

Annex 7

Response from Facebook

Thank you for the opportunity to review and respond to the findings of a story Privacy International is planning to publish regarding data sharing practices by menstruation apps. These are important issues that you've raised and we share your goal of ensuring that Privacy International's assessment is as accurate as possible.

As you are aware, it's common for app developers to share information with a wide range of platforms for analytics. Our Business Tools Terms place clear requirements on app developers who choose to send us app event data. Specifically, our Terms require the app developer to be clear with their users about the information they are sharing with us and to have a lawful basis for the disclosure and use of data.

Our Terms also prohibit app developers from sharing customer data with us that “includes health, financial information, or other categories of sensitive information (including any information defined as sensitive under applicable law).” Facebook does not want this information in its systems and apps that send us this data are in violation of their obligations under those Terms.

We take violations of our Terms seriously and have been in contact with each of the apps identified in the story to remind them of their obligations under our Terms and notify them that the data they are sharing may constitute categories of data that we prohibit them from sharing with us under our policies and that, if this is the case, they should stop sending.

In addition to our Terms prohibiting the sharing of sensitive information with us, we are increasing our efforts to help businesses understand their obligations, including adoption of our new SDK. Additionally, we have systems in place to detect and delete certain types of data such as Social Security Numbers, passwords, and other personal data, such as email, phone number, etc. We have begun looking at ways to improve our system/ products to detect and filter out more types of potentially sensitive data and are happy to talk further about these efforts with members of your team.