

Dear Mr. Zuckerberg and Mr. Pichai,

In the past few years, you have pioneered important transparency tools to help your platform users understand, learn about and contextualise the political advertising they see. We agree that advertiser verification processes and ad repositories are key safeguards against online manipulation and misinformation. However, we are saddened to observe that these benefits have not been equally distributed among your global user base.

Each platform operates <u>fluctuating</u> and <u>often widely differing transparency standards</u> for different countries. While some users benefit from seeing political advertising in an ad repository, others do not. Where some users are offered detailed information about a political ad, others are not. There are no legitimate or otherwise publicly disclosed reasons justifying this difference in treatment.

The combined effect of these inconsistent policies is to create a two-tiered user base within each platform, with a wide regulatory gap separating the transparency haves and havenots. We first <u>highlighted these problems</u> in 2019. While some progress has been made since, we are disappointed to conclude that the transparency divide persists.

Online transparency should not be a privilege of the few, but the right of all. To that end, the changes we believe are necessary are as follows:

- Accelerate the expansion of full transparency tools to all countries where you operate
 to ensure that the least favoured countries benefit from the same level of
 transparency as the most favoured countries
- Develop, and make public, a plan of action setting out commitments and related timescales to roll out full transparency tools globally
- Disclose the full array of criteria, both past and present, used to select countries qualifying for higher transparency standards

The above changes, which we believe to be fair and reasonable, are only a starting point to begin to correct the current platform-created inequality between users. By contrast, the benefits are conclusive: heightened transparency standards for millions of users worldwide, and increased legitimacy of online political advertising for the sake of fair and informed decision-making by voters.



We urge you to take responsibility as two of the most influential platforms in online political campaigning, and empower users and voters with heightened ads transparency.

Yours sincerely,

Access Now

Africa Freedom of Information Centre (AFIC)

Aliansi Jurnalis Independen/Alliance of Independent Journalists (AJI)

Amnesty International

ApTI

Article 19

Artículo 19 México y Centroamérica

Asociación Derechos Civiles

Asociación para una Ciudadanía Participativa, ACI Participa

Associação Data Privacy Brasil de Pesquisa

Asociación para el Progreso de las Comunicaciones (APC)

Association for International Affairs (AMO) in Prague

Association pour le Developpement Integré et la Solidarité Interactive (ADISI-C)

Citizen D

Centre for Independent Journalism Malaysia (CIJ-M)

Collaboration on International ICT Policy for East and Southern Africa (CIPESA)

Balazs Denes, Civil Liberties Union for Europe

Bytes for All (B4A)



Datos Protegidos

Defend Democracy

Dejusticia

Democracy Reporting International (DRI)

Derechos Digitales

Digital Rights Foundation

ELSAM

Electronic Frontier Finland

Electronic Frontier Norway

epicenter.works

EU Disinfo Lab

Fundación Acceso

Fundación Huaira de Quito-Ecuador

Fundación Internet Bolivia

Fundación Karisma

Freedom Forum

Free Media Movement (FMM)

Global Forum for Media Development

Global Witness

Hiperderecho

Homo Digitalis

Instituto Brasileiro de Defesa do Consumidor

InternetLab



Intervozes - Coletivo Brasil de Comunicação Social

IPANDETEC Centroamérica

Irish Council for Civil Liberties (ICCL)

Laboratorio de Datos y Sociedad (DATYSOC)

Media Foundation for West Africa (MFWA)

Media Institute of Southern Africa MISA-Zimbabwe

Media Matters for Democracy

Merit Legal Advocacy & Human Rights Initiative (MELAHRI)

OBSERVACOM

Paradigm Initiative (PIN)

Privacy International

R3D: Red en Defensa de los Derechos Digitales

SFLC.in

Stiftung Neue Verantwortung (SNV)

Sursiendo, Comunicación y Cultura Digital AC

TEDIC

The Tor Project

Unwanted Witness

Usuarios Digitales

Venezuela Inteligente

Who Targets Me

World Wide Web Foundation

Xnet