KoPl-G Transparency Report

July 2022

1. GENERAL OBSERVATIONS

> General observations outlining the efforts undertaken by a service provider to eliminate unlawful content on the platform.

Meta Platforms Ireland Limited, which provides the social network Facebook for users in Austria, aims to create a safe and trusted platform, where people can feel free to express themselves. But we are clear that we do not allow people to post content that is against the law or encourages criminal behavior. We also do not allow for bullying or harassment in any form. In order to achieve this balance, we take a multi-faceted approach to addressing potentially criminal or harmful activity on the Facebook platform.

First, we maintain a set of globally applicable Community Standards that define what is and isn't allowed on Facebook, and that in many instances tracks, to some degree, what is unlawful under Austrian law. These standards apply to content worldwide and are integral to protecting both expression and personal safety on Facebook. Our Community Standards prohibit a wide range of objectionable or harmful content, including content that:

- Promotes violent and criminal behavior
- Threatens the safety of others
- Is considered hate speech
- Is considered graphic violence
- Is considered spam
- Is considered bullying or harassment

The [Community Standards](#) are created by a global team with a wide array of backgrounds, including those who have dedicated their careers to issues like child safety, hate speech, and terrorism. This team regularly seeks input from outside experts and organizations to help balance the different perspectives that exist on free expression and safety, and to better understand the impacts of our policies on different communities globally. Our reviewers enforce these standards using comprehensive guidelines, which ensure that decisions are as consistent as possible. A Community Standards-report does not trigger a legal review by us – in accordance

with the user's Community Standards-report, we review for violation of our Community Standards. We maintain separate reporting mechanisms for users to report content they believe violates the local law (described in further detail below).

Logged-in Facebook users can report Community Standards violations in a variety of ways, including through an option appearing with each piece of content. When content is reported through these tools, we review the reported content (automated or manually) to determine whether it violates our Community Standards and remove it if it does. In addition, we use technology to help detect potentially Community Standards violating content, including terrorist content and child exploitation imagery, before people see it and report it to us. Technology can support by automatically removing violating content or by selecting content for human review on the basis of severity, virality and likelihood of a violation.

Second, we provide an array of options for people to report content they believe violates local law. When something on Facebook is reported to us as violating Austrian law, but doesn't go against our Community Standards, we may block the content from being available in Austria. People in Austria may use various channels to report alleged violations of Austrian law such as:

- KoPl-G reporting form – This form allows people in Austria to report content they believe violates one or more of the Austrian criminal law provisions set forth in KoPl-G (more information on this form can be found in Section 2 of this transparency report).
- Intellectual property reporting forms – These forms allow rights owners and their authorized representatives to report content they believe violates copyright or trademark rights.
- Defamation reporting form – This form allows injured parties and certain authorized representatives to report content they believe to be defamatory. This may include content that is a false assertion of fact, leading to injury to reputation.
- Legal removal request form – This form allows individuals in European Union Member States to report content they believe violates their personal legal rights or applicable local laws. When people select Austria as the country for which they want to claim rights, they are, first, provided an option to report through our KoPl-G complaint form. If they opt not to do so, this leads to access to the other forms mentioned above, as well as to a separate form for Right to Privacy/Erasure. The form also provides a means for people to report content they believe violates other laws not covered by the categories above.

2. REPORTING MECHANISMS/CRITERIA

> Description of the procedure and user-friendliness of the reporting mechanism (section 3 subsections (1) to (3)) and of the criteria applied in deciding whether to delete or block unlawful content, including the steps taken to determine whether content is unlawful or whether contractual provisions agreed between the service provider and the user have been violated.

If someone believes content on Facebook is unlawful under one or more of the Austrian criminal law provisions covered by KoPl-G, they can report it by using Facebook's dedicated KoPl-G reporting form. This form has been in place for users in Austria since April 1, 2021, and is intended for reports claiming violations of Austrian criminal law provisions listed in KoPl-G. This transparency report uses the noun "report" to mean the notification by a user of content available on the communications platform that is allegedly illegal within the meaning of Section 2 (8) of the KoPl-G and submitted via the KoPl-G reporting form outlined below.

For logged-in users, the KoPl-G reporting form is directly accessible via a link available next to the piece of content on the Facebook platform.

The KoPl-G reporting form can additionally be accessed via the Facebook Help Center, on a page dedicated to helping individuals understand how to submit KoPl-G reports. All users in Austria (i.e. registered and unregistered users) can access this Help Center page from the Facebook homepage by clicking the link titled "Help". The KoPl-G Help Center page can be found there under the "Policies and Reporting" tab and is otherwise searchable via the Help Center search bar. Once on the KoPl-G Help Center page, people can reach our KoPl-G reporting form by clicking on the button "Submit Report".

So that we can properly evaluate the claim and comply with section 4 ("Reporting obligation") of KoPl-G, people are prompted to provide the following information in our KoPl-G reporting form:

- Reasons why the content is believed to be unlawful under the KoPl-G (i.e. users can select (i) it's hate speech or content that supports hateful ideologies; (ii) it's a threat or extortion; (iii) it's an insult, accusation or harassment; (iv) it supports terrorism; and/or (v) it's graphic or intimate content),
- Section(s) of the Austrian criminal law alleged to have been violated by the reported content,
- Why the reported content is believed to violate the selected Austrian criminal law sections (users are given the opportunity to add any comments in a blank optional field),
- A court order, if available,
- Indication whether the report is made on behalf of a client.

If users wish to submit a KoPl-G report using the KoPl-G reporting form available on the KoPl-G Help Center Page, they will be asked (in addition to the above) to provide contact information as well as the link to the specific content on Facebook that is subject to the report. The contact information is filled in automatically for logged-in users. When logged-in users reach the reporting form directly from a piece of content, they do not need to provide links to the reported content or contact information. These fields are filled in automatically.

The reporting form only requires the information necessary for the correct classification and evaluation of the report as well as for the fulfillment of the reporting

obligation. Where we allow users to add further information, the information is clearly marked to be *optional*.

Once an individual has completed the KoPl-G reporting form (via one of the ways described above) and clicks "send", their report automatically reaches us through an internal review tool – no additional action is required by the reporting party. Users will also receive an acknowledgement of receipt of the report with the reference number of their report.

We then take a two-step approach to reviewing content that is reported through the KoPl-G reporting form. First, we review the reported content under our Community Standards. If it violates our Community Standards, we ensure that it is removed from the Facebook platform globally. Second, if the reported content does not violate our Community Standards, we review it for legality based on the information provided in the report. Specifically, we assess whether the reported content violates the relevant provisions of Austrian criminal law listed in KoPl-G. If the reported content is deemed to be unlawful under KoPl-G, we will disable access to that content in Austria (see further information on how we handle KoPl-G reports in Section 5). We also communicate with the reporting party to provide updates on their report, request additional information if necessary, and inform them about our decision once we have finished reviewing the report (see further information on this in Sections 5 and 7).

3. REPORT VOLUMES

Presentation of the number of incoming reports about allegedly unlawful content in the reporting period.

The following table shows the number of reports submitted through Facebook's KoPl-G reporting form between January 1, 2022 and June 30, 2022. In principle, only one piece of content can be reported per KoPl-G report. In some cases, however, users cite multiple pieces of content in a single KoPl-G report (e.g. by mentioning multiple URLs in an attachment uploaded to the report). The numbers reflected in the table below pertain to reports submitted rather than unique pieces of content identified in the reports. It is worth noting that in the period between January 1, 2022 and June 30, 2022, there were 20,712 KoPl-G reports identifying a total of 38,193 pieces of content. When the same piece of content was reported to us multiple times, we counted it as one piece of content.

The number of reports is broken down as follows according to the Austrian criminal law provisions listed in KoPl-G and cited by the reporting party. Please note that a report may cite multiple reasons for illegality. Therefore, the sum of reports listed in the rows in the below table exceeds the total number of reports submitted:

Table 1. KoPl-G Reports by Selected Austrian Criminal Law Provision

Criminal Law Provision	Reports from Users
Coercion (section 105 StGB)	1,991
Dangerous threat (section 107 StGB)	2,513
Stalking (section 107a StGB)	2,749
Harassment by way of telecommunication (section 107c StGB)	3,478
Accusation of a criminal offense for which the sentence has been served (section 113 StGB)	1,570
Insults (section 115 StGB)	7,481
Unauthorized publication of a privacy-violating picture (section 120a StGB)	2,447
Extortion (section 144 StGB)	2,471
Disparagement of religious teachings (section 188 StGB)	1,986
Pornographic depictions of minors (section 207a StGB)	1,506
Initiation of sexual contacts with minors (section 208a StGB)	1,538
Terrorist criminal offenses (sections 278b, 278f, 282a StGB)	4,445
Incitement to hatred (section 283 StGB)	6,386
Nazi propaganda (section 3d, section 3g or section 3h of the Prohibition Act)	3,404

4. DELETION/BLOCKING VOLUMES

> Overview of the number of reports of allegedly unlawful content in the reporting period that resulted in the deletion or blocking of the content at issue, including information on which step of the review led to the deletion or blocking and an outline description of the type of content.

4A. NUMBER OF REPORTS RESULTING IN DELETION OR BLOCKING

The following table depicts the number of times content was deleted or blocked following reports submitted through Facebook's KoPl-G reporting form between January 1, 2022 and June 30, 2022. Please note the following about this table:

- This table breaks down the number of times a report led to the deletion or blocking of content according to the provision(s) of Austrian criminal law cited by the reporting party.

- In principle, only one piece of content can be reported per KoPl-G report. In some cases, however, users cite multiple pieces of content in a single KoPl-G report (e.g. by mentioning multiple URLs in an attachment uploaded to the report). The numbers reflected in the table below pertain to reports submitted rather than unique pieces

of content identified in the reports. It is worth noting that in the period between January 1, 2022 and June 30, 2022, 3,018 KoPl-G reports resulted in the deletion or blocking of content. This amounted to a total of 2,769 deleted or blocked pieces of content. The total of deleted/blocked pieces of content is lower than the total of reports, because the same piece of content is sometimes reported in several reports – in such cases, in the content deletions/blockings statistics, we counted the same piece of content reported multiple times only once.

- Individuals may cite multiple reasons for illegality in a single KoPl-G report. If we took action on content pursuant to a report, it is listed in the table under every provision cited in the report. Therefore, the sum of deletions/blockings listed in the table below exceeds the total number of reports that led to the deletion or blocking of content.

Table 2. Number of Reports Resulting in Deletion/Blocking

Criminal Law Provision	Number of Deletions/Blockings
Coercion (section 105 StGB)	156
Dangerous threat (section 107 StGB)	292
Stalking (section 107a StGB)	301
Harassment by way of telecommunication (section 107c StGB)	434
Accusation of a criminal offense for which the sentence has been served (section 113 StGB)	145
Insults (section 115 StGB)	1,391
Unauthorized publication of a privacy-violating picture (section 120a StGB)	232
Extortion (section 144 StGB)	179
Disparagement of religious teachings (section 188 StGB)	181
Pornographic depictions of minors (section 207a StGB)	200
Initiation of sexual contacts with minors (section 208a StGB)	163
Terrorist criminal offenses (sections 278b, 278f, 282a StGB)	289
Incitement to hatred (section 283 StGB)	669
Nazi propaganda (section 3d, section 3g or section 3h of the Prohibition Act)	388

Of the 2,769 deleted or blocked pieces of content, 2680 were deleted globally for a violation of our Community Standards, and 89 did not violate our Community Standards, but were blocked in Austria due to a violation of a provision of the Austrian criminal law listed in the KoPl-G.

4B. OUTLINE DESCRIPTION OF THE TYPE OF CONTENT

Please see the table in Section 4A above for a summary of the type of content reported and deleted or blocked under KoPl-G.

5. ORGANIZATION, PERSONNEL AND TECHNICAL RESOURCES, PERSONNEL EXPERTISE, TRAINING, AND SUPPORT

> Description of the organization, personnel and technical resources, specialist expertise of the personnel responsible for processing reports, as well as training and support of the persons responsible for processing reports.

5A. ORGANIZATION

KoPl-G reports are reviewed in two steps by teams of trained professionals and lawyers, who cover both the Facebook and Instagram platforms.

First, content reported via the Facebook KoPl-G reporting form is reviewed by members of our Global Operations team. Our Global Operations team consists of full-time employees and personnel of companies we partner with. Each KoPl-G report is reviewed by an individual member of this team through our contractual partnerships with Majorel in Berlin and Telus/CCC in Essen (Germany) to determine whether the reported content violates Facebook's Community Standards (as opposed to reviewing the content for potential unlawfulness, which as discussed below is handled by separate teams). If the content is found to violate the Community Standards, then the content is removed globally.

Second, all KoPl-G reports containing content that was not removed for violating Community Standards undergo a legal review process that can consist of multiple stages (see below) handled by our Scaled Regulatory Operations team.

This team is made up of two groups – a group of employees based out of Ireland and Sunnyvale, California (and one employee working remotely from Austin) and a group of contractors based out of Dublin, Ireland and Austin, Texas. KoPl-G reports containing content that was not removed for violating Community Standards are first reviewed by one of the contractors. The purpose of this review stage is to ensure that manifestly unlawful content is blocked within 24 hours. Each report is reviewed by an individual member of that team, who is tasked with identifying and blocking manifestly unlawful content, and corresponding with the reporting party, including when the report lacks critical context. All of this is done in accordance with guidance developed by our in-house lawyers and external legal counsel. Should the report require more granular investigation, it is enqueued for review by one of the Scaled Regulatory Operations team employees. That individual will then carefully review the report and take appropriate action in instances where illegality or legality can be determined on the basis of guidance prepared for the team by our in-house lawyers and external legal counsel.

Where the legality of reported content is still unclear, the report is then escalated to our in-house lawyers for review. In particularly complex cases, our in-house lawyers may obtain a legal assessment from German-speaking outside counsel who have knowledge of Austrian law.

Once a decision on how to handle the content is made, the Scaled Regulatory Operations team handles any advised content actions and corresponds directly with the reporting party and – if content is blocked – the reported user.

There are open lines of communication between content reviewers at each stage of the review process.

In the Global Operations team the Majorel and Telus/CCC teams work closely with the Global Operations team employees in Dublin. The Majorel and Telus/CCC teams receive training, additional guidance, and Community Standards expertise on KoPl-G cases as needed. Specifically, both sites conduct content moderation (CM) introductory training. Part of content moderation training is content which has been assessed in KoPl-G reports in the past. Content moderation refresher training does happen regularly as CM-related policy updates do occur.

The group of Scaled Regulatory Operations team contractors work closely with our Scaled Regulatory Operations employees, who provide training, guidance, and assistance on challenging or unique reports. A similar line of communication is also open between the Scaled Regulatory Operations employees and a team of our in-house lawyers. These two teams meet multiple times a week and maintain open lines of communication to discuss legally complex KoPl-G reports.

5B. PERSONNEL AND TECHNICAL RESOURCES AND EXPERTISE

As of June 30, 2022, 173 individuals spread across three teams are eligible and have been trained accordingly (as further set out in Section 5C) to process KoPl-G reports. These individuals also engage in work outside of KoPl-G reports, which allows for flexible staffing. When reporting volumes are low, only a subset of these individuals process KoPl-G reports. When volumes increase, additional trained members of the teams can be utilized to process reports as well. The personnel resources and expertise of each team are as follows:

- **Global Operations team:** As of June 30, 2022, there were 140 individuals on this team eligible to handle KoPl-G reports. Prior to handling KoPl-G reports, all of these individuals were required to display proven operational efficiency over the course of at least 3-6 months on other types of content takedown requests. In addition, all of these individuals are fluent in German, and have received the training as further set out in Sections 5A and 5C. As noted above, these individuals also engage in other queues focused on content moderation outside of KoPl-G to help balance their workload depending on KoPl-G reporting volumes.

- **Scaled Regulatory Operations team:** As of June 30, 2022, there were a total of 31 individuals eligible to handle KoPl-G reports on the Scaled Regulatory Operations team. 21 of these individuals were contractors, and 10 were employees. These 21 contractors are fluent in German, and have received KoPl-G training (as further discussed in Section 5C below). The Scaled Regulatory Operations team employees eligible to handle KoPl-G reports are fluent in a wide variety of languages, including German, English, French, and Turkish, and can rely on other members of the team for expertise in other languages, such as Polish, Spanish, Russian, and Dutch.

Reports are generally reviewed by members of the team that are fluent in both German and English, with occasional exceptions for reports submitted in other languages or where the reported content does not require German language expertise. The 10 employees have varied backgrounds to account for both the legal and operational complexities of KoPl-G reports. Specifically, 4 have law degrees, and 9 had operational experience in other roles before joining the team. All of these individuals have received KoPl-G training (as further discussed in Section 5C below).

- **Legal:** As of June 30, 2022 there were 2 in-house lawyer involved in handling KoPl-G reports (among other work). These 2 lawyers are specialists for the assessment of potentially problematic content and have extensive experience regarding handling legal questions concerning takedown requests. These lawyers work closely with the Scaled Regulatory Operations team employees and correspond regularly with external legal counsel in Austria who provide advice on specific KoPl-G reports.

The people processing the reports access them via a technical system. For example, the Scaled Regulatory Operations team communicates with the reporter via an internal review tool.

5C. EDUCATION, TRAINING AND SUPPORT

The teams which handle KoPl-G reports (see also Sections 5A and 5B above regarding the education of these teams), receive distinct types of training based on the nature of their respective work.

As Global Operations team members who review KoPl-G reports on Facebook only review these reports for violations of Community Standards, their training is focused on developing operational skills and expertise in the implementation of Community Standards (rather than training to assess legality of content according to KoPl-G). They undergo several weeks of training in content review under Facebook's Community Standards.

Members of the Scaled Regulatory Operations team review content for illegality and therefore receive greater levels of training on KoPl-G and the provisions of Austrian criminal law that make up the definition of "unlawful content" under the law. Every member of this team eligible to handle KoPl-G reports receives several weeks of training focused heavily on operational proficiency and KoPl-G ahead of them processing KoPl-G reports. The KoPl-G-specific training includes background material on the law, detailed breakdowns of every criminal law provision referenced in the KoPl-G, and instruction on how to correspond with reporting parties and users, whose content was reported.

There is a robust and diverse program to support our Global Operations and Scaled Regulatory Operations team members who review KoPl-G reports. This program currently offers e.g. the following services for team members:

- Psychological support
- One-on-one sessions with a full-time in-house psychologist

- Group therapy
- On-site counseling sessions to support emotional well-being

We are dedicated to providing our content reviewers with a high-quality, diverse support program and will continue to add new services and improve on existing services to accomplish this goal.

6. DELETION/BLOCKING TURNAROUND TIMES

> Overview of periods between receipt of a report by the service provider, beginning of review, and deletion or blocking of unlawful content, broken down into the periods "within 24 hours", "within 72 hours", "within seven days" and "at some later point".

Every KoPl-G report is picked up within less than 24 hours.

The following table contains a breakdown of the time taken to block or delete content deemed unlawful or in violation of our Community Standards after receiving a KoPl-G report. This table concerns reports submitted through Facebook's KoPl-G reporting form between January 1, 2022 and June 30, 2022.

This table shows the following details for each report where a piece of content was deleted or blocked: (1) the time it took to delete or block the reported content, and (2) the Austrian criminal law provision(s) cited by the reporter in the report. Please note the following about this table:

- As set forth under section 4 subsection (2) number (7) KoPl-G, we report on the following time periods between receipt of a report and deletion/blocking of content: (a) within 24 hours, (b) within 72 hours, (c) within 7 days, and (d) at a later date.
- The numbers reflected in the table below pertain to reports submitted rather than unique pieces of content identified in the reports.
- The time periods refer to the time between when the report was submitted and the last action we took in response to the report. As an example, if a report identified two pieces of content and we actioned one piece within 24 hours and the other within 7 days, then that report would be listed in the table as taking action within 7 days.
- Individuals may cite multiple reasons for illegality in a single KoPl-G report. If we took action on content pursuant to a report, it is listed in the table under every provision cited in the report. Therefore, the sum of deletions/blockings listed in the table below exceeds the total number of reports that led to the deletion or blocking of content. It is worth noting that of the 3,018 reports that led to a block or deletion, our last block/deletion action occurred within 24 hours 2,779 times, within 72 hours 159 times, within 7 days 69 times, and after 7 days 11 times (e.g. due to necessary alignments with inhouse lawyers in particularly complex / difficult cases).

Table 3. Turnaround Time for Reports with Deletion/Blocking

Criminal Law Provision	Reports from Users			
	24 Hours	72 Hours	7 Days	> 7 Days
Coercion (section 105 StGB)	150	2	4	0
Dangerous threat (section 107 StGB)	276	8	8	0
Stalking (section 107a StGB)	282	11	8	0
Harassment by way of telecommunication (section 107c StGB)	415	14	5	0
Accusation of a criminal offense for which the sentence has been served (section 113 StGB)	127	7	10	1
Insults (section 115 StGB)	1,307	62	22	0
Unauthorized publication of a privacy-violating picture (section 120a StGB)	206	11	13	2
Extortion (section 144 StGB)	166	9	3	1
Disparagement of religious teachings (section 188 StGB)	160	7	14	0
Pornographic depictions of minors (section 207a StGB)	171	12	14	3
Initiation of sexual contacts with minors (section 208a StGB)	138	9	13	3
Terrorist criminal offenses (sections 278b, 278f, 282a StGB)	265	8	14	0
Incitement to hatred (section 283 StGB)	609	34	24	2
Nazi propaganda (section 3d, section 3g or section 3h of the Prohibition Act)	342	25	18	3

7. SPAM

Overview of the number and types of cases in which the service provider refrained from carrying out a reporting procedure.

Between January 1, 2022 and June 30, 2022, we have carried out the procedure described in Section 2 above for all reports sent to us via Facebook's KoPl-G reporting form. We received one report that used an email address that almost certainly did not belong to the reporting party. To protect the true owner of this email account from spam, we reviewed the report and actioned the reported content according to the result of our review, but did not send a notification about the result of the review to the email address.