

To:	A BERNE CONTRACTOR OF THE STATE
From:	
Sent:	Mon 5/9/2016 10:09:12 PM (UTC)
Subject:	Re: [tasks] : Clarify policies around platform scraping for politics

Description of what we allow with respect to third party data collection and use. This will serve as a reminder to get that done.

changed the subscribers, Added: Flags G

Clarify policies around platform scraping for politics

RECENT ACTIVITY

D commented:

Let's keep this open. Figure and I are going to put something together that is a more business friendly description of what we allow with respect to third party data collection and use. This will serve as a reminder to get that done.

changed the subscribers, Added: F

Comment · Close · Unsubscribe · Assign · Add Subscribers · Tag · Set Priority · Star

STATUS Open

OWNER

CREATED

PRIORITY

Sep 22, 2015 9:27am by H

DESCRIPTION

HiD -

None

Our team has been spending a lot of time lately attempting to clarify to clients in the political space how our policies apply to pitches coming from vendors regarding matching social data to voter files. You'll recall TrendPo using scraped engager audiences last year to create custom audiences - we suspect many of these companies are doing similar types of scraping, the largest and most aggressive on the conservative side being Cambridge Analytica (http://ca-political.org/what-we-do/), a sketchy (to say the least) data modeling company that has penetrated our market deeply. Because the frequency with which this is coming up has increased drastically in the past few weeks, we'd like to work with your team to make sure we have clear channels between our teams. Specifically, we need answers to the following questions:

- 1. Can we develop template messaging to advise clients on how our policies apply to these types of services? Does this already exist? (I believe I remember enforcement relying on a few different policies last year).
- 2. Can you help us investigate what Cambridge specifically is actually doing?
- 3. One vendor offering beyond Cambridge we're concerned with (given their prominence in the industry) is NationBuilder's "Social Matching," on which they've pitched our clients and their website simply says "Automatically link the emails in your database to Facebook, Twitter, LinkedIn and Klout profiles, and pull in social engagement activity." I'm not sure what that means, and don't want to incorrectly tell folks to avoid it, but it is definitely being conflated in the market with other less above board services. Can you help clarify what they're actually doing?

Please let us know if you need any more information. Thanks in advance!

TAGS	platform policy politics oncall
SUBSCRIBERS	
COMMENT HISTOR	
Let's keep this open.	and I are going to put something together that is a more business friendly description of what we allow with respect to third
	and use. This will serve as a reminder to get that done.
May 9, 2016 3:08pm	
Jan Kara L	and there are seen as already along and
	needed here, or are we okay to close out?
May 6, 2016 9:58am	
	We've received a response from the FullContact team that they've taken the necessary steps from remove FB data from their
•	ase note that new updates to FullContact's apps reflecting these changes I believe are still pending approval from Apple, but
should be live shortly	
Feb 12, 2016 3:38pm	
J K L	

DI and I spoke with FullContact yesterday. They have agreed to remove any current and stored data obtained from Facebook via our APIs from their service, and to remove any references to Facebook from their site. They have agreed to do this by February 13th (the deadline decided upon on the call).

Please let me know if we'd like to host a similar call with For America; I will hold out on outreach until I hear otherwise.

Jan 28, 2016 12:52pm

JEKET L

Great, sent! (TPS 299056219). Will follow up with response.

Jan 21, 2016 1:17pm

Description E

Let's do it. Thanks, J

Jan 21, 2016 12:25pm

JESKES LESS

of For America (page https://www.facebook.com/ForAmerica/?fref=ts), as well Thanks, all! To clarify, I will reach out to EE FF as Full Contact (app ID 184998594896953; contact address billing@fullcontact.com) and set up separate calls with both. Please confirm and I'll reach out today!

Jan 21, 2016 12:20pm

Description E

To clarify, Nation Builder didn't say ForAmerica did anything wrong. Instead, they indicated that ForAmerica was the organization that tipped them off that Facebook was looking into them. At the same time they apparently terminated any agreements they had with Nation Builder.

Jan 21, 2016 10:38am

Thanks for that. Just to circle back to the original context on this thread: the agency for ForAmerica is who actually filed the original complaint on Nation Builder - so I find it a bit strange (and potentially suspicious) that Nation Builder is now pointing fingers back to ForAmerica:) ForAmerica's agency was concerned Nation Builder was pitching violating products. At any rate, if you would like the individual who used to work on the ForAmerica account at the agency who complained originally - it is GG HH @CRCPublicRelations.com. Please note he no longer works on this business as ForAmerica has taken it in house. That said,I think if you are investigating the full scope of violations, GG is a fine place to start even if not officially associated with ForAmerica. On the other hand, this is the ForAmerica digital director. no working relationship with him, as we do all their support via their agency.

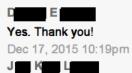
Jan 21, 2016 9:51am

E

Hi J - Yes, let's set up separate calls. Let me know if you need my help or if you can handle that for us. Thank you in advance!

Everyone - Full Contact is a service provider used by Nation Builder, Full Contact is in violation of our data policies. For America was brought up by Nation Builder. For America is no longer a client of Nation Builder, and it was For America who told Nation Builder we were going to be contacting them.





Thanks all. Yes, I found an associated app: NationBuilder (126739610711965), 132k MAP. The app has passed review and seems to be actively pulling some data based on my scuba data dive. The contact address the developer has listed on the app is info@nationbuilder.com.

DI, should I schedule the call for after the 28th?

Dec 17, 2015 8:39pm



This should come from J and I'll support. J am I correct we found an app for them which means we have their dev email address or am I off? Just on mobile so did not parse through the task.

Dec 17, 2015 6:58pm



Dec 17, 2015 5:20pm

Q R

J do you want to reach out to them or do you want us to? My contact there is UU VV @nationbuilder.com and he handles their international accounts but could put us in touch with the right folks to have the call with.

Dec 17, 2015 5:17pm

JES KES L

That would be great! As DI mentioned I've been digging into Nation Builder following our call with Strategic Media 21 though am struggling to fully understand the app based on online investigation alone. Here's what I've found:

- NationBuilder (126739610711965), 132k MAP
- Passed review for following permissions (https://our.cstools.facebook.com/.../crow/apps/submission-su.../): user_events, publish_actions, rsvp event, manage pages
- Actively pulling these perms: https://fburl.com/188631556
- In short the app seems to offer monthly subscription services for politicians, nonprofits, unions, etc building profiles based (in part) on information pulled from the person's activity on the client's Facebook Page. It then seems to offer correspondence services for the client's 'voter database,' including email blasts and text messages. From the 'How to connect to FB' FAQ page (http://nationbuilder.com/how_to_facebook_twitter#facebook): "Types of Facebook page interactions logged in a nation:
- Someone comments on an official post in a Facebook page
- Someone creates a new post on a Facebook page
- Someone likes an official post in a Facebook page
- 4. Someone RSVPs to an event via Facebook if that Facebook event is connected to an event in your nation.

The entire list of people who have liked the Facebook page cannot be added to your people database. It is also not possible to access an individual person's friends list in a nation."

{1740343496196792}

You can "tag" people that like a post on your Page (http://nationbuilder.com/tag people who liked a facebook po ..)

I can continue to dig in, though would potentially suggest a call wit the developer to ask directly how they're using data from Facebook. Damentioned she is on PTO until the 28th - if we opt for a call, is this something I should schedule for after the 28th, or is the Nation Builder aspect of this high pri?

Dec 17, 2015 3:09pm

D E Yes please. Thanks!

Dec 17, 2015 12:43pm

Q R

/J , if you need a contact at Nation Builder we have that.

Dec 17, 2015 12:16pm

We are investigating Nation Builder and will reach out to them for a mtg after checking internally to see if we have any relationship with them. J is on point. We met with Strategic Media yesterday and from that conversation it's clear we need to focus first on Nation Builder.

Dec 16, 2015 1:43pm

M

"XXX will take ForAmerica's community of 7.6 million Facebook likes and create a database identifying people who like ForAmerica posts and in many cases use data matching to layer other information points over these individuals, including methods of contact and interests.

In order to do this, XXX will first set up an API to gather data on anyone who "Likes" a post on ForAmerica's page. Once a critical mass is reached, XXX will match this list against our database of names, phone numbers, e-mails and mailing addresses of 82 million conservatives and Christians and their friends.

Our initial data gathering and matching run will take place over the two months in October and November. Our estimates are that this data run would generate a 1.25 - 3 million person database (this is an estimate and not a guarantee) that could be broken down along the following lines: 100,000-250,000: Full Data Match- name, street address, phone number, email, DOB and number of interactions with ForAmerica (can be used to assign donorvalue at later date)

150,000 - 300,000: Partial Match- Name, City, State, DOB (can be matched against voter file to determine physical address at a future date) and number of interactions with ForAmerica

1-2.5 million: Facebook Profile- Name and Facebook ID of individual interacting with ForAmerica"

Dec 16, 2015 11:38am

S T

Im happy to cover with you, but up to you! Discount, thanks for organizing.

Dec 11, 2015 5:16pm

U V

- Please include me on all items related to this and I'll pull in folks as needed. See I - Do you both need to be involved in meetings / investigation, etc. or can one of you cover (with me)? Thanks.

Dec 11, 2015 4:27pm

Description E

Update: We are reaching out to Dr. Kogan and will schedule a call in addition to asking for immediate responses over email. Please be sure not to contact Dr. Kogan or discuss anything pertaining to this investigation if he contacts you. If he does contact you, please put him in touch with me directly.

DevOps team - are Secretary and Am my poc for this investigation or should I include anyone else on any mtgs we schedule (want to make sure I'm looping in the right people)?

Dec 11, 2015 4:17pm

WEST XET YET Z

Hey team, AA pointed me to this thread. Alex Kogan was my postdoc supervisor at Cambridge, although I left before he founded GSR. I have a cursory understanding on the basic principles behind GSR's products and data collection methods, if that helps. Feel free to ask me anything.

Dec 11, 2015 3:50pm

AA BB

Hi - I'm a bit familiar with some of the context around the personality modeling stuff. As I understand it, it's inspired from

http://www.pnas.org/content/110/15/5802.abstract which is solid science. I'm good friends with the lead author from that paper (Michal Kosinsky) and he is not happy about how these guys are bringing his field of research into disrepute. He's offered to chat with people on our end and to give more context if that helps. edit to be clear, the datasets mentioned in the Guardian article are different/collected differently to those in the PNAS research!

Dec 11, 2015 3:22pm

V

Taking a broader perspective on how to manage this moving forward, I've been in touch with Q and team in DC to see if there is a better way to

explain our policies - not only on the data side, but also ensuring all political apps are platform policy compliant prior to launching. We've had cases where apps were restricted or disabled as a result of violations and that a bad experience for everyone involved. (Ben Carson app this week, White House app earlier this year, etc.) We have a more immediate concern here, but would love to help educate.

Dec 11, 20152:18pm

M N

Also, importantly: according to the Wait, What thread and also an email from WW - it sounds like Facebook has worked with this "Aleksandr Kogan" on research with the Protect & Care team.

Dec 11, 2015 1:04pm

Harris I

The relevant part from the Guardian article on the supposed connection between SCL and GSR:

By summer 2014, Kogan's company had created an expansive and powerful dataset. His business partner boasted on Linked In that their private outfined Global Science Research (GSR), "owns a massive data pool of 40+ million individuals across the United States – for each of whom we have generated detailed characteristic and trait profiles".

Documents show SCL agreed to a contract with GSR, whereby it would pay its data collection costs in order to improve "match rates" against SC L's existing datasets or to enhance GSR's algorithm's "national capacity to profile capacity of American citizens".

In an email, Kogan said he was unable to explain in detail where all the data came from, as he was restricted by various confidentiality agreements. H said SCL is no longer a client.

He said that while GSR often used MTurk for data collection, it "never collected more than a couple thousand responses on MTurk for any one project, or even across all projects for a single client – the vast majority of our MTurk data collection as a company is in the form of surveys only". He said GSR stores Facebook data anonymously.

Kogan explained that separate from his university role, his private company undertook various commercial ventures relating to data analysis. He said that when GSR collect Facebook data, the terms detail the use that information collected will be put to and make clear to participants that they are giving GSR full permission to use the data and user contribution for any purpose.

He said Cambridge University had "no knowledge of the clients or projects GSR had worked on" and that GSR has never used any data collected as part o his university activities.

Dec 11, 2015 12:59pm

S T

Digging in more. Appulled this list of UIDs (first three are associated with Cambridge Analytica, last one is associated with GSR): https://fburl.com/187082435. I tried to find an obvious connection among the group, but wasn't able to (no shared apps, pages, etc among ALL four). This means that the Cambridge Analytica/GSR connection remains unconfirmed.

Lastly (and most interestingly), the business is associated with two other Pages: https://www.intern.facebook.com/keepthepromisel/ (a ted cruz page that links here: http://www.keepthepromise1.com/about/) AND https://www.intern.facebook.com/PCIAA/ (property casualty insurers which links here: http://www.pciaa.net/about-us/about-pci). Both Pages have roughly 1k likes.

Dec 11, 2015 12:56pm

H

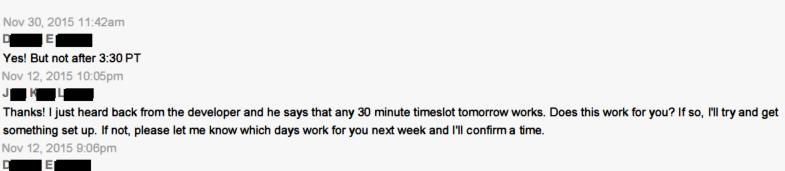
D = I just looked more deeply on the GSR website and it appears they *are* offering PII via their API:

Reveal new depths of insight from your social media data with our API product, delivering the same consumer psychology insight provided by BrandAnalyzer at the individual level.

"Enrich Your Social Media Data

Augment social media data by appending deep psychological profiling, contextualized brand preferences, and more accurate consumer personas.

http://gobalscienceresearch.com/#brand_analyzer_api
Dec 11, 2015 12:00pm
As mentioned to Description to the two new hires Cambridge Analytica has made: AAA BBB BBB BBB BBB BBB BBB BBB BBB BB
@cambridgeanalytica.org;
YY is is a constant of the con
https://cambridgea.nalytica.org/_/Cambridge-Analytica-
Dec 11, 2015 11:32am
JEN KEN LENN
Regarding speaking with Strategic Media 21, as I mentioned I've been having a back and forth with Strategic Media to set up time, I've asked GG (the
contact there) to speak with us next Tuesday at 1pm PST.
Dec 11, 2015 11:09am
Unfortunately, a full analysis of Cambridge Analytica is challenging, since the site doesn't appear to be integrated with Facebook (no app id, Facebook
Page, etc). While this is the case today, in order to have obtained Facebook data, the site must have had some integration in the past. Beyond the Guardian article, do you have additional information about the site's relationship to Facebook? If the article is true, then @
want to have a call to clarify the data collection piece. Again, I'm having trouble gathering more information than what's featured on their site. Let me
know what you think.
Dec 11, 2015 11:08am
Hamma I amount to the state of
A case study on applying these methods for Hostess: http://globalscienceresearch.com/blog-promotions-trans-fats
Dec 11, 2015 10:35am
Herman I amount of the Control of th
Screenshots of their tool attached.
Dec 11, 2015 10:20am
Hammal I and the state of the s
you can register and see their data here: http://globalscienceresearch.com/./205313./Facebook/Everyone
Dec 11, 2015 10:14am
Adding United Visited from Developer Policy Enforcement
Dec 11, 2015 10:11am
HERE I
Here's a link to Global Science Research, the "for profit' arm of CA mentioned in the article: http://globalscienceresearch.com/.
We had not heard of this org before the article. They operate a product called "BrandAnalyzer" which promises to "Instantly access over 15,000 brand
reports with consumer psychology profiles and implementation guides generated from our social media data. Gain a high level overview of who
supports your brand (and your competitors)."
Dec 11, 2015 10:06am
COME DOME
Hi everyone – this is hi pri at this point. This story just ran in the Guardian and is now prompting other media requests. We need to sort this out ASAF Thank you!
Dec 11, 2015 9:45am
Marin Name
Date, Jan - Can you expedite the review of Cambridge Analytica or let us know what the next steps are? Unfortunately, this firm is now a PR issue as
this story is on the front page of the Guardian website - http://www.theguardian.com//senator-ted-cruz-president-cam CC DD is fielding
comms policy requests and concerns.
Dec 11, 2015 9:34am
JEN MEN LESSON
Thanks Miss, yes I have been having a back-and-forth with the developer from Strategic Media attempting to set up a time to talk, though he has been
slow to respond (though is responsive) and it has been difficult to pin down a time, particularly given the short week last week. As D
be setting up time next week to talk. Thanks for following up!
Nov 30, 2015 12:36pm
Hi J and D a
that they sell their appending process is considered within terms.



Nov 12, 2015 9:06pm

This week works. If he gives a few blocks of time I'm sure we can make it work. Just you and I are fine (unless U wants to join). Thank you! Nov 11, 2015 1:04pm

J K K L

The developer just got back to me noting he is free anytime this week. Del, would it work for you if I schedule a call for this week? If so, is there anyone else we need to include on our end?

Nov 10, 2015 8:59pm

J K K L

As a follow-up note, I've reached out to Strategic Media (TPS 277017911) via the email address listed on the app ID associated with the strategic media site (ID 341917549290893). I have asked for times to talk next week and will follow up here when I hear back.

Oct 29, 2015 12:00pm

JESKE LES

Thanks, all! De and I synced offline about this yesterday; I will run draft outreach wording by her before reaching out to schedule a call, and will update here with details once I've reached out. Please let me know if there are any questions or additional details in the interim.

Oct 21, 2015 9:06am

M

Awesome, thanks Discussional and Jim. Really appreciate this as I do suspect there is plenty of bad actor behavior going on .. both Nation Builder (who is more dominant in this space and where the original concern/scraping/appending issues are) as well as Strategic Media 21 are the two to reach out to. My sense is that Nation Builder sells these services to Strategic Media 21 so not sure how you want to approach but they are both worthy of some direct conversation.

Oct 20, 2015 1:40pm

DE E

JI - We'll need to get on a call with this company b/c they appear to be violating our data policies, although it is hard to understand specifically what they are violating without having a conversation. Can you drive this for us? I'm happy to support the call. If you think we can manage it via email I defer to your team, but I suspect this may be easier if we talk this one out.

Oct 20, 2015 11:45am

M :Discology, thanks for confirming this seems in violation. As @liscology :History | mentioned there is a lot of confusion in the political space about how people use Facebook to connect with other offline sets of data. In particular, Strategic media 21 has been exerting a good deal of pressure on one of our clients to take advantage of this type of appending. This client's agency, who does not want to violate policy, is stuck in the middle of knowing this is happening and that it is out of policy - but on the other hand, doesn't want to ruin their client relationship by calling this other vendor out. We are seeing more of this type of activity in the political space, and since a few firms are now offering this type of service, clients assume that it's acceptable since no one has been told otherwise. How would you recommend proceeding here?

Oct 14, 2015 1:08pm

The vendor is strategic media 21. http://www.strategicmedia21.com/

Creative Response Concepts is the agency that represents ForAmerica (not involved in pitching this at all – they received the below reactively) and is uncomfortable telling them to back off without firm enforcement here given that many of FA's peers are apparently utilizing these services.

From CRC:

"If it is not allowed and you all are able to formally tell us, I can get it stopped immediately. If it is allowed, I am sure I have other clients that will want to do it." They essentially want these guys to be shut down so they don't look like they're telling their client to play by a different set of rules from everyone else.

Is there anything devops can do with the information we have provided?



facebook | instagram

U.S. Politics and Advocacy | Washington, DC



Oct 13, 2015 2:24pm



There are likely a few data policy violations here. They can't collect information from public posts and share that information with any type of data broker (company XXX seems to operate in that fashion). We should tell ForAmercia not to proceed, as they (and any service provider acting on their behalf) must not collect and use information from us for this purpose. See, Platform Policies (https://developers.facebook.com/policy). Can you ensure the client doesn't proceed? Also, can you ask the client to tell us who the vendor is? We will keep it confidential and thank them in advance.

Oct 13, 2015 1:00pm



Hi All, we have some new information to share. Our client sent over the following email today referring to a Nationbuilder project their client (ForAmerica) is moving forward with, but redacted the middle man vendor. However, this is the person who presumably works for that middle man vendor that was added to their page as an analyst:



Email from the client:

"FYI – ForAmerica is moving forward with the Nation Builder project. There is a vendor in the middle and this is what they have indicated ForAmerica should end up with:

XXX will take ForAmerica's community of 7.6 million Facebook likes and create a database identifying people who like ForAmerica posts and in many cases use data matching to layer other information points over these individuals, including methods of contact and interests.

In order to do this, XXX will first set up an API to gather data on anyone who "Likes" a post on ForAmerica's page. Once a critical mass is reached, XXX will match this list against our database of names, phone numbers, e-mails and mailing addresses of 82 million conservatives and Christians and their friends.

Our initial data gathering and matching run will take place over the two months in October and November. Our estimates are that this data run would generate a 1.25 - 3 million person database (this is an estimate and not a guarantee) that could be broken down along the following lines:

100,000-250,000: Full Data Match- name, street address, phone number, email, DOB and number of interactions with ForAmerica (can be used to assign donor value at later date)

150,000 - 300,000: Partial Match- Name, City, State, DOB (can be matched against voter file to determine physical address at a future date) and number of interactions with ForAmerica

1-2.5 million: Facebook Profile- Name and Facebook ID of individual interacting with ForAmerica

My understanding is that they are using Nation Builder to do everything.

We've set up one of their folks as an analyst on the FA Facebook account."

Oct 13, 2015 11:36am



It's difficult to get app ID's for these companies since they're usually one-off for clients and they're not volunteering them, but I'll dig a little.



facebook | instagram

U.S. Politics and Advocacy | Washington, DC



Sep 30, 2015 12:17pm



To set expectations, we can't certify/approve apps for compliance, and it's very likely these companies are not in violation of any of our terms. What may help is if you provide us with concrete examples of what we understand the apps to be doing that we think may violate our terms, and that can help us dive in. If we had more resources we could discuss a call with the companies to get a better understanding, but we should only explore that path if we do see red flags.

Sep 30, 2015 10:48am



Hi A B B C , I will have to get back to you on the Cambridge app ID, but the NationBuilder app id is: 126739610711965, which we are also very interested if they are compliant. Thanks!

Sep 30, 2015 6:02am



Hello, thanks for surfacing this very interesting question. To start: could you provide App IDs and App names for the apps that are engaging in this scraping of user data?

tl;dr-Need more info before can offer anything more definitive; but my hunch is that these apps' data-scraping activity is likely non-compliant (see FPPs cited below).

11126

As for the website itself, I dug around a bit and couldn't find any very salient red flags. However, in light of our data-sensitivity-related policies, the following Facebook Platform Policies (FPPs) come to mind:

FPP3.9 - Don't sell, license, or purchase any data obtained from us or our services.

FPP3.10 - Don't transfer any data that you receive from us (including anonymous, aggregate, or derived data) to any ad network, data broker or other advertising or monetization-related service.

FPP7.4 - Request only the data and publishing permissions your app needs.

There are also more FPPs related to data stuff here: https://developers.facebook.com/policy/#data

As for your questions:

- (1) I don't believe we currently have any language/boilerplate messaging re: political analysis/data-scraping apps.
- (2) Please provide App IDs, I'd be happy to investigate their app's activity.
- (3) Without App IDs to dig deeper, I can't say exactly what they're doing, but my initial hunch is that "automatically linking emails in your database to FB accounts" would be against our policies (whether for FPP or otherwise), mainly because it seems to access data that isn't explicitly being permitted access by the user (see FPP7.4 above). It also brings to mind the following:

FPP3.11 - Don't put Facebook data in a search engine or directory, or include web search functionality on Facebook.

With all the above-mentionend FPPs in mind, I imagine it would be *very* difficult to engage in data-scraping activity as you described while still being compliant with FPPs.

Passing back to @[Date:] for her thoughts.

Sep 29, 2015 5:38pm



Hi team - I'm passing this to DevOps for initial review. They can help investigate and from there we can discuss. At a high level it is possible these services comply with our terms, but it is also possible they do not. I'm happy to meet with anyone who would like to learn more about our policies with respect to data collection and use. My calendar is up to date, so don't hesitate to find time for us.

Sep 29, 2015 8:57am



Following up on Hill 'task here - we are getting several pointed questions from the political partner space around what is in bounds versus what is out of bounds. Many companies seem to be on the edge-possibly over. Would it be worth setting up a call to chat through the boundaries? or can you take a look at the cited examples and weigh in on the methods/tolerance for them? Thank you!

Sep 29, 2015 7:16am

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