

EXHIBIT 6

9.17.2018

App Developer Investigation & Enforcement

September 2018 Status and Re-scoped Approach



ADI Timeline to Date

March 2018 – April 2018

- March 21: Mark committed to investigate and audit all suspicious v1 apps
 - “We will **investigate all apps** that had access to **large amounts of information** before we changed our platform to dramatically reduce data access in 2014, and we will conduct a **full audit of any app with suspicious activity.**”
- April 5-6: Final decisioning regarding which outside consultants to engage
- April 6: **Phase I** kick-off; DevOps prioritization of initial review through App Litigation Tool (“ALT”)
 - Prioritized by buckets (P0, P1, and P2) across multiple APIs
 - P0 Platform started with ~3200 apps, overall v1 prioritization currently covers **11 million apps**
 - ALT reviewers staffed through DevOps (from a group of 60, rotating team of 30-40 reviewers)
- April 9: **Phase II** kick-off (in advance of Mark’s April 10 testimony); engaging of Stroz Friedberg and FTI Consulting as ADI investigators, under direction of GDC
- April 23: First wave of ADI investigators and attorneys provisioned
- April 26: ADI investigators begin background investigations and initial reports for review, feedback, and refinement

ADI Timeline to Date

May 2018 – September 2018

• May-June:

- May 9-10: Project Analytica Summit
- Onboard provisioned consultants
- Learn Facebook systems and data sources
- Develop actionable understanding of Mark's commitment
- Develop ADI protocol and set up process
- Develop templates for background investigation reports and technical review reports
- Conduct initial background investigations, review reports, and give feedback
- Develop templates for RFIs and set up RFI protocols
- Explore tracking tools on various platforms and begin developing ADI tracker tool (SPARTA) in collaboration with data security, engineering, and other teams at Facebook to ensure long-term, secure solution
- Begin developing protocols for onsite audits
- Investigate, create reports and analyses, and assist in decisioning on numerous high-priority escalations
- Maintain presence onsite to set up process, oversee outside investigators, and support crisis management

• July-September:

- Onboard additional provisioned consultants and attorneys due to scope and data security considerations
- Continue learning Facebook systems and data sources, identify and attempt to resolve data integrity issues
- Refine actionable understanding of Mark's commitment and resulting scope of ADI process based on learning to date
- Refine ADI protocol and process
- Ongoing background investigations, reports, and review
- Refine templates for technical review reports and manage associated data integrity issues
- Refine RFI templates and process
- Refine and launch ADI tracker tool (SPARTA)
- Refine protocols for onsite audits
- Investigate, create reports and analyses, and assist in decisioning on numerous high-priority escalations
- Maintain presence onsite for swift and nimble mobilization in response to shifting demands of investigation and high-priority escalations

ADI Goals & Approach

What Constitutes ADI Success? – Goals

- Near Term:

- Honor Mark’s commitment in a timely fashion
- Have a credible, systematic, defensible, accurate, and privileged process
- Enforce on apps that are misusing PII
- Refer to FB and support potential action against platform misuse uncovered by ADI, which may not fall under Mark’s commitment
- Have a credible, systematic, defensible, and accurate way to report our progress internally, and to users and regulators, while maintaining the investigation’s flexibility and privilege

- Long Term

- Deepen understanding of how developers and apps are misusing and have misused data on the FB platform and ensure learnings are disseminated
- Create a sustainable and credible model for a continued, privileged enforcement program against platform misuse
- Create a reliable internal program for managing internal reporting, and reports to users and regulators, while maintaining credibility

ADI Status

As of September 17, 2018

The Numbers

Total Apps Reviewed under “Initial Assessment” (Phase 1):	22,238
Apps Escalated for “Enhanced Examination” (Phase 2):	3,697
Apps with completed Background Investigation (FTI/Stroz prelim rec provided):	1,790
Apps GDC has reviewed and provided preliminary recommendations:	1,599
Apps GDC has recommended for RFI:	1,372
RFIs sent (actual)	425

Learnings and Takeaways

- Developed case management tool (SPARTA), which can be used for other purposes, including for in-house team
- Developed insight into available data and limits on data reliability and availability
- Developed enforcement “tool kit”

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ADI Status – Hi-Pri Escalations

As of September 17, 2018

- ADI and GDC have handled 30+ hi-pri escalations to date
- Hi-pri escalations typically arise from a source other than the ALT/ADI workflow, e.g., internal Facebook reporting, media reports, or political interest
- Gibson Dunn, FTI, and Stroz work up the app in around 48-72 hours, although some investigations take around a week
- The full work-up may include: a background investigation/report, a technical investigation/report, a factual summary and analysis, an analysis of potential policy and legal violations, developed recommendations on next steps, comms consultations, regulatory response consultations, and (if the developer has counsel) communications with counsel
- The list below represents escalations handled in roughly the last 3.5 months, since mid-May 2018

Profile Technology / Profile Engine	Fast Likers Developers	QuizStar	GupShup	Crimson Hexagon
CubeYou/CPC / You Are What You Like	myPersonality data takedowns (GitHub, Tableau, Kaggle, RapidMiner, Google)	Social Video Downloader	Meltwater / Connect	Spredfast
CPC/Stillwell/Kosinski / myPersonality	Social Sweethearts	Zubizu	Branch.io	Sysomos apps
CPC/Stillwell / Apply Magic Sauce	VonVon	Censia	Mail.ru	
Guard.Social / Social Pain Killer	Sync Me	Moves Platform	TrolleyBust	
Project Peoria	Becklicka	AIQ / WPA	TimeHop	
CPC/myDays	Social Data Hub	Lovoo/Voo	Walrus Music	

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ADI Goals & Approach – To Date

ADI review started with App Litigation Tool (“ALT”) review, built off DevOps prioritization (P0, P1, P2)

- For Platform, DevOps used the following prioritization:
 - P0 (highest pri): >2 million installs, created before 2015, and access to sensitive user and friends’ permissions
 - P1: >100k installs, created before 2015, and access to sensitive user and friends’ permissions
 - P2: >10 installs with public profile
- Similar P0, P1, and P2 buckets were developed for additional, non-platform Products (e.g., Pages, Messenger, Media)
- Included other escalations (Data Abuse Bounty, Data Abuse Detection, others like media)

Apps escalated from ALT are investigated by ADI team in Enhanced Examination Phase

- Background and technical investigations by FTI and Stroz to identify apps with potential misuse of Facebook account holders’ data that could result in legal claims by or against Facebook
- Depending on situation, ADI team may send RFIs to developers, may audit developers, and then recommend enforcement (can include suspension or suspension-plus (e.g., enhanced fan-out, C&D, civil referral/litigation))
- ADI team also handles rapid response escalations (high-pri apps subject to media inquiry or escalated by internal Facebook teams)

ADI Goals & Approach – Revised

Risk-scoped prioritization approach to complete ADI by end of 1Q19

- **ALT and ADI to complete review of P0**
 - Complete review as quickly as possible consistent with other risk priorities and hi-pri escalations
 - ~1,700 apps (Instagram, Messenger, Media) remaining for ALT to review
- **Risk-based prioritization of other pre-2014-platform-changes apps for ADI review**
 - Review focused on riskiest apps and developers based on [9-13] risk-based prioritization categories, incorporating learning from ADI efforts to date (this will capture some, but not all, apps in the original P1 and P2 categories)
 - Categories being developed and tested include:
 - Top 50 developers (Apps)
 - Public Data
 - Academics
 - Suspicious v1 Activity
 - Risky Permissions
 - Social App Developers (Quiz/Game/Horoscope)
 - High-Risk Jurisdictions (with add'l China/Russia focus)
 - Insights/Advertising Companies
 - Prior Enforcement
 - Child-focused
- **Remainder of apps not reviewed by ADI will be handled by in-house team**

ADI Goals & Approach – Revised

- **Risk-based prioritization of other pre-2014-platform-changes apps for ADI review (cont.)**
 - ***Top 50 Developers***
 - Goal: Review the developers who created the most apps as potentially raising increased risk
 - Status: Launched pilot of 6 top developers of v1 apps, divided between FTI (TFM-CRM Apps, 91APP – TWD, Gameloft) and Stroz (Tobit.Software, EFUN, Qublix Games)
 - Pilot to include (a) developer background investigations and (b) for small selection of apps (~5%, up to 20) per developer, background and technical investigations for each app.
 - Apps selected using Risk Prioritization Formula, with more apps investigated if circumstances warrant
 - Pilot will generate background reports on sample of 6 top developers, which collectively have 11,667 v1 apps (out of 23,699 non-test apps overall (i.e., including v1 and v2 apps) for those 6) and technical reports on approximately 120 apps (top 20 of each of 6 developers)
 - See summary by bucket on next slide

ADI Goals & Approach – Revised

Top 50 Developers (cont.)

Apps > 10 Users			Apps > 1K Users			Apps > 100K Users		
Business ID	Name	# of v1.0 Apps	Business ID	Name	# of v1.0 Apps	Business ID	Name	# of v1.0 Apps
884664228226327	Tobit Software	9,404	860762973953309	TFM - CRM Apps	634	10152129083228034	Zynga Inc.	61
860762973953309	TFM - CRM Apps	1,792	842028852496710	育駿科技股份有限公司	558	676478429054178	IGG Main-Self01	60
842028852496710	育駿科技股份有限公司	630	513859462091934	Lidl INT Business Manager	268	819593788117586	Gameloft	58
480274312075744	Clarin	395	480274312075744	Clarin	169	817443311612275	Six Waves Inc.	41
513859462091934	Lidl INT Business Manager	377	179419815562115	Facelift BBT	141	631423240309624	EFUN	34
510613342398529	91APP - TWD	293	10152769303050219	Our.com	127	842028852496710	育駿科技股份有限公司	34
179419815562115	Facelift BBT	227	884664228226327	Tobit Software	117	1744482895786860	Web2mil S.A.	29
10152793383194542	Friend2Friend	163	676478429054178	IGG Main-Self01	116	571441229626493	Funplus	29
792673854088628	Lubię to - linked by Isobar	152	631423240309624	EFUN	115	10153064712010763	Tangelo Games	27
747847051945478	Uversity	144	747847051945478	Uversity	107	843200289041879	GamePoint International BV	27

Apps > 300K Users			Apps > 1M Users			P0/P1, v1, Platform Apps		
Business ID	Name	# of v1.0 Apps	Business ID	Name	# of v1.0 Apps	Business ID	Name	# of v1.0 Apps
10152129083228034	Zynga Inc.	59	10152129083228034	Zynga Inc.	55	819593788117586	Gameloft	53
819593788117586	Gameloft	50	819593788117586	Gameloft	39	10152129083228034	Zynga Inc.	51
676478429054178	IGG Main-Self01	37	817443311612275	Six Waves Inc.	27	817443311612275	Six Waves Inc.	23
817443311612275	Six Waves Inc.	37	343996589117033	Qublix games	24	10152568573772002	Miniclip SA	22
10152684163208775	Rockyou Inc	25	10152684163208775	Rockyou Inc	21	10152684163208775	Rockyou Inc	18
343996589117033	Qublix games	25	571441229626493	Funplus	19	10152769303050219	Our.com	17
571441229626493	Funplus	25	990210080994955	Ludia Inc.	18	10152770370384538	Mindspark Interactive	17
431107583706523	Artrix Limited	21	343910162456695	CookApps	16	739465616120649	深圳市东方博雅科技有限公司	17
10152398839704640	MegaZebra	19	1146513688695997	Game Insight UAB	15	882139301981231	SCDS	16
10153064712010763	Tangelo Games	18	493124377481268	King	15	10152398839704640	MegaZebra	15

ADI Goals & Approach – Revised

- **Risk-based prioritization of other pre-2014-platform-changes apps for ADI review (cont.)**
 - ***Social App Developers (Quiz / Game / Horoscope Apps)***
 - Goal: Review apps that are games or quizzes, i.e., “social apps,” because the viral nature and business model of such apps make them well-suited to deceptive collection of data for purposes of sale and as a category have a history of being problematic.
 - Status: Launching pilot of 7 major entities in this space, to be reviewed by Stroz, which will cover ~700 apps
 - ***Public Data***
 - Goal: Review the apps of developers that have either: (1) undergone a corporate event—such as M&A, sale of assets, or bankruptcy—involving FB data; or (2) experienced a data breach potentially compromising FB data
 - Status: Under development.
 - “Corporate event” workstream: Identified 12 possible entities; continuing efforts to match entities with apps/developers (have matched 2 of 12 currently identified), and continuing to refine searches to identify more entities; will plan to launch pilot on representative set of entities.
 - “Data breach” workstream: FTI identified 16 relevant entities that can be mapped onto FB’s platform, fan-out of these entities produced 1332 apps, however, there is difficulty ascertaining whether FB data was implicated and reservations regarding whether breaches can be tied to misuse.

ADI Goals & Approach – Revised

- **Risk-based prioritization of other pre-2014-platform-changes apps for ADI review (cont.)**
 - ***High-Risk Countries***
 - Goal: Review apps of developers located in certain “high-risk” jurisdictions, because those jurisdictions may be governed by potentially risky data storage and disclosure rules or be more likely to house malicious actors
 - Status: Under development
 - We ran preliminary queries on a test set of 9 suggested countries to understand the number of developers in those jurisdictions and review any facially interesting results—see next slide for numbers of developers
 - E.g., some countries have a relatively small number of developers that created pre-2014 apps; Iran had a significant number of seemingly Russian developers
 - Based on a review of lists prepared by government agencies (e.g., State Dept., FBI, OFAC) and watchdog organizations (e.g., FireEye), we have now identified 28 countries for our review, and elaborated the rationale for including those countries
 - E.g., states known to collect data for intelligence targeting and cyber espionage
 - We will separately review China and Russia, given the risk associated with those countries
 - For other jurisdictions, we have identified them as tier 1 and tier 2 risk to assist in prioritizing
 - We are in the process of identifying the total number of developers in each country, and will take into account learnings from other categories to prioritize our review of this category

ADI Goals & Approach – Revised

- Risk-based prioritization of other pre-2014-platform-changes apps for ADI review (cont.)
 - *High-Risk Countries*

Developers in Test Set of High-Risk Jurisdictions	
Summary of Developers by Predicted Country	
<u>Country</u>	<u># of Developers</u>
China	86,961
Cuba	250
Iran	2,533
North Korea	21
Russia	42,078
Sudan	647
Syria	929
Ukraine	34,624
Vietnam	76,813

* Country determination is based on the country field in the dim_all_users_sensitive:bi table.
 * Only includes developers of apps with over 10 installed users. Excludes developers and apps identified as Facebook internal.

ADI Goals & Approach – Revised

- **Risk-based prioritization of other pre-2014-platform-changes apps for ADI review (cont.)**

- Risks/Issues

- How this pivot will be conveyed publicly and to regulators and how it will land in terms of addressing Mark’s commitment and regulator’s view of comprehensiveness
- Review will largely not utilize ALT
- Review addresses both P1 and P2, but does so through sampling review of developers and apps determined to be most potentially risky, rather than review of all apps and developers
- Relies on in-house team to address remainder of P1 and potentially large amounts of P2, with risk in terms of ability to adequately scale in-house team
- Internally, we’ve historically focused on P0/P1/P2 and numbers of apps, this will require a new way to think about assessing the number of developers and apps by risk (with potentially many more thousands of apps addressed in “sampled” manner)
- Challenge in measuring progress and at end of 1Q19, will have to transition remainder to in-house team regardless of number of apps and developers reviewed

APPENDIX

ADI Team & Pace

Where We Are Today

- **ALT** has reviewed 0.1% of the 11 million apps and objects that DevOps has identified for ADI review (11,435 as of August 8)
 - ALT has escalated approximately 20% of apps it reviews (2,373 as of August 8)
- **Stroz Friedberg and FTI Consulting** have over 60 and over 130 consultants working on ADI, respectively
 - Combined, they are producing about 150 background reports on escalated apps per week (total of 1,238 as of August 8)
 - Stroz and FTI each have personnel onsite, which facilitates speedy interaction with multiple Facebook groups
 - Stroz, FTI, and GDC, are constantly ready, and regularly called upon, to assist with high priority and other escalations
- **Gibson Dunn** has attorneys onsite daily, overseeing ADI and ready to handle rapid response escalations; there are often as many as 5 hi-pri diversions a day
- **Looking Ahead**
 - Given the number of apps, our original estimate was that the current structure would operate through at least 2020
 - Having now completed about four months of review this work, we have a better understanding of the process and risk
 - **Now is an opportunity to reflect and consider alternative approaches to better risk-calibrate the investigation**

ADI Goals & Approach

How Do We Achieve ADI Success? – Long-Term Approach

- Identify and eliminate policy violations committed by third-party developers and apps, especially misuse of user data
- Build review process, protocols, and tools (e.g., SPARTA, automated RFI tool) that will outlast immediate ADI tasks and create scalable approach to analyzing and enforcing against apps
- Work with internal experts—engineers, data scientists, privacy experts, policy experts, etc.—to seamlessly integrate that process with existing structure and policies
- Coordinate, direct, and manage enforcement actions, including litigation and pre-litigation negotiations
- Coordinate and communicate with key FB stakeholders to build, improve, and communicate process and progress
- Develop and maintain strategy for external reporting regarding ADI

ADI Goals & Approach

Apps Currently in Queue for ADI Review Based on DevOps Prioritization (as of September 17, 2018)

App Review Progress By Platform/Priority

Priority	Product	Total	Reviewed	Not Escalat..	Escalated
P0	Pages	1,105	1,105	879	226
	Platform	3,243	3,243	2287	956
	Audience Network	240	240	197	43
	Groups	686	686	548	138
	Event	28	28	25	3
	Games	444	444	366	78
	Lead Ads	86	82	57	25
	Messenger	1,118	915	818	97
	Media	100	2	2	0
	Instagram	1,405	0	0	0
P1	Pages	4,749	1,938	1671	267
	Platform	33,556	12,131	10557	1,574
	Audience Network	1,322	5	3	2
	Groups	726	1	0	1
	Event	642	0	0	0
	Games	4,425	1	1	0
	Lead Ads	163	3	3	0
	Messenger	2,135	7	7	0
	Media	16	1	1	0
	Instagram	2,617	0	0	0
P2	Pages	14,313	92	85	7
	Platform	8,859,216	586	499	87
	Audience Network	243	0	0	0
	Groups	790,995	14	11	3
	Event	6,282	1	1	0
	Lead Ads	1,921	0	0	0
	Messenger	1,188,886	66	59	7
	Media	15,106	1	1	0
	Instagram	9,120	0	0	0

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