Social media companies are failing to provide adequate advertising transparency to users globally

An analysis of what Facebook, Google, and Twitter have done to provide users with political ad transparency as of September 2019.

Recently the role of social media and search platforms in political campaigning and elections has come under scrutiny. Concerns range from the spread of disinformation, to profiling of users without their knowledge, to micro-targeting of users with tailored messages, to interference by foreign entities, and more. Significant attention has been paid to the transparency of political ads, and more broadly to the transparency of online ads.

Notably, in the lead up to the 2019 EU Parliamentary elections Facebook, Google, and Twitter, as well as the Interactive Advertising Bureau and others, agreed to take a series of steps to prevent online disinformation on their respective platforms. These measures are reflected in a self-regulatory Code of Practice on Disinformation and the companies provided the European Commission with monthly updates on their progress. The Commission's final report, due in November 2019, will indicate to what extent the companies met their commitments within the Code of Practice. Already, however, there has been criticism of the companies' actions, which as will be documented below, were comparatively minimal. Additionally, while the Code of Practice is intended to be applied within the EU, PI has also looked at the implementation of similar measures in other countries. We are concerned that the measures are enforced unequally in different parts of the world, leading to unfair treatment of users.

This document outlines PI's understanding of what steps Facebook, Google and Twitter have taken so far, PI's analysis of the companies' shortcomings in online political and issue-based advertising transparency, and suggestions for what companies should do moving forward.

Main takeaways

- Companies have applied different policies in different countries. In jurisdictions where companies are under pressure to act (by governments, institutions such as the EU, or civil society), they have adopted self-regulatory practices. Where such pressure is absent, they have, by and large, failed to act.
- Facebook, Google, and Twitter have taken a blatantly fragmented approach to providing users with political ad transparency. Most users around the world lack meaningful insight into how ads are being targeted through these platforms.
    - **Facebook** provides heightened transparency for political ads in 35 countries (roughly 17% of the countries in the world). This means that for roughly 83% of the countries in the world, the company does not require political advertisers to become authorised, for political ads to carry disclosures, or for ads to be archived.
    - **Google** provides heightened transparency for political ads in 30 countries (roughly 15% of the countries in the world).
    - **Twitter** provides heightened transparency for ads tied to specific elections (rather than political ads more generally) in 32 countries (roughly 16% of the countries in the world).
        - Outside of the US, **Twitter** does not treat political ads or political issue ads differently from promoted tweets, meaning that these ads (which are political, but not tied to an election), run without heightened transparency.
            - Within the analysis, PI has provided an example of a UK Brexit party ad being run on Twitter without being marked political, and therefore with no targeting information provided. The ad has since been deleted.
- The companies do not provide meaningful transparency into political issue ads (which each platform defines separately, or not at all) that have run or are running on their platforms.

    - **Google** has not defined what it considers to be "political issues" and therefore transparency into what political issue ads have run or are running, to whom they are being shown, how much was spent, etc., is impossible.
- The targeting provided by Facebook, Google, and Twitter is inadequate - it is still impossible to meaningfully understand who political advertisers are targeting across the three platforms.
    - The ad libraries of Facebook, Google, and Twitter, in varying degrees, provide broad ranges of targeting information on some ads in some countries, instead of meaningful insight into how an ad was targeted. This is especially problematic given the granularity with which advertisers, political or not, are able to micro-target ads users.
        - Google is especially deficient given that it only provides broad ranges of insight, such as 100K-1M as the number of times an ad was shown, rather than meaningful information about how an ad or campaign was targeted.

Methodology

To structure our analysis, we have taken the commitments within the Code of Practice and rewritten them in question form. For example, the Code states:

> *"Relevant Signatories commit to enable public disclosure of political advertising (defined as advertisements advocating for or against the election of a candidate or passage of referenda in national and European elections), which could include actual sponsor identity and amounts spent."*

We have formulated this commitment in question form as:

> *How can users report political advertising for the company to act upon?*
> *Did they include actual sponsor identity and amounts spent?*

To inform our analysis we have relied on publicly available transparency tools that the platforms make available in the UK, publicly available company policies, and publicly available reporting. We have also asked Facebook, Google, and Twitter for clarification and have included wherever relevant their responses. Google did not respond to our requests.

An important caveat is that this is a fast-moving space, and the companies continue to make changes to their policies in the EU and internationally. This document examines the companies' efforts that we are aware of until September 2019.

Beyond the reports on the implementation of the Code of Practice, PI looked at how companies describe their transparency policies' application globally. Facebook, Google, and Twitter have taken an overwhelmingly fragmented approach to providing users with political ad transparency. Most users around the world remain without meaningful insight into how ads are being targeted through these platforms. We've outlined how the companies describe their policy application globally in the table below.

Finally, we have focused only on commitments directly related to online political advertising transparency; for those interested in how companies can improve content ranking, API access, and combatting disinformation, we suggest your look at the Asociación por los Derechos Civiles, Democracy Reporting International, DisinfoLab, Mozilla, and Ranking Digital Rights.

In addition to this written summary PI have created three maps that show geographically where each platform provides heightened political and issue-based ad transparency globally. If you spot something that we've missed, please reach out to us on info@privacyinternational.org.

This research is a part of PI's work on Defending Democracy and Dissent, which aims to investigate the role technology plays in facilitating and/or hindering everyone's participation in civic society.

Below is an overview of how the three companies define "political ads" and political "issue ads". Each company defines these terms differently, or not at all, which means that the companies' policies and procedures vary depending on how they define the different types of ads.

	FACEBOOK	GOOGLE	TWITTER
Political Ads (as of 4 September 2019)	Argentina, Brazil, Canada, EU member states including the UK, India, Israel, Ukraine, the US • Is made by, on behalf of or about a current or former candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office; or • Is about any election, referendum or ballot initiative, including "get out the vote" or election information campaigns Facebook does not appear to enforce these definitions outside of the countries listed above.	Google's transparency requirements, including identifying who paid for an ad, appear to apply only to "election ads" in EU member states, including the UK, as well as India, and the US. Google defines "election ads" in EU member states, including the UK as: • ads featuring a political party, a current elected officeholder or candidate for the EU Parliament; or • ads featuring a political party, a current officeholder or candidate for an elected national office within an EU member state. Google defines "election ads" in relation to India's general election as: • ads that feature a political party, a political candidate or current member of the Lok Sabha (India's lower House of Parliament) or any ads that are run by a political party, political candidate or current member of the Lok Sabha. Google defines "election ads" in relation to US federal elections and various state elections as: • ads that feature a current officeholder or candidate for an elected federal office, such as that of the President or Vice President of the United States, or members of the United States House of Representatives or United States Senate. Canada Google has banned "ads that feature a federal political party, leader of a federal political party, current member of, or candidate (including nomination contestant) for member of the Parliament of Canada."	Generally • Ads that advocate for or against a candidate or political party. • Ads that appeal directly for votes in an election, referendum, or ballot measure. • Ads that solicit financial support for an election, referendum, or ballot measure. Political ads are not allowed in Brazil, Cyprus, France, Hungary, Latvia, Lithuania, Malaysia, Morocco, Pakistan, Portugal, South Korea, Vietnam. Additional definitions Australia political ads: • Ads purchased by a political party, candidate, or entity registered with the Australian Election Commission; or • Ads that advocate for or against a clearly identified candidate or party for Australian federal elections. Canada political ads • Ads purchased by a Canadian political party, candidate or third party registered with Elections Canada • Ads that advocate for or against a party or the election of a candidate registered with Elections Canada • Ads that advocate on an issue associated with a party or candidate registered with Elections Canada during an election period EU member states, including the UK political ads (applied to EU Parliamentary elections only) • Ads purchased by a European or national political party, • Ads purchased by a candidate registered with their corresponding national electoral authority, or • Ads that advocate for or against a clearly identified candidate or party for European elections. • Political ads were not permitted in Cyprus, Latvia,

			Lithuania, France, Hungary, and Portugal. India political ads • Ads purchased by a political party registered with the Election Commission of India; • Ads purchased by a candidate authorized by the Election Commission of India; or • Ads that advocate for or against a clearly identified candidate or political party for Indian general elections. Japan political ads • Ads that advocate for or against a candidate or political party. • Ads that appeal directly for votes in an election, referendum, or ballot measure. • Ads that solicit financial support for an election, referendum, or ballot measure. USA political ads • Ads purchased by a political committee or candidate registered with the Federal Election Commission (FEC); or • Ads that advocate for or against a clearly identified candidate for Federal office. • Foreign nationals are prohibited from targeting political advertisements to the U.S. • Political campaigning advertisers are prohibited from using foreign payment methods.
Political Issue Ads (as of 4 September 2019)	Canada • civil and social rights • economy • environmental politics • health • immigration • political values and governance • security and foreign policy EU member states, including the UK • immigration • political values • civil and social rights • security and foreign policy • economy	Google does not define political issue ads. Canada • Between 27 August – 21 October 2019, Google banned "Ads that feature an issue with which a federal political party, current member of or candidate for member of the Parliament of Canada is associated." 2018 Irish Abortion Referendum Two weeks prior to the vote, Google, including YouTube, banned all ads related to the Irish abortion referendum.	Generally • Ads that refer to an election or a candidate, or • Ads that advocate for or against legislative issues of national importance. However, outside of the US, Twitter does not treat political issue ads differently from promoted tweets, meaning that these ads (which are political, but not tied to an election), run without heightened transparency. Additional definitions Australia political issue ads are permitted without restriction. Canada it was reported that political ads are not allowed during the 2019

	• environmental politics USA • abortion • budget • civil rights • crime • economy • education • energy • environment • foreign policy • government reform • guns • health • immigration • infrastructure • military • poverty • social security • taxes • terrorism • values Facebook does not appear to enforce these definitions outside of the countries listed above. 2018 Irish Abortion Referendum It was reported that Facebook banned foreign-bought ads related to the Irish abortion referendum in the lead up to the 2018 referendum vote.		Canadian campaign due to Canadian law on ad transparency. EU member states, including the UK political issue ads are permitted without restriction except in France where they are Twitter states they are prohibited. India political issue ads are permitted without restriction. USA political issue ads: • Ads that refer to an election or a clearly identified candidate ("any candidate running for federal, state, or local election"); or • Ads that advocate for legislative issues of national importance (Twitter gives examples as: abortion, healthcare, guns, climate change, immigration, taxes.)

What policies and processes did the companies deploy to disrupt advertising and monetization incentives for relevant behaviours?

Facebook

1. Ad authorisation
    a. In a limited number of countries Facebook requires those running political ads to become authorised. These countries are Argentina, Brazil, Canada, all EU member states, including the United Kingdom, as well as India, Israel, Ukraine, and the USA. Facebook does not require political advertisers in other countries to become authorised.
    b. Where authorisation is required, those placing ads confirm their identity and location prior to running ads.
        i. Authorisation results in 1) political ads appearing in Facebook's Ad Library and 2) political ads showing disclaimers, which state the name or "entity" that paid for the ad.
        ii. Facebook ads include 'Why are you seeing this particular ad' link which gives basic demographic and interest information, as well as information about where the data used to target to came from. The level of information granularity provided to users appears to depend in which country the ad is

running. For example, activists have asked Facebook to provide basic transparency in Tunisia in advance of the 2019 elections.

iii. Facebook told PI that transparency measures do not apply to Messager ads.

c. In countries where authorisation is required, Facebook requires political ads to be bought in local currency and advertisers must have a payment source for ads with an address in country in which political ads are running. Advertisers can run political ads only in the countries in which they are authorised. If an advertiser wants to run political ads in multiple countries – they must complete the authorisation process in each respective country. However, two weeks prior to the 2019 EU Parliamentary elections, the Dutch digital rights organisation Bits of Freedom was able to run ads in Germany using a Dutch Facebook and bank account, apparently skirting the policy.

d. It's worth noting also that researchers recently identified 96,106 political ads that ran without a 'Paid for by' disclosure, before being taken down. Researchers report that the total spent on those ads was "at least $42.8 USD and [made] 670 million impressions".

e. Facebook confirmed to PI that the requirement of advertiser authorisation and disclaimers is applied only to a limited number of countries, and the company otherwise only "strongly encourage[s] advertisers to authorize and provide disclaimers": "*In the markets where we have already introduced our ads transparency tools, authorization and disclaimers are required and enforced upon when setting up the ad. For all other countries, we are providing these tools and strongly encourage advertisers to authorize and provide disclaimers --especially in a rapidly evolving regulatory landscape. We will continue rolling out enforcement to more countries around the world and remain committed to introducing more enforcement mechanism."*

f. Facebook also told PI: "*With elections happening all over the world, we are committed to bringing authorization and disclaimer enforcement to more places around the world, starting in countries with imminent elections or regulations."*

2. Ad Library

a. Facebook's Ad Library, which is only available in Argentina, Brazil, Canada, EU member states, including the United Kingdom, as well as India, Israel, Ukraine, and the USA, contains political and issue ads of authorised advertisers. If an advertiser is not authorised, ads do not appear in the Library.

i. Political ads are stored in Facebook's Ad Library for seven years. The utility of Facebook's Ad Library, namely the ability to efficiently search the library, has been criticised.

ii. At present it is not possible to type in a country name and see all the ads that have been or are being targeted at users in a certain country. The results show only a partial view of all the ads. As noted by the Broadcasting Authority of Ireland, this means that "without having access to the complete set of words used by all advertisers, a user cannot retrieve the full set of political adverts from the Facebook Ad Library API".

1. Facebook told PI: "*With any new undertaking we're committed to taking feedback, and learning and improving our tools to make them more useful. For example, we heard feedback on the Ad Library Report and plan to add regional spend aggregation, rolling presets and more up-to-date data."*

Google

1. Ad Library for "elections ads"

a. While the company defines "political content", Google's transparency requirements, including what is archived in the company's Ad Library, appear to apply only to "election ads" appearing on Google and YouTube.

b. The Ad Library archives 1) ads that feature a political party, a current elected officeholder, or a candidate in the EU, 2) election ads that feature or are run by a political party, a political candidate, or a current member of the lower house of the Indian Parliament (Lok Sabha), and 3) ads that feature a current elected federal officeholder or candidate for the US House of Representatives, US Senate, President, or Vice President.
b. It includes election ads and basic, broad information about the performance of the ads such as when an ad ran, a spend range, and a range of how many impressions an ad made [for example 10k – 100k], instead of exact impression data.
    i. This means that Google has not made information about microtargeting of political ads available.
    ii. As noted in a paper entitled "Analysis of United States Online Political Advertising Transparency" by Laura Edelson, Shikhar Sakhuja, Ratan Dey, and Damon McCoy, impressions are an imperfect metric to measure the reach of an ad. The authors suggest that it would be more useful to "also include click and other interaction metrics recorded by the platforms".

Twitter

1. Political Content policy
    a. This policy allows political ads related to an election, including political issue ads, on Twitter. There are country level restrictions to the policy.
        i. Political ads are prohibited in Brazil, Canada [until election period starts], Cyprus, France, Hungary, Latvia, Lithuania, Malaysia, Morocco, Pakistan, Portugal, South Korea, and Vietnam.
        ii. Further restrictions are outlined in the table above.
    b. Advertisers running political campaigning ads in Australia, Canada, India, the US, and during the 2019 EU Parliamentary elections cannot use foreign payment methods.
    c. The policy does not apply to ads that mention or 'refer' to candidates, but only to ads that 'advocate' for candidates. Ads that 'refer' to candidates are considered (except in the USA) by Twitter to be issue ads and are therefore not regulated (except in France, where according to Twitter they are prohibited). In France, only ads telling people when and how to vote appear to be allowed.
3. Unacceptable business practice policy
    a. Twitter's website lists examples of unacceptable business practices, including:
        i. Potentially deceptive, misleading, or harmful business propositions.
        ii. Making misleading, false, or unsubstantiated claims.
4. Quality ads policy
    a. This policy monitors the quality of ads and includes editorial guidelines related to things such as content, URLs, text, images, and videos.
5. Certification
    c. Within Twitter's Political Content Policy, the company requires political advertisers running ads in certain elections to become certified. At present, only advertisers running ads related to "US federal elections, US issue advocacy, and Canada federal elections" must become certified. Past elections where certification was required in elections in Australia, India, and the 2019 EU Parliamentary election. The policy appears to only require advertiser verification during the campaigning period and for certain elections, instead of extending verification outside the narrow campaigning period.
    d. Certification means that advertisers provide proof of identity to Twitter. At present [accessed August 2019] it appears that only advertisers running political ads for the 2020 US elections or general elections in India and Australia need to become certified.
6. Ad transparency centre

a. The transparency Twitter provides depends on what kind of ad is being interrogated.
    i. **Promoted tweet (political)** – are political ads tied to an election. These ads are archived for a longer period of time than political ads that are not tied to an election.
        1. Promoted tweet (political) ads are archived in Twitter's ads transparency centre, which is available for Australia, Canada, EU member states (limited to the 2019 Parliamentary elections), India, and the US only.
        2. For Promoted tweet (political) ads, Twitter shows billing information, amount spent, number of impressions, campaign disclaimers, and demographic targeting data – both intended audience and reached audience.
    ii. **Promoted tweets** – commercial and political ads [that are not tied to an election]. These ads are archived for only seven days and Twitter does not provide campaign targeting information about what users were targeted by the campaign, who actually saw the campaign ads, other campaign performance details.
    iii. This is a major weakness in Twitter's political ad transparency because it means that political ads can run outside of an election period with little to no transparency, and they are deleted within seven days.
    iv. For example, the below Brexit Party promoted tweet was screenshot on 13 September 2019 and appears not to have been stored in Twitter's Ad transparency centre and has since disappeared.



    v. In response to PI asking Twitter for clarification on this, the company said: "*Political campaigning ads can only run during corresponding election periods per our country specific policies. Twitter will review supporting additional national elections in order to archive such ads and show additional campaign performance details. Once EU national elections are supported, ads by political parties, candidates or authorized third-parties or individuals will have additional transparency. We are working to support UK*

elections and other EU member states national elections throughout the next year."

vi. Twitter did not provide information about the company's timeframe for providing this level of transparency outside of the EU.

b. For Promoted tweet (political) ads, the centre requires users to scroll through a long list of political advertisers and click through to see ads that each individual page is running. There does not appear to be a holistic view.

c. For Promoted tweet ads, users are able to search for an advertiser name or topic to see related ads, but not see a holistic view of all ads that have run or are running targeted as users in a certain country.

d. Twitter says that when an advertiser spends less than $100 USD and an ad has fewer than 1K impressions, the transparency centre does not disaggregate the spend and impressions, meaning the number of times the tweet shows in users' timelines.

   i. This means that the transparency centre could fail to provide comprehensive insight into political micro-targeting.

   ii. In their paper entitled "Analysis of United States Online Political Advertising Transparency", researchers found that "across all three platforms the majority of political ads are small, costing their sponsors less than $100 USD with 82% of all Facebook political ads costing between $0-$99. This confirms and quantifies the prevalence of small likely highly targeted ads that can contain custom political messaging."

e. Twitter says that if an advertiser deletes an ad or their username, the ads will no longer be shown in the transparency centre, which also could result in historical insight into who a campaign or advertiser is targeting.

PI analysis

- Companies should provide transparency tools globally. In countries where authorisation isn't required, it's not clear what incentive companies expect political actors and advertisers to have to become authorised.
  - For example in Indonesia, a country with a population of 264 million, where Facebook is the most used social media platform, and where there was an election in 2019, Facebook does not provide heightened political ad transparency. The Indonesia-based organisation ELSAM – The Institute for Policy Research and Advocacy, and PI Network partner provided PI the below screenshots.
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  - *ELSAM told PI that the "Browse and download the Ad gallery report" option was not available in Indonesia.*
  - All companies should have meaningful and accessible Ad Libraries and the Libraries should be upgraded to address concerns from civil society, journalists, researchers,

and others. At present the companies are operating with different definitions of political and political issue ads (or have not defined political issues), which impact on what transparency they provide to the ads, including if an ad is archived by a company's Ad Library.
    - Consideration should be given to archiving all ads, not only political or political issues ads. Any definition of political and political issue ad risks being too narrow and therefore there needs to be further discussion about what ads must have heightened transparency requirements.
        - In some cases, there may be a legitimate need to advertise anonymously. For example, due to human rights restrictions. Options of how this could be modelled should be explored [see Who Targets Me's proposal]. It is especially important that companies understand the contexts in which they operate and build strong independent national teams.
    - Companies should address and act on concerns raised about Ad Libraries being research friendly, as examining political ads is a key method of understanding political reach and influence today and the way that people's data is used for this. There has been vocal criticism about the functionality of Facebook's Ad Library API.
    - Ad Libraries should be archiving continuously, rather than solely during an election or referendum period. Limiting heightened ad transparency to narrow campaigning periods is a dated approach – digital political campaigning is continuous. Companies should provide transparency tools and disclaimers continuously.
- It is still impossible to understand what users on all three platforms are being targeted by an advertiser or campaign. While the platforms provide general information about to whom the ad was targeted (gender, age, location), the platforms provide advertisers the ability to target on a much more granular scale. This differential of transparency is problematic.
    - Companies should provide users with meaningful information about why they are targeted by an advertiser or campaign. Given the granularity with which advertisers are able to target users on Facebook, Google, and Twitter, the companies must provide much more information about why users are seeing an ad.
        - This information should include at least 1) the source of the data used to target ads, 2) the target audience of the advertiser and actual audience of the advertiser, 3) information about if and how the ad was micro-targeted [i.e. A/B tested, if the advertiser used a look alike audience, meaningful financial transparency as to who actually paid for the ad, and more here].
        - In their paper entitled "Analysis of United States Online Political Advertising Transparency", researches said "Facebook and Google have detailed information about how users are targeting for each ad, based on advertiser produced lists of personally identifiable information, groups they belong to, demographic or income information that the platform has about the user, geography, or keyword search information, however they do not currently make any of this information available in their archives."
- Companies should work with election monitoring bodies and observers nationally, to understand local contexts.
- While Facebook have taken steps to increase political ad transparency, the company have failed to address reports of apparent loopholes in the company's transparency requirements. For example, on 1 August 2019, the Guardian reported that a powerful political lobbying company was able to run multiple Pages via Facebook's Business Manager tool without telling users that they were behind the Pages or ads, or who was paying for their work.
- Facebook, Google, and Twitter are very powerful advertising companies. The more data they collect, the better they become at profiling individuals and offering these profiles to advertisers, political parties, and others, as well as using those profiles to improve the attractiveness of their own services. And the more people are drawn into these services, the less any individual user has the power to opt out of the corporate data exploitation model because no equivalent service exists. When assessing market power, competition authorities

have tended to focus on price and outputs. This narrow approach gives little to no consideration to other factors, such as consumer welfare, quality, innovation, and privacy; and the interaction between the different relevant markets at play. The company's dominant market position should result in heightened scrutiny of how they apply ad transparency and disclaimers globally. They must comply with legal standards including data protection, electoral law, and competition law and should apply the highest standards globally.

How did the companies comply with the requirement outlined in self-regulatory Codes, that all advertisements should be clearly distinguishable from editorial content, including news, whatever their form and whatever the medium used?

Facebook

1. Disclaimers
    a. In countries where authorisation is required [Argentina, Brazil, Canada, EU member states including the UK, India, Israel, Ukraine, and the US], such authorisation results in 1) political ads appearing in Facebook's Ad Library and 2) political ads showing disclaimers. The disclaimers state the name or "entity" that paid for the ad. Disclaimers also apply to political ads on Instagram.

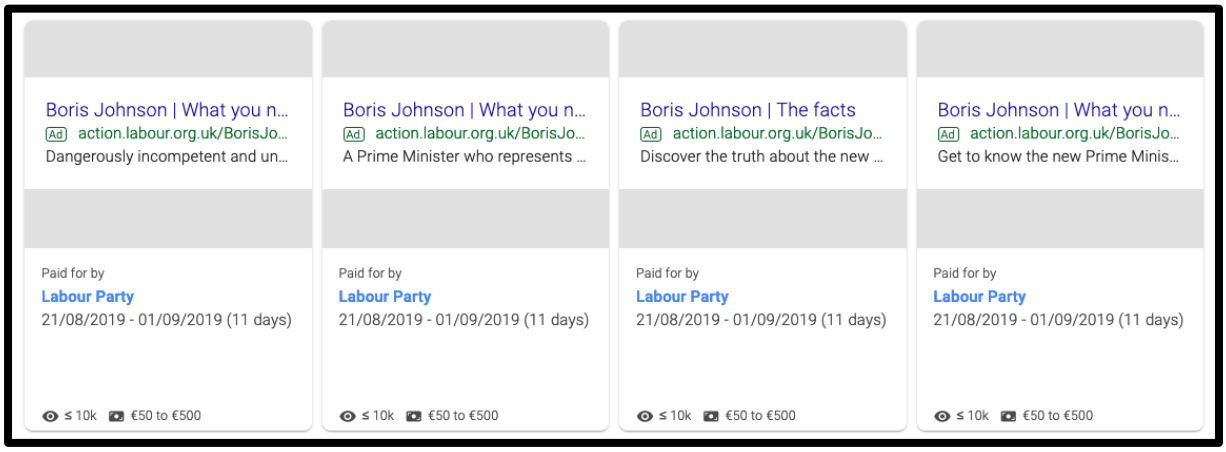
Twitter

1. Disclaimers
    a. Political ads on Twitter are marked with a "Promoted (political)" disclaimer. Twitter does not appear to have a disclaimer for political issue ads.
        i. Twitter told PI: "*Political ads also include 'Paid for by' disclaimers and directly link to the Ads Transparency Center. Once EU national elections are supported, ads from political parties, candidates or authorized third-parties or individuals will have additional transparency. We are working to support EU national elections throughout the next year.*"
    b. Promoted tweets, including political ads not tied to an election, are marked with a "Promoted tweet" disclaimer.
    c. "Promoted (political)" ads show an option to view ad details. The details Twitter provides includes broad information such as total impressions and total spend of a campaign. A further click gives slightly more information about to whom the ad campaign was targeted but continue to give very broad ranges such as an ad being targeted at everyone 18 years or older.
        i. Twitter told PI: "*Campaign targeting information is inferred; Twitter uses models to predict the age of users who don't share it during the sign-up process. Models assign users to one of multiple categories which are not mutually exclusive and impressions may be double counted.*"
    d. Promoted tweet ads show a "Promoted" disclaimer. Twitter's Ad Library provides no heightened transparency for these ads, beyond including them in the archive for seven days. Because Twitter offers no holistic, users are required to search for an advertiser in the Library to see if they are running ads.
    e. Outside the US, Twitter provides no heightened transparency for political issue ads.
    f. Within the Twitter's transparency centre, the company lists the entity Twitter billed for an ad campaign, the actual spend, and the billing city.
    g. Researchers have said that Twitter does not appear to have "any mechanism for retroactively marking an ad as political if it is discovered after [the ad has run]".
        i. Twitter told PI: "*Twitter has mechanisms to flag unlabeled political ads that involve a combination of both human and machine review, where a machine detects a potential political ad and flags for human review. Unlabelled*

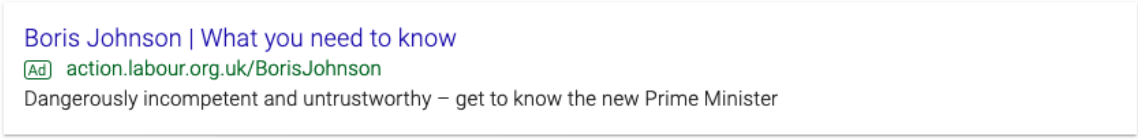
political ads are halted until the advertiser completes the certification process which results in political ads being marked as such and displayed in the Ads Transparency Center."

Google

1. Disclaimers
    a. Google appears to provide heightened transparency for EU member states including the UK, India, and the US. Political disclosures appear to have begun only in late March 2019.
    b. Researchers have said that Google does not appear to have "any mechanism for retroactively marking an ad as political if it is discovered after [the ad has run]".
    c. Google reported to the Commission that in "some ad formats", the company "adds a built-in disclaimer based on the advertiser's verification information. For other ad formats, the advertiser is responsible for incorporating the disclaimer into the ad on their own". Election ad disclaimers show across Google products including YouTube.



How ad appears in Google's Ad Transparency centre.



How ad appeared when running [accessed 16 September].

PI analysis

- At present companies are applying their ad transparency and disclaimer policies unequally. In a set of countries, companies require disclaimers be put on political ads based, but for the majority of the world they do not. Companies should apply their disclaimer policies globally and to all ads and should be applied across products, such as Facebook's Instagram and Messenger, and Google's YouTube.
- There are ways to advertise on social media without using the platforms' advertising systems. For example, an 'influencer' might work in partnership with a company to talk about a product positively in a YouTube video or to pose with a product in an Instagram photo. While nationally some countries have guidance on what is required in affiliate marketing and other forms of 'influencer' marketing – for example the UK – companies should explore how such marketing happens on their platforms and ensure users are made aware when they are being promoted a product or service outside of the companies' advertising platforms.

- If political ads are discovered to have run without a disclaimer, Facebook, Google, Twitter should develop a method to retroactively mark the ads as such, and they should be archived in the platforms' Ad Libraries, and include full campaign information including reach.

How can users report political advertising for the company to act upon? Did companies publish sponsor identity and amount spent?

Facebook

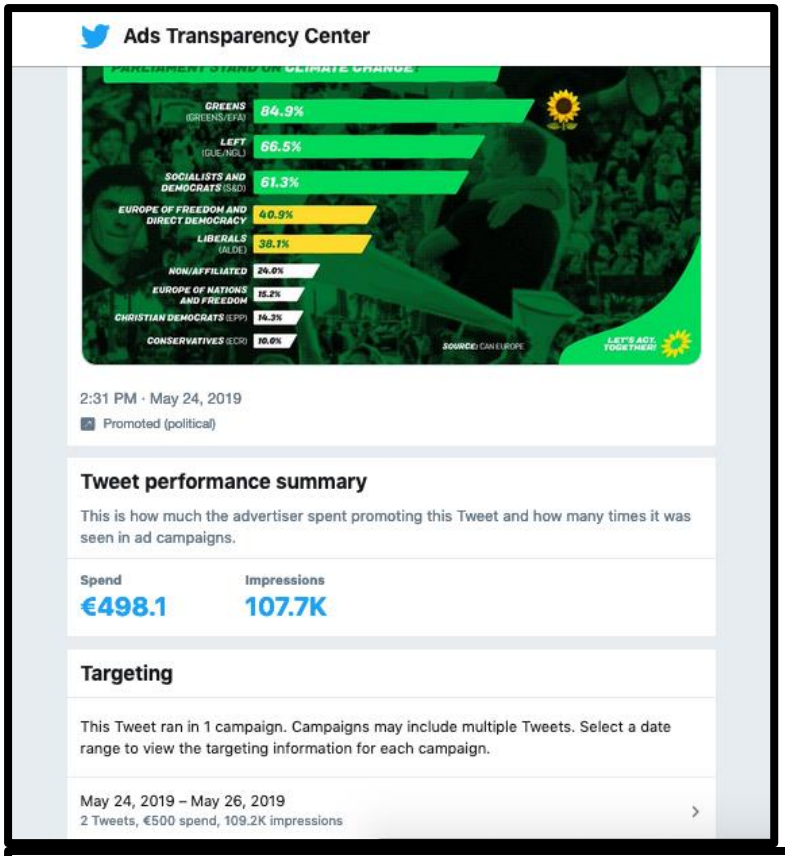
1. EU Legal Reporting Channel
    a. Facebook reported that the company piloted the EU Legal Reporting Channel for users to report content posted to the platform that they believe violates applicable laws. Specifically Facebook reported that users can report on legal issues related to intellectual property, defamation, privacy/erasure and other content they believe is unlawful.
    b. For other ads, not necessarily political content, Facebook lists options here. Ads on Facebook include the ability to report the ad within the ad interface itself.
2. Facebook told PI: "*Users can report ads that do not have a disclaimer, that they believe should, directly in the Ad Library. Users can click on the three dots on the top right corner of the ad and select Report Ad."*
3. Sponsor identity and amount spent
    a. Facebook says that the company requires the name or 'entity' behind Facebook Pages running ads to be available to users. However the Guardian has reported that a powerful political lobbying company was able to run multiple Pages without telling users that they were behind it or who paid for the work. Therefore, at present, users cannot have faith that the person listed on a Facebook Page is the actual person behind the Page.
        i. Facebook told PI: "*Our review to-date suggests the majority of the Pages are operated by real people and do not currently violate our coordinated inauthentic behaviour policy. However, we take seriously the information shared by The Guardian and are continuing to review the activity of the Pages mentioned. Ensuring the safety of people on our platform, and that they can trust what they see on Facebook, is paramount. We recently introduced greater transparency to help people on Facebook understand more about Pages they follow. This includes showing all the ads a Page is running, when it was created, a history of name changes, and, for Pages with a large audience, the locations of admins. We are exploring additional transparency that would show people more information about who is running the page. Real people running Facebook Pages with a point of view is not against our terms, and is common across the internet through websites, blogs and other platforms. We are already working with Governments and regulators across a number of areas where we believe regulation is needed, including ensuring that the rules of online political campaigning are clearly defined. These examples could highlight the case for new rules since internet platforms are not currently required to find out who is paying page admins or managers."*
    b. When a political or political issue ad runs without a disclaimer, the ad does not appear to include a sponsor identity, even when the ad is removed and archived by Facebook.
    c. Facebook's Ad Library provides an amount spent range for ads in the Library [for example £100-499], instead of exact impression data.
        i. Facebook told PI: *"In may, we updated the Ad Library report [announced in blog] making it available daily, rather than weekly, and added weekly, monthly and quarterly reports that are downloadable for anyone. We also added spending by location across different date ranges and exchange rate*

conversion for advertisers that have spend across multiple countries that have different currencies to compute total spend or have spend in a currency different from the primary currency they advertised in."

d. Facebook provides a range of how much was spent on an ad in its Ad Library, as well as general information about the age, gender, and region about who saw an ad. The Ad Library also shows the total spent by a Facebook Page on political or political issues ads. Facebook does not break down the amount spent by targeting category, provide information about the intended v. actual audience, or provide granular targeting information via the Ad Library.
    i. Facebook told PI: "*We believe the actual impact of an ad with political or issue content offers more transparency than its intent, which is targeting."*

Twitter

1. Twitter includes on Promoted Tweets a "Report ad" option, which allows users to report an ad from within their timeline. Users can also fill out an online form on the Twitter Help Centre. Twitter told PI that "*reports from electoral regulators or trusted partners are automatically sent for manual review*".
2. Sponsor identity and amount spent
    a. Users who see an ad marked "Promoted (political)" are able to click on "Ad details". Once on the ad details page, users can again click to how the twitter page targeted ads in its campaigns. This information does not appear to reveal how individual ads were targeted, but rather how the overall campaign, which can include multiple ads, was targeted. On this page, which is three clicks from when a user sees the ad, the financer of the ad is revealed. In some instances this is the Page name, and in others (as shown in the next section) is a person.
    b. 

c. 

d. 

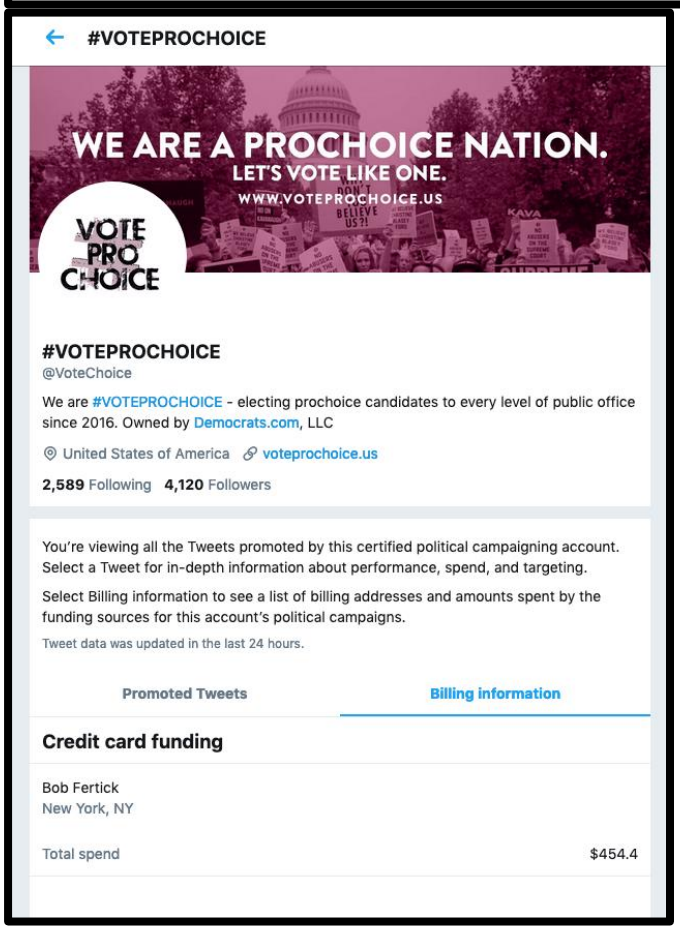
e. Twitter provides users broad and general information about the audience the advertiser aimed to reach (targeted audience) and more granular information about who the ad actually reached.
    i. There have been instances reported of Twitter not providing meaningful transparency about how and why someone was targeted with an ad.

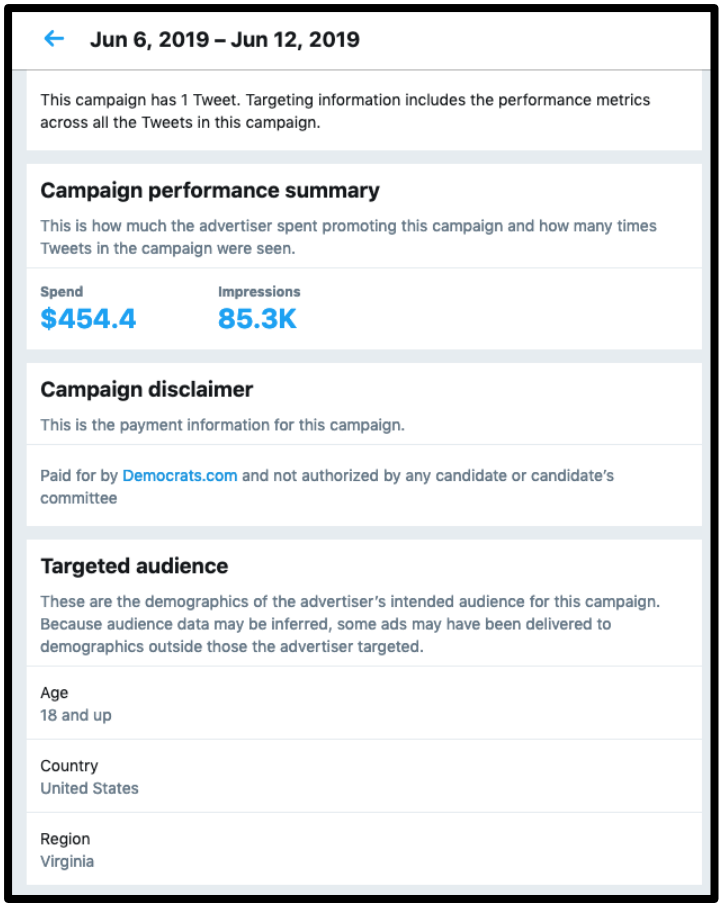
f. Within the Twitter's transparency centre, the company lists the entity Twitter billed for an ad campaign. However, Twitter does not appear to provide contextual information on this page about affiliations of the person who paid for the ad. For example, Twitter lists "Bob Fertick" as the person who paid for the ads run by the Twitter page @VoteChoice, but Twitter only reveals that the actual financier behind the ad is Democrats.com two clicks later.

g.


#VOTEPROCHOICE @VoteChoice · Jun 5
Virginia Primary Elections are next Tues, June 11!
Our reproductive freedom is under attack—the *only* way to save it is to elect prochoice champions. Use our #VOTEPROCHOICE Voter Guide to find the progressive, prochoice champions on your ballot vpc.guide
VIRGINIA VOTES
TUES, JUNE 11!
SAVE
REPRODUCTIVE FREEDOM
#VOTEPROCHOICE
VOTER GUIDE
131
164
Promoted (political) · Ad details

h.


#VOTEPROCHOICE
WE ARE A PROCHOICE NATION.
LET'S VOTE LIKE ONE.
WWW.VOTEPROCHOICE.US
VOTE PRO CHOICE
#VOTEPROCHOICE
@VoteChoice
We are #VOTEPROCHOICE - electing prochoice candidates to every level of public office since 2016. Owned by Democrats.com, LLC
United States of America
voteprochoice.us
2,589 Following 4,120 Followers
You're viewing all the Tweets promoted by this certified political campaigning account. Select a Tweet for in-depth information about performance, spend, and targeting.
Select Billing information to see a list of billing addresses and amounts spent by the funding sources for this account's political campaigns.
Tweet data was updated in the last 24 hours.
Promoted Tweets
Billing information
Credit card funding
Bob Fertick
New York, NY
Total spend
$454.4

i. 

3. Twitter provides the total campaign spend but does not appear break down spend by targeting category.
4. Twitter archives promoted tweets for seven days but does not provide transparency about how much an advertiser spent, who they were targeting, who saw the ad, or other insight into the spend or demographic data.

Google

1. To report a policy violation, users can follow the steps here. This process requires the user to say which type of ad was in violation, what made the ad inappropriate, provide their email address, and provide a URL to the ad.
2. Sponsor identity and amount spent
    a. In the EU, India, and US, Google provide very broad range data about ad spend [for example <$10K].
    b. Google does not appear to provide a sponsor identity tied to a person – only an entity name with little to no contact information.
3. In their paper entitled "Analysis of United States Online Political Advertising Transparency", researchers raised with concern that Google allows third party vendors to serve ads. However, if one of these ads violates Google's Advertising Policy, the ad would no longer be available in the company's Ad Library.

PI analysis

- Companies should provide quickly and clearly accessible information as to who paid for an ad and how much was spent to run the ad.

    - Within this information should be how the ad spend ties to the target and actual audience.
    - In some cases, there is a legitimate need to advertise anonymously, for example, due to risks of violence or other human rights abuses. Options of how this could be modelled should be explored. It is important that companies understand the contexts in which they operate and build strong independent national teams.
    - Facebook says that the company requires the name or 'entity' behind Facebook Pages running ads to be available to users. In August 2019, the company said it was introducing a "confirmed organisation" label for US political advertisers. To have this flag on an ad, advertisers will be required to provide proof that they are registered with the US government.
- Companies should provide more granular data about the number of impressions made and the exact spend by an advertiser.
- Users should be able to easily report an ad with minimal clicks and have accessible information about what steps may be taken as a result of that report.
- Importantly, companies should invest in building robust policy teams nationally – including for Facebook-owned Instagram and WhatsApp. Monitoring ads for political content requires in depth understanding of the national and local political contexts.
    - For example, PI spoke with NGOs in Ukraine in advance of the 2019 Presidential election, and heard repeatedly that Facebook, the most used social platform in the country, had no policy person for the country and that this had resulted in NGO's content – which aimed to combat misleading news – to be removed and blocked. Other issues that Ukrainian civil society experienced include Facebook being slow to remove inappropriate ads, advertisers circumventing the ban on foreign-bought ads by paying Ukrainians for access to their personal Facebook accounts to place ads, and issues with the Ad Library such as it not containing all the political ads running and ads in the Library going missing. Companies should work with election bodies nationally, to understand local contexts.

How did the companies define "issue-based advertising"?

Facebook

- Canada: civil and social rights, economy, environmental politics, health, immigration, political values and governance, and security and foreign policy
- EU member states, including the UK: immigration, political values, civil and social rights, security and foreign policy, economy, environmental politics
- USA: abortion, budget, civil rights, crime, economy, education, energy, environment, foreign policy, government reform, guns, health, immigration, infrastructure, military, poverty, social security, taxes, terrorism, values
- Facebook does not appear to enforce these definitions outside of the countries listed above. Political issue ads also are included in Facebook's Ad Library.
- Facebook told PI: "*How we define, detect and review political ads vary by country due to different understandings, criteria and definitions of what a political ad is. In the EU, for example, there aren't laws or agencies that list specific issues that are subject to regulation. But to have a policy that our reviewers can enforce, they need a list explaining what's covered and what's not. So, like in the US, we looked to the non-partisan Comparative Agendas Project (CAP). For decades, CAP has collected information on the policy processes of governments around the world and used that information to develop a list of common terms related to politics and issues. In addition to the CAP list, we leveraged the Eurobarometer survey that the European Parliament published last year in May and engaged with in-country policy stakeholders and trusted third-party advisors throughout the region. We used all of these inputs to develop our policy for issue ads in the EU that take a position with the goal of influencing public debate on topics such as immigration."* Facebook did not directly address plans for similar steps outside the EU or US.

Twitter

- Generally**:** Ads that refer to an election or a candidate or ads that advocate for or against legislative issues of national importance.
    - However, outside of the US, Twitter does not treat political issue ads differently from promoted tweets, meaning that these ads (which are political, but not tied to an election), run without heightened transparency.
- Additional definition: Australia political issue ads are permitted without restriction; EU member states, including the UK political issue ads are permitted without restriction except in France where they are prohibited; India political issue ads are permitted without restriction; USA political issue ads: Ads that refer to an election or a clearly identified candidate ("any candidate running for federal, state, or local election") or Ads that advocate for legislative issues of national importance (Twitter gives examples as: abortion, healthcare, guns, climate change, immigration, taxes.)

Google

- At present, it appears that Google have not defined issue ads and at present only provides increased transparency for political ads (as defined by Google) for the EU, India, and the US. Google says that they are "investigating solutions that would improve transparency of strictly issue-based advertising (i.e. not specifically related to an EU election campaign)"

PI analysis

- All companies should define political issues, with an understanding of the local contexts they operate in.
- Political issue ads should have heightened transparency and should be archived in the companies' various Ad Libraries.
- Consideration should be given to providing heighted transparency to all ads, not only political or political issues ads. Any definition of political and political issue ad risks being too narrow and therefore there needs to be further discussion about what ads must have heightened transparency requirements.
    - In some cases, there may be a legitimate need to advertise anonymously, for example, due to human rights restrictions. Options of how this could be modelled should be explored. It is important that companies understand the contexts in which they operate and build strong independent national teams.

What approaches did companies devise to publicly disclose "issue-based advertising"?

Facebook

- Facebook introduced an Ad Library in Brazil, EU member states including the UK, India, Israel, Ukraine, and the USA which contains political ads [ads that are about elected officials, candidates for public office] and political issue ads 'for several countries including the EU'.
- The Ad Library also contains all active ads for Pages but does not provide heighted transparency for ads outside of where the company requires certification. Political ads on Instagram are archived in the library.
- Issue-based ads in countries where Facebook requires certification carry a Sponsored disclaimer.

Twitter

- Outside of the US, Twitter does not treat political issue ads differently from promoted tweets, meaning that these ads (which are political, but not tied to an election), run without heightened transparency.

Google

- At present, it appears that Google have not defined issue ads and at present only provides increased transparency for election ads for the EU, India, and the US. Therefore, political issue ads do not appear in Google's Ad Library.

PI analysis

- Because each company defines political issue ads differently, each company approaches political issue ad transparency differently. Outside of the US, Twitter provides very minimal issue ad transparency, and Google provides none at all.
- Companies risk missing political issue ads in their transparency effort due to these different approaches, as well as by defining political issues narrowly – such as limited to ads tied to an election.
- Archiving political issue ads is important to understanding how campaigns, advertisers, and political actors are aiming to influence debates, who they are targeting, and how much they are spending.

What policies did the companies put in place regarding what constitutes impermissible use of automated systems and to make this policy publicly available on the platform and accessible to users?

Facebook

1. Misrepresentation
    a. Within Facebook's policy on misrepresentation the company does not allow coordinated inauthentic behaviour, meaning "that multiple accounts are working together to do any of the following: mislead people about the origin of content; mislead people about the destination of links off our services (for example, providing a display URL that does not match the destination URL); mislead people in an attempt to encourage shares, likes or clicks; or mislead people to conceal or enable the breach of other policies under the Community Standards."
    b. Examples of applications of this policy include:
        i. Facebook took action against Israeli company Archimedes Group for setting up fake accounts to run Facebook Pages.
        ii. Facebook said it would not take action against the powerful political lobbying company CTF Partners after the Guardian revealed that the company was able to run multiple Pages without telling users that they were behind it or who paid for the work. Facebook said because employees used their real names, they did not violate the policy.
2. Facebook provided PI further details about their efforts related to this, which is available in Annex A.

Twitter

1. Platform manipulation and spam policy
    a. Twitter says that users cannot use the platform "in a manner intended to artificially amplify or suppress information or engage in behaviour that manipulates or disrupts people's experience on" the platform. Twitter reports that in 2018 it challenged 193,586,952 accounts, meaning Twitter checked if a person was behind an account. The company also reports receiving 3,118,255 reports of spam from users. Twitter also says that it "challenged 17% fewer accounts in the second half of 2018" which it says relates to the company's efforts to detect fake accounts at the point of sign-up.
    b. Twitter provided PI examples of what would violate this policy, which is provided in Annex B.

Google

2. Google says that the company has policies against impersonation, misrepresentation in Google News and in their advertising products, abusive account creation, engagement abuse, and influence operations. There are examples in Google's ad transparency library of ads that have been removed due to policy violations. For example here and here.

PI analysis

- Companies should ensure that the data collected to monitor for inauthentic behaviour is not also used for the purpose of strengthening platforms' advertisement targeting. It is not compatible with data protection principles of purpose limitations and fairness to justify the collection of data for the purpose of identifying fraudulent activity and then using the same data for ad targeting.
- It is also important to briefly mention the role of astroturfing in the context of advertising transparency. A recent academic paper states:
    - "Corporations paying for political advertising is not an entirely new phenomenon and has traditionally been funded through industry trade groups and PACs. However, the reporting requirements by the FCC for U.S. political advertising on television often made this political messaging traceable to the real sponsor. These stricter reporting requirements do not apply to online political advertising and the ad-hoc reporting requirements that online platforms have enacted are being abused by corporations and industry trade groups to undo transparency efforts. We discovered in our analysis 355 ads sponsored by "Citizens for Tobacco Rights" which is not a registered company in the U.S. but does disclose on their website and Facebook page that it is operated by cigarette company Philip Morris. However, someone who only saw the Facebook ad disclaimer would not be able to connect threads to Philip Morris without further investigation."
    - Users must be able to understand quickly and clearly who is paying for the ads they see.

Annex A - Facebook
All of our policies can be found here: https://www.facebook.com/policies

Authenticity is the cornerstone of our community. We believe that people are more accountable for their statements and actions when they use their authentic identities. That's why we require people to connect on Facebook using the name they go by in everyday life. Our authenticity policies are intended to create a safe environment where people can trust and hold one another accountable.

Preventing fake accounts is one way to stop abuse on our platforms. We focus our enforcement against abusive accounts to both prevent harm and avoid mistakenly taking action on good accounts. In the six months between Q4 2018 and Q1 2019, we've seen a steep increase in the creation of abusive, fake accounts on Facebook. The number of fake accounts disabled spiked up from 1.2 billion accounts in Q4 2018 to 2.19 billion in Q1 2019, largely due to increased automated attacks by bad actors who attempt to create large volumes of accounts at one time. The majority of these accounts were caught within minutes of registration, before they became a part of our monthly active user population. For the accounts that are not initially detected and disabled, we find that many of them are used in spam campaigns and are financially motivated.

We try to stop fake accounts abusing our platforms in three distinct ways. Of the accounts we remove, both at sign-up and those already on the platform, 99% of these are proactively detected by us before people report them to us.

- **Blocking accounts from being created:** The best way to fight fake accounts is to stop them from getting onto Facebook in the first place. We've built detection technology that can detect and block accounts even before they are created. Our systems look for a number of different signals that indicate if accounts are created in mass from one location. A simple example is blocking certain IP addresses altogether so that they can't access our systems and thus can't create accounts. The data we include about fake accounts does not include unsuccessful attempts to create fake accounts that we blocked at this stage. This is because we can't know the number of attempts to create an account we've blocked as, for example, we block whole IP ranges from even reaching our site. While these efforts aren't included in the report, we can estimate that every day we prevent millions of fake accounts from ever being created using these detection systems.
- **Removing accounts when they sign-up**: Our advanced detection systems look for potential fake accounts as soon as they sign-up, by spotting signs of malicious behavior. These systems use a combination of signals such as patterns of using suspicious email addresses, suspicious actions, or other signals previously associated with other fake accounts we've removed. Most of the accounts we currently remove, are blocked within minutes of their creation before they can do any harm. We include the accounts we disable at this stage in our accounts actioned metric for fake accounts. Changes in our accounts actioned numbers are often the result of unsophisticated attacks like we saw in the last two quarters. These are really easy to spot and can totally dominate our numbers, even though they pose little risk to users. For example, a spammer may try to create 1,000,000 accounts quickly from the same IP address. Our systems will spot this and remove these fake accounts quickly. The number will be added to our reported number of accounts taken down, but the accounts were removed so soon that they were never considered active and thus could not contribute to our estimated prevalence of fake accounts amongst monthly active users or our publicly stated monthly active user number or even any ad impressions.
- **Removing accounts already on Facebook**: Some accounts may get past the above two defenses and still make it onto the platform. Often, this is because they don't readily show signals of being fake or malicious at first, so we give them the benefit of the doubt until they exhibit signs of malicious activity. We find these accounts when our detection systems identify such behavior or if people using Facebook report them to us. We use a number of signals about how the account was created and is being used to determine whether it has a

high probability of being fake and disable those that are. The accounts we remove at this stage are also counted in our accounts actioned metric. If these accounts are active on the platform, we would also account for them in our prevalence metric. Prevalence of fake accounts measures how many active fake accounts exist amongst our monthly active users within a given time period.

Annex B - Twitter

You can't artificially amplify or disrupt conversations through the use of multiple accounts. This includes:

- overlapping accounts – operating multiple accounts with overlapping use cases, such as identical or similar personas or substantially similar content;
- mutually interacting accounts – operating multiple accounts that interact with one another in order to inflate or manipulate the prominence of specific Tweets or accounts; and
- coordination – creating multiple accounts to post duplicative content or create fake engagement, including:
    - posting identical or substantially similar Tweets or hashtags from multiple accounts you operate;
    - engaging (Retweets, Likes, mentions, Twitter Poll votes) repeatedly with the same Tweets or accounts from multiple accounts that you operate; and
    - coordinating with or compensating others to engage in artificial engagement or amplification, even if the people involved use only one account.

Engagement and metrics

You can't artificially inflate your own or others' followers or engagement. This includes:

- selling/purchasing Tweet or account metric inflation – selling or purchasing followers or engagements (Retweets, Likes, mentions, Twitter Poll votes);
- apps – using or promoting third-party services or apps that claim to add followers or add engagements to Tweets;
- reciprocal inflation – trading or coordinating to exchange follows or Tweet engagements (including but not limited to participation in "follow trains," "decks," and "Retweet for Retweet" behavior); and
- account transfers or sales – selling, purchasing, trading, or offering the sale, purchase, or trade of Twitter accounts, usernames, or temporary access to Twitter accounts.

Misuse of Twitter product features

You can't misuse Twitter product features to disrupt others' experience. This includes:
Tweets and Direct Messages

- sending bulk, aggressive, high-volume unsolicited replies, mentions, or Direct Messages;
- posting and deleting the same content repeatedly;
- repeatedly posting identical or nearly identical Tweets, or repeatedly sending identical Direct Messages; and
- repeatedly posting Tweets or sending Direct Messages consisting of links shared without commentary, so that this comprises the bulk of your Tweet/Direct Message activity.

Following

- "follow churn" – following and then unfollowing large numbers of accounts in an effort to inflate one's own follower count;
- indiscriminate following – following and/or unfollowing a large number of unrelated accounts in a short time period, particularly by automated means; and

- duplicating another account's followers, particularly using automation.

Engagement

- aggressively or automatically engaging with Tweets to drive traffic or attention to accounts, websites, products, services, or initiatives.
- aggressively adding users to Lists or Moments.

Hashtags

- using a trending or popular hashtag with an intent to subvert or manipulate a conversation or to drive traffic or attention to accounts, websites, products, services, or initiatives; and
- Tweeting with excessive, unrelated hashtags in a single Tweet or across multiple Tweets.

URLs

- publishing or linking to malicious content intended to damage or disrupt another person's browser (malware) or computer or to compromise a person's privacy (phishing); and
- posting misleading or deceptive links; e.g., affiliate links and clickjacking links.