

Exhibit 14

Soft Matching for Cross-Account Data Use Policy - Core Definitions

Last updated: 4/25/23

Note: This policy is intended to provide the core definitions for cross account soft matching, and also exceptions for permissible use. A broader Privacy Knowledge Library (PKL) article is currently under development, however this document is currently the canonical reference for soft matching policy at Meta.

Context

Meta faces continued scrutiny from privacy and competition regulators regarding the use of user data across the family of apps. For example, Meta is subject to enforcement by the German Federal Cartel Office (FCO) and has received enquiries from the Irish Data Protection Agency (IDPC) regarding the use of cross-account data. As a result, in 2021, Meta decided to deprecate inter-app soft matching, and to not permit any new intra-app use-cases.

This document defines what is, and is not, considered soft matching, and sets strict global policies on how and when cross-app data can be used.

A concise and clear definition of soft matching at Meta is critical as teams develop cross-app and cross-account experiences, ensuring that these experiences comply with our regulatory obligations, but also support Meta's business goals.

Core Definition

Soft matching is defined as follows:

'Cross-account data use is considered soft matching where data is used to match the same user across two different Family of Apps accounts without user permission (either explicit or implied).'

Detailed Soft Matching Definition and Policy

- The scope of the policy is Meta Family of Apps, in particular Facebook, Instagram and Meta (RL). Matching with WhatsApp users and with 3PD data are subject to independent restrictions and are out of scope of this policy.

- This policy covers the use of cross-account data for all FoAs for both inter-app usage (e.g. FB:IG), and intra-app usage (e.g. IG:IG).
- Soft matching, as defined by this policy for both inter-app and intra-app is not permitted; existing intra-app use-cases can continue to operate, however, no new use-cases are allowed.
- Core Definition: ***Cross-account data use is considered soft matching where data is used to match the same user across two different FoA accounts without user permission (either explicit or implied).***
- 'Permission', as it relates to permitting cross-account data use, requires:
 - An action from the user;
 - Sufficient transparency for the data use that is being permitted;
 - A full PXFN review and approval for each use-case.
- Whether the resulting matched data is persisted or transient is not relevant to whether the data sharing is considered soft matching or not.
- Cross-account data use that is not used to match user accounts across FoA accounts, but used for other purposes, is not soft matching. Examples of purposes that are not considered soft matching are:
 - **Aggregates and models** - Aggregates and models that process cross-account data are permitted.
 - **Using device-side cross-account data (e.g. use of Native Auth)** - *Pending updates as of 4/5/23*

Currently, soft matching is permitted for three purposes:

- **Integrity, Safety and Security** - For example, when Meta has taken action in response to a violating account on Facebook after identifying inappropriate interactions with children. This data use exception allows Meta to take proactive steps to determine whether the owner of that account also has accounts on other apps and, where appropriate, take action across apps.
- **Family Accounting** - This use is permitted in order to de-duplicate the number of users on the platform for internal and external reporting purposes.
- **Operation Logging** - Operational logging allows Meta to monitor, detect, and repair defects in Meta's products and anomalies in Meta infrastructure – i.e., when Meta's products and infrastructure don't work as designed. Cross-account data may be used from operational logs for three broad purposes related to offering users a reliable service:

- Troubleshooting technical issues raised through user-initiated bug reports;
- Monitoring/detection – i.e., detecting abnormal patterns (for example, detecting significant latency only for one app, but not for another); and,
- Developing more reliable infrastructure to prevent future anomalies on various Meta apps.

Importantly, these logs may not be used for production purposes, meaning they must not be generally available for providing product functionality like ads or content. An example of a permitted operational logging use would be to confirm whether an internal centralized tool related to photo compression and storage is failing for only one Meta app or multiple Meta apps on the same device.

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