDaddy.com  
SECURE WEB SITE  
org  
VERIFY  
MAR 2 2010 17:57:56

# SCREEN SHOT #6b

i-SAFE Store - Windows Internet Explorer

https://auth.isafe.org/store/checkout.php

File Edit View Favorites Tools Help

Favorites Suggested Sites Free Hotmail Web Slice Gallery

i-SAFE Store

or telephone (760) 603-7911 Ext. 14

FAQs

### YOUR CART

Total Cost: \$135.99

<b>Credit Card Information</b>	<b>Billing Address</b>
First Name: <input type="text"/>	Address: <input type="text"/>
Last Name: <input type="text"/>	City: <input type="text"/>
Card Type: <input type="text" value="Visa"/>	State: <input type="text" value="Select a state"/>
Card Number: <input type="text"/>	Zip: <input type="text"/>
Expiration: <input type="text" value="mm"/> <input type="text" value="yyyy"/>	<b>Shipping Address</b> (if different than billing address)
Card Verification Code: (This is the 3 digit code at the back of the card for Visa, Mastercard & Diners Club OR the 4 digit code on the front of the card for JCB)	Address: <input type="text"/>
	City: <input type="text"/>
<b>Contact Information</b>	State: <input type="text" value="Select a state"/>
Contact Phone: <input type="text"/>	Zip: <input type="text"/>
Contact E-Mail: <input type="text"/>	

[Help](#) | [Shipping Information](#) | [Return to isafe.org](#)

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SECURE WEB SITE  
VERIFY

# HOT #7

X-BLOCK: Chatroom - Windows Internet Explorer

http://xblock.isafe.org/chat.php

File Edit View Favorites Tools Help


Favorites Suggested Sites Free Hotmail Web Slice Gallery

X-BLOCK: Chatroom

**X-BLOCK**


[i-Mentors](#) [i-Mentor Training](#) [i-Drive TV](#) [Get the 411](#) [Contests](#) [Chatroom](#)

Welcome back, **chefdawn**  
(School id: 42373)  
[My Info](#) [Sign Out](#)

  
**Chat**

Do you like to chat? So do we! One of the coolest and safest places on the 'net to chat with other students is the i-SAFE chat room. It's all about students who want to make a difference and change the future of the Internet!

Join students from around the world, and discuss topics that are important to you. Come and talk about how the cyber world is influencing your world, and see what other students are doing to educate and empower others to stay safe.



**THE i-SAFE CHAT ROOM IS TEMPORARILY CLOSED.**

Click on the "Create Account" link in the upper right corner to register with i-SAFE and to receive notifications of upcoming hosted chats, the i-SAFE Kewl Timez student newsletter and other important i-SAFE information.

Then log in to the X-BLOCK Web site <http://xblock.isafe.org/imentors.php> to learn more about online dangers and how you can help others learn about Internet safety.

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# SCREEN SHOT #8

i-SAFE Inc. - Windows Internet Explorer

http://www.isafe.org/channels/sub.php?ch=ai&sub\_id=privacy

File Edit View Favorites Tools Help

★ Favorites | ★ Suggested Sites | ★ Free Hotmail | ★ Web Slice Gallery

i-SAFE Inc.

Project Safe Childhood Tool Kit

- Information collected for the "Project Safe Childhood Virtual Toolkit" will be used to verify that the submitter is from the US Attorney's Office.
- Information collected for the "Project Safe Childhood Virtual Toolkit" will be sent, upon request, to other prosecutors and law enforcement officials in the state to wish to collaborate and partner with Project Safe Childhood team members.

**Information Sharing and Disclosure**

- Other than the following instances, i-SAFE does not rent, sell or share personal information about you with any other person(s) or organization(s):
  - i-SAFE may share your information with outsourced service providers in order to provide the materials you requested. For example, to fill an order for training materials, your name, address, and phone number may be provided to a third-party order filling agency so they can ship you the materials.
  - When the law requires i-SAFE to respond to subpoenas, court orders, or other legal process, i-SAFE provides the information needed to obey the law. i-SAFE also may provide information in order to establish or exercise our legal rights or defend against legal claims.
  - i-SAFE believes it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law.
- i-SAFE makes every reasonable effort to ensure the security of the data it collects. However, i-SAFE cannot warrant against the disclosure of this information in the event of a security breach or other event beyond our control.

**Cookies**

- To facilitate the experience our website strives to offer, i-SAFE may use cookies to store various pieces of information on your computer. The information in these cookies is only retrievable by i-SAFE servers. We are confident the information within the cookies is reasonably secure. Although vulnerabilities in this technology exist, by keeping your web browser up to date, it is unlikely the information in these cookies will be misappropriated.
- A cookie is a data file stored on your hard drive by your browser. It does not contain any executable code and cannot gather information from your computer that you have not already provided i-SAFE either in a form, or by requesting a page from our site (see "Information Collection and Use", above).
- Most browsers allow users to choose not to receive cookies. If you disable cookies on your browser, some pages on our site may not work correctly (or at all), or some features may be disabled.

Your Ability to Edit Your Account Information

Done

Internet 100%