PRIVACY INTERNATIONAL

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Facebook

6 March 2019

Dear Facebook,

We are writing to express our concern and ask for your urgent response to reports regarding Facebook's policy on the sharing of mobile phone numbers of its users.

Privacy International (PI) is a registered charity based in London that works at the intersection of modern technologies and rights. Privacy International challenges overreaching state and corporate surveillance, so that people everywhere can have greater security and freedom through greater personal privacy.

We are alarmed by recent reports saying that some of the phone numbers provided by users for the express purpose of two-factor authentication (2FA) as a way of securing their accounts are now made searchable by default. In effect, this would mean that user data is made available to advertisers and others without the users being aware and without providing free and informed consent. As a result, users who want their accounts to be more secure are forced to allow other users and advertisers to more easily find them on the social network.

We are concerned that allowing such numbers to be searchable both undermines users' trust in two-factor authentication, a critical security feature, and that it puts users' security at risk if they are unaware that their account may be identified by their phone number. This is particularly concerning for activists, dissidents and communities at risk all over the world which use Facebook to communicate and organise and that have a clear and present need to protect their security.

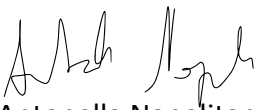
While mobile numbers are no longer required to enable 2FA, they are nonetheless used by people; in some cases this could even be the only option available to them in order to enable that extra level of security.

We therefore have a number of urgent questions regarding these reports:

1. Is it accurate that phone numbers given specifically for security purposes (including 2FA) are now searchable?
2. If this is accurate, was this due to a deliberate policy, an oversight, or a bug?
3. If this is a change of policy, what is your legal basis for repurposing these phone numbers under GDPR Article 6(4)?
4. Are users made aware of the repurposing of the phone numbers given for security purposes?
5. Can a given user see who has access to this information?
6. Can you confirm reporting by Venkatadri et al that "we found no privacy settings that directly let a user view or control which PII is used for advertising; indeed, we found that Facebook was using the above PII for advertising even if our control account user had set the existing PII-related privacy settings on to their most private configurations. Finally, some of these phone numbers that were usable to target users with did not even appear in Facebook's "Access Your Data" feature"?[1]
7. What steps, if any, will you take to ensure that phone numbers provided for the purpose of securing accounts are not made searchable?

We look forward to a prompt response which we may publish on our site at www.privacyinternational.org

Yours sincerely,



Antonella Napolitano
Policy Officer

[1] " https://mislove.org/publications/PII-PETS.pdf