04 April 2019

Dear Google,

We are writing to ask about what steps your platform is taking to provide transparency to your users regarding advertising.

As you know, Facebook recently announced expanding the company’s ad transparency measures to include more information about why an ad or content appears in a user’s newsfeed. While Facebook has a lot more to do, it is important that all technology companies, including yours, provide advertising transparency.

Recently, we have seen how platforms such as yours have been used by political and other actors to disrupt democratic processes. At present, people using your platform are not able to completely understand why they are targeted with ads. How ads are targeted at users is incredibly complex and can involve targeting parameters and tools provided by platforms or data from advertisers (and their sources). What's especially difficult for most users to understand is how data from disparate sources is linked, and how data can be used to profile them in ways that can be incredibly sensitive. Because all advertisements have the potential to be political in nature, steps to increase transparency must be applied broadly and uniformly across advertising platforms and networks, and not limited to ads bought by political actors. This opacity to users about not only who is purchasing and targeting ads at them, but also how a platform has targeted an ad at them, is inherently problematic and is only exacerbated in political and democratic contexts.

We are therefore writing to ask for your urgent answers to the below questions:

- What steps do you plan to take in relation to expanding transparency of issue-based advertising, under your commitments to the EU Code of Practice on Disinformation?

- What steps do you plan to take in relation to expanding transparency of advertising outside of political or political issue advertising?

- What steps are you taking to increase transparency around why a user was targeted or shown an ad, whether political, issue-based, or otherwise?
• What steps are you taking to include promoted content and sponsored content in your transparency efforts?

• Where do your transparency efforts currently apply geographically and what is your timeline for global application?

• How do you define political advertising?

• How can users control how your company personalizes ads?

We look forward to your prompt response by Friday 17th April. We will publish all responses on our site at www.privacyinternational.org.

Yours sincerely

Sara Nelson
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