



UNIVERSAL MUSIC GROUP

June 14, 2020

Privacy International
62 Britton Street
London EC1M 5UY
United Kingdom

via email: [REDACTED]

Dear [REDACTED]

We received your letter dated May 28, 2020 from Privacy International ("Letter"). Thank you for giving us an opportunity to comment prior to publication.

In August 2019, Universal Music Group ("UMG," "we," "our," or "us") received data subject access requests from two individuals identified as [REDACTED]. In response to those requests, we conducted a review of our systems pursuant to our normal protocol for those types of requests. We did not find any personal data in our systems about either individual and communicated the same to them. Upon receipt of your Letter, we again conducted a review of our systems and again did not find any personal data about those individuals in our systems (as of June 2020), or any indication that we stored personal data about them in or prior to August 2019.

It may be helpful to clarify that Facebook's privacy tools disclose the Facebook Business Manager account associated with the upload of a user's data, but they do not disclose who actually uploaded the data. This distinction is important because artists, like many companies, work with third party partners who are granted advertising access to artist Facebook accounts, along with the ability to create Custom Audiences. These partners often include management, record labels, tour promoters, ticketing companies, merch operators, agencies, and others.

By way of example, a ticketing company with advertising access to an artist account may create a Custom Audience using a list of individuals who purchased concert tickets for the same or similar artists. This Custom Audience is created *through* the artist account, but the artist never sees or acts as data controller over the ticketing company data uploaded to create the Custom Audience. Unfortunately, we are not aware of any Facebook tool or functionality that allows account administrators to reconstruct who, when, or what specific data related to a particular individual was uploaded to create a Custom Audience.

It may be the case that someone uploaded information about [REDACTED] through James Blake's Facebook account, but we can only confirm that UMG does not have personal data related to these individuals.

Based on the information you have provided in the Letter, we believe that the information shown on the Facebook Off-Site Activity tool most likely came through a Facebook pixel deployed on a site operated

by UMG. UMG incorporates the Facebook pixel on many of its sites using Facebook's standard tools. When a user visits one of these sites, Facebook automatically collects information through the pixel for various purposes, including to show relevant ads to the user. UMG's own Facebook Business Manager account is associated with these Facebook pixels so users see UMG rather than any particular artist in the off-Facebook activity tool. UMG does not itself collect or store information related to the Facebook pixel and has no way of connecting Facebook pixel data to an email address or other identifiers submitted as part of a DSAR.

We appreciate your Letter and your research on this important topic. Hopefully this response provides clarity regarding your findings. Please feel free to follow up if you have any additional questions.

Regards,



Chief Privacy Officer, Group DPO
Universal Music Group