



TRUSTe Children's Self-Assessment Sheet

This form asks difficult and sometimes confidential questions about your internal business practices. It is critical that representatives from all levels of your organization are involved in answering these questions and understand the implications of not following the privacy and data collection practices described in this document. Answers need to be complete in order for TRUSTe to understand, verify, and assess your company's business practices. We appreciate your careful attention in answering these questions.

- Every question must be answered completely.
- Answers must reflect the current business practices of your site. TRUSTe cannot cover future activities of your site.
- No question may be left blank. If a response is not required, that question should be marked "N/A".
- Be sure to sign the last page of this form. If the form is unsigned or any of the questions left unanswered, the processing of your application may be delayed.
- All information entered into this form is considered confidential and will be treated as such as outlined in the license agreement.

Company Name: _____ 	Name of Contact Person for future communications from TRUSTe _____ (Designated Site Coordinator)
Web Site Name: _____ Note: this is how your site will be listed on TRUSTe's list of licensees	Web Site URL: _____
Site Coordinator's Contact Information Email Address: _____ Fax Number: _____	
Is the site live? Yes _____ No _____ If no, when will the site be available for review by TRUSTe? _____ 	

I. Collection and Use of Information from Children

The answers to these questions need to cover all information collected from children under the age of 13, which includes information collected about a parent/guardian, other relative, and/or a friend.

- A. Is your Web site directed towards children? Yes No
If so, what age group is your site directed toward?_____
- B. Does your Web site contain areas directed specifically toward children? Yes No
- C. Does your Web site collect personal information from children? Yes No
If yes, how long does your Web site retain the child's information?

- D. Does your Web site collect age/birth date? Yes No
- E. What information does your Web site collect from children and how is the information used? List all uses.

1. Contact Information

Name	Mailing Address
Email Address	Phone Number
Other (please specify)_____	
Uses: _____	

2. Financial/Billing Information

Credit Card Number	Salary/Income
Other (please specify)_____	
Uses: _____	

3. Unique Identifiers

Social Security Number	ID Number
User Name	Password
Other (please specify)_____	
Uses: _____	

4. Legal Information

Criminal Record	Criminal Record
Other (please specify)_____	
Uses: _____	

5. Demographic Information

Zip Code _____ Gender _____
Ethnicity _____ Martial Status _____
Hobbies _____ Interests _____
Other (please specify) _____
Uses: _____

6. Educational Information

Schooling _____
Other (please specify) _____
Uses: _____

7. Age Identifiers

Age _____
Date of Birth _____
Grade Level _____
Last level of education completed _____
Other (please specify) _____
Uses: _____

8. Health Information

Health Status _____ Medical History _____
Medical Records _____ Health Related Interests _____
Other (please specify) _____
Uses: _____

9. What information does the site request from the child (e.g. parent's personal information or additional demographic data) in order to participate in a game, activity, or a promotion?

- a. Is the requested information required or optional? _____
b. What is the information used for? _____
-

10. Explain what information collected by the site is optional and how the user benefits by entering that optional information.

11. By what means is this information collected? (check all that apply)

Registration Forms Order Forms News Groups
Feedback Forms Contact Us Request Forms
Contests Surveys Mail to
Other (please specify) _____

12. Does your site offer any of the following (check all that apply):

chat rooms forums message boards

a. Are the messages posted in a chat room, forum, and/or message board pre-screened and monitored for personal information? Yes No If yes, what procedures are in place to pre-screen messages for personal information?

b. If messages are pre-screened for personal information, what is done with the personal information after it has been edited from the message?

c. How are children made aware of the risks and responsibilities associated with entering into a chat room or other public forum?

13. Does your site offer any of the following features? (check all that apply)

Instant Messenger Free Email Accounts
Electronic greeting cards/post cards
Electronic Photo albums

14. Does your site publicly post children's personal information (i.e. posting names of contest winners or photos)? Yes No

F. Under what circumstances does your Web site provide notice to parents regarding the collection of personal information from children?

1. What information is collected from the child to send the notice?

2. How does the parent prevent the site from using the child's information?

3. How does the parent access/correct and/or update the child's information?

4. How does the parent request the deletion of their child's personal information??

5. How does the parent limit the use of the child's information for internal purposes only without consenting to the transfer of personal information to a third party?

6. Who is the contact person to receive inquiries from parents?

G. Explain under what circumstances does your Web site seek verifiable parental consent.

1. What information is collected from the child in order to obtain verifiable parental consent (i.e. parent's email address)? _____

2. How is verifiable parental consent obtained?

Printed Permission Form (faxed or postal-mailed to your company)

Credit Card Number (in conjunction with a transaction)

Email

Toll-free number staffed by trained personnel

Other (please specify) _____

H. If the site is seeking verifiable parental consent, does the notice to the parent contain the following:

1. All information contained in the privacy statement? Yes No
2. A statement notifying the parent that the site wishes to collect personal information from the child and cannot do so without verifiable parental consent? Yes No
3. A statement that the parent can consent to the website's collection and internal use of personal information without consenting to the disclosure of that information to third parties? Yes No
4. A statement with the procedures for limiting disclosure? Yes No

I. Do you include the following information in the notice to the parent for multiple contacts with the child?

1. All information contained in the privacy statement? Yes No
2. What Personal Information was collected from the child? Yes No
3. How the personal information will be used? Yes No
4. A statement informing parents that they can refuse to permit further contact with the child and require the collected information to be deleted? Yes No
5. The procedures for parents to refuse further contact with the child? Yes No
6. The procedures for the parents to access, correct, and/or update the child's personal information? Yes No
7. The procedures for the parent to delete their child's information? Yes No
8. A statement notifying the parent that the site will use the information for the purpose for which it was collected if the parent fails to respond? Yes No

J. Do you include the following information in the notice to the parent to protect the child's safety?

1. All information contained in the privacy statement? Yes No
2. What Personal Information was collected from the child? Yes No
3. How the personal information will be used? Yes No
4. A statement informing parents that they can refuse to permit further contact with the child and require the collected information be deleted? Yes No
5. The procedures for parents to refuse further contact with the child? Yes No

6. The procedures for the parents to access, correct, and/or update the child's personal information? Yes No
7. The procedures for the parent to delete their child's information? Yes No
8. A statement notifying the parent that the site will use the information for the purpose for which it was collected if the parent fails to respond? Yes No

II. Passive Collection of Information

A. Log Files and Tracking Software

1. Does your site track user movement throughout the site? Yes No
2. Does your site continue to track users after they leave your Web site for another Web site? Yes No
3. What information is passively collected from the user? (check all that apply)

IP Address	Browser Type	Domain Names
Access Times	Referring URL	Page Views
Other (please specify) _____		
4. For what purposes do you use the information that is passively collected?

5. Is passively collected information linked to the user's personal information? Yes
 No If yes, how is the information used?

6. Is passively collected information shared with third parties? Yes No
 If yes, how is the information shared? (aggregate or personally identifiable)

B. Cookies

1. Does your Web site use cookies? Yes No
 If yes, what information is being collected through each cookie? _____

2. For what purpose(s) are cookies being used? (check all that apply)
 - Keep track of shopping cart
 - Keep track of login name, passwords
 - Keep track of click stream data
 - Provide content tailored to the user's interest
 - Enhance navigation
 - Session timeout
 - Offer a personalized experience (such as greeting user when they return to the site)
 - Other (please specify) _____
3. Is the information collected through the cookie linked back to the user's personal information?
4. How does your site's use of cookies benefit the user? _____

5. What are the consequences if a user chooses to reject cookies? _____

C. Clear Gifs (a.k.a. Web bugs, Web beacons)

1. Does your site set Clear Gifs on its Web pages? Yes No
2. If yes to question 1, what information is collected through the use of Clear Gifs?

3. How is the information collected through Clear Gifs used?

-
4. Is the information collected through Clear Gifs linked back to the user's personal information? Yes No If yes, how is the information used?

5. How are users made aware that Clear Gifs are being placed on the site's Web pages?

- D. Are you using any other technology that collects non-personal information or personal information that has not been disclosed in the preceding questions? Yes No
If yes, explain _____

III. Communication

- A. Explain what, if any, communications will occur between the Web site and the user?

- B. What method of communication will be used? (check all that apply)

Email Postal Mail Telephone call Fax

Other (please specify) _____

- C. How often will the communication take place?

- D. How are parents notified of any material changes in the site's privacy practices, including changes in the collection, use, or disclosure of personal information?

- E. How is verifiable parental consent obtained in connection with changes in the site's information practices?

- F. What procedures are in place to ensure user information is governed by the privacy policy that the user consented to have their information collected under?

IV. Use of the Information Collected

A. Unrelated Uses of User Information by the Web Site

1. Does the site use personal information for any purposes unrelated to the purpose for which the information was originally collected? Yes No
2. How are users able to opt-out of having their personal information used for purposes unrelated to the purpose for which it was collected? (check all that apply)
Opt-out box (On-line) via email "reply" to unsubscribe
via telephone via postal mail
Other (please specify)_____

B. Sharing of Personal Information

1. Is the personal information collected on the Web site shared, transferred, or released to third parties? (this includes sharing with both agents and unrelated third parties)
Yes No

If yes:

- a. With whom is the information being shared, transferred, or released?

- b. What specific information is being shared, transferred, or released to third parties?

- c. How are users able to opt-out of having their personal information shared transferred, or released to unrelated third parties? (check all that apply)
Opt-out box (On-line) via email "reply" to unsubscribe
via telephone via postal mail
Other (please specify)_____

2. Does the site share, transfer, or release aggregated (non-personal information) user information with third parties? Yes No
3. Are Non-Disclosure Agreements (NDAs) pertaining to sensitive information in place with contractors and third parties? Yes No

V. Who Is Collecting the Information

- A. Please list the name(s) of all organizations that control the day to day operations of the Web site and own the information collected on the Web site.

- B. Do special relationships with third parties exist, such as:

(Check all that apply and list the names of the third parties with the relationship)

“Powered by” _____

“Brought to you by” _____

“Content provided by” _____

“Presented by” _____

“Featuring” _____

Partners _____

Co-branding _____

Network _____

Subsidiaries _____

Agents _____

Other (please specify) _____

N/A _____

C. Please explain any special relationship(s) that exist:

D. Third Party Ad Servers

1. Do banners ads appear on the web site? Yes No
2. Does the site have a relationship with a third party ad server? Yes No
3. If yes, who serves the ad strings on the web site (e.g. Engage, Doubleclick)?

4. Is the ad server authorized to deliver cookies to users while on the web site?
Yes No
 - a. If yes, how are users informed? _____
 - b. Can users opt-out of receiving third party cookies? Yes No
 - c. Does your privacy statement provide information to the user about how to opt out of having information collected by third party ad servers? Yes No
5. Are third parties, such as ad servers, allowed to place Clear Gifs on your site’s web pages? Yes No
6. If yes to question 5, what information is being collected by third parties through the use of Clear Gifs? _____

E. Links, Framing, and Masking

1. Does the Web site contain links to other Web sites? Yes No If yes, how are users made aware they are leaving your site to go to another Web site?

2. Does the site display its frame or give the user the look and feel of your site even though the user is actually on another Web site? Yes No If yes, are users alerted that they are on another Web site? Yes No
3. When users leave your site is the URL of the new site hidden? Yes No
4. If yes, explain the site’s use of masking. _____

5. If the site uses masking techniques, how is the user notified that they are leaving your web site? _____

VI. Data Quality and Access

A. Parents

1. How do parents access and correct Personal Information submitted by their children to the Web site? (check all that apply)

Online via email via telephone
via postal mail Other (please specify) _____

2. Are there any limitations on what information parents are allowed to access and correct? Yes No

If yes, what are the limitations? _____

3. How do you verify the identity of the parent wishing to access/correct her/his child's personal information (i.e. username and password)?

4. Does your site have a mechanism in place for the parent to request that his/her child's information be deleted from the site's database? Yes No

5. If yes to question 4, how can parents request that the information collected from their children be deleted from your database? (check all that apply)

Online via email via telephone
via postal mail Other (please specify) _____

6. Is there some information that the site is unwilling or unable to delete, such as medical records? Yes No

If yes, explain _____

- B. If a child's personal information is collected for a one-time use, how long is the information retained after the information has been used?

VII. Security

A. Data Integrity

1. What is your company's procedure for maintaining the integrity of user information collected on the site? _____

-
2. Does your company compare data in order to merge or coordinate records?
Yes No

B. Sensitive Data

1. If sensitive information is collected, used, or disclosed, what mechanisms are in place to ensure confidentiality over public communication lines?

2. What mechanisms are in place to ensure confidentiality once the information has reached your site?

3. Is sensitive information, such as credit card numbers or medical information differentiated from other less sensitive information? Yes No

4. Is access to sensitive information restricted? Yes No
If yes, explain _____

C. Authentication and Identification

1. Is access to user data limited to specific employees and/or contractors? Yes No

2. If no, do you grant general access to data within your organization?
Yes No If yes, explain: _____

3. Is access to sensitive data revoked in a timely manner for employees and/or contractors that change job positions or resign? Yes No If yes, when is access revoked?

4. What systems are in place to verify the identity of the employees and/or contractors accessing the information?

- a. If passwords are used, is there a maximum password age, a minimum password length required, and/or a set of content guidelines for employees and/or contractors creating passwords (i.e. upper and lower case, alphanumeric characters)?

- b. Are there authentication requirements instead of, or on top of password security?

5. When would an employee and/or contractor be denied access (i.e. 3 failed login attempts)?

6. What are the procedures for re-activating access (i.e. account locked for 1 hour or until an administrator re-enables the account)?

7. What procedures are in place to deny third party and/or contractor access to the site's database after contracts have been terminated?

8. What mechanisms are in place to limit unauthorized access by outside parties?

D. Data Storage

1. Where do you physically store data both in electronic and alternative medium?

2. How long do you store the data?

3. Are your Web servers located in a secure and environmentally controlled room/location?

4. Where are sensitive printouts and logs stored?

5. What are the procedures to backup data tapes? _____

6. Is backup data continuously stored in a secure location and periodically off-site?

7. How often is backup media destroyed? _____

8. Is there any data that is not destroyed? Yes no

If yes, what data?

Explain why it is not destroyed _____

E. Disaster Management

1. Have security and privacy threats, both from an operational and technical standpoint been assessed? Yes No If yes, what countermeasures have been taken to eliminate or reduce these vulnerabilities?

2. What internal or external audits and reviews are in place to ensure the information is secure? (i.e. intrusion/penetration tests, web site security reviews, risk analysis)

3. Which of the following are logged in a security audit log if there is a security breach? (check all that apply)

the date and time of an event

type of an event

identity of unauthorized user

success/failure of the event

other (specify) _____

4. Does the system/application associate any auditable events with the individual identity of the user that caused the events (i.e. If someone without authorization tries to access the database, is the system logging the person's IP address or some other unique identifier.)? Yes No

5. What procedures or mechanisms are in place to identify attempted or successful breaches to the computing environment or unauthorized access to customer information? _____

6. Is the ability to create, delete, or empty the audit log limited to authorized security personnel? Yes No

7. How do you verify the identity of the security personnel accessing the security log?

VIII. Overall Management, Policies, and Procedures

A. Are all employees and contractors aware of the company's privacy and security policies?

Yes No

B. How and how often is the value of customer information communicated across the organization? _____

C. How and how often are employees and contractors made aware of privacy and security policies?

D. How are employees and contractors made aware of any changes in the company's privacy and security policies?

By signing below, an authorized officer of Licensee attests to the statements made on this self-assessment sheet and warrants that the statements made on the self assessment sheet are true and accurate as of Effective Date and shall remain true and accurate for the term of this Agreement.

Accepted and Agreed by Licensee

Authorized
Representative
Signature _____
Name _____
Title _____
Date _____
Telephone _____
Email _____