



*Committee Secretary
Select Committee on Foreign Interference through Social Media
Department of the Senate
PO Box 6100
Canberra ACT 2600*

By email: foreigninterference.sen@aph.gov.au

18 September 2020

Dear Secretariat,

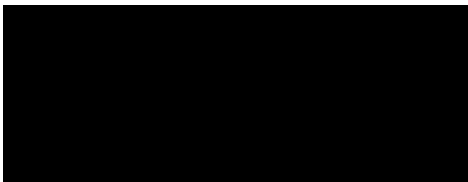
Thank you for the invitation to participate in the Select Committee's consultation process as part of the inquiry into and report on the risks posed by foreign interference through social media.

TikTok is a leading destination for short-form mobile video. Our mission is simple: inspire creativity and bring joy. We aim to cultivate an environment that encourages users to celebrate what makes them unique and express themselves creatively.

We understand that with our success comes responsibility and accountability. The entire industry has received scrutiny, and rightly so. Yet, we have received even more scrutiny due to the company's origins. Whilst we don't want TikTok to be a political football, we accept this scrutiny and embrace the challenge of giving peace of mind by providing even more transparency and accountability. We believe it is essential to show our users, advertisers, creators, and regulators that we are responsible and committed members of the community, particularly as we create more jobs and increase our investment in Australia.

This written submission aims to inform the Select Committee about who we are and what we do. We look forward to discussing these matters with you at our upcoming appearance.

Kind regards,



Lee Hunter
TikTok Australia



TikTok: inspire creativity and bring joy

TikTok is a leading destination for short-form mobile video. The app was launched in May 2017 and since then our mission has been to inspire creativity and bring joy. TikTok has connected a global community of people looking for a fun, welcoming experience.

TikTok is a participatory platform where users discover and value authentic content related to their interests. On TikTok, creative ideas matter more than social connection and users are celebrated for being their authentic selves. The content is light-hearted, real, heart-warming and truly fun.

The official launch of TikTok in Australia was in May 2019. We only recently opened an office here and hired our first local employee late in 2019. Given our recent arrival in Australia, we wanted to take this opportunity to share our approach to managing content and behaviour on the platform.

Managing content and behaviour on the platform

As you would expect from a platform of our nature, we have clear terms and policies that outline appropriate use.

Our Terms of Service (**Terms**) are available online, [here](#). These Terms include:

- TikTok reserves the right to disable a user account at any time, including if the user has failed to comply with the Terms, or if activities occur on a user's account which would or might violate any applicable laws or regulations.
- A user's access to and use of the TikTok platform is also subject to our Privacy Policy and Community Guidelines.

Our Privacy Policy is available online, [here](#). In line with industry standards, our Privacy Policy covers information on the following topics:

- The types of personal data we collect from our users
- How we use the information about users
- Information about cookies
- Who we share user's information with and how we share that data
- Where we store user's personal data
- How long we keep hold of user information
- How we notify users of changes to the privacy policy

Our Community Guidelines are an important code of conduct for a safe and friendly environment on TikTok. We recognise that our platform is home to diverse users with equally diverse views and encourage our users to have respectful engagements about the subjects that matter to them. We created our Community Guidelines, so users know exactly what is, and what is not allowed on the platform. Our Community Guidelines can be found online, [here](#).

By way of background, in October 2019 we hired a specialised law firm in the US, to help us with our Community Guidelines, increase transparency around moderation policies and further build our team of internal leaders in the US to navigate the challenges that come with a rapidly expanding company. We launched our Community Guidelines shortly after. We understand that our Community Guidelines need to continually evolve to reflect our users' needs.



We monitor the TikTok platform for content that potentially violates our Community Guidelines. Any activity that violates the guidelines may result in their content and/or account being removed. We also trust our users to respect the community and keep TikTok fun and welcoming for everyone. We ask our users to report content that they believe violates any of the Community Guidelines, so we can review and take appropriate action.

Our Community Guidelines detail that TikTok is **NOT** the place to post, share, or promote any of the following content:

Harmful or dangerous content	Any post or content that could harm other users or encourage them to harm themselves – whether through physical, emotional, financial, or legal harm.
Graphic or shocking content	Any graphic, violent, shocking, or sensational content, or any content that incites others to commit acts of violence.
Discrimination or hate speech	Any content that attacks or incites violence against other users, including content that incites hatred against a group of people based on their race, ethnicity, religion, nationality, culture, disability, sexual orientation, gender, gender identity, age, or any other discrimination.
Nudity or sexual activity	Any content that contains, promotes, or encourages explicit content, sexual assault, sexual abuse, sexual exploitation, or sexual violence.
Child safety infringement	TikTok takes child safety with the utmost seriousness. If we become aware of content that sexually exploits, targets, or endangers children, we will report cases to law enforcement and cooperate with them, as appropriate.
Harassment or cyberbullying	Any content that is used to harass other people, or deliberately degrade, humiliate, defame, or bully other people, or encourages other users to do so.
Impersonation, spam, scams, or other misleading content	Content that is spammy, fake, fraudulent, or misleading (including digital forgeries, being synthetic media or manipulated media) is prohibited and will be removed.
Intellectual property infringements	Any content that violates someone else’s copyrights, trade marks, or other intellectual property rights.
Other malicious activity	In addition to the content and behavior outlined above, our policies prohibit activity that undermines the TikTok service. For instance, anything that interferes with TikTok’s daily operation or distributes files that contain viruses, trojans, worms, logic bombs, or other material that is malicious or technologically harmful.



How this relates to misinformation and foreign interference

Misinformation or deliberate disinformation (for instance in relation to inaccurate medical information, conspiracy theories, or even influence campaigns waged by state or non-state actors to change public opinion on matters of importance) can have real world harm, and is antithetical to building a trust-based community where authentic interactions can thrive.

We continue to invest in efforts to actively identify misinformation and to prevent inauthentic behaviour. We have taken the following measures to combat misinformation, disinformation and other content that may be designed to disrupt civic processes:

1. **Enhancing our misinformation policies:** We updated our Community Guidelines to explicitly capture a broader coverage of topics related to misleading information. We also introduced a new policy which prohibits synthetic or manipulated content that misleads users by distorting the truth of events in a way that could lead to real world harm. This explicitly protects users from things like shallow or deep fakes and, whilst this kind of content was broadly covered by previous guidelines, our recent update makes our policies easier to understand and enforce. We have made our policy around influence campaigns more transparent. Our Community Guidelines already prohibit content around disinformation campaigns but the recent addition makes our stance against coordinated inauthentic behaviour unambiguous.
2. **Expanding our teams and programs:** Central to the issue of misinformation is the presence of unverified content circulating the internet that may appear to the public to be 'facts' or 'news'. To support our efforts in identifying and limiting the spread of misinformation, we have put systems in place to allow our users to easily report misinformation in-app. In turn, we have also recently introduced a third-party fact-checking program for Australia, with a team of global fact-checkers who review and verify reported content across 16 languages. If the information is confirmed to be false or misleading, we take proactive steps to remove the content in line with our Community Guidelines.
3. **Deepening our partnerships:** We continue to consult with a wide range of industry experts, academics and civil society organisations to seek guidance on improving our policies, including those that are part of our Content Advisory Council (see below). We welcome collaboration with Australian industry players and regulators. This includes working with the Australian Communications and Media Authority (ACMA), towards the development of a draft industry code of conduct on misinformation, which is due for release later this year.

For clarity, we do not accept paid political advertising on TikTok.



A COVID-19 Case Study: Our approach to misinformation in practice

We understand that we have a responsibility to protect our community from misleading information, to educate our community on why it is inappropriate to post and spread misinformation, and to encourage everyone in our community to think twice about the information provided in any given post, by providing more context and information from verified resources.

Our approach to misinformation in relation to COVID-19 and the global pandemic provides a useful case study of the steps we take to combat misinformation on TikTok.

Preventing the spread of COVID-19 requires not only enabling access to accurate information but also taking steps to limit the potential for false or misleading information to be distributed on TikTok. To that end, we introduced a global misinformation strategy, which included updates to our policies and rolling out new in-app features to provide more context on COVID-19 and help combat against misleading medical information online. We are working hard to minimise the opportunity for disinformation to gain traction on TikTok, and we are working with public health organisations (like World Health Organisation, International Federation of Red Cross, and popular voices for public health and science, like Bill Nye the Science Guy) to provide trusted information to our community.

Updates to TikTok policies

In light of the pandemic, we updated our policies in the following ways to allow us to more easily remove or limit the dissemination of harmful COVID-19 misinformation:

1. **Medical misinformation:** We remove false medical advice about COVID-19 that could cause imminent harm to a user's health, or could cause harm to public safety by discouraging people from seeking helpful medical treatment.
2. **Dangerous misinformation:** We remove false information that is likely to stoke panic and consequently result in real world harm.
3. **Conspiracy theories:** We limit the distribution of conspiratorial content that may allege that the COVID-19 was intentionally developed by a person, group or institution for nefarious purposes.
4. **Hate speech:** We remove content that suggests a certain race, ethnicity, gender or any member of a protected group is more susceptible to have and/or spread coronavirus.

In light of the pandemic and the serious risk it poses to public health, we are erring on the side of caution when reviewing reports related to misinformation that could cause harm to our community or to the larger public. This may lead to the removal of some borderline content.

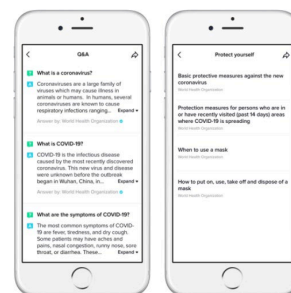
In-app features

We launched the following features within the TikTok app in order to fight against misinformation in relation to COVID-19. We connect users to authoritative sources of health information and also offer features and tools that allow users to evaluate the content that they are engaging with on the platform.

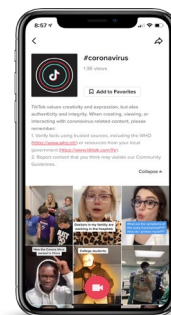


1. **Information Resource Pages:** We provide links to resources that contain links to official Government websites from over 40 countries, with information about COVID-19. We also provide educational resources and valuable information from credible sources within the app. This includes an informational page that offers facts from the World Health Organization, answers common questions, gives tips on staying safe, and busts common myths surrounding COVID-19.

While these resources aren't the reason that users come to TikTok, we want to make sure it's readily available among the creative content they're enjoying. The informational page can be accessed from the Discover tab and when users search for coronavirus-related topics, they'll also find videos from verified accounts that provide trusted information from reliable sources.



2. **Public Service Announcement (PSA) in respect of Coronavirus Hashtags:** In January, we launched a PSA in respect of hashtags related to the coronavirus. The PSA reminds users of our community guidelines and presents them with resources to find accurate and up-to-date information. We launched the PSA in 20 languages within 24 hours of settling on the idea. This demonstrates TikTok's commitment to moving quickly to keep our users and platform safe.



3. **Providing access to trusted resources in the search function:** In February we launched in-app notices on the top results page, which appear when a TikTok user explores hashtags related to coronavirus. The in-app notice provides easy links to [local health resources](#) and reminds users of our Community Guidelines, which prohibit misinformation that could cause harm to an individual's health or wider public safety.

We also help our users gain access to trusted and verifiable information by directing them to our Covid-19 [Resource "Hub"](#). When users search for Covid-19, coronavirus or other related hashtags or terms, they are directed to “learn the facts about Covid-19” through the Hub. To ensure as many users as possible are directed towards the Hub, it is permanently pinned to the top of the Discover tab (one of the main ways a user discovers and explores content on TikTok). The Hub provides three key areas of information from the World Health Organisation

- Advice on how to avoid catching the virus
 - Helpful ‘mythbusters’ content and
 - A series of questions and answers about the global pandemic.
- Globally, the Resource Hub has had over 350 million views.





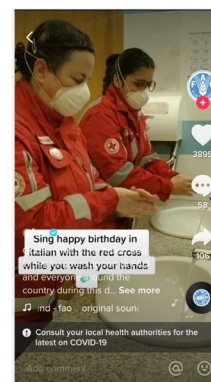
4. **Limiting 'auto-suggest' for misinformative hashtags:** To limit the views in relation to content containing COVID-19 misinformation, we restricted the 'auto-suggest' search function for certain hashtags. Specifically, hashtags that relate to known misinformation that credible authorities like the CDC and World Health have debunked. So, for instance, if a user starts to type "coronavirus" into hashtag search, "coronavirusbleach" or "coronavirusclorox" will not automatically populate as a suggested search result. We also work to restrict auto-suggest for hashtags related to conspiracy theories as and when these conspiracy theories gain traction online.



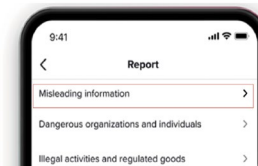
5. **Notice Tag (Warning Banner):** In March, we started featuring banners on videos that are tagged with Coronavirus hashtags, which directed and encouraged users to consult their local health authorities for the latest information on COVID-19.

On viewing a video with a Coronavirus or COVID-19 hashtag, a banner with the following text appears across the bottom "Consult your local health authorities for the latest on COVID-19."

We also provide a link to TikTok's informational page on videos that may relate to coronavirus and remind users to seek accurate information from credible sources.



6. **New ability for users to report content in-app:** To help limit the potential for the spread of coronavirus and health-related misinformation, we have also introduced a dedicated reporting reason for COVID-19 misinformation. Users can now report videos and content to us, if they think it contains misleading information so that we can investigate and take appropriate action in accordance with our Community Guidelines.



Transparency and Accountability

We have built a TikTok Transparency and Accountability Centre in Los Angeles, and we are building another in Washington DC. These centres provide outside experts an opportunity to directly view how our teams at TikTok go about moderating content on the platform.

Visitors to the Centres will have the opportunity to review:

1. How our trained content moderators apply the Community Guidelines to review the content and accounts that are escalated to them via user reports and technology-based flagging, and to identify additional potential violations that the technology may miss
2. Our data security practices and the measures we're taking to safeguard user privacy and information and
3. Review and learn how our application's algorithm operates.



Additionally, TikTok source code will also be made available to qualified Government personnel at the Centre for testing and evaluation.

While the full opening of the physical Transparency and Accountability Centres is unfortunately delayed due to the Coronavirus pandemic, we have now made adjustments so that we can offer virtual tours for parts of the experience.

Last year we published our first **Transparency Report** to provide clear data about government requests for users' account information and other legal notifications, and we will continue to do so regularly. Through these regular updates, outside experts will have the opportunity to better understand the actions we take.

Here are our transparency reports to date:

- Report for January 1 - June 30, 2019 (published December 30, 2019)
- Report for July 1 - December 31, 2019 (published June 30, 2020)

TikTok Content Advisory Council

We also have an external council of leading experts advising TikTok on content moderation policies covering a wide range of topics - the TikTok Content Advisory Council. This Council brings together thought leaders who can help us develop forward-looking policies that not only address the challenges of today, but also plan ahead for the next set of issues that our industry will face.

The Council members have a diverse array of backgrounds and perspectives, and have spent much of their lives researching, studying and analysing issues such as child safety, hate speech, misinformation, and bullying. We call upon our Council to provide unvarnished views on and advice around TikTok's policies and practices as we continually work to improve in the challenging area of content moderation, including how we deal with misinformation on TikTok.

The current members of TikTok's Content Advisory Council are:

- Rob Atkinson, Information Technology and Innovation Foundation, brings academic, private sector, and government experience
- Hany Farid, University of California, Berkeley Electrical Engineering & Computer Sciences and School of Information, is an expert on digital image and video forensics, computer vision, deep fakes, and robust hashing
- Mary Anne Franks, University of Miami Law School, will provide valuable insight into industry challenges including discrimination, safety, and online identity
- Vicki Harrison, Stanford Psychiatry Center for Youth Mental Health and Wellbeing, is a social worker at the intersection of social media and mental health
- Dawn Nunziato, Chair, George Washington University Law School, is an internationally recognized expert in free speech and content regulation
- David Ryan Polgar, All Tech Is Human, is a leading voice in tech ethics, digital citizenship, and navigating the complex challenge of aligning societal interests with technological priorities
- Dan Schnur, USC Annenberg Center on Communication and UC Berkeley Institute of Governmental Studies, brings valuable experience and insight on political communications



The Content Advisory Council has met a number of times already. The first meeting focused on platform integrity, including policies against *misinformation and election interference*. As our company grows, we are focused on reflection and learning as a part of company culture and committed to transparently sharing our progress with our users and stakeholders. Our hope is that through thought-provoking conversations and candid feedback with the Content Advisory Council, we will find productive ways to support platform integrity, counter potential misuse, and protect the interests of all those who use our platform.

Addressing misinformation about TikTok

Finally, we would like to take this opportunity to address misinformation about TikTok's connection to China.

We note and welcome the Prime Minister, Scott Morrison's recent comments with respect to TikTok. After reported investigation by security agencies, the Prime Minister stated there was "nothing at this point that would suggest to us that security interests have been compromised or Australian citizens have been compromised because of what's happening with those applications."

Nevertheless, it is timely to reiterate that TikTok is committed to building an app that continues to respect the privacy of our users and to being even more transparent with our community. We know that security is a job that is never finished, and we'll continue to aggressively build an experience that respects and protects our community.

TikTok is a ByteDance Ltd (**ByteDance**) product. ByteDance is a privately-owned company, and investors include the founder, Yiming Zhang, and major institutional investors such as Sequoia Capital, General Atlantic and Softbank. The Board of Directors comprises two Chinese citizens, two US citizens and a French citizen.

As a global platform, TikTok is offered in all major markets *except* China (where ByteDance offers a different short-form video app called Douyin) and Hong Kong. As publicly reported, we withdrew TikTok from the Hong Kong market following the introduction of the new security law.

As outlined in our Privacy Policy, the personal data we collect from Australian users is stored on servers located in the United States and Singapore.

We have strict controls around security and data access. As noted in our Transparency Reports, TikTok has never shared Australian user data with the Chinese government, nor censored Australian content at its request.

We apply HTTPS encryption to user data transmitted to our data centres and we also apply key encryption to the most sensitive personal data elements. User data is only accessible by employees within the scope of their jobs and subject to internal policies and controls. Further, any legal requests from the Chinese Government relating to Australian TikTok user data would need to go through the Mutual Legal Assistance Treaty (**MLAT**) process. MLAT is an agreement between states outlining the terms for managing cross-jurisdictional requests for evidence. The Chinese Government or law enforcement would need to send the evidence disclosure request through the relevant MLAT process. If, for example, a request came through in relation to Australian user data that was stored in the US, the US Department of Justice (**US DOJ**) would consider the MLAT request. If the US DOJ approved the evidence request, the US DOJ would send the request on to us at TikTok. If the request from the US DOJ complied with our processes and legal requirements, we would provide the user data information to the US DOJ, who would



in turn pass the data on to the Chinese Government or law enforcement.

To date, we have not received any MLAT requests in respect of Australian user data, nor have we received requests to censor Australian content from, the Chinese Government.

It has been widely reported that ByteDance has been considering various strategic alternatives to meet the requirements of the US Government that may result in a change to the TikTok business in Australia. We would be happy to provide the Select Committee updates on such changes as and when appropriate.