



**BY EMAIL**

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Dear Meagan Barrera, Danny Rayman, and Jorge V. Cardenas:

Thank you for your September 2, 2022 email inviting us to respond to questions regarding our "human rights due diligence related to the collection and use of sensitive data that may be used to restrict access to abortion and the exercise of reproductive rights." We care deeply about protecting the privacy and other rights of our community and appreciate the opportunity to provide some insight into our work on these critical issues.

**Our Commitments to Human Rights and Privacy**

TikTok is [committed](#) to respecting human rights throughout our business. We continuously evaluate our operations to identify, assess, and address salient human rights risks; engage key stakeholders; and prioritize areas where we have the greatest opportunity to have a positive impact.

TikTok strives to create an environment where members of our community can express themselves creatively, while also maintaining their privacy. TikTok allows users to request information about their data, report privacy violations, and ask about a particular privacy issue via a [form](#) available in the privacy policy and in-app via "report a problem." Additionally, we give our users control over their privacy through "Settings and privacy" within the app, where they can make their accounts private, decide who can view each video they post, and request a copy of their TikTok data.

We also build in privacy protections from inception to launch, and our products and features undergo a privacy-by-design review to minimize the collection and retention of personal information from users. We collect and retain information needed for the platform to function, to operate securely, and to improve the user experience. As a general matter, we look to limit the data we collect from users. For example, we do not require users to provide their real names in order to create an account. We also do not ask our users for personal profile information, such as education, employment, or marital status. We do not seek to collect information that is directly related to the health of our users, nor do we currently collect precise location data about our users. However, users may voluntarily share information related to health on the platform, for example, when they post content or comments.

We are proud of the work we are doing to protect the privacy of our users, but we know we can always do more. Since the U.S. Supreme Court’s decision in *Dobbs v. Jackson Women's Health Organization*, TikTok has begun to evaluate its implications, including the impact of *Dobbs* on our platform and our broader community. We have stood up a cross-functional, internal working group that includes members of our Legal, Public Policy, and Trust and Safety teams in order to better understand how this monumental decision will affect our internal processes and users. This work is underway, and we are considering any changes we should make in response to developments arising from the decision. Accordingly, we are exploring safeguards around the collection, use, and disclosure of personal information that, while not directly health related, has the possibility of being used to infer health-related information.

TikTok evaluates and qualifies our vendors and third parties based on our third party risk management (TPRM) program, which includes a review of third party data privacy policies. Additionally, we take appropriate steps to ensure our security and privacy measures are maintained by vendors who provide services that support our Platform.

We do not sell personal information of our users to advertisers or other third parties. TikTok advertisers agree to terms that prohibit collecting or sharing health-related information on TikTok’s behalf, and bidding on keywords (or targeting TikTok users) based on “health-related” information. We are evaluating further steps to mitigate risks as part of the efforts mentioned above.

## **Our Responses to Government Requests**

TikTok is committed to cooperating with law enforcement while respecting the privacy and other rights of our users. To achieve this, we have developed [Law Enforcement Guidelines](#) governing how we handle and respond to law enforcement requests. TikTok reviews requests we receive carefully on a case-by-case basis and will only disclose user data where a request is based on a valid legal process or in exigent circumstances. In the former case, our Law Enforcement Guidelines provide fairly granular information about the type of information we might disclose based on the legal process issued (e.g., subpoena, court order, search warrant). For exigent circumstances, we limit the scope of information provided to what is necessary to provide help and avert the emergency. If a request does not meet the applicable legal

requirements, we will not disclose the data. Our Law Enforcement Guidelines specify some of the reasons why we may reject or seek to narrow government or law enforcement requests for user data. For example, we have worked to narrow overly broad requests from law enforcement agencies and negotiated about the scope, validity, and relevance of requests prior to providing information.

We also publish a biannual [Information Requests Report](#) which provides insight into how we respond to legal requests regarding user data and how many requests for information we receive. For each country, we provide the total number and type of request (legal or emergency), the total accounts specified in each request, and the percentage of requests where some data is disclosed. The report demonstrates that we will not disclose user data in response to requests that do not meet relevant legal standards or our Law Enforcement Guidelines. As of the date of this response, we have not received any information requests in the US indicating that they are connected to reproductive health. We are also taking steps to evaluate further risks and possible safeguards that could improve our law enforcement policies and procedures.

Thank you again for the opportunity to address this important issue and to provide more information on our commitment to protecting the human rights and privacy of our community. We know that there is no finish line when it comes to providing a platform that is safe for our community, and we strive to develop policies, processes, and procedures that will protect their ability to freely and creatively express themselves, while also honoring their rights to protect their personal data.

Sincerely,

*David Lieber*

[David Lieber \(Sep 23, 2022 11:22 EDT\)](#)

David Lieber  
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