

Pinterest's Response to Ofcom's Call for Evidence on Categorisation: Research and Advice Date: 12 September 2023

Introduction

Pinterest submits the below response to Ofcom's Call for Evidence, published July 11 2023, on categorising regulated services under the Online Safety regime. We are very pleased to have this opportunity to engage with Ofcom.

We have a longstanding commitment to making Pinterest a positive and inspiring place for everyone, which is the right thing for the people who use Pinterest. The work needed to achieve this goal will never end and we are dedicated to continually improving our policies, practices, and technology to keep our community safe. This is an industry-wide challenge as online trends and technological solutions continue to evolve, and we remain committed to exploring the best ways to achieve this goal.

In response to the questions posed to stakeholders in the call for evidence, this submission provides information on how Pinterest measures its users, Pinterest functionalities that affect the dissemination of content on our platform, and whether those functionalities differ for teen users.

Measurement of Pinterest Users

Pinterest typically measures the number of users on its services as "monthly active users" (MAU). We define a monthly active user as an authenticated (i.e. logged-in) Pinterest user who visits our website, opens our mobile application or interacts with Pinterest through one of our browser or site extensions, such as the Save button, at least once during the 30-day period ending on the date of measurement. Pinterest's MAUs include only unique users, as a user must be authenticated to be counted, and will be counted only once per measurement period even if they use Pinterest on multiple occasions. [REDACTED - CONFIDENTIAL]

We publish global and regional (U.S. and Canada, Europe, Rest of World) MAU on a quarterly and annual basis, based on the number of MAU measured on the last day of the current period. [REDACTED - CONFIDENTIAL]

There are a number of reasons why Pinterest reports its user numbers in terms of MAU.



MAU is the industry standard for online platforms to report user measurement, and Pinterest's methodology for calculating MAU is aligned with that of peer companies. [REDACTED - CONFIDENTIAL]

[REDACTED - CONFIDENTIAL]

Dissemination of Content on Pinterest

Pinterest is a visual discovery engine where users - which we call Pinners - find visual recommendations related to food, beauty, home decor, travel, and more. Our mission is to bring everyone the inspiration to create a life they love, and it is our guiding light in how we have created Pinterest, developed our products, and shaped our policies.

Pinterest shows users visual recommendations called Pins, which Pinners can then save and organise into collections called boards. Pins are created by both individual and business users by uploading photos or videos directly to Pinterest, or bookmarking third-party content from the web, and providing a text caption. All of the organic and paid content on Pinterest is generated by users holding personal or business Pinterest accounts. Accordingly, all of the content on Pinterest would be considered "user-generated content" as the term is defined in paragraph 2.9 of the Call for Evidence, so there are no separate parts of Pinterest that are defined by whether or not user-generated content is present.

Pins are recommended to Pinners on multiple Pinterest surfaces, and may also be shared between users. However, for the reasons discussed herein, Pinterest's functionalities are not prone to easily, quickly or widely disseminating viral content, particularly harmful content.

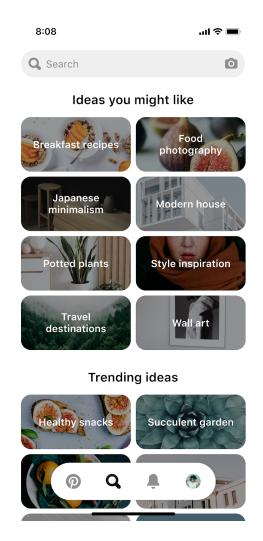
Pins primarily appear on three places on Pinterest: the home feed, the search tab, and as related Pins. The home feed is a feed of Pins that have been picked for the Pinner based on a number of factors, including the boards they've created, Pins they've engaged with, people and boards they've followed, and things they've searched for on Pinterest. It also contains recommendations for Pins that are inspired by the Pinner's recent activity.





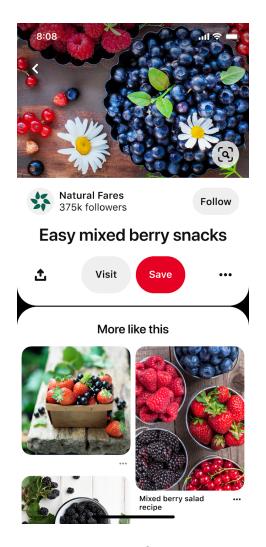
Pinners can use Pinterest search to discover new ideas that are relevant to their specific needs or interests. When Pinners tap the search bar or scroll the search page, Pinterest also shows them suggested topics that are based on the Pinner's interests as well as what's trending on Pinterest.





Pinterest's related Pins surface allows Pinners to explore different variations of the same idea. To see ideas related to a Pin, a Pinner can tap a Pin to open it and scroll down to see more ideas related to that Pin. Similarly, when viewing a board, a Pinner can scroll down to find more ideas related to that board.





The home feed, then, is the only Pinterest surface that does not serve content in response to a direct prompt from the user, such as entering search terms or clicking on a specific Pin. Even in the home feed, though, Pinterest's recommender system serves content based on the individual user's engagement with our service, rather than emphasising content simply because it is new or trending.

Pinterest's recommender systems are designed to show our users content we think will be relevant, inspiring, and personal. We look at a Pinner's activity on the platform—such as recent searches they've made, the content they save, Pins they view, and other Pinners they follow—to recommend new and relevant content, such as Pins, boards or other Pinners that we think users may like. We also use explicit signals that Pinners provide to us such as age, gender, and selected topics of interest, to recommend content, as well as information from their engagement with advertisers. Our algorithmic systems are designed to prioritise user action and engagement signals (such as Saves) so that recommendations are relevant to the user. Our Pinners also have the ability to finetune the recommendations they receive through their Privacy and Data Settings, as



well as through Pinterest's Home Feed Tuner. For example, users can remove specific topics of interest when they no longer wish to see those recommendations. Pinners can also hide individual Pins from their home feed or unfollow the board, topic or account that the Pin came from.

[REDACTED - CONFIDENTIAL]

Pinterest's mission to deliver inspirational content that matches each Pinner's tastes and interests stands in contrast to some other online platforms, which have surfaces that are explicitly designed to uprank new content. Pinterest can also be distinguished from social networks whose defining purpose is to connect users with other people. Content on social networks may be more prone to achieving "viral" status as it becomes widely shared through peer-to-peer interactions.

Pinterest provides some features that allows Pinners to interact with one another, such as messaging, commenting, and following. However, these features are all in the service of Pinterest's mission of discovery and inspiration, rather than being the primary purpose of the service. [REDACTED - CONFIDENTIAL]

Dissemination of Content to Minors on Pinterest

Pinterest requires individual users to be 13 or older in order to create an account, and explicitly prohibits children under the age of 13 from using Pinterest. Pinterest's Community Guidelines, which outline what content is and is not allowed on Pinterest, are written with our 13+ user population in mind and broadly prohibit various types of content that are harmful to users of all ages, including, among others: pornography; content promoting suicide or self-harm; hateful or violent content; content promoting disordered eating; and health, climate, or civic misinformation.¹

There are also specific areas of our policies that focus on harms that uniquely affect younger users. For example, our Community Guidelines ban, amongst other types of content: child sexual abuse material, any content that contributes to sexualization or sexual exploitation of minors, bullying and harassment, and harmful pranks or challenges that could pose a risk of imminent physical harm or extreme emotional distress, especially if showing or encouraging the participation of minors. In other areas, content that might be permitted in other circumstances is prohibited when it involves minors, for example, content depicting alcohol use by minors.

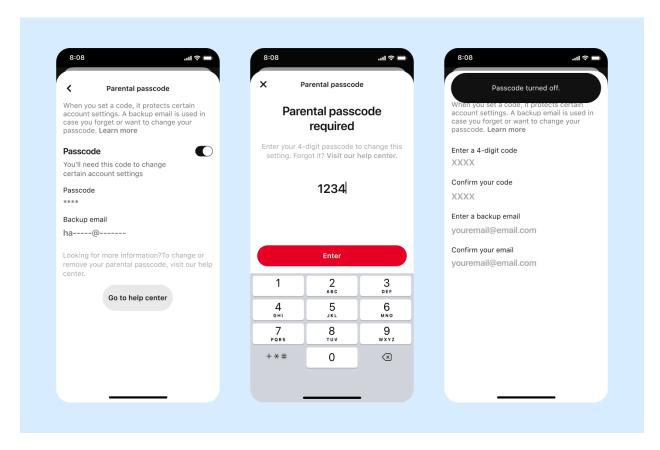
Furthermore, in addition to content moderation systems that benefit all users (discussed in more detail in the following section), we also have measures in place that are particularly focused on protecting teen users.

¹ https://policy.pinterest.com/en/community-guidelines



We enforce our minimum age requirements by requiring users to provide Pinterest with their date of birth at account registration, using a "neutral" prompt that does not indicate that the user needs to be a certain age to join Pinterest. [REDACTED - CONFIDENTIAL]

Pinterest offers a Parental Passcode feature for Pinners under the age of 18, which allows parents and caregivers to set up a 4-digit passcode to lock certain settings and have oversight of their teen's Pinterest account. These settings include those related to account management, privacy and data, public/private profile status, and social permissions such as messaging, mentions, comments, and shopping recommendations. With Parental Passcode, we aim to help parents and caregivers have more insight and control over the online interactions of minors on our platform, so they can guide and encourage responsible social media use.



On Pinterest, the accounts of users under the age of 16 are set to private as the default and only option, and the accounts of users aged 16 and 17 are set to private by default, with an option to switch to a public account. Private accounts are undiscoverable on Pinterest search and search engines, and profiles, boards and Pins for these users will only be visible to followers approved by the user. Users with private profiles are able to connect with family and friends by sending a unique profile link, and all users have the ability to review and remove followers. For teens under the age of 16, all existing



followers were removed in August 2023, so that they could decide anew who gets to follow them.

All Pinners must give permission to receive messages or collaborate on group boards with other users. Furthermore, teens under the age of 16 can only send and receive messages from mutual followers who have been accepted through a unique profile link that expires after 3 days or when they get 5 new followers with the shareable link, whichever comes first. Teens under the age of 18 can only receive messages from mutual followers, and can only receive message requests from users they follow.

For more information, please see Pinterest's teen safety portal,² as well as our Help Centre article with resources for parents and caregivers of teens on Pinterest.³

[REDACTED - CONFIDENTIAL]

Content Moderation on Pinterest

In addition to offering a personalised experience that inherently limits content from being easily, quickly or widely disseminated across our platform, Pinterest also deploys broad-reaching content policies and robust content moderation efforts to prevent the dissemination of harmful content.

These efforts are effective in drastically limiting the reach of harmful content on Pinterest. As detailed in our global transparency report,⁴ we count the number of unique users that viewed each policy-violating Pin deactivated in a reporting period for at least 1 second before it was deactivated. While there is some variance between categories of prohibited content, this data shows that across the board, policy-violating content is reaching very few Pinners. For example, in our last reporting period, 77% of Pins deactivated for violating our self-harm policy were seen by 0 users before being deactivated, with another 21% being seen by less than 10 users, 2% being seen by 10-100 users, and only 0.6% being seen by more than 100 users. Similarly, over 90% of Pins deactivated under most policies were seen by either 0 or less than 10 users before being taken down, including, amongst others, policies prohibiting adult content, child sexual exploitation, civic and medical misinformation, and graphic violence.

As detailed in Pinterest's response to Ofcom's call for evidence on the protection of children (dated 21 March 2023), to help us cultivate a positive and inspired community we develop and enforce industry-leading content policies that help in our aim to ensure our platform is a positive place. We enforce these policies through automated tools,

² https://business.pinterest.com/teen-safety-on-pinterest/

³ https://help.pinterest.com/en/article/resources-for-parents-and-caregivers-of-teens

⁴ https://policy.pinterest.com/en/transparency-report



manual review and hybrid approaches that combine elements of both, and we work with trusted third parties and the wider industry to enhance our work.

Our automated tools use a combination of signals to identify and take action against specific types of harmful and policy-violating content: adult content, child safety (including sexualization of minors), civic and electoral integrity, graphic violence, hate speech, illegal drugs, medical misinformation, self-harm, and spam. Where a system detects policy-violating content, it will deactivate or limit the distribution of the content, depending on the violation type and severity.

We also manually act on some Pins through our human review process. Pins actioned through this process may include those identified internally, those reported to us by third parties, and those reported to us by users. Pinterest uses manual review teams to review and take appropriate action on reports of harmful and illegal content and behaviour on our platform. Agents go through a robust training session at onboarding, followed by regular ongoing and ad hoc training.

Hybrid actions include those where a team member determines that a Pin violates policy, and automated systems help expand that decision to enforce against machine-identified matching Pins.

For any type of deactivation, to balance the fundamental rights of users, we have a process for Pinners to appeal if they think that a content restriction taken for a policy violation has been in error.

We also maintain a list of sensitive terms which is used to block search results or prevent content from appearing in certain recommendation surfaces (such as email notifications) where it may violate our policies, including terms associated with child safety, self-harm, suicide, drug abuse, and eating disorders. In response to searches containing certain terms, where appropriate, we display an advisory that connects users with resources if they or someone they know are in crisis. Our list of sensitive terms is continually expanding as we identify online trends, both internally and with the support of third-party experts.

To help ensure that our content policies and moderation practices are always evolving to keep up with new behaviours and trends, we engage with third-party experts to provide additional content moderation support. These third parties are experts in specific harm types, keep us informed of industry trends, and help us detect whether these trends occur on the Pinterest platform. The new and emerging trends and other signals we receive from these experts are reviewed, and where appropriate, we build these trends and signals into our content moderation tools. We may also carry out proactive sweeps of our platform based on signals provided by these third parties and update our moderation tools based on the results of those sweeps.



Thank you again for the opportunity to contribute to the important work being done by Ofcom to prepare for the enforcement of the Online Safety Bill. We are keen to continue this dialogue with Ofcom and welcome further opportunities to discuss the upcoming Online Safety regime.