

## Kim, Reenah

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**From:** Koss, Laura  
**Sent:** Monday, September 24, 2012 8:16 AM  
**To:** Kim, Reenah  
**Subject:** FW: Facebook - Irish DPC Audit

Laura Koss  
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**From:** Olsen, Christopher  
**Sent:** Friday, September 21, 2012 4:27 PM  
**To:** Berger, Laura; Koss, Laura  
**Subject:** FW: Facebook - Irish DPC Audit

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**From:** Rob Sherman [mailto:[\(b\)\(6\)](mailto:(b)(6))]  
**Sent:** Friday, September 21, 2012 10:58 AM  
**To:** Mithal, Maneesha; Olsen, Christopher  
**Cc:** Erin Egan  
**Subject:** Facebook - Irish DPC Audit

Dear Maneesha and Chris,

Erin and I wanted to let you know that the Irish Data Protection Commissioner, which regulates our European affiliate Facebook Ireland, issued a report this morning on its follow-up audit relating to Facebook's privacy practices. This report follows up on the comprehensive audit that the Irish DPC performed at the end of 2011 (available at <http://dataprotection.ie/viewdoc.asp?DocID=1182>). Today's report is available at [http://dataprotection.ie/docs/Facebook Audit Review Report/1232.htm](http://dataprotection.ie/docs/Facebook%20Audit%20Review%20Report/1232.htm).

We welcome the confirmation in this new report by the DPC that Facebook has "demonstrated a clear and ongoing commitment...to comply with its data protection responsibilities." The report also makes clear that the "great majority of the recommendations [in the 2011 audit report] have been fully implemented to the [DPC's] satisfaction." The report identifies a few areas where we are continuing to work toward the DPC's recommendations, and in these cases the report identifies the progress that we have made and describes our timetable for full implementation.

Areas of improvement covered in the report include –

**Better transparency for the user**, where we have:

- ✍ Revised our **plain-language Data Use Policy**, which describes not only our policies but concrete explanations of how the policies work in practice
- ✍ Increased the use of **inline privacy settings**, which gives users in-context transparency and control over who will see their posts
- ✍ Introduced **tours to help new users to understand the controls** available to them

**Better user control over settings**, where we have:

- ✍ Introduced **simpler and more upfront information** about the data that will be used by **third party application**.
- ✍ “Extended considerable time and resources” to ensuring that when **users request deletion of an account** “it takes place in a **timely fashion**”
- ✍ Satisfied the DPC that “users are interacting in a **fully informed way with how tags work in practice**”

**Clear retention periods for personal data**, where we have:

- ✍ **Refined our retention policies** around **log-in data and cookies**
- ✍ Given users **transparency into and control over the retention of their search queries**
- ✍ Agreed to **anonymize all ad-click data** after a two year period

**Right to have ready access to personal data**, where we now enable users (including U.S.-based users) to access their data in the following ways:

- ✍ The **Activity Log** which provides a detailed description and ability to interact and control their actions on the site.
- ✍ A **download tool** providing additional data that users may frequently want to export from their Facebook accounts.
- ✍ An **enhanced, expanded archive**, which provides access to more detailed account-level information that many users typically do not seek to access.

We believe that this is one of the most comprehensive examinations of the privacy practices of an Internet service, involving months of work by the DPC's auditors. These audit reports are not frequently made public, but in this case, the DPC and Facebook agreed that, in the interest of transparency, the contents of the audit and subsequent review should be made available to the public. We believe this is the best way for users and policymakers around the world to understand the extensiveness of the audit and the steps we are taking to promote privacy best practices on Facebook.

As the DPC's report notes, one of the reasons for Facebook's success is our effort to constantly innovate to provide the best possible service to our users. As Facebook continues to evolve, we are committed to building our service in a way that promotes our users' privacy, and our ability to have regular discussions with the FTC, as well as with the Irish DPC, has greatly contributed to our ability to meet that goal.

Please let us know if you have any questions about the specific conclusions described in the Irish report. Erin and I would be happy to set up a time to stop by to talk about this or to discuss any other aspects of our privacy practices.

Best,

Rob

Rob Sherman

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