

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Joseph J. Simons, Chairman**
 Noah Joshua Phillips
 Rohit Chopra
 Rebecca Kelly Slaughter
 Christine S. Wilson

FTC Matter No. **P205402**

ORDER TO FILE A SPECIAL REPORT

Pursuant to a resolution of the Federal Trade Commission (“FTC” or “the Commission”) dated December 11, 2020, entitled “Resolution Directing Use of Compulsory Process to Collect Information Regarding Social Media and Video Streaming Service Providers’ Privacy Practices,” a copy of which is enclosed, [COMPANY NAME], hereinafter referred to as the “Company,” is ordered to file with the Commission, no later than 45 days after date of service, a Special Report containing the information and Documents specified herein.

The Commission is seeking information concerning the privacy policies, procedures, and practices of Social Media and Video Streaming Service providers, including the method and manner in which they collect, use, store, and disclose Personal Information about consumers and their devices. The Special Report will assist the Commission in conducting a study of such policies, practices, and procedures.

The Special Report is required to be subscribed and sworn by an official of the Company who has prepared or supervised the preparation of the report from books, records, correspondence, and other data and material in Your possession. Your written report should restate each item of this Order with which the corresponding answer is identified. If any question cannot be answered fully, give the information that is available and explain in what respects and why the answer is incomplete. The Special Report and all accompanying documentary responses must be Bates-stamped.

You are required to respond to this Order using information in Your possession, custody, or control, including information maintained in a central data repository to which You have access. You should not seek any responsive information and data from separately incorporated subsidiaries or affiliates or from individuals (other than in their capacity as Your employee or as Your agent). However, You should provide information from separately incorporated subsidiaries or affiliates or from individuals if You already have possession, custody, or control of such information. No later than 14 days from the date of service, You should contact Commission staff and indicate whether all of the information required to respond to this Order is in Your possession, custody, or control. If certain information is not in Your possession, custody, or control, no later than 14 days from the date of service, You also must: (1) Identify, both orally and in writing, each question or sub-question that You are not able to fully answer because information is not in Your possession, custody, or control, and (2) for each, provide the

full names and addresses of all entities or individuals who have possession, custody, or control of such missing information.

Confidential or privileged commercial or financial information will be reported by the Commission on an aggregate or anonymous basis, consistent with Sections 6(f) and 21(d) of the FTC Act. Individual submissions responsive to this Order that are marked “confidential” will not be disclosed without first giving the Company ten (10) days’ notice of the Commission’s intention to do so, except as provided in Sections 6(f) and 21 of the FTC Act.

SPECIFICATIONS

Please produce the following information, Documents, and items, consistent with the definitions, instructions, and formatting requirements contained in Attachment A.

Identification of Report Author

1. Identify by full name, business address, telephone number, and official capacity the individual(s) who prepared or supervised the preparation of the Company’s response to this Order, and Describe in Detail the steps taken by the Company to respond to this Order. For each Specification, Identify the individual(s) who assisted in preparation of the response. Produce a list Identifying the individual(s) whose files were searched, and Identify the individual(s) who conducted the search.

Company Information

2. State the Company’s complete legal name and all other names under which it has done business, its corporate mailing address, all addresses from which it does or has done business, and the dates and states of its incorporation.
3. Describe the Company’s corporate structure, and state the names of all parents, subsidiaries, divisions, affiliates, branches, joint ventures, franchises, operations under assumed names, websites, and entities over which it exercises supervision or control. For each such entity, Describe in Detail the nature of its relationship to the Company and the date it was created, acquired, sold, or otherwise changed ownership or control. Produce organizational charts sufficient to detail the Company’s corporate structure.
4. If the Company is not publicly traded, Identify each individual or entity having an ownership interest in the Company, as well as their individual ownership stakes and their positions and responsibilities within the Company.

General Information Regarding Social Media and Video Streaming Services

5. Identify each Social Media and Video Streaming Service provided or sold by the Company from January 1, 2019 to the present in each Relevant Area, and for each such Social Media and Video Streaming Service, separately for all users in total and for each mutually exclusive Selected User Group, provide, on a monthly basis, separately for

desktop and mobile, the number of users and the value of each User Metric, in total and on average per monthly active user (if applicable), Including:

- a) number of registered users;
- b) daily active users (“DAUs”);
- c) monthly active users (“MAUs”);
- d) time spent;
- e) number of sessions;
- f) unique posts, separately by photos, videos, stories, or other;
- g) views, separately by photos, videos, stories, or other;
- h) “like” or “recommend” actions (e.g., likes, upvotes, downvotes);
- i) shares, reposts, or forwards, within the Social Media and Video Streaming Service or to any other Social Media and Video Streaming Service;
- j) comments;
- k) messages sent, separately by text, video, and image messages;
- l) status updates;
- m) size of the social graph;
- n) User Network Size;
- o) privacy settings;
- p) User Engagement on any Social Media and Video Streaming Service, or other product or service, owned by any Person other than the Company;
- q) value of user to the Company (e.g., dollar value);
- r) exposure to ads (e.g., ad load);
- s) ad engagement;
- t) ads viewed for (i) each Advertising Format and (ii) all Advertising Formats in total;
- u) ads viewed for (i) each Advertising Format and (ii) all Advertising Formats in total; as a share of total posts, stories, and messages viewed; and

- v) any other measure of user traffic, density, engagement, or activity used by the Company in the ordinary course of business.

Provide with Your response a description of each User Metric, Including a description of how each User Metric is calculated, and a data dictionary with each such metric.

Submit a list of available mutually exclusive Selected User Groups to Commission counsel before submitting a full response to Specification 5. If the Company lacks a value (e.g., “yes,” and “no,” for whether a natural Person is of Hispanic, Latino or Spanish origin) for a Selected User Attribute for any user, the Company should treat “missing” as the value of that Selected User Attribute for the users who lack a value.

For the limited purpose of illustrating the concept of mutually exclusive Selected User Groups, assume that the Selected User Attributes are age, whether a natural Person is of Hispanic, Latino or Spanish origin, and country, and that the mutually exclusive values for those Selected User Attributes are 0-25 years, 26-50 years, 50+ years, and “missing” for age; yes, no and “missing” for whether a natural Person is of Hispanic, Latino or Spanish origin; and United States, Other, and “missing” for country. The number of mutually exclusive Selected User Groups in the Company’s response would be the product of the number of mutually exclusive values for each Selected User Attribute: $N = (\# \text{ of age values}) * (\# \text{ of origin values}) * (\# \text{ of country values})$.

In this example, the Company’s response would Include 36 mutually exclusive Selected User Groups per month $[(4 \text{ age values}) * (3 \text{ origin values}) * (3 \text{ country values}) = 36]$, and the Company’s response should Include the number of registered users in each such group and the value of each User Metric, on a monthly basis, in total and on average per MAU (if applicable), for each such group of users. The spreadsheet in Appendix A illustrates this example.

- 6. For each Social Media and Video Streaming Service identified in response to Specification 5, provide, on a monthly basis, separately for each Relevant Area, the total number of registered users and value of each User Metric, in total and on average per MAU (if applicable), separately for the subset of users in each Selected User Group that were:
 - a) MAUs on such Social Media and Video Streaming Service; and
 - b) MAUs on such Social Media and Video Streaming Service and also active on another Social Media and Video Streaming Service provided or sold by any Person other than the Company, stated separately for each other Social Media and Video Streaming Service (and Identifying such other Social Media and Video Streaming Service).
- 7. For each Social Media and Video Streaming Service identified in response to Specification 5, separately for each Relevant Area, Identify and describe each metric (Including the inputs and the methodology used to calculate the metric) that the Company uses to assess the service’s penetration or reach (e.g., 1-day reach, 30-day reach, installed base, or app downloads). Provide each such metric (Including the inputs used to

calculate the metric) on a monthly basis, stated separately for each Social Media and Video Streaming Service in each Relevant Area.

8. For each Social Media and Video Streaming Service identified in response to Specification 5, separately for each Relevant Area, state, on a monthly, quarterly, and annual basis:
 - a) the Company's revenue, other than advertising revenue, stated in dollars, stated separately by type of revenue, Including gross and net revenue;
 - b) the Company's revenue for each Digital Advertising Service on the Social Media and Video Streaming Service, stated in dollars, stated separately by type of revenue, Including gross and net revenue;
 - c) the Company's costs and expenses, other than for Digital Advertising Services on the Social Media and Video Streaming Service, stated in dollars, Including, but not limited to, cost of revenue, traffic acquisition costs, and revenue guarantees;
 - d) the Company's costs and expenses for each Digital Advertising Service on the Social Media and Video Streaming Service, stated in dollars, Including, but not limited to, cost of revenue, traffic acquisition costs, and revenue guarantees;
 - e) the Company's prices for revenue-generating products or services other than advertising revenue; and
 - f) the Company's gross margins, operating margins, and the method of computation.
9. State whether the Company uses data professionals (e.g., a privacy engineer) in the management and operation of its Social Media and Video Streaming Service's privacy, ethics, or bias efforts, and state their roles (e.g., legal, technical, operational, design, etc.) in the Social Media and Video Streaming Service's product lifecycle, Including any privacy, bias, or ethics-focused professionals working on Algorithms or Data Analytics utilized by a Social Media and Video Streaming Service, and Describe in Detail their responsibilities.

Data Collection, Use, Storage, Disclosure, and Deletion

10. For each Social Media and Video Streaming Service identified in response to Specification 5, separately for each Relevant Area, Identify each User Attribute that the Company uses, tracks, estimates, or derives, Including, but not limited to, each User Attribute Related to the Company's sale of Digital Advertising Services such as User Attributes for targeted advertising. Further, provide the following:
 - a) For each such User Attribute, Identify and provide the available values for that attribute (e.g., "yes," "no" for whether the natural Person is of Hispanic, Latino, or Spanish origin) that the Company uses, tracks, estimates, or derives.

- b) For each Social Media and Video Streaming Service in each Relevant Area, Identify, on an annual basis, the top 1,000 most populous User Attribute values (excluding “missing” as a value), based on average number of MAUs of the Social Media and Video Streaming Service, and for each, provide, on an annual basis:
 - i) the number of registered users;
 - ii) the average number of DAUs;
 - iii) the average number of MAUs;
 - iv) the total time spent;
 - v) the average time spent per day per MAU; and
 - vi) the average value of the user to the Company, Including average revenue per user.
 - c) For each Social Media and Video Streaming Service in each Relevant Area, Identify, on an annual basis, the top 1,000 User Attribute values most frequently used by the Company and advertisers on the Company’s Social Media and Video Streaming Service to target advertising or match advertisements to users, provide a description of the Company’s criteria and method for determining the top values, and, for each top value, provide, on an annual basis:
 - i) the number of registered users;
 - ii) the average number of DAUs;
 - iii) the average number of MAUs;
 - iv) the total time spent;
 - v) the average time spent per day per MAU; and
 - vi) the average value of the user to the Company, Including average revenue per user.
 - d) Identify any metric the Company uses, tracks, estimates, or derives to assess the accuracy of its User Attribute information, and, for each such metric, provide on an annual basis, the value of each such metric.
11. Describe in Detail the process for Identifying and reporting inaccurate User Attribute information, and the process, if any, for remedying any harms caused by these inaccuracies, Including all oversight provided by senior leadership as identified by position. For each Social Media and Video Streaming Service in each Relevant Area, Identify, on an annual basis:
- a) the number of inaccurate User Attributes identified per quarter;

- b) the top 100 types of inaccuracies (e.g., fake account, unauthorized account, bot, inaccurate information, invalid clicks or views, etc.) and their primary genesis if known;
 - c) the top 1,000 User Attributes with inaccuracies in rank order, starting with the attribute with the most inaccuracies;
 - d) the number and type of advertisements shown based on (i) inaccurate information overall, (ii) top 1,000 User Attributes with inaccuracies, and (iii) for each of the top 100 types of inaccuracies where applicable;
 - e) the total and average cost of advertisements placed based on (i) inaccurate information overall, (ii) top 1,000 User Attributes with inaccuracies, and (iii) for each of the top 100 types of inaccuracies where applicable;
 - f) the total and average revenue value, Including but not limited to revenue derived from (i) inaccuracy overall, (ii) top 1,000 User Attributes with inaccuracies, and (iii) for each of the top 100 types of inaccuracies where applicable; and
 - g) the total and average amount of restitution provided to third parties harmed by (i) inaccuracy overall, (ii) for the top 1,000 User Attributes with inaccuracies, and (iii) for each of the top 100 types of inaccuracies where applicable.
12. For each Social Media and Video Streaming Service identified in response to Specification 5, submit all Documents Relating to the Company's or any other Person's strategies or plans, Including, but not limited to:
- a) business strategies or plans;
 - b) short-term and long-range strategies and objectives;
 - c) expansion or retrenchment strategies or plans;
 - d) research and development efforts;
 - e) sales and marketing strategies or plans, Including, but not limited to, strategies or plans to expand the Company's customer base or increase sales and marketing to particular customer segments (e.g., a user demographic);
 - f) strategies or plans to reduce costs, improve products or services (e.g., expanding features or functionality), or otherwise become more competitive;
 - g) plans to enter into or exit from the sale or provision of any Relevant Product or other product or service;
 - h) presentations to management committees, executive committees, and boards of directors; and

- i) budgets and financial projections. For regularly prepared budgets and financial projections, the Company need only submit one copy of final year-end Documents for prior years, and cumulative year-to-date Documents for the current year.
13. For each Social Media and Video Streaming Service identified in response to Specification 5, submit all Documents Relating to the Company's or any other Person's advertising or premium subscription pricing plans, pricing strategy, pricing practices, pricing decisions, pricing Analyses, and pricing policies, Including, but not limited to, pricing Algorithms or Data Analytics, discount policies, pricing programs, and bundling strategies.
14. Describe in Detail how the Company shares users' and non-users' Personal Information with, or obtains users' and non-users' Personal Information from, its affiliates or other Company-branded entities. As part of Your response, (a) Identify those entities and Describe in Detail the types of Personal Information and purposes for such sharing or obtaining; and (b) Describe in Detail and provide any policies or contracts detailing sharing and use restrictions among affiliates and Company-branded entities.
15. Describe in Detail how the Company shares users' and non-users' Personal Information with, or obtains users' and non-users' Personal Information from, third parties. As part of Your response, (a) Identify those entities and Describe in Detail the types of Personal Information and purposes for such sharing or obtaining; and (b) Describe in Detail and provide any policies or contracts applicable to such sharing.
16. Describe in Detail how the Company collects, assembles, purchases, or otherwise obtains information Related to a consumer's shopping behavior, Including at offline and online retail outlets (e.g., grocery stores). Include in Your response a detailed description of how the Company uses this data, or permits this data to be used, to target individual consumers or members of a household.
17. Submit all data deletion and retention policies the Company has in place. If the Company does not have such data deletion and retention policies, Describe in Detail the Company's data deletion and retention practices, Including (a) any retention periods for Personal Information collected from or about users and their devices, or information inferred about users and their devices; (b) how these practices apply to Personal Information associated with canceled or abandoned accounts; and (c) the process for responding to a third party request to delete data.
18. Describe in Detail the Company's policies and procedures Related to the minimization of Personal Information, as well as policies and procedures to ensure that the Company's employees, affiliates, and third parties with whom the Company shares such Personal Information comply with these policies and procedures.
19. Describe in Detail any analyses the Company performed on different variations of user interfaces for users' privacy settings or ability to exercise access, correction, porting, or deletion rights. Produce the Documents associated with and all results of such Analyses. Describe in Detail any changes to the user interfaces as a result of these processes, the

dates these changes were made, and every metric and its value pertaining to the financial, growth, or other Company outcomes associated with each change. State, separately for each month from January 1, 2019 onward, the number of users who (a) made changes to their privacy settings; (b) requested access to their data; (c) requested correction of their data; (d) requested to port their data; or (e) requested to delete their data. If any of these choices were not honored, Describe in Detail why.

20. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail how academics and researchers may request access to Personal Information or other information held by the Social Media and Video Streaming Service, and what types of Personal Information and other information such academics and researchers may access. Produce all materially different contracts or policies that apply to academics' and researchers' use of Personal Information or other information.

Advertising

21. Identify each Digital Advertising Service sold or provided by the Company from January 1, 2019 to the present in each Relevant Area, and for each such service, provide the following information:
 - a) a description of the Digital Advertising Service;
 - b) its intended user or user segment;
 - c) whether the product or service is priced by cost-per-click, cost-per-impression, revenue split, or other formula;
 - d) whether the intended focus of the product or service is for brand awareness advertising, performance advertising, product purchase, or other purposes; and
 - e) the targeting capabilities of the product or service, Including, but not limited to, a description of all data points that can be used to target (e.g., user information, mobile device type, location information, application being used, keywords), and the source of that data.
22. For each Digital Advertising Service identified in response to Specification 21, separately for each Relevant Area, state on a monthly, quarterly, and annual basis:
 - a) the Company's revenue, other than those for advertising on any Social Media and Video Streaming Service reported in Specification 8(b), stated in dollars, Including, but not limited to, gross revenue, separated by advertising and non-advertising revenues; and
 - b) the Company's costs and expenses, other than those for advertising on any Social Media and Video Streaming Service reported in Specification 8(d), stated in dollars, Including, but not limited to, cost of revenue, traffic acquisition costs, or revenue guarantees, exclusive of the costs and expenses reported in response to Specification 8(d); and

- c) the Company's gross margins, operating margins, and the method of computation.
23. For each Digital Advertising Service identified in response to Specification 21 separately for each Relevant Area, Identify and describe (Including, but not limited to, describing how the Company defines each item in the ordinary course):
- a) each Advertiser Metric, Including but not limited to, each metric for:
 - i) ad revenue;
 - ii) number of bids in auctions that resulted in an ad being shown to a user;
 - iii) number of advertisers;
 - iv) number of impressions (i.e., ads shown to a user);
 - v) number of clicks;
 - vi) click-through rate (i.e., number of clicks per impression);
 - vii) measures of User Engagement (e.g., number of users or average time spent per user);
 - viii) average winning advertiser bid for ads shown to a user;
 - ix) average price determined by the auction for ads shown to a user (e.g., average cost per click or cost per action);
 - x) average cost per mille (i.e., cost per thousand impressions) regardless of whether cost to advertisers was based on number of views or other user actions;
 - xi) number of ads shown to a user that resulted in the desired Advertising Objective (e.g., conversions);
 - xii) advertiser return on investment (e.g., return on ad spend); and
 - xiii) the existence or absence of other advertising Publishers and their identities;
 - b) each Advertising Objective;
 - c) the pricing models available for each Advertising Objective (e.g., cost per click or cost per impression);
 - d) each Selected Advertiser Attribute, and each mutually exclusive value for each such Selected Advertiser Attribute (e.g., "small business" or "large business" for advertiser size) tracked by, derived by, estimated by, or available to the Company (with "missing" treated as a value if the Company lacks a value for the Advertiser Attribute for every advertiser);

- e) each mutually exclusive Selected Advertiser Category (i.e., each mutually exclusive group of advertisers reflecting each mutually exclusive combination of Selected Advertiser Attribute values), and each set of Selected Advertiser Attribute values used to define such Selected Advertiser Category; and
 - f) each Advertiser Metric the Company provided to any other Person and the time periods for which such information was provided, stated separately for each Third-Party Category, Including, but not limited to, app developers, analytics partners, and advertisers.
24. For each Digital Advertising Service, (i) by Advertising Placement, (ii) by Country Location where the advertisement was displayed, (iii) by Advertising Format, (iv) by each pricing model available for Advertising Objectives, (v) by whether sales are direct or by auction, (vi) by desktop and by mobile; provide, on a monthly basis, the number of advertisers and the value of each Advertiser Metric identified in response to Specification 23(a), for:
- a) all advertisers in total; and
 - b) each mutually exclusive Selected Advertiser Category.

Provide with Your response a description of each Advertiser Metric, Including a description of how each Advertiser Metric is calculated, and a data dictionary with each such metric.

Submit a list of available mutually exclusive Selected Advertiser Categories to Commission counsel before submitting a full response to Specification 24. If the Company lacks a value for a Selected Advertiser Attribute for any advertiser, the Company should treat “missing” as the value of that Selected Advertiser Attribute for the advertisers who lack a value.

For the limited purpose of illustrating Specification 24(b), assume that the Selected Advertiser Attributes are advertiser size, industry vertical, and spend tier, and that the mutually exclusive values for those Selected Advertiser Attributes are small business, large business, and “missing” for advertiser size; ecommerce, gaming, and “missing” for industry vertical; and “1” and “2” for spend tier. The number of mutually exclusive Selected Advertiser Categories in the Company’s response would be the product of the number of mutually exclusive values for each Selected Advertiser Attribute: $N = (\# \text{ of advertiser size values}) * (\# \text{ of industry vertical values}) * (\# \text{ of spend tier values})$.

In this example, the Company’s response would Include 18 mutually exclusive Selected Advertiser Categories per month $[(3 \text{ advertiser size values}) * (3 \text{ industry vertical values}) * (2 \text{ spend tier values}) = 18]$, and the Company’s response should Include the number of advertisers in each such group and the value of each Advertiser Metric, on a monthly basis, for each such group of advertisers. The spreadsheet in Appendix B illustrates this example.

25. For each Digital Advertising Service:

- a) Identify, on a monthly basis:
 - i) the top 100 advertisers in each mutually exclusive Selected Advertiser Category, by revenue generated by the Company on advertisements displayed in the United States; and
 - ii) the top 100 advertisers in each mutually exclusive Selected Advertiser Category, by revenue generated by the Company on advertisements displayed worldwide; and
 - b) for each such advertiser and month identified in subparts (a)(i) and (a)(ii), provide:
 - i) the value of each Selected Advertiser Attribute for the advertiser; and
 - ii) the ad revenue in the relevant geography for the advertiser by (1) Advertising Format, (2) each pricing model available for Advertising Objectives, (3) whether advertising purchases are direct or by auction, and (4) desktop and mobile.
26. Submit all Documents Relating to the sale or provision of any Digital Advertising Service or the display of advertising to users in any Relevant Area, Including, but not limited to, all Documents Relating to:
- a) the Company's collection of, or access to, information about user or consumer activities, attributes, or interests;
 - b) the tracking of user or consumer activity on or off of the Company's products or services;
 - c) the quality or accuracy of the Company's measurement or assessment of user activities, attributes, and interests, and the Company's ability to target advertising;
 - d) the effect of advertising, Including advertising load, on consumer behavior or user activity, engagement, growth, retention, or attrition; and
 - e) the effect of advertising load and advertising inventory volume on revenue, price, and profitability of the Company's Digital Advertising Services.

Algorithms or Data Analytics

27. For each Social Media and Video Streaming Service identified in response to Specification 5, state whether the Social Media and Video Streaming Service applies Algorithms or Data Analytics to Personal Information, and if so, Describe in Detail the specific categories of Personal Information to which the Algorithms or Data Analytics are applied and each of the ways the Company uses Algorithms or Data Analytics, Including:
- a) the processes and techniques used:

- i) to prepare data for Analysis, Including but not limited to locating, acquiring, and ingesting data; assessing and cleaning data; reconciling and making data uniform; extracting, restricting, and linking data; coding and annotating data; and updating data as new information becomes available; and
 - ii) to analyze data, Including but not limited to:
 - (1) descriptive and exploratory Analysis;
 - (2) predictive Analysis, such as machine learning, linear regression, non-linear regression classification, data mining, text analytics, Bayesian methods, and simulation; and
 - (3) prescriptive Analysis, such as stochastic models, and optimization;
- b) the sources of such Personal Information, Including
- i) whether the source is the user, affiliate, third party or other, and if other, describe;
 - ii) the top 100 non-user sources of data;
 - iii) categories of data procured on existing users, uses for each category, the total cost and average cost per user for each category from each source, and the total value both overall and per user, Including revenue, derived from each category, per source and per use;
 - iv) categories of third-party data procured on nonusers, uses for each category, the total cost and average cost per user for each category from each source, and the total value both overall and per user, Including revenue, derived from each category, per source and per use; and
 - v) the processes and techniques used to integrate or otherwise monetize data from each third-party source, any new predictive capability or other Company outcome enabled by each integration, and the value, Including revenue, derived from any integration, predictive capability, and/or other Company use of external data;
- c) the purpose(s) for which the Company applies Algorithms or Data Analytics to the Personal Information, Including but not limited to:
- i) to make inferences or conclusions, and if so, the types of inferences and conclusions the Company makes; and
 - ii) to make decisions, and if so, the types of decisions the Company makes;

- d) whether the Social Media and Video Streaming Service has any written policies and procedures with respect to the development or application of Algorithms or Data Analytics to Personal Information. If so, produce such policies and procedures; and
 - e) whether the Social Media and Video Streaming Service monetizes the development or application of such Algorithms or Data Analytics to the Personal Information, and if so, how the Company monetizes such applications (i.e., research and development, third-party sales, etc.).
28. For each Social Media and Video Streaming Service that applies Algorithms or Data Analytics to Personal Information identified in response to Specification 27, Describe in Detail how the Company identifies and addresses privacy, security, or ethics issues with respect to the application of Algorithms or Data Analytics to Personal Information, Including:
- a) the Company's use of Classifiers, Including (i) how often Classifiers are revised, considered, and retrained; and (ii) whether it excludes or limits use of any Classifiers;
 - b) whether the Company examines whether data sets are missing information from particular populations, and if so, how the Company examines data sets for missing information from particular populations and what steps it takes to address such missing information; and
 - c) whether the Company examines any correlations and other empirical relationships found by the application of Algorithms or Data Analytics, and if so, how the Company determines whether the correlations and empirical relationships are meaningful.
29. For each Social Media and Video Streaming Service that applies Algorithms or Data Analytics to Personal Information identified in response to Specification 27, Describe in Detail how the Company monitors and tests the application of Algorithms or Data Analytics to Personal Information, Including:
- a) the Person(s) responsible for monitoring and testing the Algorithms or Data Analytics;
 - b) the process(es) by which the Company monitors and tests the accuracy or impact of the Algorithms or Data Analytics, Including the extent to which the processes are automated or rely on human intervention;
 - c) the frequency with which the Company tests, validates, and reviews the accuracy or impact of any Algorithms or Data Analytics;
 - d) whether the Company determines that any decisions made by Algorithms or Data Analytics are reliable, and if so, how the Company determines that any decisions made by Algorithms or Data Analytics are reliable;

- e) how the Company determines the accuracy of any decisions made by the Algorithms or Data Analytics, Including the false-positive and false-negative rates;
 - f) whether the Company examines or tests data sets and Algorithms for bias, or allows affiliates or third parties to examine or test for bias, and if so how the Company, affiliates, or third parties examine and test data sets and Algorithms for bias, Including which types of demographic categories the Company, affiliates, or third parties analyze, and, if the Company or third party finds bias, the steps the Company takes to address it;
 - g) how the Company monitors any automated decision-making by the Algorithms or Data Analytics;
 - h) how the Company evaluates the usefulness of any particular Algorithm or Data Analytics; and
 - i) the frequency with which the Company updates or modifies its Algorithms or Data Analytics.
30. Produce all relevant policies and procedures, and any Analysis associated with evaluating, monitoring, testing, and validating the use or application of Algorithms or Data Analytics to Personal Information.
31. Describe in Detail how the Company uses Algorithms or Data Analytics to sell or provide any Digital Advertising Service or display advertising to users. Your response should Describe in Detail the process for and the frequency of updates to Algorithms or Data Analytics to remove inaccurate or unauthorized information (Including information on Children and Teens, or information retained after a user revokes consent), and information that users deleted. Produce Documents sufficient to show all:
- a) Analyses of each such update, remedial actions taken following each such update, and/or strategies and rationale on timing of updates; and
 - b) Analyses of financial metrics associated with each such update, remedial actions taken following each such update, and/or strategies and rationale on timing of updates.

User Engagement

32. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail how the Company measures, promotes, and researches User Engagement, Including:
- a) tools the company uses, Including but not limited to Algorithms or Data Analytics, to increase User Engagement;

- b) how the Company studies and analyzes User Engagement, Including User Engagement with other products and services offered by the Company or User Engagement's impact on advertising revenue; and
 - c) how a user's negative interactions with the Social Media and Video Streaming Service (e.g., blocking or unsubscribing from content) affect the user's engagement.
33. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail what factors influence what content (whether user-created or ad-based) users see in the Social Media and Video Streaming Service, Including:
- a) how the Company moderates content;
 - b) how the Company targets, surfaces, or promotes content;
 - c) what ranks and measures, Including if applicable User Attributes, the Company uses to target, surface, or promote content to users;
 - d) whether the display of information differs if a user is logged in or logged out of an application or service; and
 - e) how user-created content presentation is influenced by, impacted by, or in any way associated with the Company's advertising goals and outcomes.
34. For each Social Media and Video Streaming Service identified in response to Specification 5, separately for each Relevant Area, Identify each rank, measure, or User Attribute that the Company uses, tracks, estimates, or derives, to target, surface, or promote content to users. Additionally, Identify the top values most heavily weighted by the Company in order to target content or surface or promote user-created content. If You provided this information in response to Specification 10 or Specification 32, please Identify the relevant information.
35. For each Social Media and Video Streaming Service identified in response to Specification 5, submit all of the Company's content moderation policies and content promotion policies.
36. For each Social Media and Video Streaming Service identified in response to Specification 5, submit Documents sufficient to show the Company's development, launch, growth, performance, termination, or discontinuance of any User Engagement strategy or Social Media and Video Streaming Service strategy for targeting, surfacing, or promoting user content, Including but not limited to:
- a) any efforts, strategies, or tools of the Company to increase the number of users or User Engagement;
 - b) any efforts, strategies, or tools of the Company to develop new or improved features or functionality; and

- c) any action or decision of the Company to terminate or discontinue any Social Media and Video Streaming Service offering or functionality.
37. Provide representative samples of each type of promotional material the Company disseminates referring or Relating to User Engagement, Including revenue derived from such User Engagement.
38. Describe in Detail any strategies, efforts, processes, plans, and/or presentations associated with producing higher revenue, generating growth, spurring User Engagement, or soliciting user agreement by making changes to user interfaces or designs, and the outcomes and/or metrics associated with any changes made to user interfaces or designs. To the extent Your responses to Specifications 12 or 17 Include this information, Identify the relevant information.

Demographic Information

39. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail the types of Demographic Information, Including how the Company categorizes this information (e.g., Hispanic/non-Hispanic) it collects, infers, or otherwise processes about (a) users, (b) their households, (c) non-users, and (d) their households.
40. Describe in Detail how the Company identifies, predicts, determines, infers, or makes correlations with or about Demographic Information, Familial Status, or Familial Relationships, Including based on:
- a) content a user posts on or shares with the Social Media and Video Streaming Service;
 - b) Algorithms or Data Analytics;
 - c) Personal Information, Including whether and how the Company uses location data (whether or not such data is associated with other identifiers or other data) for such purposes; and
 - d) content engagement (e.g., clicking on specific ads, joining groups, attending events, liking or following specific brands).
41. Describe in Detail all the Company's uses of Demographic Information, Familial Status, or Familial Relationships, Including:
- a) how the Company uses Demographic Information, Familial Status, or Familial Relationships for ad targeting or exclusions;
 - b) if the Company personalizes content based on Demographic Information, Describe in Detail all content and design features that are personalized, the purpose of personalizing (e.g., User Engagement, convenience, advertising, implementing choices, data Analysis, classification into segments, in-gaming content modification,

etc.), and what Demographic Information the Company uses to personalize those features;

- c) how the Company uses such information in connection with lookalike modeling, and Describe in Detail whether and, if so, how the Company uses or avoids selecting protected characteristics for this process. Produce a representative list of all characteristics the Company offers for lookalike modeling; and
 - d) Identify the top five entities (by amount of revenue generated) with whom the Company has contracts that engage in or facilitate programmatic marketing (Including real-time bidding, guaranteed direct buying, and preferred deals) for advertising space on the Company's Social Media and Video Streaming Service(s).
42. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail what mechanisms, if any, users and non-users have to inquire about or request access or deletion of the Demographic Information the Company has collected, and provide all user interfaces for such requests or inquiries. Describe in Detail policies, practices, and procedures to ensure that the Company's internal divisions, affiliates, and third parties' use of Demographic Information complies with the Company's use and data limitations.
43. Describe in Detail any methods the Company employs to attempt to determine when a user's account on the Social Media and Video Streaming Service is used by an individual other than the user, Including a malicious attacker, a friend, or a family member.

Children and Teens

44. For each Social Media and Video Streaming Service identified in response to Specification 5:
- a) state whether the Company has indicated to any third party or affiliate, Including but not limited to any app store, platform, or advertising network or platform, that the Social Media and Video Streaming Service or portions of content thereof is directed to Children and Teens. If so, Describe in Detail how the Company determines that the Social Media and Video Streaming Service or portions of content thereof are directed to Children and Teens; and
 - b) Describe in Detail the Company's policies, processes, procedures, and practices regarding users who indicate they are under thirteen years old, and between thirteen and seventeen, inclusively, Including:
 - i) whether the Company blocks such users from creating an account;
 - ii) whether the company collects Personal Information of Children or Teens without verified parental consent for "support for internal operations," and if so Describe in Detail all of the internal-operations purposes and the necessity of each piece of Personal Information to accomplish those purposes;

- iii) all strategies, plans, presentations, Analyses, machine learning or artificial intelligence, and/or efforts to Identify usage patterns associated with Children and Teens, validate results, and/or monetize this usage, Including all efforts to maintain and/or increase User Engagement by Children and Teens;
 - iv) each use and its associated value, Including revenue, derived from the Personal Information of Children and Teens collected according to the following categories: (1) with verified consent, (2) without parental consent for “support of internal operations,” (3) during usage associated with patterns indicating Children’s and Teens’ use of an adult account, and (4) without parental consent for another specified reason; and
 - v) a description of any technical measures to enforce such policies, processes, procedures, and practices.
45. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail:
- a) the intended age range of the user base; and
 - b) any information in the Company’s possession about the actual age of the user base, Including any predictions or calculations of age through machine learning or artificial intelligence.
46. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail the Company’s policies, processes, procedures, and practices when contacted by parents who wish to review or delete Personal Information that has been collected from their Child or Teen, or when the account is otherwise discovered to have been created or posted by a Child or Teen without parental consent.
47. State whether the Company is a member of any self-regulatory organizations or programs Related to children’s privacy, Including any FTC-approved Children’s Online Privacy Protection Act safe harbor program. If so, Identify each organization and state the dates of membership.
48. For each Social Media and Video Streaming Service identified in response to Specification 5, state whether there are system(s) in place to automatically or algorithmically Identify Children and Teens. If so, Describe in Detail the system(s) in place, Including whether the Company uses any other metrics to determine whether a user is a Child or a Teen.
49. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail whether the Company has ever relied on verified parental consent provided by an educational institution. To the extent the Company uses the information for commercial purposes, provide the Company’s user interfaces for getting consent. Describe in Detail any policies or procedures Relating to the retention or deletion of such data.

Relationship with Other Services

50. Submit all Documents Relating to competition in the sale or provision of each Social Media and Video Streaming Service identified in response to Specification 5, Including, but not limited to, market studies, forecasts, surveys, and all other Documents Relating to:
- a) the ability or willingness of customers, consumers, or other Persons to switch to (or from) the Company's products or services from (or to) another product or service, Including by altering relative level of engagement such as time spent;
 - b) monitoring or collection of information about any other Person's Social Media and Video Streaming Service or Digital Advertising Service;
 - c) competition to attract, gain, and retain users to, or increase User Engagement with, the Company's Social Media and Video Streaming Services, Including competition to expand or improve product offerings, features, functionality, coverage, user interfaces, product quality, or level of service;
 - d) the ability or willingness of users to seek access to or use the Company's Social Media and Video Streaming Services while also using Social Media and Video Streaming Services offered by other Persons;
 - e) competition Relating to data protection and privacy;
 - f) competition to obtain data, information, or other content for the Company's products or services;
 - g) the effect of advertising load on (i) consumer or user perceptions or behavior, or (ii) advertising revenue, prices, or profitability;
 - h) the effect of User Engagement on advertising revenue, prices, or profitability;
 - i) competition between different types of Digital Advertising Services, or between Digital Advertising Services and any other form of advertising;
 - j) competition to attract, gain, or retain advertising customers of the Company's Digital Advertising Services, or attempts to win advertising customers or other revenue-generating customers from other companies, and losses of advertising customers or other revenue-generating customers; and
 - k) the value, Including conversion rate, lead quality, or advertiser return on investment, of the Company's or any other Person's advertising products or services.
51. For each Social Media and Video Streaming Service identified in response to Specification 5, submit all Documents Relating to:

- a) barriers to entry into the provision or sale of the Relevant Product, Including but not limited to customer or user lock-in effects, access to user data, and algorithmic sophistication; and
 - b) switching costs for users, Including loss or lack of access to data specific to any Relevant Product, Including users' social graph and social history, or difficulty in transferring such data.
52. For each Social Media and Video Streaming Service identified in response to Specification 5, Describe in Detail all material changes made by the Company to comply with the European Union's General Data Protection Regulation, Including whether those changes apply exclusively to users in the European Union or also to users in the United States and worldwide. Describe in Detail any material changes to the ability of third parties to access or port data, Including changes to application program interfaces and software development kits.

Other Documents

53. Produce all Documents consulted or otherwise relied on to prepare Your response to this Order that were not otherwise specifically requested.

You are advised that penalties may be imposed under applicable provisions of federal law for failure to file special reports or for filing false reports.

The Special Report called for in this Order is to be filed on or before 45 days from the date of service.

By direction of the Commission, Commissioner Phillips dissenting.

Joseph J. Simons, Chairman

SEAL

December 11, 2020

Attachment A

DEFINITIONS & ADDITIONAL INSTRUCTIONS

- A. “**Advertiser Metric**” means, and information shall be provided separately for, each metric of advertising performance or effectiveness that is tracked by, reported on, derived from other data by, or otherwise used by the Company for any Digital Advertising Service.
- B. “**Advertising Format**” means, and information shall be provided separately for, each type of ad by media type (e.g., text, photo, or video), ad type (e.g., carousel ad, slideshow ad, collection ad, playable ad), and location (e.g., specific locations on a web page or app) the Company uses to place advertisements for any Person on any Digital Advertising Service or any other application or website, whether or not owned by the Company.
- C. “**Advertising Objective**” means, and information shall be provided separately for, each selectable objective offered by the Company to advertisers on any Digital Advertising Service owned by the Company or other platform on which the Company displays advertisements, including, but not limited to, objectives such as brand awareness, reach, traffic, engagement, app installs, video views, lead generation, messages, conversions, catalog sales, or store traffic.
- D. “**Advertising Placement**” means, and information shall be provided separately for, each location where the Company displays advertisements, stated separately for (1) each website, app, or other online platform owned or operated by the Company, and (2) each supply side platform owned or operated by the Company.
- E. “**Algorithms or Data Analytics**” means the process of examining and analyzing data in order to find patterns and make conclusions about that data, whether by machine or human analyst.
- F. “**Analysis**” or “**Analyses**” include, but are not limited to, studies, reports, tests, and experiments.
- G. The terms “**and**” and “**or**” have both conjunctive and disjunctive meanings as necessary to bring within the scope of this Order anything that might otherwise be outside its scope. The singular form of a noun or pronoun includes its plural form, and vice versa; and the present tense of any word includes the past tense, and vice versa.
- H. “**Communication**” means any exchange, transfer, or dissemination of information, regardless of the means by which it is accomplished.
- I. “**Child**” or “**Children**” means individuals under the age of thirteen (13).
- J. “**Classifiers**” means a machine-based process that sorts unlabeled data into categories.

- K. **“Company”** means [COMPANY NAME], its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures; and all directors, officers, employees, agents, and representatives of the foregoing. The terms “subsidiary,” “affiliate,” and “joint venture” refer to any Person in which there is partial (25% or more) or total ownership or control between the Company and any other Person.
- L. **“Country Location”** means, and information shall be provided separately for, (1) the United States; (2) Australia; (3) Brazil; (4) Canada; (5) China; (6) France; (7) Germany; (8) India; (9) Indonesia; (10) Italy; (11) Japan; (12) Mexico; (13) the Netherlands; (14) Russia; (15) Saudi Arabia; (16) South Korea; (17) Spain; (18) Switzerland; (19) Turkey; (20) the United Kingdom; and (21) all other countries not in the foregoing list, combined.
- M. **“Demographic Information”** means characteristics of human populations, such as age, ethnicity, race, sex, disability, and socio-economic information.
- N. **“Describe in Detail”** means providing the information requested in narrative form, including an explanation of each material change, if any, made during the applicable time period Relating to the practices described, as well as the effective date(s) of the change(s) and the reason(s) for such change(s).
- O. **“Digital Advertising Service”** Includes, and information shall be provided separately for: each Company product or offering that serves or displays, or Company service Relating to the service or display of, advertisements through an application or website on any device (e.g., personal computer, iOS device, Android device, etc.).
- P. **“Document”** and **“Documents”** mean any information, on paper or in electronic format, including written, recorded, and graphic materials of every kind, in the possession, custody, or control of the Company. The term “Documents” includes, without limitation: computer files; email messages; audio files; instant messages; text messages; messages sent on any enterprise messaging system; any other form of electronic message; drafts of Documents; metadata and other bibliographic or historical data describing or Relating to Documents created, revised, or distributed electronically; copies of Documents that are not identical duplicates of the originals in that Person’s files; and copies of Documents the originals of which are not in the possession, custody, or control of the Company.
1. Unless otherwise specified, the term “Documents” excludes:
 - a. bills of lading, invoices, purchase orders, customs declarations, and other similar Documents of a purely transactional nature;
 - b. architectural plans and engineering blueprints;
 - c. Documents solely relating to environmental, tax, human resources, OSHA, or ERISA issues; and
 - d. relational and enterprise databases, except as required to comply with an individual Specification.

2. The term “computer files” Includes information stored in, or accessible through, computers or other information retrieval systems. Thus, the Company should produce Documents that exist in machine-readable form, Including Documents stored in personal computers, portable computers, workstations, minicomputers, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off Company premises. If the Company believes that the required search of backup disks and tapes and archive disks and tapes can be narrowed in any way that is consistent with the Commission’s need for Documents and information, You are encouraged to discuss a possible modification to this Definition with the Commission representative identified on the last page of this Request. The Commission representative will consider modifying this Definition to:

- a. exclude the search and production of files from backup disks and tapes and archive disks and tapes unless it appears that files are missing from those that exist in personal computers, portable computers, workstations, minicomputers, mainframes, and servers searched by the Company;
- b. limit the portion of backup disks and tapes and archive disks and tapes that needs to be searched and produced to certain key individuals, certain time periods, or certain Specifications identified by the Commission representative; or
- c. Include other proposals consistent with Commission policy and the facts of the case.

Q. The terms “**Each**,” “**any**,” and “**all**” mean “each and every.”

R. “**Electronically Stored Information**” or “**ESI**” means the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by You into a reasonably usable form. This Includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards, magnetic or electronic tapes, disks, computer hard drives, network shares or servers, or other drives, cloud-based platforms, cell phones, PDAs, computer tablets, or other mobile devices, or other storage media.

S. “**Familial Relationship(s)**” means a description of the Familial Status of all members of a household (e.g., family of four with two parents and two Children).

T. “**Familial Status**” means the familial designation of a natural Person (e.g., spouse, Child, stepchild, parent, grandparent, parent-in-law, sibling-in-law, and child-in-law, among others).

- U. “**Identify**” or “**Specify**,” when used in reference to a natural Person, mean to state the Person’s (1) full name; (2) present or last-known residence and telephone number and present or last-known business address and telephone number; and (3) present or last-known employer and job title. For any Person identified, if any of the above information was different during the time period relevant to the CID, supply both the current information and such different information as applies to the time period relevant to the CID. Once a natural Person has been identified properly, it shall be sufficient thereafter when Identifying that same Person to state the name only.

The terms “Identify” or “Specify,” when used in reference to a corporation or other non-natural Person, mean (1) to state that entity’s name; (2) to describe its nature (e.g., corporation, partnership, etc.); (3) to state the location of its principal place of business; and (4) to Identify the natural Person or Persons employed by such entity whose actions on behalf of the entity are responsive to the CID. Once such an entity has been identified properly, it shall be sufficient thereafter when Identifying that same entity to state the name only.

The terms “Identify” or “Specify,” when used in reference to facts, acts, events, occurrences, Meetings, or Communications, mean to describe, with particularity, the fact, act, event, occurrence, Meeting, or Communication in question, Including, but not limited to, (1) Identifying the participants and witnesses of the fact, act, event, occurrence, Meeting, or Communication; (2) stating the date or dates on which the fact, act, event, occurrence, Meeting, or Communication took place; (3) stating the location(s) at which the fact, act, event, occurrence, Meeting, or Communication took place; and (4) providing a description of the substance of the fact, act, event, occurrence, Meeting, or Communication.

- V. The terms “**Include**” and “**Including**” mean “including, but not limited to.” The use of the term “Include” in any request shall not be used to limit the generality or scope of any request. Nor shall the generality of any request be limited by the fact that another request touches on the same topic with a greater or lesser degree of specificity.
- W. “**Meeting**” means an assembly of two or more people, in-person or via telephone, voice-over-IP, video, video conferencing, WebEx, chat messaging, or similar means of Communication.
- X. “**Order**” means the Order, Including the attached Resolution, Specifications, and Attachment.
- Y. “**Person**” Includes the Company and means any natural person, corporate entity, partnership, association, joint venture, government entity, or trust.
- Z. “**Personal Information**” means information about a specific individual or Device, Including: (1) first and last name; (2) home or other physical address, Including street name and name of city or town, or other information about the location of the individual, Including but not limited to location from cellular tower information, fine or coarse location, or GPS coordinates; (3) Email address or other online contact information, such

as an instant Messaging user identifier or screen name; (4) telephone number; (5) a persistent identifier, such as a customer number held in a “cookie,” a static Internet Protocol (“IP”) address, a device identifier, a device fingerprint, a hashed identifier, or a processor serial number; (6) nonpublic Communications and content, Including, but not limited to, e-mail, text messages, contacts, photos, videos, audio, or other digital images or audio content; (7) Internet browsing history, search history, or list of URLs visited; (8) video, audio, cable, or TV viewing history; (9) biometric data; (10) health or medical information; (11) Demographic Information or (12) any other information associated with that User or Device.

- AA. **“Publisher”** means any Person paid to show an advertisement to consumers.
- BB. **“Relate,” “Related to,” and “Relating to”** mean, in whole or in part, addressing, analyzing, concerning, constituting, containing, commenting on, discussing, describing, Identifying, referring to, reflecting, reporting on, stating, or dealing with.
- CC. **“Relevant Area”** means, and information shall be provided separately for, (1) the United States, and (2) worldwide.
- DD. **“Relevant Product”** Includes, and information shall be provided separately for, any Social Media and Video Streaming Service or Digital Advertising Service.
- EE. **“Selected Advertiser Attribute”** means, and information shall be provided separately for, (1) the five (5) Advertiser Attributes that the Company uses most frequently in the provision or sale of advertising, and (2) each of the following Advertiser Attributes:
- a. industry vertical (e.g., ecommerce, consumer packaged goods, professional services);
 - b. advertiser size (e.g., global business group, small business group);
 - c. advertising spend tier or bracket; and
 - d. status (e.g., active, inactive).
- FF. **“Selected Advertiser Category”** means, and information shall be provided separately for, each mutually exclusive group of advertisers resulting from every combination of values across each Selected Advertiser Attribute.

For illustration purposes, assume “advertiser size,” “industry vertical,” and “spend tier,” are the Selected Advertiser Attributes. Assume further that “small business,” and “large business” are mutually exclusive values for the “advertiser size” attribute; “ecommerce” and “gaming” are mutually exclusive values for the “industry vertical” attribute; and “1” and “2” are mutually exclusive values for the “spend tier” attribute. In this example, “ecommerce small business with spend tier 1” and “ecommerce small business with spend tier 2” are mutually exclusive Selected Advertiser Categories.

- GG. **“Selected User Attribute”** means, and information shall be provided separately for, each of the following User Attributes: (1) age; (2) gender; (3) Country Location of the user; (4) network size; (5) education; (6) income; (7) race and ethnicity; (8) registration status of the user (e.g., registered or non-registered).
- HH. **“Selected User Group”** means, and information shall be provided separately for, each mutually exclusive group of users reflecting each mutually exclusive combination of values from the Selected User Attributes.
- II. **“Social Media and Video Streaming Service”** Includes, and information shall be provided separately for, any product or service that allows users to create and share content with other users (whether a private or group interaction) through an application or website on any device (e.g., personal computer, iOS device, Android device, etc.), or stream video, Including, but not limited to, any social networking service, messaging service, video streaming service, or photo, video, or other content sharing application, whether offered for a fee or for free.
- JJ. **“Teen”** or **“Teens”** means individuals between the ages of thirteen (13) and seventeen (17), inclusively.
- KK. **“Third-Party Category”** means, and information shall be provided separately for, each type of Person (e.g., app developers, analytic partners, or advertisers) with whom the Company provides application programming interface (“API”) access or shares data, or with whom the Company otherwise has a business relationship.
- LL. **“User Attribute”** means, and information shall be provided separately for, each attribute or categorization of any user (e.g., age, gender, country, language, categorizations based on user interests, or categorizations based on other user behavior) of any Social Media and Video Streaming Service that is tracked or used by the Company for any purpose, Including, but not limited to, the provision or sale of any Social Media and Video Streaming Service or advertising.
- MM. **“User Engagement”** means how a user, on and off the Social Media and Video Streaming Service, interacts with any product or service of the Social Media and Video Streaming Service (Including, but not limited to, how frequently, for how long, and in what manner).
- NN. **“User Metric”** means, and information shall be provided separately for, each metric for user interaction with any web site or application owned or operated by any Person (Including the Company) on any device (e.g., personal computer, iOS device, or Android device).
- OO. **“User Network Size”** means, and information shall be provided separately for, each metric for the size of a user’s network within any Social Media and Video Streaming Service owned by any Person (Including the Company), Including, but not limited to, the number of a user’s friends, the number of a user’s followers, the number of other users that a user follows, the number of a user’s reciprocal followers, and the number of telephone contacts stored by a user.

- PP. **“You” and “Your”** means the individual or entity to whom this Order is issued and Includes the “Company.”
- QQ. **Meet and Confer:** You are encouraged to contact **Andrea Arias** at **(202) 326-2715** or **Caroline Schmitz** at **(202) 326-2621** as soon as possible to schedule a Meeting (telephonic or in person) in order to confer regarding Your response.
- RR. **Modification of Specifications:** If You believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission’s need for Documents or information, You are encouraged to discuss such possible modifications, Including any modifications of definitions and instructions, with the Commission counsel named above.
- SS. **Electronic Submission of Documents:** See the attached “Federal Trade Commission, Bureau of Consumer Protection Production Requirements,” which details all requirements for submission of information, generally requiring that files be produced in native form and Specifying the metadata to be produced. As noted in the attachment, some items require discussion with the FTC counsel **prior to** production, which can be part of the general “Meet and Confer” described above. If You would like to arrange a separate discussion involving Persons specifically familiar with Your ESI systems and methods of retrieval, make those arrangements with FTC counsel when scheduling the general meet and confer discussion.
- TT. **Applicable Time Period:** Unless otherwise directed in the Specifications, the applicable time period for the request shall be from **January 1, 2019 until the date of full and complete compliance with this Order.**
- UU. **Document Production:** Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS.
- VV. **Production of Copies:** Copies of marketing materials and advertisements shall be produced in color, and copies of other materials shall be produced in color if necessary to interpret them or render them intelligible.
- WW. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive Personally Identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production. For purposes of these requests, sensitive Personally Identifiable information Includes: an individual’s Social Security number alone; or an individual’s name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver’s license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information Includes medical records and other individually identifiable health information Relating to the past, present, or future physical or mental health or conditions

of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

APPENDIX A

The Selected User Attributes (including the values associated with each Selected User Attribute) and User Metrics identified in this Appendix are exemplary, and are not intended to limit the Company's response to the CID.

Selected User Attribute Definitions

Age	Origin	Country
1 (0-25)	Yes	US
2 (26-50)	No	Other
3 (50+)	Missing	Missing
4 (Missing)		

Example Data

Selected User Attributes			Number of Registered Users	Period		User Metrics				
Age	Origin	Country		Month	Year	Number of MAUs	Average Time Spent per MAU	Total Time Spent (Hours)	Average Posts per MAU	Total Posts
1	Yes	US	13	Jan	2010	10	2.7	27	2.0	20
2	Yes	US	15	Jan	2010	12	2.8	33	2.3	27
3	Yes	US	16	Jan	2010	13	3.7	48	2.5	32
4	Yes	US	6	Jan	2010	3	2.7	8	2.3	7
1	No	US	11	Jan	2010	8	2.6	21	4.4	35
2	No	US	12	Jan	2010	9	2.7	24	6.2	56
3	No	US	13	Jan	2010	10	4.5	45	4.0	40
4	No	US	5	Jan	2010	2	3.0	6	7.0	14
1	Missing	US	5	Jan	2010	2	2.5	5	3.0	6
2	Missing	US	5	Jan	2010	2	3.0	6	4.0	8
3	Missing	US	5	Jan	2010	2	4.5	9	3.5	7
4	Missing	US	4	Jan	2010	1	1.0	1	2.0	2
1	Yes	Other	14	Jan	2010	11	7.3	80	2.7	30
2	Yes	Other	18	Jan	2010	15	2.8	42	4.7	70
3	Yes	Other	17	Jan	2010	14	5.6	78	6.5	91
4	Yes	Other	7	Jan	2010	4	2.8	11	4.5	18
1	No	Other	23	Jan	2010	20	2.9	57	4.8	95
2	No	Other	8	Jan	2010	5	2.4	12	3.2	16
3	No	Other	9	Jan	2010	6	2.5	15	2.5	15
4	No	Other	4	Jan	2010	1	3.0	3	4.0	4
1	Missing	Other	6	Jan	2010	3	4.7	14	4.3	13
2	Missing	Other	5	Jan	2010	2	2.5	5	4.5	9
3	Missing	Other	5	Jan	2010	2	4.5	9	5.5	11
4	Missing	Other	4	Jan	2010	1	1.0	1	2.0	2
1	Yes	Missing	10	Jan	2010	7	9.6	67	4.3	30
2	Yes	Missing	18	Jan	2010	15	2.8	42	4.7	70
3	Yes	Missing	15	Jan	2010	12	6.4	77	8.1	97
4	Yes	Missing	9	Jan	2010	6	2.2	13	3.8	23
1	No	Missing	21	Jan	2010	18	3.3	59	4.9	89
2	No	Missing	10	Jan	2010	7	1.7	12	2.3	16
3	No	Missing	8	Jan	2010	5	2.6	13	3.8	19
4	No	Missing	5	Jan	2010	2	1.5	3	2.0	4
1	Missing	Missing	7	Jan	2010	4	3.5	14	2.0	8
2	Missing	Missing	8	Jan	2010	5	1.0	5	1.4	7
3	Missing	Missing	5	Jan	2010	2	4.5	9	6.5	13
4	Missing	Missing	5	Jan	2010	2	3.0	6	3.5	7

APPENDIX B

The Selected Advertiser Attributes (including the values associated with each Selected Advertiser Attribute) and Advertiser Metrics identified in this Appendix are exemplary, and are not intended to limit the Company's response to the CID.

Selected Advertiser Attribute Definitions

Advertiser Size	Industry Vertical	Spend Tier
1 (Small business)	Ecommerce	1
2 (Large business)	Gaming	2
3 (Missing)	Missing	

Example Data

Selected Advertiser Attributes			Period		Advertiser Metrics			
Advertiser Size	Industry Vertical	Spend Tier	Month	Year	Number of Advertisers	Total Ad Revenue	Total Number of Auctions	Average Winning Advertiser Bid
1	Ecommerce	1	Jan	2010	10	\$ 90,000	27	\$ 16.50
2	Ecommerce	1	Jan	2010	12	\$ 110,000	33	\$ 8.50
3	Ecommerce	1	Jan	2010	13	\$ 110,000	33	\$ 6.55
1	Gaming	1	Jan	2010	8	\$ 70,000	21	\$ 1.76
2	Gaming	1	Jan	2010	9	\$ 80,000	24	\$ 8.15
3	Gaming	1	Jan	2010	10	\$ 90,000	27	\$ 2.35
1	Missing	1	Jan	2010	7	\$ 60,000	23	\$ 2.67
2	Missing	1	Jan	2010	5	\$ 55,000	17	\$ 5.13
3	Missing	1	Jan	2010	4	\$ 50,000	12	\$ 9.15
1	Ecommerce	2	Jan	2010	11	\$ 100,000	30	\$ 3.35
2	Ecommerce	2	Jan	2010	15	\$ 130,000	39	\$ 7.15
3	Ecommerce	2	Jan	2010	14	\$ 130,000	39	\$ 1.45
1	Gaming	2	Jan	2010	20	\$ 190,000	57	\$ 3.07
2	Gaming	2	Jan	2010	5	\$ 40,000	12	\$ 25.10
3	Gaming	2	Jan	2010	6	\$ 40,000	12	\$ 30.25
1	Missing	2	Jan	2010	9	\$ 80,000	21	\$ 15.80
2	Missing	2	Jan	2010	7	\$ 65,000	13	\$ 12.30
3	Missing	2	Jan	2010	3	\$ 25,000	8	\$ 13.50