



# NetzDG Transparency Report

January 2022

## 1. GENERAL OBSERVATIONS

General observations outlining the efforts undertaken by the provider of the social network to eliminate criminally punishable activity on the platforms.

Meta Platforms Ireland Limited (until 4 January 2022 known as: Facebook Ireland Limited), which provides the social network Facebook for users in Germany, aims to create a safe and trusted platform, where people can feel free to express themselves. But we are clear that we do not allow people to post content that is against the law or encourages criminal behavior. We also do not allow for bullying or harassment in any form. In order to achieve this balance, we take a multi-faceted approach to addressing potentially criminal or harmful activity on the Facebook platform.

First, we maintain a set of globally applicable Community Standards that define what is and isn't allowed on Facebook, and that in many instances tracks, to some degree, what is unlawful under German law. These standards apply to content worldwide and are integral to protecting both expression and personal safety on Facebook. Our Community Standards prohibit a wide range of objectionable or harmful content, including content that:

- Promotes violent and criminal behavior
- Threatens the safety of others
- Is considered hate speech
- Is considered graphic violence
- Is considered spam
- Is considered bullying or harassment

The [Community Standards](#) are created by a global team with a wide array of backgrounds, including those who have dedicated their careers to issues like child safety, hate speech, and terrorism. This team regularly seeks input from outside experts and organizations to help balance the different perspectives that exist on free expression and safety, and to better understand the impacts of our policies on different communities globally. Our reviewers enforce these standards using comprehensive guidelines, which ensure that decisions are as consistent as possible. A Community Standards report does not trigger a legal review by us – in accordance with



the user's Community Standards report, we review for violation of our Community Standards. We maintain separate reporting mechanisms for users to report content they believe violates the local law (described in further detail below).

Logged-in Facebook users can report Community Standards violations in a variety of ways, including through an option appearing with each piece of content. When content is reported through these tools, we review the reported content to determine whether it violates our Community Standards and remove it if it does. In addition, we use detection technology to help identify certain types of potentially Community Standards violating content, including terrorist content and child exploitation imagery, and flag it for review or remove it automatically.

Second, we provide an array of options for people to report content they believe violates local law. When something on Facebook is reported to us as violating local law but doesn't go against our Community Standards, we may block the content from being available in the country where it is alleged to be illegal. People in Germany may use various channels to report alleged violations of German law such as:

- [NetzDG complaint form](#) — This form allows people in Germany to report content they believe violates one or more of the German Criminal Code provisions set forth in NetzDG (more information on this form can be found in Section 2 of this transparency report).
- [Intellectual property reporting forms](#) — These forms allow rights owners and their authorized representatives to report content they believe violates copyright or trademark rights.
- [Defamation reporting form](#) — This form allows injured parties and certain authorized representatives to report content they believe to be defamatory. This may include content that is a false assertion of fact, leading to injury to reputation under the law. When people select Germany as the country for which they want to claim rights, they are provided an option to report through our NetzDG complaint form should they believe the content constitutes criminal insult, defamation or intentional defamation.
- [Legal removal request form](#) — This form allows individuals in European Union Member States to report content they believe violates locally applicable laws. When people select Germany as the country for which they want to claim rights, this form provides access to all of the forms mentioned above, as well as to a separate form for Right to Privacy/Erasure. The form also provides a means for people to report content they believe violates other laws not covered by the categories above.

## 2. COMPLAINT MECHANISMS/CRITERIA

Description of the mechanisms for submitting complaints about unlawful content and the criteria applied in deciding whether to delete or block unlawful content.

If someone believes content on Facebook is unlawful under one or more of the German Criminal Code provisions covered by NetzDG, they can report it by using Facebook's dedicated [NetzDG complaint form](#). This form has been in place for people in Germany



since January 1, 2018, and is intended for complaints claiming violations of the German Criminal Code provisions listed in NetzDG.

The NetzDG complaint form can be accessed via a link available next to a piece of content on the Facebook platform.

So that we can properly evaluate the claim and comply with Section 2 (“Reporting obligation”) of NetzDG, people are prompted to provide the following information in our NetzDG complaint form:

- Complete contact information, including whether the reporter is a complaints body (*Beschwerdestelle*) under NetzDG and/or is reporting the content on behalf of a client
- Section(s) of the German Criminal Code alleged to have been violated by the reported content
- Why the reported statements or images are alleged to be unlawful under NetzDG
- A court order, if available

Since people reach the complaint form directly from a piece of content, they do not need to provide links to the reported content or contact information (if they are reporting while signed into their Facebook account). These fields are filled in automatically. Also, within the form it is clearly highlighted which information is requested by us optionally.

Every user in Germany (registered users and non-registered users) can also access the NetzDG complaint form in other ways. One way to do so is on the Facebook homepage, to click the link titled “Impressum/Terms/NetzDG/UrhDaG”, choose the section “Network Enforcement Act (“NetzDG”) and Impressum” and click the link “submit a report”. Another way is via Facebook’s [NetzDG Help Center page](#), which is dedicated to helping individuals understand how to submit NetzDG complaints. On that page, people can reach our complaint form by clicking “Submit Report.” This NetzDG Help Center page can be found via a link in the aforementioned section “Network Enforcement Act (“NetzDG”) and Impressum” as well as in the [Facebook Help Center](#) under the “Policies and reporting” tab, subsection “Network Enforcement Act (“NetzDG”)” and is otherwise searchable via the Help Center search bar.

In this reporting period, we finalized the alignment of the NetzDG complaint form accessible in the ways mentioned in the preceding paragraph with the one available directly from the content. The only difference is that users who do not submit their NetzDG complaint via the complaint form available directly from the content are asked (in addition to the aforementioned points) to provide the link to the content in question on Facebook.

Once an individual has completed the NetzDG complaint form (via one of the ways described above) and clicks “send,” their complaint automatically reaches us through an internal review tool – no additional action is required by the reporting party. We then take a two-step approach to reviewing content that is reported through the NetzDG complaint form. First, we review the reported content under our Community



Standards. If it violates our Community Standards, we ensure that it is removed from the Facebook platform globally. Second, if the reported content does not violate our Community Standards, we review it for legality based on the information provided in the complaint. Specifically, we assess whether the reported content violates the relevant provisions of the German Criminal Code listed in NetzDG. If the reported content is deemed to be unlawful under NetzDG, we will disable access to that content in Germany (see further information on how we handle NetzDG complaints in Section 4). We also communicate with the reporting party to provide updates on their complaint, request additional information if necessary, and inform them about our decision once we have finished reviewing the complaint (see further information on this in Section 9).

### 3. COMPLAINT VOLUMES

Number of incoming complaints about unlawful content in the reporting period, broken down according to whether the complaints were submitted by complaints bodies (Beschwerdestelle) or by users; according to the reason for the complaint.

The following tables show the number of complaints submitted through Facebook’s NetzDG complaint form between July 1, 2021 and December 31, 2021. In principle, only one piece of content can be reported per NetzDG complaint. In some cases, however, users cite multiple pieces of content in a single NetzDG complaint (e.g. by mentioning multiple URLs in an attachment uploaded to the complaint). The numbers reflected in the tables below pertain to complaints submitted rather than unique pieces of content identified in the complaints. It is worth noting that in the period between July 1, 2021 and December 31, 2021, there were 115,085 NetzDG complaints identifying a total of 95,659 pieces of content. When the same piece of content was reported to us multiple times, we counted it as one piece of content. We note that we applied the same method of counting reported pieces of content also in the first half of 2021, even though this clarifying note was not explicitly included in the corresponding transparency report.

The tables cover two different categories of numbers:

#### 3A. NETZDG COMPLAINTS BY REPORTER TYPE

- This Section breaks down the number of complaints according to whether they were submitted by complaints bodies or other individuals.

Table 1. NetzDG Complaints by Reporter Type

Complaints from Complaints Bodies	3,666
Complaints from Other Individuals	111,419
Total	115,085



### 3B. NETZDG COMPLAINTS BY CRIMINAL CODE PROVISION(S) CITED

- This Section breaks down the number of complaints according to the provision(s) of the German Criminal Code cited by the reporting party.
- Please note that a NetzDG complaint may cite multiple reasons for illegality. Therefore, the sum of complaints listed in the rows per reporter type in the table below exceeds the total number of complaints submitted per reporter type as outlined in Section 3A.

Table 2. NetzDG Complaints by German Criminal Code Provision(s) cited

Criminal Code Provision	Reporter Type		
	Complaints from Complaint Bodies	Complaints from Other Individuals	Total
Dissemination of propaganda material of unconstitutional organizations (§ 86)	952	19,332	20,284
Using symbols of unconstitutional organizations (§ 86a)	954	12,419	13,373
Preparation of a serious violent offense endangering the state (§ 89a)	716	9,991	10,707
Encouraging the commission of a serious violent offence endangering the state (§ 91)	675	9,048	9,723
Treasonous forgery (§ 100a)	666	9,152	9,818
Public incitement to crime (§ 111)	772	15,264	16,036
Breach of the public peace by threatening to commit offenses (§ 126)	754	12,778	13,532
Forming criminal or terrorist organizations (§§ 129 - 129b)	713	9,356	10,069
Incitement to hatred (§ 130)	1,125	32,260	33,385
Dissemination of depictions of violence (§ 131)	974	14,424	15,398
Rewarding and approving of offenses (§ 140)	717	13,074	13,791
Defamation of religions, religious and ideological associations (§ 166)	1,071	22,365	23,436
Distribution, acquisition, and possession of child pornography (§ 184b in conjunction with § 184d)	724	9,144	9,868
Insult (§ 185)	1,580	45,241	46,821
Defamation (§ 186)	1,357	35,099	36,456
Intentional defamation (§ 187)	1,246	29,905	31,151
Violation of intimate privacy by taking	1,137	14,430	15,567



Criminal Code Provision	Reporter Type		
	Complaints from Complaint Bodies	Complaints from Other Individuals	Total
photographs (§ 201a)			
Threatening the commission of a felony (§ 241)	821	13,085	13,906
Forgery of data intended to provide proof (§ 269)	933	14,936	15,869

## 4. ORGANIZATION, PERSONNEL RESOURCES, PERSONNEL EXPERTISE, TRAINING, AND SUPPORT

Organization, personnel resources, specialist and linguistic expertise in the units responsible for processing complaints, as well as training and support of the persons responsible for processing complaints.

### 4A. ORGANIZATION

NetzDG complaints are reviewed in two steps by teams of trained professionals and lawyers, who cover both the Facebook and Instagram platforms.

First, content reported via the Facebook NetzDG complaint form is reviewed by members of our Global Partner Operations & Enablement team. Our Global Partner Operations & Enablement team is a mix of full-time employees and personnel of companies we partner with. Each NetzDG complaint is reviewed by an individual member of this team through our contractual partnerships with Majorel in Berlin and Telus/CCC in Essen (Germany) to determine whether the reported content violates Facebook’s Community Standards (as opposed to reviewing the content for potential unlawfulness, which as discussed below is handled by separate teams). If the content is found to violate the Community Standards, then the content is removed globally.

Second, all NetzDG complaints containing content that was not removed for violating Community Standards undergo a legal review process that can consist of multiple stages (see below) handled by our Scaled Regulatory Operations team (previously Legal Takedown Request Operations team).

This team is made up of two groups – a group of employees based out of Ireland and Sunnyvale, California (and one employee working remotely from Austin) and a group of contractors based out of Dublin, Ireland and Austin, Texas. NetzDG complaints containing content that was not removed for violating Community Standards are first reviewed by one of the contractors. The purpose of this review stage is to ensure that manifestly unlawful content is blocked within 24 hours. Each complaint is reviewed by an individual member of that team, who is tasked with identifying and blocking manifestly unlawful content, and corresponding with the reporting party, including when the complaint lacks critical context. All of this is done in accordance with



guidance developed by our in-house lawyers and external legal counsel. Should the complaint require more granular investigation, it is enqueued for review by one of the Scaled Regulatory Operations team employees. That individual will then carefully review the complaint and take appropriate action in instances where illegality or legality can be determined on the basis of guidance prepared for the team by our in-house lawyers and external legal counsel.

Where the legality of reported content is still unclear, the complaint is then escalated to our in-house lawyers for review. In particularly complex cases, our in-house lawyers may obtain a legal assessment from outside counsel in Germany.

Once a decision on how to handle the content is made, the Scaled Regulatory Operations team handles any advised content actions and corresponds directly with the reporting party and – if content is blocked – the reported user.

There are open lines of communication between content reviewers at each stage of the review process.

In the Global Partner Operations & Enablement team the Majorel and Telus/CCC teams work closely with the Global Partner Operations & Enablement team employees in Dublin. The Majorel and Telus/CCC teams receive training, additional guidance, and Community Standards expertise on NetzDG cases as needed from specially trained contractors, who in turn are trained by different Facebook teams.

The group of Scaled Regulatory Operations team contractors work closely with our Scaled Regulatory Operations team employees, who provide training, guidance, and assistance on challenging or unique complaints. A similar line of communication is also open between the Scaled Regulatory Operations employees and a team of our in-house lawyers. These two teams meet multiple times a week and maintain open lines of communication to discuss legally complex NetzDG complaints. Every month, employees from the Scaled Regulatory Operations team send out an internal update to a cross-functional team on complaint volumes, trends, questions that arose while handling the complaints, and training of our teams.

## 4B. PERSONNEL RESOURCES AND EXPERTISE

As of December 31, 2021, 142 individuals spread across three teams are eligible and have been trained accordingly (as further set out in Section 4C) to process NetzDG complaints. These individuals also engage in work outside of NetzDG complaints, which allows for flexible staffing. When complaints volumes are low, only a subset of these individuals process NetzDG complaints. When volumes increase, additional trained members of the teams can be utilized to process complaints as well. The personnel resources and expertise of each team are as follows:

- **Global Partner Operations & Enablement team:** As of December 31, 2021, there were 96 individuals on this team eligible to handle NetzDG complaints. Prior to handling NetzDG complaints, all of these individuals were required to display proven operational efficiency over the course of at least 3-6 months on other types of



content takedown requests. In addition, all of these individuals are fluent in German, and have received NetzDG training (as further discussed in Section 4C below). As noted above, these individuals also engage in other queues focused on content moderation outside of NetzDG to help balance their workload depending on NetzDG complaints volumes.

- **Scaled Regulatory Operations team:** As of December 31, 2021, there were a total of 44 individuals eligible to handle NetzDG complaints on the Scaled Regulatory Operations team. 31 of these individuals were contractors, and 13 were employees. The 31 contractors are all fluent in German and have received NetzDG training (as further discussed in Section 4C below). The Scaled Regulatory Operations team employees eligible to handle NetzDG complaints are fluent in a wide variety of languages, including German, English, French, and Turkish, and can rely on other members of the team for expertise in other languages, such as Polish, Spanish, Russian, and Dutch. Complaints are generally reviewed by members of the team that are fluent in both German and English, with occasional exceptions for complaints submitted in other languages or where the reported content does not require German language expertise. The 13 employees have varied backgrounds to account for both the legal and operational complexities of NetzDG complaints. Specifically, 6 have law degrees, and 12 had operational experience in other roles before joining the team. All of these individuals have received NetzDG training (as further discussed in Section 4C below).
- **Legal:** As of December 31, 2021, there were 2 in-house lawyers involved in handling NetzDG-related complaints (among other work). These 2 lawyers are specialists for the assessment of potentially problematic content and have extensive experience regarding handling legal questions concerning takedown requests. These lawyers work closely with the Scaled Regulatory Operations team employees and correspond regularly with German external legal counsel who provide advice on specific NetzDG complaints.

#### 4C. TRAINING AND SUPPORT

The teams which handle NetzDG complaints receive distinct types of training based on the nature of their respective work.

As Global Partner Operations & Enablement team members who review NetzDG complaints on Facebook only review these complaints for violations of Community Standards, their training is focused on developing operational skills and expertise in the implementation of Community Standards (rather than training to assess legality of content). They undergo several weeks of training in content review under Facebook's Community Standards. Importantly, as noted above in Section 4B, NetzDG complaints are only handled by a select group of Global Partner Operations & Enablement team members who reach a certain level of tenure on the team and demonstrate consistently high operational proficiency prior to being considered for the work. Once selected, those individuals then receive training that provides background information on NetzDG to help contextualize their work.



Members of the Scaled Regulatory Operations team review content for illegality and therefore receive greater levels of training on NetzDG and the German Criminal Code provisions that make up the definition of “unlawful content” under the law. Every member of this team who is eligible to handle NetzDG complaints receives several weeks of training focused heavily on operational proficiency and NetzDG ahead of them processing NetzDG complaints. The NetzDG-specific trainings include background material on the law, detailed breakdowns of every Criminal Code provision referenced in the law, and instruction on how to correspond with reporting parties and users, whose content was reported. The team members also receive refresher trainings at least once every half year. These refresher trainings provide reminders and updates on operational best practices, as well as breakdowns of common types of complaints and commonly cited Criminal Code provisions. The refresher training for the group of contractors is conducted by a Scaled Regulatory Operations team employee, and the refresher training for the group of Scaled Regulatory Operations team employees is conducted by our in-house lawyers.

There is a robust and diverse program to support our Global Partner Operations & Enablement and Scaled Regulatory Operations team members who review NetzDG complaints. This program currently offers e.g. the following services for team members:

- Psychological support
- One-on-one sessions with a full-time in-house psychologist
- Group therapy
- On-site counseling sessions to support emotional well-being

We are dedicated to providing our content reviewers with a high-quality, diverse support program and will continue to add new services and improve on existing services to accomplish this goal.

## 5. INDUSTRY ASSOCIATIONS

Membership of industry associations with an indication as to whether these industry associations have a complaints service.

Companies of the Meta group are a member of the following industry associations in Germany:

- Eco - Verband der Internetwirtschaft e.V. (which includes an internal complaints service)
- Bitkom - Bundesverband Informationswirtschaft, Telekommunikation und neue Medien e.V. (which do not have an internal complaints service)
- BVDW - Bundesverband Digitale Wirtschaft e.V. (which do not have an internal complaints service)

In addition to the industry associations listed above, companies of the Meta group are a party to FSM (Freiwillige Selbstkontrolle Multimedia-Diensteanbieter e. V.) as well as



to DsiN (Deutschland sicher im Netz e. V.), and maintain a close working relationship with [Jugendschutz.net](https://www.jugendschutz.net). While not industry associations, these organizations also operate in the field of combating illegal content and promoting safety online.

## 6. EXTERNAL CONSULTATION

Number of complaints for which an external body was consulted in preparation for making the decision.

Between July 1, 2021 and December 31, 2021, we referred 24 NetzDG complaints to Freiwillige Selbstkontrolle Multimedia-Diensteanbieter e.V. (FSM) for a decision on the legality of content identified in the complaints.

In 73 of the 115,085 complaints received between July 1, 2021 and December 31, 2021, we consulted external legal counsel (who we do not consider to be an “external body” but rather an extension of our legal team) to assist in making a decision on individual complaints. All of these consultations were with German outside counsel, who we work with for clarification on the law for complaints when needed.

## 7. DELETION/BLOCKING VOLUMES

Number of complaints in the reporting period that resulted in the deletion or blocking of the content at issue, broken down according to whether the complaints were submitted by complaints bodies or by users, according to the reason for the complaint, according to whether the case fell under section 3 subsection (2) number (3) letter (a), and if so, whether the complaint was forwarded to the user, and whether the matter was referred to a recognized self-regulation institution pursuant to section 3 subsection (2) number (3) letter (b).

The following table depicts the number of times content was deleted or blocked following complaints submitted through Facebook’s NetzDG complaint form between July 1, 2021 and December 31, 2021. Please note the following about this table:

- This table breaks down the number of times a complaint led to the deletion or blocking of content according to the provision(s) of the German Criminal Code cited by the reporting party.
- In principle, only one piece of content can be reported per NetzDG complaint. In some cases, however, users cite multiple pieces of content in a single NetzDG complaint (e.g. by mentioning multiple URLs in an attachment uploaded to the complaint). The numbers reflected in the tables below pertain to complaints submitted rather than unique pieces of content identified in the complaints. It is worth noting that in the period between July 1, 2021 and December 31, 2021, 17,791 NetzDG complaints resulted in the deletion or blocking of content. This amounted to a total of 17,730 deleted or blocked pieces of content. The total of deleted/blocked pieces of content is lower than the total of complaints, because the same piece of content is sometimes reported in several complaints – in such cases, in the content deletions/blockings



statistics, we counted the same piece of content reported multiple times only once.

- Individuals may cite multiple reasons for illegality in a single NetzDG complaint. If we took action on content pursuant to a complaint, it is listed in the table under every provision cited in the complaint. Therefore, the sum of deletions/blockings listed in the table below exceeds the total number of complaints that led to the deletion or blocking of content.

Table 3. Number of Complaints Resulting In Deletion/Blocking

Criminal Code Provision	Reporter Type		
	Complaints from Complaints Bodies	Complaints from Other Individuals	Total
Dissemination of propaganda material of unconstitutional organizations (§ 86)	60	2,050	2,110
Using symbols of unconstitutional organizations (§ 86a)	50	1,651	1,701
Preparation of a serious violent offense endangering the state (§ 89a)	39	691	730
Encouraging the commission of a serious violent offence endangering the state (§ 91)	32	603	635
Treasonous forgery (§ 100a)	30	552	582
Public incitement to crime (§ 111)	45	2,127	2,172
Breach of the public peace by threatening to commit offenses (§ 126)	46	1,133	1,179
Forming criminal or terrorist organizations (§§ 129 - 129b)	32	545	577
Incitement to hatred (§ 130)	82	3,554	3,636
Dissemination of depictions of violence (§ 131)	54	1,462	1,516
Rewarding and approving of offenses (§ 140)	35	1,300	1,335
Defamation of religions, religious and ideological associations (§ 166)	88	2,420	2,508
Distribution, acquisition, and possession of child pornography (§ 184b in conjunction with § 184d)	42	1,207	1,249
Insult (§ 185)	186	8,194	8,380
Defamation (§ 186)	123	3,715	3,838
Intentional defamation (§ 187)	97	2,739	2,836
Violation of intimate privacy by taking photographs (§ 201a)	63	1,049	1,112
Threatening the commission of a felony	51	1,388	1,439



Criminal Code Provision	Reporter Type		
	Complaints from Complaints Bodies	Complaints from Other Individuals	Total
(§ 241)			
Forgery of data intended to provide proof (§ 269)	54	1,164	1,218

Of the 17,730 deleted or blocked pieces of content, 16,648 were deleted globally for a violation of our Community Standards, and 1,082 did not violate our Community Standards, but were blocked in Germany due to a violation of a provision of the German Criminal Code listed in the NetzDG.

Information regarding the previous NetzDG transparency report (covering the period from January 1, 2021 until June 30, 2021): We note that the total number of deleted/blocked pieces of content indicated in this report did not add up to the sum of the individual values of deleted and blocked pieces of content. Here, in a few cases, double statistical recording of the action taken has occurred by mistake. In these cases, content that was either deleted or blocked (according to the result of the review by the responsible teams described above) was inadvertently recorded cumulatively in the statistics as deleted and blocked, but was accurately recorded only once in the total number. This affected less than 0.5% of the pieces of content reported via Facebook's NetzDG complaint form during this period. The discrepancy cannot be fully resolved at this time. We have taken measures to avoid this double recording in the future.

Number of complaints which fell under section 3 subsection (2) number (3) letter (a) and in which we reached out to the user who posted the reported content for additional facts: 1.

We referred 24 complaints to a recognized self-regulation institution.

## 8. DELETION/BLOCKING TURNAROUND TIMES

Time between complaints being received by the social network and the unlawful content being deleted or blocked, broken down according to whether the complaints were submitted by complaints bodies or by users, according to the reason for the complaint, and into the periods "within 24 hours"/"within 48 hours"/"within a week"/"at some later point".

The following table contains a breakdown of the time taken to delete or block content deemed unlawful or in violation of our Community Standards after receiving a NetzDG complaint. This table concerns complaints submitted through Facebook's NetzDG complaint form between July 1, 2021 and December 31, 2021.



This table shows the following details for each complaint where a piece of content was deleted or blocked: (1) the type of reporter who submitted the complaint, (2) the time it took to delete or block the reported content, and (3) the provision(s) of the German Criminal Code cited by the reporter in the complaint. Please note the following about this table:

- As set forth under section 2 subsection (2) number (8), our removal time is divided into: (a) within 24 hours, (b) within 48 hours, (c) within a week, and at a later date.
- The numbers reflected in the table below pertain to complaints submitted rather than unique pieces of content identified in the complaints.
- The time periods refer to the time between when the complaint was submitted and the last action we took in response to the complaint. As an example, if a complaint identified two pieces of content and we actioned one piece within 24 hours and the other within 7 days, then that complaint would be listed in the table as taking action within 7 days.
- Individuals may cite multiple reasons for illegality in a single NetzDG complaint. If we took action on content pursuant to a complaint, it is listed in the table under every provision cited in the complaint. Therefore, the sum of deletions/blockings listed in the table below exceeds the total number of complaints that led to the deletion or blocking of content. It is worth noting that of the 17,791 complaints that led to a block or deletion, our last block/deletion action occurred within 24 hours 16,584 times, within 48 hours 261 times, within 7 days 800 times, and after 7 days 146 times.

Table 5. Turnaround Time for Complaints with Deletion/Blocking

Criminal Code Provision	Reporter Type							
	Complaints from Complaints Bodies				Complaints from Other Individuals			
	24 Hours	48 Hours	7 Days	> 7 Days	24 Hours	48 Hours	7 Days	> 7 Days
Dissemination of propaganda material of unconstitutional organizations (§ 86)	52	4	3	1	1,862	40	127	21
Using symbols of unconstitutional organizations (§ 86a)	43	4	2	1	1,465	35	130	21
Preparation of a serious violent offense endangering the state (§ 89a)	33	3	2	1	649	x10	22	10
Encouraging the commission of a serious violent offence endangering the state (§ 91)	28	1	2	1	571	7	18	7
Treasonous forgery (§ 100a)	26	1	2	1	508	9	27	8
Public incitement to crime (§ 111)	38	2	3	2	2,014	29	71	13
Breach of the public peace by threatening to commit offenses (§ 126)	41	2	2	1	1,065	16	41	11

Criminal Code Provision	Reporter Type							
	Complaints from Complaints Bodies				Complaints from Other Individuals			
	24 Hours	48 Hours	7 Days	> 7 Days	24 Hours	48 Hours	7 Days	> 7 Days
Forming criminal or terrorist organizations (§§ 129 - 129b)	30	1	0	1	504	10	21	10
Incitement to hatred (§ 130)	71	4	6	1	3,234	71	214	35
Dissemination of depictions of violence (§ 131)	49	3	1	1	1,367	25	60	10
Rewarding and approving of offenses (§ 140)	33	1	0	1	1,208	26	53	13
Defamation of religions, religious and ideological associations (§ 166)	82	2	3	1	2,302	31	73	14
Distribution, acquisition, and possession of child pornography (§ 184b in conjunction with § 184d)	37	3	1	1	1,031	45	120	11
Insult (§ 185)	171	5	9	1	7,776	72	269	77
Defamation (§ 186)	114	3	5	1	3,421	47	201	46
Intentional defamation (§ 187)	87	4	5	1	2,468	40	189	42
Violation of intimate privacy by taking photographs (§ 201a)	57	1	4	1	957	21	59	12
Threatening the commission of a felony (§ 241)	47	1	2	1	1,312	16	50	10
Forgery of data intended to provide proof (§ 269)	44	3	5	2	1,086	13	55	10

## 9. CORRESPONDENCE

Measures to inform the person who submitted the complaint and the user for whom the content at issue was saved about the decision on the complaint.

We take a variety of measures to correspond with people who report content through the NetzDG complaint form, and with members of our community whose content is deleted or blocked under NetzDG.

### 9A. CORRESPONDENCE WITH REPORTING PARTY

When someone submits a complaint, we correspond with them over email and through their Facebook Support Inbox (if the reporter is logged into their Facebook account and provides an email address associated with that account when submitting their complaint). Immediately after receiving a complaint, we send the reporting party an



automatic response that informs them their complaint is being reviewed, and this correspondence provides them with a reference number and link to our NetzDG Help Center. If we are still looking into a complaint 24 hours after submission, we inform the reporting party that we are continuing to review the complaint. If at any point we need additional information from the reporting party to review the complaint, we will ask the reporting party for that information.

Once we decide what (if any) action to take on the reported content, we provide the reporting party with tailored correspondence that informs them of why we did or didn't take action on the reported content. This can take a variety of forms depending on the result of our review, but can broadly be categorized into the following:

- **Reported content is deleted for violating Community Standards.** In this circumstance, we inform the reporting party that the content was removed because it violated our Community Standards. We also provide links to our NetzDG Help Center page and to our Community Standards in case the reporting party would like additional information.
- **Reported content is blocked for violating a German Criminal Code provision covered by NetzDG.** In this circumstance we inform the reporting party that the content is no longer accessible in Germany, and state the specific Criminal Code provision(s) under which we determined the content was unlawful. We also provide a link to our NetzDG Help Center page in case the reporting party would like additional information.
- **Reported content does not violate Community Standards or a German Criminal Code provision covered by NetzDG.** In this circumstance we inform the reporting party that we have reviewed the complaint, but are not in a position to remove the content because we determined it was not unlawful.
- **Variety of actions taken on reported content.** Individuals may identify in some cases multiple pieces of content in a single NetzDG complaint. We review each piece of content individually and act accordingly. In order to limit the amount of correspondence we send the reporting party, we generally will review and act on each piece of reported content before informing them of our decisions. If we take different actions on content identified in a complaint (e.g., we block one piece of content and do not take any action on another piece of content), we will provide the reporting party with specific information on what we did, using a hybrid of the responses explained above.

We received several complaints that used email addresses that almost certainly did not belong to the reporting party. To protect the true owners of those email accounts from spam, we reviewed the complaints and actioned the reported content according to the result of our review, but did not send notifications about the results of the review to the email address.

In addition to the information we provide in response to specific complaints, individuals can also find comprehensive educational information about NetzDG in our [NetzDG Help Center](#). The NetzDG Help Center contains information about (1) the type of content individuals can report under NetzDG, (2) what happens after an individual submits a NetzDG complaint, (3) how to report content that an individual believes is



subject to NetzDG, (4) what information to include in a NetzDG complaint, (5) in which cases an individual can turn to the Zustellungsbevollmächtigter under section 5(1) NetzDG, (6) the difference between NetzDG and Facebook's Community Standards, and (7) where individuals can find Facebook's NetzDG Transparency Reports.

## **9B. CORRESPONDENCE WITH POSTING USER**

We also correspond with users whose content is deleted or blocked following a NetzDG complaint. If we delete content for violating our Community Standards, we inform the posting user of our action through the Facebook Support Inbox and let them know their content violated our Community Standards. If we block content for violating a German Criminal Code provision covered by NetzDG, we inform the posting party via email of our action and of the specific German Criminal Code provision the content violated. If a complaint results in no action being taken on a user's content, we don't notify the user.

