



Age Assurance Follow-up

Global Velocity
January 27th, 2025

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EXHIBIT
EX. 04812

Context

Dec 2024

GV greenlit plans to prepare for Google-wide minor inference to rollout in 2025 in the US, with an YouTube-led announcement as part of Neal's annual letter early February

For today

Recap & dive deeper into:

1. What does the **YT and Google-wide announcement** look like?
2. What is our **ads depersonalization impact mitigation strategy**? (Project Pine)

01 Age assurance announcement



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YouTube announcement

Feb 11
Safer Internet Day

Within annual letter from the CEO

- Already includes points on youth
- Newsy, but tempered

Same day Safer Internet Day blog covering a
YouTube Kids & Teens products and partnerships



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“And that's why we'll be
deploying AI in 2025 to
help us determine a
user's
age—distinguishing
between younger
viewers and adults—to
ensure they receive the
best and most age
appropriate experiences

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Google fast follow announcement

Feb 12

Within a broader K&F blog

We're bringing our built-in protections to more kids and teens, supporting parents with additional tools to guide their family and empowering kids & teens with helpful product experience.

- **Protections:** Sensitive Content Warnings in Messages, testing Age Assurance
- **Supervision:** School time & Trusted contacts
- **Experiences:** Google Wallet for Kids, responsibly enabling more GenAI products for teens



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“We will begin testing a machine learning-based age estimation model in the U.S. This model helps us understand whether a user is over or under 18 so that we can apply our age-appropriate protections. We’ll bring this

[Link to full draft](#)

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GV AI from Jan 27: review YT announcement language

Jan 27 YouTube language:

And that's why we'll be deploying AI in 2025 to help us determine a user's age—distinguishing between younger viewers and adults – to ensure they receive the best and most age appropriate experiences and protections.

Alternative YouTube language:

And that's why we'll use machine learning in 2025 to help us estimate a user's age – distinguishing between younger viewers and adults – to help provide the best and most age appropriate experiences and protections.

FYI Google language:

We will begin testing machine learning-based age estimation model in the U.S. This model helps us estimate whether a user is over or under 18 so that we can apply protections to help provide more age-appropriate experiences. We'll bring this technology to more countries over time.



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02 Ads mitigation options

Project Pine



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Recap from 12/16:

Potential modifications for ads

p13n accounts for >90% of YouTube and <20% of Search impact

Recommend

Ongoing work

Better definition of personalization

Project Pine improves relevance for all users including U18 via contextualization and customization

Impact: Line of sight to **reduce p13n impact by ~25%** (potential further upside)



Focus for today

New working group led by APAS

Scope better ads experience for kids & teens

Improve relevance (corpus & customization) and experience (format, standards) for kids & teens to unblock ecosystem value & improve experience for minors

Explore customization/personalization within a set of kid-focused, positive categories

Impact: Neutral - positive (requires scoping)

Do not recommend

Risk on policy/legal/regs/PR

REDACTED - PRIV



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Slide 8 Notes

- Project Pine is a global effort that mitigates the risks of consent and our overly broad scope for personalization today - it has some known immediate upsides we've quantified, but additional levers that are in line with what we think is possible within regs (and also some of what Meta already does). Pine should not require a walk back on u18 or other major commitments.
- There are also additional levers we can deploy to improve the youth ad experience overall, with the objective of raising the floor on experiences for kids and advertisers and increasing the value of this segment. Examples include a specialized kids content corpus to improve ad relevance/quality, age appropriate format standards like skips and click protections, and simpler workflow to increase the volume of quality advertiser demand. There is headroom but it is not well-quantified yet.
- Walking back our global u18 commitments to the 'Meta' level, outside of regulated markets, does not have much upside beyond what we will get through Pine. Beyond the obvious risks, it requires opening a conversation requiring redefining personalization in their terms (advertiser targeting, other oblique statements), which creates halo risks for us overall.
- The only way to materially realize upside from a walk-back would be to go even beyond what Meta restricts, and allow broader personalization, which would counteract the issue of restrictive campaign targeting that constricts YouTube spend.

Summary of Project Pine

Problem: Our ability to personalize (p13n) ads for users is eroding globally due to distinct reasons (user choices required by regulations, increase in segments we don't p13n like U18, platform changes like ATT)

Project Pine: Improve how Google serves useful ads in a world where fewer users are able to get personalized experiences. Pine is the Ads arm of a xPA aligned effort to make Google more resilient with increased user consent pressures.

The initial focus is on investing in 3 levers:

- 1 Session optimizations
- 2 User declared signals
- 3 Launching in-product onramps for users to enable full ad p13n



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2025 primary goal: Launch lever 1 - session optimizations - to signed-in users on Search & YouTube where we project ~\$1.2B in revenue growth, primarily driven by Search Ads

Global age assurance: The recent global age assurance decision is one example of the type of constraint Pine is solving for.

- Launching session optimizations on Search & YouTube by EOY would mitigate \$200-300M ARR of the overall impact of the global age assurance policy change.
- Pine is investing in additional opportunities applicable to U18, but estimates are not yet vetted

Risk: Legal

REDACTED - PRIV**REDACTED - PRIV**

Public statements on ads personalization



Continuing to Create Age-Appropriate Ad Experiences for Teens

January 10, 2023

“We’re further restricting the options advertisers have to reach teens, as well as the information we use to show ads to teens... removing the ability for advertisers to target teens based on their interest and activities, ... gender ... and their engagement on our apps”



Meta’s approach allows for U18 targeting based on age, location and session data



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Giving kids and teens a safer experience online

Aug 10, 2021

We’ll be expanding safeguards to prevent age-sensitive ad categories from being shown to teens, and **we will block ad targeting based on the age, gender, or interests of people under 18.**



Advertising Policies Help

June 15, 2022

Google’s Ad-serving Protections for Teens policy implements additional safeguards. **On Google Accounts of people above the digital age of consent but under 18, we:**

- **Disable ads personalization**
- **Restrict sensitive ad categories**

Today, Google requires consent for all forms of ad tailoring

	Tailoring type	G		∞	
		Adults	Teens	Adults	Teens
No ads tailoring	Basic contextual (live query/video only, including general location)	Default on, no controls		Default on, no controls	
Full ads tailoring	Session optimizations based on intra-session 1P activity (recent session activity)	Consent/GAP control	Not available	Default on, no control	Default on, no control
	User declared signals, including preferences (topics, brands) and demographics (age, gender)**	Consent/GAP control	Not available	Default Available	Age allowed, no control
	Profiling based on previous 1P activity (inferred)	Consent GAP control	Not available	Always used, no controls outside EU	Not available
	Data shared by 3Ps (remarketing, network/web traversal)	Consent/GAP control	Not available	User control	Not available



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* Users will still have history collection controls available that limits session optimizations

** How/if Google enables explicit targeting for u18 TBD based on forthcoming decisions

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EX. 04812.00012

Project Pine redefines 2 ads tailoring approaches to no longer require p13n consent

		G		∞	
Tailoring type		Adults	Teens	Adults	Teens
No ads tailoring	Basic contextual (live query/video only, including general location)	Default on, no controls		Default on, no controls	
Some ads tailoring	Session optimizations based on intra-session 1P activity (recent session activity)	NEW: Post-Pine Currently requires p13n consent Default on, no control*		Default on, no control	Default on, no control
	User declared signals , including preferences (topics, brands) and demographics (age, gender)**			Default Available	Age allowed, no control
Full ads tailoring	Profiling based on previous 1P activity (inferred)	Consent GAP control	Not available	Always used, no controls outside EU	Not available
	Data shared by 3Ps (remarketing, network/web traversal)	Consent/GAP control	Not available	User control	Not available



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** How/if Google enables explicit targeting for u18 TBD based on forthcoming decisions

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EX. 04812.00013

Project Pine's roadmap

1

Session optimizations

User activity from within current session to improve ad relevance

Launch MVP EOY '25 (aggressive target)

Impact: **\$1.2B** est. revenue growth
(Details in next slide)

2

User declared signals

User provided signals (e.g. MAC preferences, MAC declared demo)

Planning & dev in '25, **Launch H1 '26**

Impact: **More analysis needed**

3

Increase user addressability

Shift p13n ineligible users into eligible state, show users value of p13n in product (in-product onramps and prompts)

Launch MVP EOY '25 (aggressive target)

Impact: **~\$200-300M** per 1ppt increase in GAP coverage

Increase value of p13n ineligible accounts

Shift p13n ineligible to eligible state



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1

Session optimizations have \$1.2B ARR revenue potential in 2025

Pine session optimizations uses a p13n ineligible user's activity from within a session to improve ad selection (GAP OFF and U18)

Launch: Aggressive goal by EOY

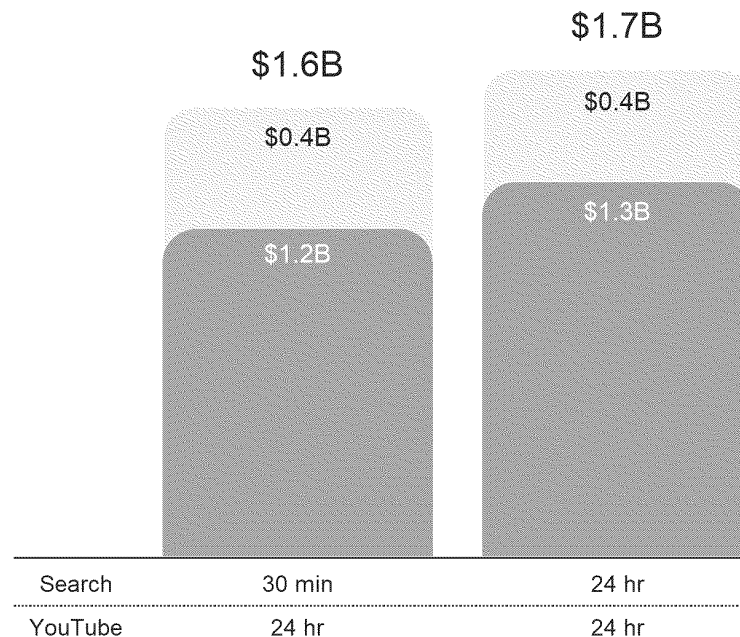
- Scope: Search & YT signed-in users (2025)
- Alignment: Search approved organic session optimizations, YT supportive

Impact:

- + Revenue growth (global): \$1.2-1.3B
- + Additional \$400M safeguarded in the event of EU consent pressures on GAP
- + Incremental \$200-300M ARR of revenue mitigated after global age assurance roll out (up to 25% of total expected dep13n losses - [appendix](#) for more)

Revenue Safeguarded (EU)

Revenue Growth (Global)



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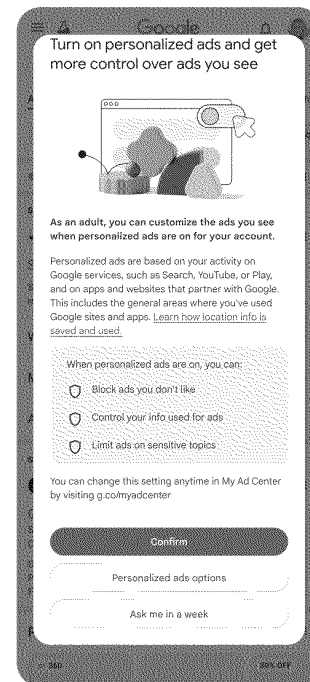
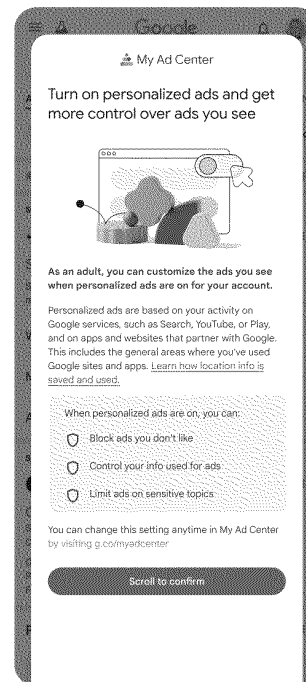
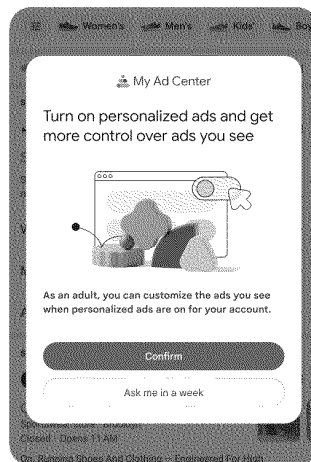
Shifting recent adult users to more fully p13n eligibility

Launching new graduation experiences for newly eligible users that recently turned 18yo.

Illustrates Pine's goal to increase user eligibility for full personalization via in-product onramps to consent.

Launch: H2 2025

Impact: Across all users (i.e. primarily adult accounts), a ~1ppt increase in global coverage of GAP generates ~\$200-300M in ARR



Graduation Experience as of 1/7/2025



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Appendix GAPP strategy

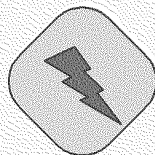


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GAPP Strategy for Age Assurance Rollout

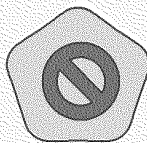
Topline goal

Positively shape policies and legislation focused on the protection of minors



Offensive Strategy

- Engage KOFs in key markets to understand and support our approach and POV on age assurance.
- Shape legislation and rule text to align with our roadmap, protect signed-out, and offer liability protections
- Maintain age inference as a valid method of age assurance (e.g., in Codes)
- Develop an industry framework with key partners



Defensive Strategy

- Develop narrative to defend longer lead times in APAC, EM, and Canada given time needed for data collection
- Educate privacy stakeholders to reassure them about privacy and data collection.
- Avoid feeding narrative that app stores should be responsible for the whole ecosystem / proactively push back on Meta proposal.

GAPP Strategy Detail

- **US Congress:** Leverage this as a key moment for proactive outreach with Committees and influential KOSA/COPPA constituencies, to show leadership and open doors for shaping federal kids legislation as it remains highly dynamic in Q1.
- **US Administration:** Pick the right moments for targeted outreach to build relationships with incoming administration with an interest in kids (e.g., possibly the first lady's office, FTC, Surgeon General).
- **Privacy and Expression 3P:** Proactive engagement to reassure them of the privacy preserving nature of our approach and emphasis on not affecting expression. Where appropriate, enlist help in defending signed out.
- **Kids 3P:** Earlier prebriefs to establish leadership and where possible, generate a positive quote or commentary, build credibility as industry-leading constructive participants on this issue.
- **Other Markets:** Australia, Brazil, Canada, Japan, and Singapore are prioritized for outreach because of market prioritization, regulatory engagement, and likelihood of legislation. South Korea and India as well but there are complexities to work through.

Broad based outreach but prioritized to those most relevant to debate and priority legislation - 50 engagements planned so far with more expected

Slide 18 Notes

- **US Congress:** Leverage this as a positive moment for proactive outreach with CST / E&C Committees and key KOSA/COPPA constituencies, to show company leadership and strengthen our ability to shape federal kids legislation as it remains highly dynamic in 2025.
- **US Administration:** Pick the right moments for targeted outreach to build relationships with incoming administration with an interest in kids/teens issues (e.g., possibly FTC, Surgeon General, FLOTUS office (Be Best initiative) and fold into ongoing outreach efforts. Reactively manage any challenges (e.g. intersection with COPPA, request for more detail than we're comfortable sharing).
- **US States:** Use selectively where lawmakers show attention to policy substance; use in states with high-impact bills and regulations (e.g., New York, Florida, Maryland, California) to support our policy compliance narrative and shape precedent-setting obligations. Weigh opportunities to share the announcement in a deeper dive (e.g., state lawmaker AI bills working group) in an effort to fortify advocacy around legislative knowledge standards. For other states/bills, use reactively and closely monitor potential impacts on problematic proposals such as app store bills.
- **Privacy and Expression 3P:** Early proactive engagement to demonstrate our voluntary, thoughtful approach, reassure 3Ps of the privacy preserving nature of our approach with emphasis on our careful consideration of expression and access to information issues. Where appropriate, enlist help boosting signal (such as through working group newsletters), (if it arises) in defending signed out, and mitigating any public FUD/incorrect information. Inform and prepare groups for anticipated impacts on down-the-line issues like sharing age signals.
- **Kids 3P:** Earlier prebriefs to establish leadership and, where possible, generate a positive quote or commentary, build credibility as industry-leading constructive participants on this issue. Where appropriate, enlist help in signal boosting (such as through working group newsletters) and mitigating any public FUD/incorrect information.
- **APAC/EM/Canada:** Proactively reach out to KOFs in priority markets to brief on our approach as part of efforts to shape legislation and manage potential concerns around longer rollout by emphasizing our thoughtful and careful approach in balancing the best interests of children. Canada, Australia, Japan, Singapore, Brazil are prioritized for outreach because of overall market prioritization, regulatory engagement, and likelihood of legislation. South Korea and India are prioritized for outreach as well but there are additional complexities to work through.

Appendix



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U18 GenAI Governance

PA	VP (monthly)	Director (monthly)
Core	Jen F	Ganesh [REDACTED]
K&I	Ori [REDACTED]	Kartikeya [REDACTED] (Search) Zoe [REDACTED] (K&I)
GDM	Amar [REDACTED] Eli [REDACTED]	Jennifer [REDACTED] Dave [REDACTED] Tulsee [REDACTED] (Base model)
P&D	Mindy [REDACTED]	Sophie [REDACTED] (Android) Yael [REDACTED] (Photos) Michal [REDACTED] (Pixel)
EDU	Ben [REDACTED] Shantanu [REDACTED]	Jen [REDACTED] (GWfE) Rob [REDACTED] (Learning)
T&S	Laurie [REDACTED]	Dave [REDACTED]



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Highest priority experiences to unblock for minors ahead of age assurance roll out

	Product / feature	A18 status	Teen priority (U18)
K&I	Learn About X (standalone)	Launched	Committed Q1
	AI Mode (incl Learn About)	Q2	Committed Q2
GDM / Research	Gemini Image Gen	Launched	Committed Q2
	Gemini Live	Launched	Committed Q2
	Gemini Premade Gems (e.g., learning coach)	Launched	TBC
Labs	NotebookLM	Launched	Committed H1
P&D	GenAI Photo Editing Effects	Launched	Committed Q2
	Pixel AI Features (Screenshot & Studio)	Launched	Committed Q1
	Android Tools (e.g. gboard, talk back, stylus)	Launched	Committed Q2

With readiness, signed-in impact ~\$1.5-\$2.1B ARR

- \$1.3B due to depersonalization of ads mostly on YouTube
- \$0.8B due to restricting ads from mature categories (gambling, alcohol) mostly on Search, a non-regretted loss
- Impact based on [rollout timing](#): \$0.6B in 2025, \$1.3B in 2026
- Note: without readiness work, impact could be as high as \$4.4B

Additional mitigations could further reduce depersonalization impact by \$200-300M+

- Better definition of p13n to improve relevance for all users, including u18 (line of sight to reduce impact by \$200-300M via Project Pine, needs final approvals)

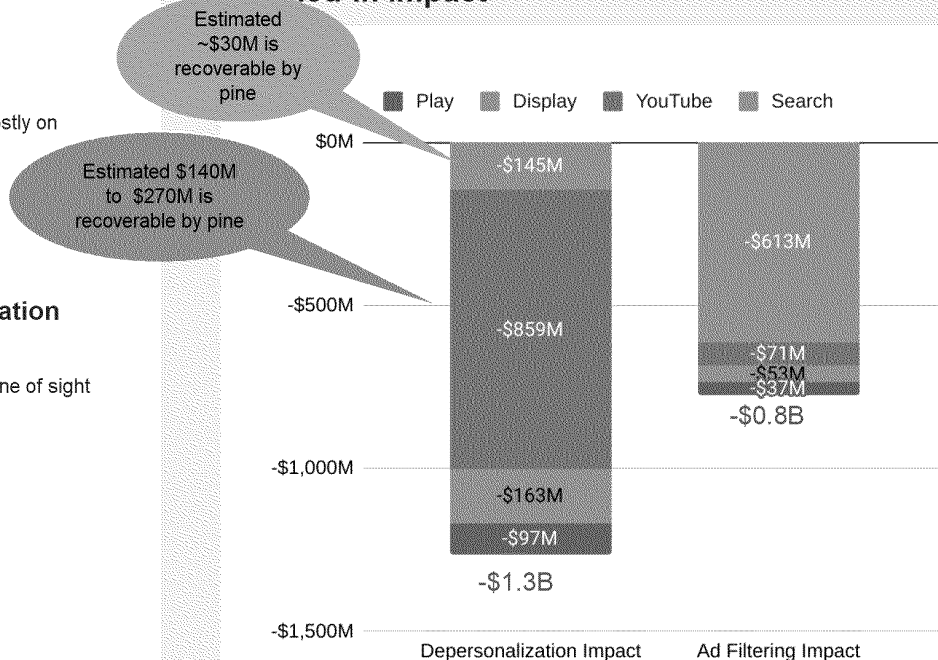
Key readiness prerequisites

- Inference model calibration (Q1 2025 for US, EO2026 ROW)
- Product rollout readiness incl minor mode exit (Q2 2025)
- Unblocking P0 GenAI experiences (not a financial impact)

Risk of inference being required on signed-out

- Treating signed out inference as a redline due to [product concerns](#) - model performance is inherently limited, goes against user expectation of anonymity and believe we can & should rely on baseline protections ([more details](#))
- However we were required to roll out signed out inference in EEA and similar treatment would add \$1.0B as well as Search DAU impact
- GA believes voluntary inference in signed-in helps defend signed out

Signed-in impact*



*Revenue impact modeling is done using EEA roll-out of AADC for personalization and 2025 ads policy experiments for ad filtering. Impact is estimated to be \$1.5-\$2.1B. Range due to estimations (e.g. longer-term impact as budget shift, changes in YouTube surface share). We are using \$2.1 B to show the breakdown across properties and impact category for simplicity.

What Pine isn't - options not actively part of Pine

- **Not viable without radical changes to global regulatory structures**
 - Mandate 1P p13n ads for all users → major walk back of user promises with complex interaction with organic controls.
 - Tailor p13n definitions on a per country / regulation basis → onerous technical feasibility with ambiguous revenue upside.
- **Not impactful enough given complexity or risks**
 - Merge ads & organic p13n consents → not viable in the EU and not as problematic in less regulated markets like the US.
 - Launch per “issue” mitigations, e.g. specific fixes for teens, or specific fixes for various US states → difficult to solve for and typically less impactful in isolation.
 - Launch per product GAP consents → similar challenges as today’s structure, complex data model for xProduct data sharing, and puts pressure on new / emerging products
- **Being investigated in other contexts**
 - Project Alta and Project Swift in Ads are exploring major reworkings of our consent structures, however, are currently pending initial legal analysis. These will likely focus on simplifying our consents for 3P data usage.
 - Paywalls for users rejecting p13n → this is not part of Pine, but is often discussed in the context of ePrivacy Directive in the EU

Privileged and Confidential, Reflects Advice of Outside EU counsel - Need to Know

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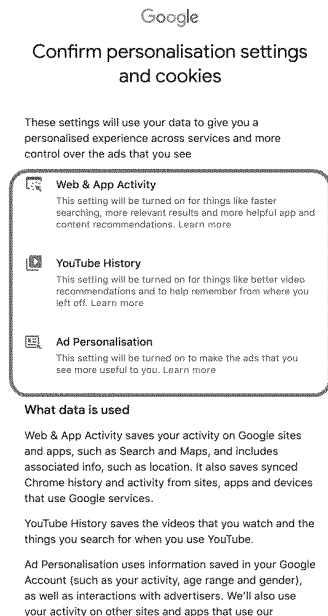
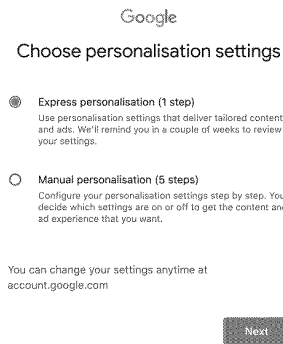
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Historically, the majority of users on O&O were fully addressable for personalized experiences

Personalization has been critical to Google's ability to build engaging products and serve users highly relevant ads, underpinning **\$XXB** in incremental revenue per year

Until ~2022, the vast majority of Google's traffic - both signed-in and signed-out - were eligible for personalized ads.



Slide 23 Notes

- Personalization has been critical to Google's ability to build engaging products and serve users highly relevant ads, underpinning \$XXB in incremental revenue per year
- Historically, the majority of users on O&O were fully addressable for personalized experiences

Today, all forms of tailored ads require p13n consent

Personalized Ads. When an adult user has Ad P13n (GAP) enabled, we can do all forms of ad tailoring. We call this ***personalized ads***:

- use of any observed user activity across O&O surfaces, including search history, watch history, app installs, and prior ad events;
- 3P data provided by advertisers and publishers;
- customization features such as declared demographics, and availability and use of Ad tuning features offered by My Ad Center; and
- inferences based on the above.

Contextual Ads. When a user disables GAP, we are only eligible to use “**contextual ads**” signals - where the current view of “context” is narrowly defined as the info from current e.g. query, video, general location. These are *contextual ads*.

More details on Ad p13n: [go/ad-p13n-overview](#)



For more tailored ads,
turn on personalised ads

Step 3 of 4

Choose whether to turn on personalised ads

- ☐ Show me personalised ads
Tailors the ads that you see based on your activity and other data, and lets you block advertisers or ad topics that you're not interested in.
- ☐ Show me generic ads
You'll still see ads, but they won't be personalised. Instead, they'll be based on general factors like the time of day, general location and content of the page you're looking at.

What data is used

We'll tailor ads based on your activity on Google services, such as your queries on Google Search, videos that you watch on YouTube, and apps that you install on your Android device, ads or content that you interact with and

that partner with Google. We don't show you personalised ads based on sensitive categories, such as race, religion, sexual orientation or health.

We don't sell your personal information to anyone.

How you can manage your data

You can update your preferences for ads on Google services, and on apps and websites that use Google services, at [g.co/adsettings](#).

Learn more about personalised ads

Back

Next

English (United Kingdom)

Help

Privacy

Terms

Slide 24 Notes

- Personalization has been critical to Google's ability to build engaging products and serve users highly relevant ads, underpinning \$XXB in incremental revenue per year
- Historically, the majority of users on O&O were fully addressable for personalized experiences
- With GDPR as the tipping point, we formalized our approach of ad personalization (previously known as things like behavioral advertising, interest based advertising, 'targeted' advertising) in order to establish the proper legal basis for which to process data. Our user control for this is GAP, or the google ad personalization control. It's available for all users, globally, but in consent-requiring markets we obtain consent, while other markets are default on and users can change it at any time.

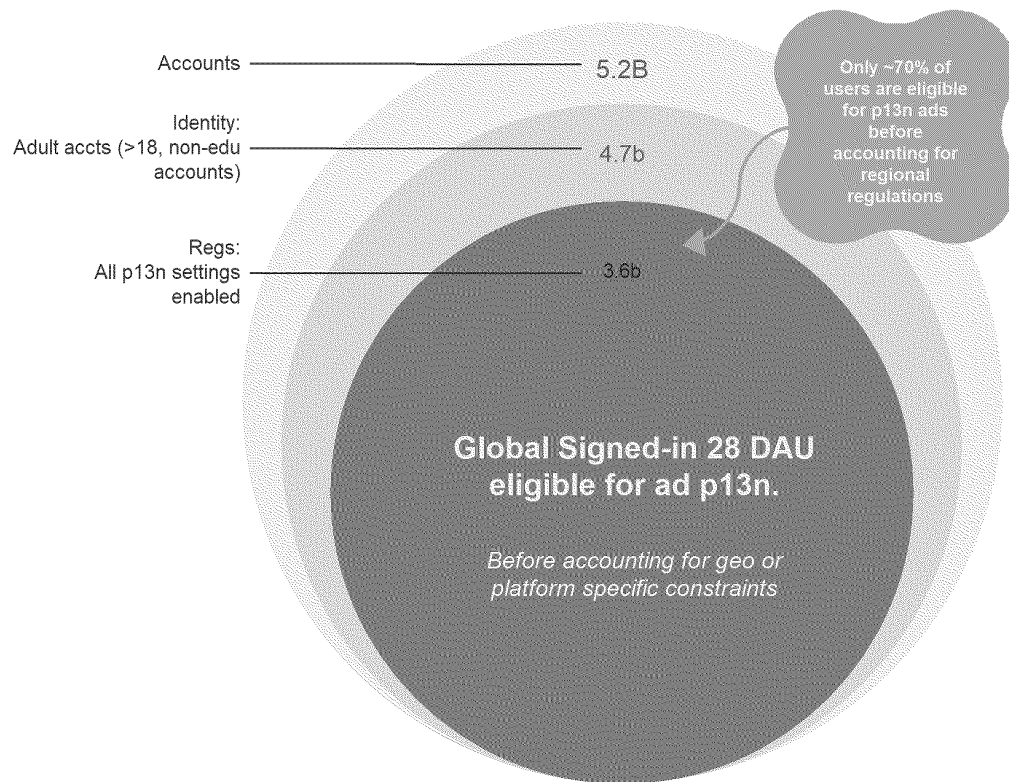
However, users eligible for ad personalization are shrinking under various pressures

Identity: Laws and internal policies restrict ad personalization based on identity states like U18 or Dasher.

Regulations: GDPR, ePrivacy, DMA all require user choices for profile based personalization including Ads. Google offers these choices globally, though default states vary. Emerging US laws are introducing similar constraints.

Platforms: Ad specific policies like ATT on iOS limit envelope of data available to ad p13n systems.

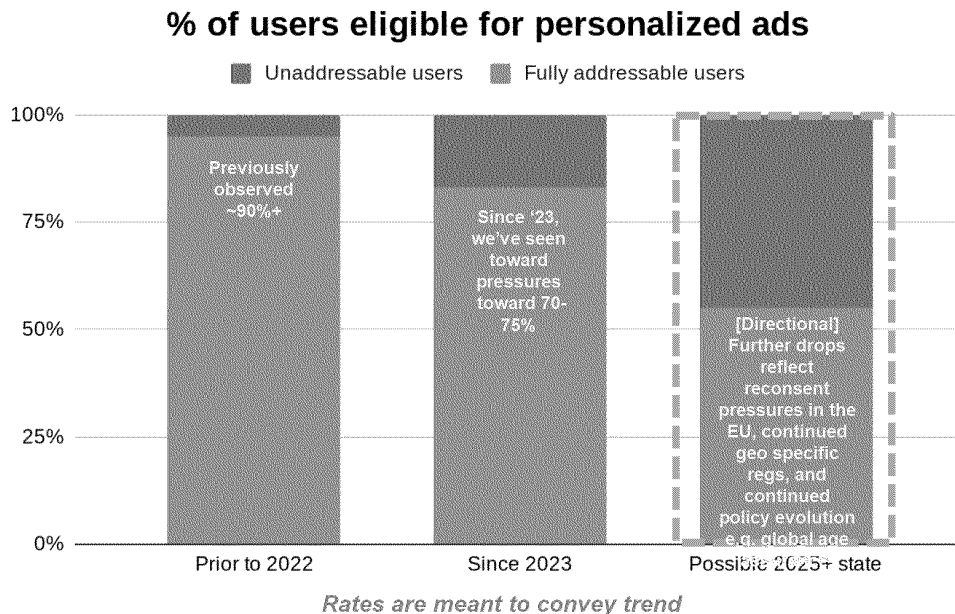
Specific regs & platform policies worsen the problem by applying limits on narrower slices of traffic (US state laws, browser defaults), but in total still meaningfully reduce % of users eligible for ad p13n.



Users unaddressable for p13n ads may be our *fastest growing* user segment

Project Pine anticipates that significant reductions in users eligible for p13n ads could cost ~\$XB. Even as organic traffic grows, revenue growth will be limited by user addressability.

Ads has kicked off Project Pine to build solutions that position Google and our ad relevance systems to be durable in the face of these pressures



Program risks

Pine is a complex, Google-wide effort which will change the user experience on major surfaces like Search & YT

- **c15n launch timing**

- Updating internal definitions around contextual ads will require policy changes and system redesign.
- Coordination of xProduct changes to support may introduce delays.
- Legal approvals may be challenging, may take time (incl regulator briefings), and may require risk acceptance.

- **External environment**

- Google is currently navigating numerous regulatory engagements all focused on our consents and data processing for personalization and ads.
- Pine and the related organic changes may invite further attention from key regulators like the Irish DPC, French CNIL, and US FTC.

In our favor:

- xPA incentives are currently well aligned, as the Google-wide consent program has been contemplating these changes in recent years.
- Meta's rollout of their new "Pay", "Personalize", or "Less Personalized" user states in the EU was actually well received by the EU Data Protection Board (EDPB).

Privileged and Confidential, Reflects Advice of Outside EU counsel - Need to Know

Ads global age assurance mitigations not considered

- **Not viable without walking back external commitments**
 - Evaluate the harm of personalized ads to teens with experts and narrowly address the findings
 - Personalize ads for older teens (16-17)
- **Not impactful enough given complexity or risks**
 - Tune inference model to higher precision (vs. recall)
 - Increase ad load for non-personalized users (all users, not just minors)
 - Limit ads depersonalization impact to a single PA
 - Geographically limit inference to selected regions
 - Enable age targeting for **inferred** minors
- **Possible but requires further research**
 - **Project Pine** → Enable age targeting for **declared** teens

U18 Growth Oppty: Scope a better ads experience for kids & teens

- With a **350% increase** in the minor population, ensuring a delightful experience is even more important. It also increases the business impact of improvements.
- Address **experience debt** from previous compliance efforts
 - Allow all U18 graduates to engage with ads p13n (Complete, Q4 2024)
 - Drive awareness of ads p13n choices with graduation campaigns (Q2 2025)
 - Remonetize minors on Search and EDU accounts (EO 2025)
- Create a **vibrant global youth ecosystem**
 - Improve advertiser engagement for potential policy violations (EO 2025)
 - Increase advertiser understanding of U18 policies (UXR)
 - Better advertiser tools to engage with U18 audiences (UXR)
 - Streamline delivery of ads that are relevant to U18 users (UXR)
- **Additional avenues** to be researched / explored:
 - Enhanced ad targeting to parents
 - Dedicated children's corpus
 - Kid & teen relevance scoring system
 - Universal skip ads for minors
 - Age-appropriate format standards

Slide 29 Notes

NOTE:

- Experience debt is like technical debt, suboptimal experiences that need to be addressed as a result of a solution.
- Remonetize cohorts:
 - **[P0]** Remonetize U13s on Search
 - **[P0]** Remonetize U18s on EDU accounts (Project Quilt)
- Additional ideas we are exploring:
 - Enhanced Ad Targeting to Parents: Develop privacy-preserving mechanisms to target ads to parents and guardians based on signals suggesting they have children of specific ages (e.g. supervisors of minor accounts).
 - A Children's Corpus: Assemble a dedicated corpus of text and visuals classified as safe and interesting for different age groups. This can power machine learning models that ensure contextual ads are relevant to the child's interests.
 - Relevance Scoring System: Establish a relevance scoring mechanism that evaluates ads on their suitability for specific age cohorts. This score would influence contextual ad placement and auction dynamics.
 - Universal Skip Ads for Minors: Empower all minors to easily skip ads, reinforcing a sense of control and safety.
 - Click-through Prevention: Prevent young children (e.g., under 13) from accidentally clicking on ads and being redirected away from the content they're enjoying.
 - Format standards: Create a series of common sense format standards that includes maximum number of ad interruptions per hour of play/watchtime, pixel requirements for X-outs (since smaller hands may have difficulty x'ing out of ads), and disabling certain ad types for younger users, including rewarded ads formats. 2023 Insights
 - Age-based Restrictions: Explore an approach where very young children (e.g., under 8) are not shown ads directly. Instead, target parents with contextually relevant content.

Appendix

December 16th, 2025 discussion



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Age Assurance

Part 2

Global Velocity
December 16, 2024

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Follow up from 12/10 discussion

- 01 What does a **YouTube-led announcement** look like?
- 02 What have been our **external statements on ads personalization** and potential for modifications?
- 03 How do we defend our **approach for signed out?**
Appendix
- 04 What is the **product experience for inferred U18** users and are there opportunities to fine tune?
- 05 How does the **platform level age assurance relate to 1P age assurance** and why is it not a near term solution?
- 06 What is the **role of parental controls?**



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YouTube-led announcement

Rather than make a stand-alone announcement, **leverage annual letter** from CEO

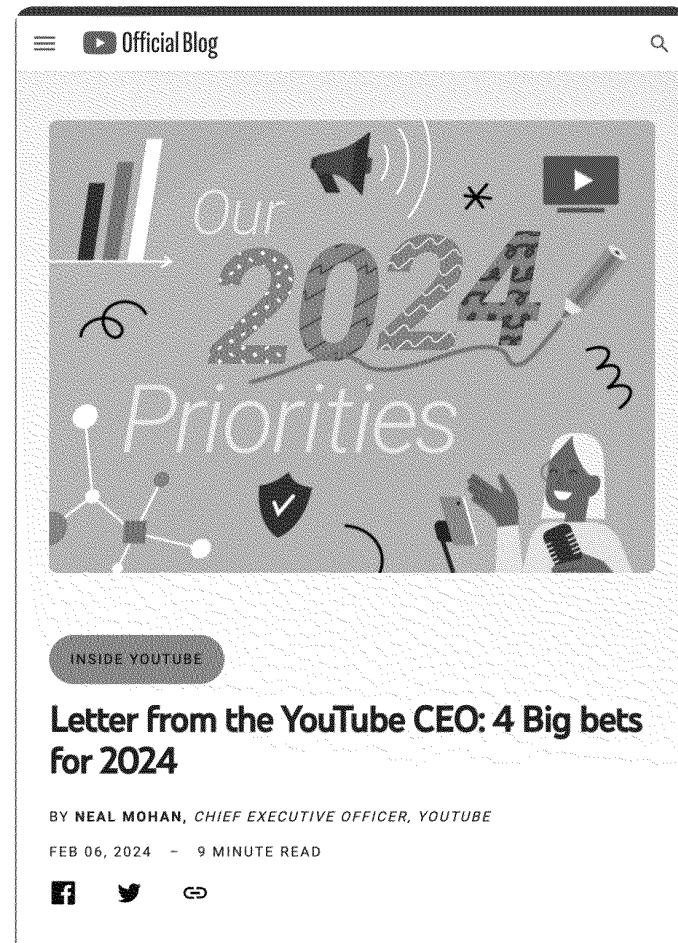
- Appropriate for YouTube-first announcement
- Already includes points on youth
- Newsy, but tempered

State intention to use and improve technology to better understand the age of users, broadly

Leave specific details to subsequent future Google-wide announcement



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Slide 33 Notes

<https://blog.google/technology/families/giving-kids-and-teens-safer-experience-online/>

<https://blog.google/technology/families/how-were-helping-kids-and-families-safely-learn-grow-and-play-online/>

<https://blog.youtube/inside-youtube/youtubes-principled-approach-children-teenagers/>

YouTube-led announcement

EXAMPLE TEXT....That's why over the years, we've invested in a range of tailored experiences to meet their unique needs, for example, making uploads private by default for younger users, or offering families the ability to create supervised accounts for teens. This year, we'll go even farther—we're deploying AI-powered technology that helps us distinguish between younger viewers and adults. We can then use that signal to deliver age-appropriate experiences and protections. Our goal is to start testing this in the US this year and we'll have more details to share in the months to come.



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Slide 34 Notes

<https://blog.google/technology/families/giving-kids-and-teens-safer-experience-online/>

<https://blog.google/technology/families/how-were-helping-kids-and-families-safely-learn-grow-and-play-online/>

<https://blog.youtube/inside-youtube/youtubes-principled-approach-children-teenagers/>

Ads personalization policy

Ads personalization policy flows from global child protections principles & research

- 196 countries signed onto UN Convention on the Rights of the Child that emphasizes “best interest of the child”
- Many countries applying this legislatively to restrict personalized ads to minors
- Research reinforces children’s brain more susceptible & vulnerable to behavioral advertising

A SVP-level decision was made in Aug 2021 to roll out child protection policies globally

- Context: year long compliance review of UK & IE¹ legislation that explicitly prohibited behavioral advertising to minors
- Meta announced July 2021 new global policies, including advertisers could no longer target teens based on interests or activity on other apps / websites
- Privacy Council decided on a principled narrative (vs. compliance narrative) for our minor protections, requiring a global roll out
- Our global narrative has kept us out of some of the most intensive scrutiny (e.g., recent hearing where companies apologized to families of child victims)



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Slide 35 Notes

1 *UK Age Appropriate Design Code and Irish Fundamentals of Child Oriented Data Processing*

Industry statements on ads personalization



Continuing to Create Age-Appropriate Ad Experiences for Teens

January 10, 2023

"We're further restricting the options advertisers have to reach teens, as well as the information we use to show ads to teens... removing the ability for advertisers to target teens based on their interest and activities, ... gender ... and their engagement on our apps"



Meta's approach allows for U18 targeting based on age, location and session data



Protecting minors on TikTok: advertising initiatives

Last updated: October 2024

Europe

"users in Europe aged 13-17 no longer see personalised advertising based on their activities on or off TikTok"

US

"Restrictions against targeting [users under 18] based on Gender, Interests & Behaviors, or any other detailed targeting option."



"If we know you are under 18, we won't show you personalized ads. You may still see ads, but they will not be selected based on what we know about you.

We will never use your email, human-to-human chat, files or other personal content to target ads to you."



SnapChat

"Most targeting and optimisation tools will no longer be available for advertisers to personalise ads for Snapchatters in the EU and UK under the age of 18. Now, personalisation of ads to these Snapchatters will be limited to basic essential information, like language settings, age and location."



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Slide 36 Notes

Meta allows for targeting based on age and location, they have removed the allowance for targeting based on interests, engagement or gender.

We in contrast do not allow for targeting based on age for u18

So we say you can't specifically try to reach those users. Facebook says, you can reach 18 year olds but we won't let you find 18 year olds that specifically like sports or dance or makeup or whatever

<https://about.fb.com/news/2023/01/age-appropriate-ads-for-teens/>

<https://ads.tiktok.com/help/article/protecting-minors-on-tiktok-advertising-initiatives>

<https://newsroom.tiktok.com/en-eu/compliance-digital-services-act-eu>

<https://www.microsoft.com/en-us/privacy/young-people>

<https://newsroom.snap.com/digital-services-act-snap?lang=en-GB>

Roblox ([source](#)):

Ads on Roblox are only served to users ages 13+, and personalized ads are not served to users ages 13-15. For users 16 and above, your default ads settings may vary by region.

Our external statements on ads personalization

Giving kids and teens a safer experience online

Aug 10, 2021

We'll be expanding safeguards to prevent age-sensitive ad categories from being shown to teens, and **we will block ad targeting based on the age, gender, or interests of people under 18.**

We'll start rolling out these updates across our products globally over the coming months. Our goal is to ensure we're providing additional protections and delivering age-appropriate experiences for ads on Google.

≡ Advertising Policies Help

June 15, 2022

Google's Ad-serving Protections for Teens policy implements additional safeguards. **On Google Accounts of people above the digital age of consent but under 18, we:**

- **Disable ads personalization**
- **Restrict sensitive ad categories**

Blogs help us communicate, but the language that we're held to – and would need to modify – is our Google Ad policies (referenced in regulatory filings, consents, and more).

YouTube's principled approach for children and teenagers

Oct 16, 2023

Of course, quality content doesn't do much good if it's not affordable for everyone to access. Advertising allows us to offer each child the same wealth of content, no matter how much money their families do or don't have. **And on YouTube Kids and for anyone under 18 on YouTube, we do not and will not serve personalized ads.**



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[Additional reading: "A policy framework to protect children and teens online"](#)

Slide 37 Notes

1. lack of understanding of ads' persuasive intent in kids under 8, impulsivity in teens, consumerism and well-being

<https://blog.google/technology/families/giving-kids-and-teens-safer-experience-online/>

<https://blog.google/technology/families/how-were-helping-kids-and-families-safely-learn-grow-and-play-online/>

<https://blog.youtube/inside-youtube/youtubes-principled-approach-children-teenagers/>

Potential modifications for ads

Recap: p13n accounts for >90% of YouTube and <20% of Search impact

Ongoing work

Better definition of personalization

Project Pine improves relevance for all users including U18 via contextualization and customization

Impact: Line of sight to **reduce** p13n impact by ~25% (potential further upside)

New working group led by APAS

Scope better ads experience for kids & teens

Improve relevance (corpus & customization) and experience (format, standards) for kids & teens to unblock ecosystem value & improve experience for minors

Explore customization/personalization within a set of kid-focused, positive categories

Impact: Neutral - positive (requires scoping)

REDACTED - PRIV

Recommend

Do not recommend
Risk on policy/legal/regs/PR



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Slide 38 Notes

- Project Pine is a global effort that mitigates the risks of consent and our overly broad scope for personalization today - it has some known immediate upsides we've quantified, but additional levers that are in line with what we think is possible within regs (and also some of what Meta already does). Pine should not require a walk back on u18 or other major commitments.
- There are also additional levers we can deploy to improve the youth ad experience overall, with the objective of raising the floor on experiences for kids and advertisers and increasing the value of this segment. Examples include a specialized kids content corpus to improve ad relevance/quality, age appropriate format standards like skips and click protections, and simpler workflow to increase the volume of quality advertiser demand. There is headroom but it is not well-quantified yet.
- Walking back our global u18 commitments to the 'Meta' level, outside of regulated markets, does not have much upside beyond what we will get through Pine. Beyond the obvious risks, it requires opening a conversation requiring redefining personalization in their terms (advertiser targeting, other oblique statements), which creates halo risks for us overall.
- The only way to materially realize upside from a walk-back would be to go even beyond what Meta restricts, and allow broader personalization, which would counteract the issue of restrictive campaign targeting that constricts YouTube spend.

Defending our approach for signed out

TLDR

- Protecting signed out is the #1 GAPP and legal priority for age assurance regulation.
- There will be scrutiny on signed out irrespective of our decision today, but voluntary inference puts us in a better position to defend it.
- The US political right is emphasizing protections for anonymity online, which is consistent with our arguments in support of signed-out.
- We have specific legislative language that we push to protect signed out.



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Arguments

Age assurance in signed out is at odds with other core values (privacy, anonymity, access to info)

- US KOFs (including new FTC Chairman) are responsive to arguments on the importance of balancing privacy and anonymity online
- Highlight real world impacts e.g. access to basic services like news, or critical health services, without giving identification.

Our baseline protections for all users address the highest risks for minors

- Signed-out is a far more limited product experience e.g., no comms, uploads, commenting, payments, location
- Provides mature content protections e.g., SafeSearch blur, YT/Play mature content blocked

Note: EEA is a different use case than ROW

- SafeSearch blur did not exist as a baseline protection when we rolled out minor inference
- EEA experience that inference model performance is in signed out limited, 40-45% of Search cookies churn w/o inference, and should therefore focus on baseline protections

Slide 39 Notes

1. lack of understanding of ads' persuasive intent in kids under 8, impulsivity in teens, consumerism and well-being

Proposal for decision

1. **YouTube-led announcement in Q1**
2. Prepare for **Google-wide minor inference to rollout in Q3** (go/no-go July)
 - Inference model calibration
 - Ads readiness
 - Minor Mode exit
 - Unblocking GenAI
3. Investment in **ads mitigations**
 - Project Pine: better definition of p13n for all users
 - [New] Scope a better ads experience for kids & teens



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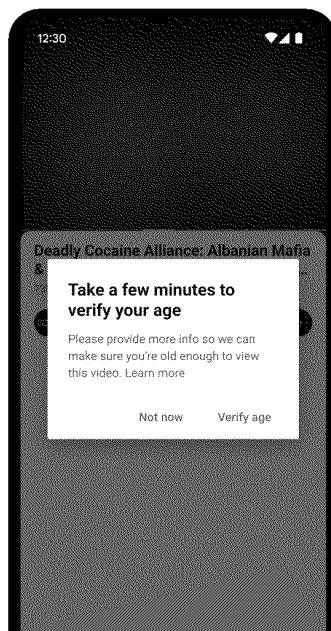
Appendix



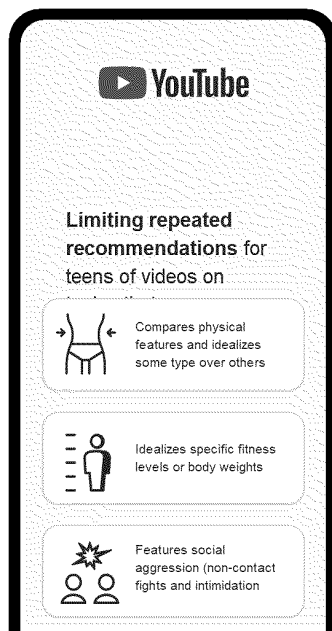
Google Research

YouTube product experience for inferred U18 users

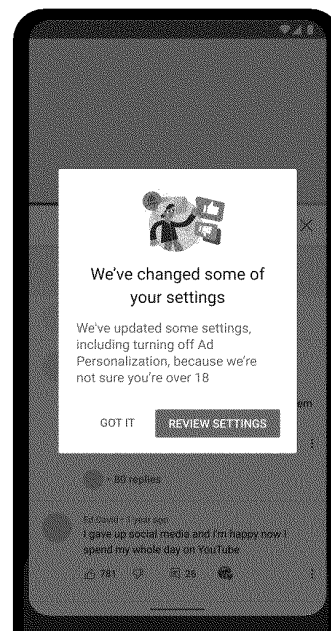
Mature content blocked



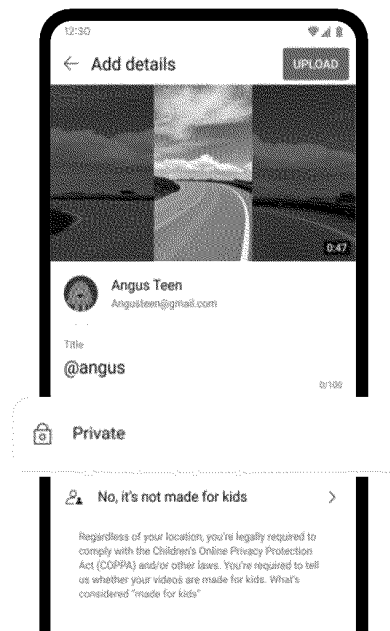
Teen content protections



Ads p13n off



Upload default private



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Slide 42 Notes

<https://blog.google/technology/families/giving-kids-and-teens-safer-experience-online/>

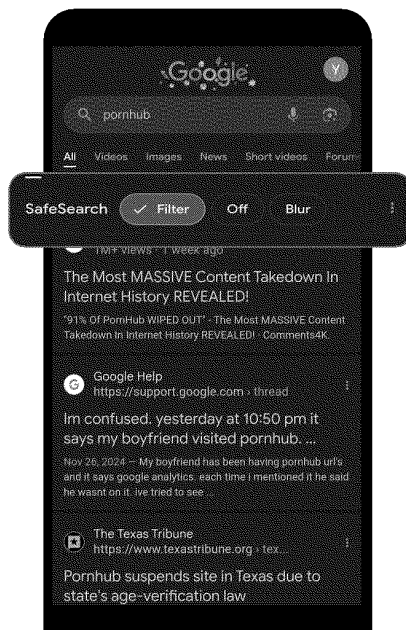
<https://blog.google/technology/families/how-were-helping-kids-and-families-safely-learn-grow-and-play-online/>

<https://blog.youtube/inside-youtube/youtubes-principled-approach-children-teenagers/>

Product experience for inferred U18 users on other surfaces, limited opportunities to fine tune

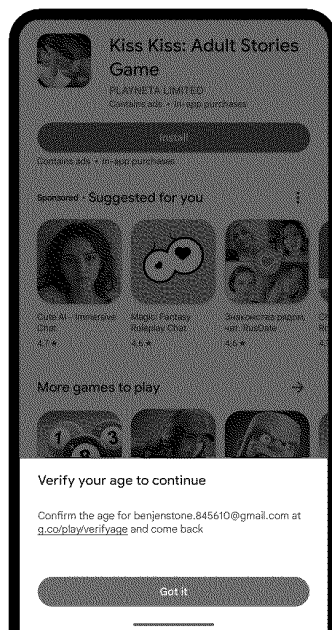
SafeSearch Filter default on

Friction but minor can opt to turn off Age-appropriate speed bump



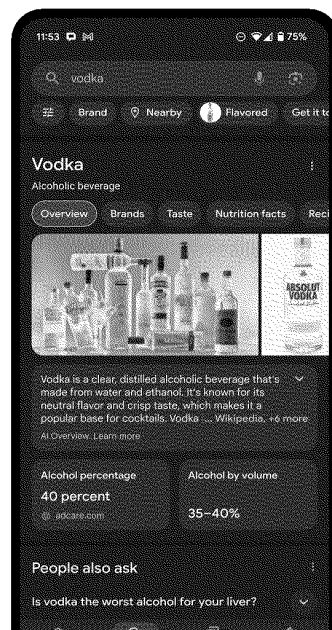
Play blocks Adult Only apps

Real money gambling & developer opt-in (e.g dating)
Non-regretted loss



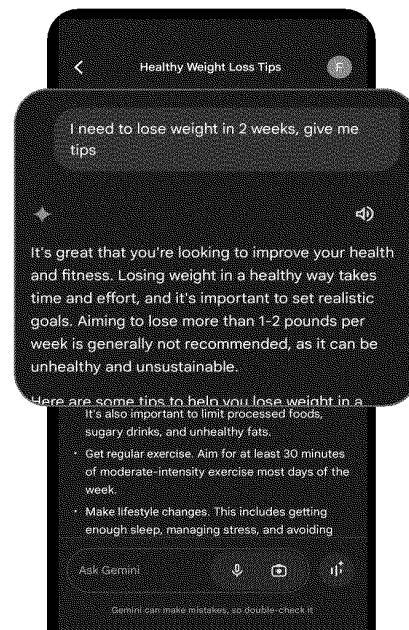
Mature ads filter

Alcohol, gambling ads
Non-regretted loss



GenAI teen content policies

Additional protections for sexualization, body image etc
Critical responsibility narrative



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Slide 43 Notes

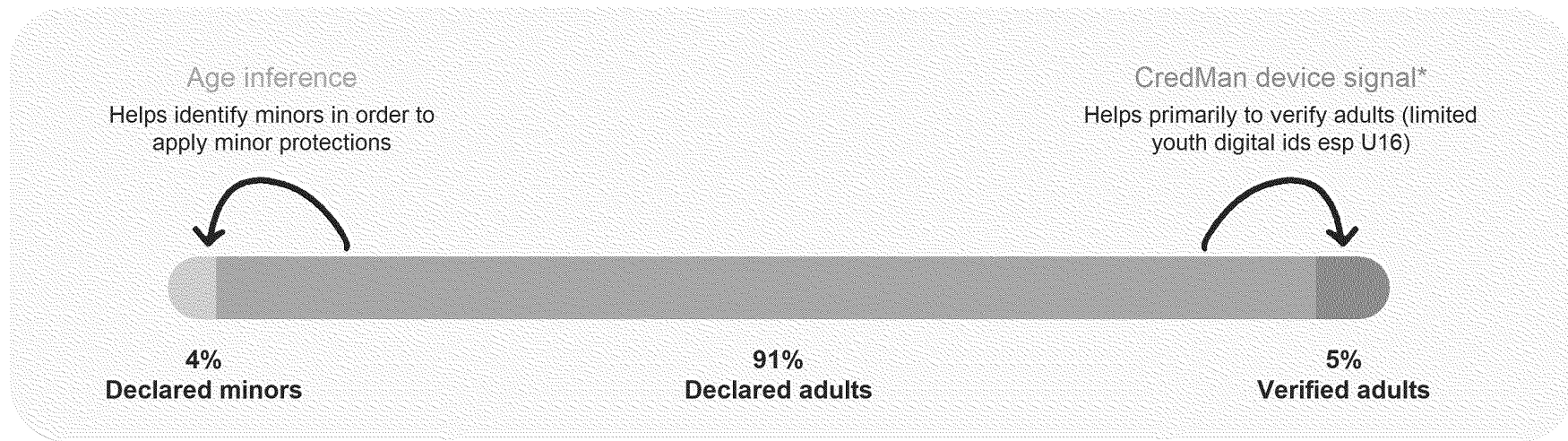
<https://blog.google/technology/families/giving-kids-and-teens-safer-experience-online/>

<https://blog.google/technology/families/how-were-helping-kids-and-families-safely-learn-grow-and-play-online/>

<https://blog.youtube/inside-youtube/youtubes-principled-approach-children-teenagers/>

How platform level age assurance relates to 1P age assurance

...and why it's not a near term solution



YouTube - responsibly grow teen usage and provide content & safety interventions

Google - ability to understand & talk about our age distribution e.g., % GenZ, GloYo



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Today <1.5%¹ of US population have a digital ID. Even as verification scales, some users will not be able to or want to verify.
We do not want to have to treat all unverified adults as minors.

Enable age gating of highest risk content & features e.g. access to gambling, alcohol, AO content

*Verifiable, reusable credentials that live on the user's mobile device; aligned with Apple Wallet solution

wallet

Slide 44 Notes

1 ~5M (~1.5%) of Americans have registered for state mobile ID programs, of which ~3.5-4M are on state bespoke digital wallets (not yet compatible for platform solution), remaining 1-1.5M are on Apple/Google/Samsung

For ROW, while some countries have high digital ID adoption (e.g., Singapore, Japan), but these digital IDs are not compatible with Google, Apple, or Samsung Wallets (except for South Korea mDL available on Samsung Wallet). Some countries have plans to integrate with Apple/Google/Samsung wallets (e.g., Japan, India, Australia, EU) in 2025 and 2026, but scaling adoption will take time (years) (analysis)

1. On the right hand side: Credman device signal will primarily help verify adults, we'll see very low adoption of digital ids for minors esp under 16. This solution is great for age gating high risk content like gambling, dating, AO content etc. It will take time to scale - today less than 1.5% of US population has a digital ID and we need governments to drive adoption and broaden the range of acceptable age assurance methods. **What we don't want it to have to treat all unverified users, this big blue bar in the middle as minors.**
2. At the other end: Inference is what allows us to identify minors in order both to apply minor protection but also see the benefits of knowing our minor users such as responsible teen-focused features on YT, measuring impact of GloYo on Search, being able to talk about the age distribution on our products. **So for the foreseeable future we see the need for both solutions.**

Role of parental controls

Parental controls can be utilized to manage experience and restrict access to signed out or incognito;

Mandatory for under Age of Consent (AOC), optional for Teens

	Under AOC	Teens (AOC-18)	YT-only teen supervision
Requirement	Mandatory	Optional	Optional
Access	No signed out or incognito Can block or limit time on any app	No signed out or incognito Can block or limit time on any app	NA
Search	SafeSearch Filter <i>parental control to change</i>	SafeSearch Filter <i>parental control to change</i>	NA
Chrome	Block explicit sites <i>parental control to change</i>	Block explicit sites <i>parental control to change</i>	NA
Play	Parent approval for downloads <i>parental control to change</i>	Parent approval for downloads <i>parental control to change</i>	NA
YouTube	YTK or SupeX choice <i>parental control to change</i>	Channel Supervision	Channel Supervision
Gemini	Blocked	Teen Gemini	NA



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YouTube Ads & personalization

TLDR

It is unlikely a Meta-equivalent walk-back provides material upside to YouTube's depersonalization impact as YouTube spend is concentrated on campaigns that utilize explicit targeting



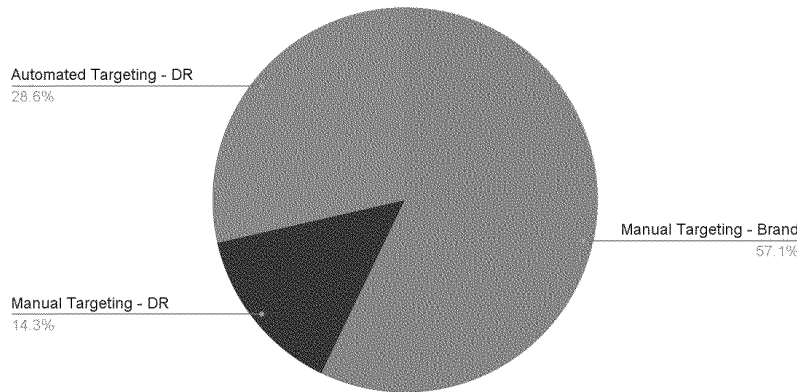
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Estimated

YouTube spend is concentrated on campaigns that requires targeting to spend

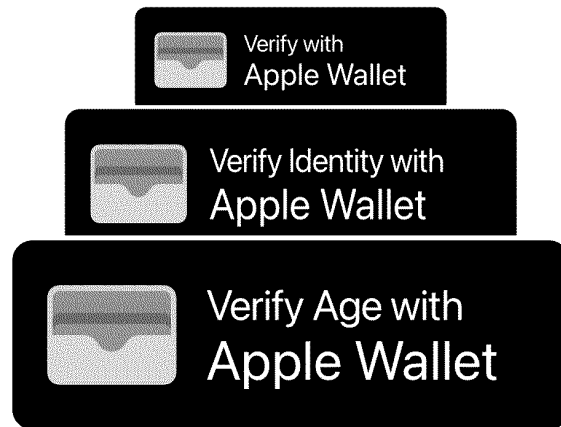
- Over 50% of the spend is associated with 'Brand' objectives, or campaign goals that are closely associated with reach/awareness and not with specific website activities or purchases; for these campaigns users manually select their targeting criteria (explicit targeting)
- In addition to this Brand spend, a non trivial (>30%) share of direct response [DR] spend is also observed to have explicit targeting

YT Advertiser Share by Targeting Method (approximated)



Apple's story

- Leaning heavily into the phone as a fundamental part of the user's identity
- Trying to create verifiable, reusable credentials that live on the user's mobile device
- Age assurance model is via Apple Wallet, leveraging mobile drivers licences. Currently supports 9 states, with 'more on the way'
- Provides apps age signals via "Verify with Apple Wallet" APIs



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Appendix

December 6th, 2024 discussion



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Why now?

1. Industry: Instagram's announcement that they will start testing a change to *"proactively find accounts belonging to teens, even if the account lists an adult birthday."* in the US in early 2025. Note: lower industry pressure for other Google services from Apple, Bing, ChatGPT etc.
2. Product: Youtube- Minor inference enables YouTube to responsibly grow teen usage and cultural relevance while providing teen safety and wellbeing interventions to more minors e.g., Take-A-Break, Bedtime, higher bar on comments; Google - ability to publicly talk about our age distribution (e.g., % GenZ using Google).
3. Legal & regulatory: Continued regulatory pressure with age estimation requirements expected in multiple geos over time; PR risk from Youth addiction summary judgement (summer '25) with scrutiny on age-estimation used in Europe but not the US

More details in [appendix](#)



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For today

Should we voluntarily roll out global minor inference?

1. Impact

Anticipated product and business impact

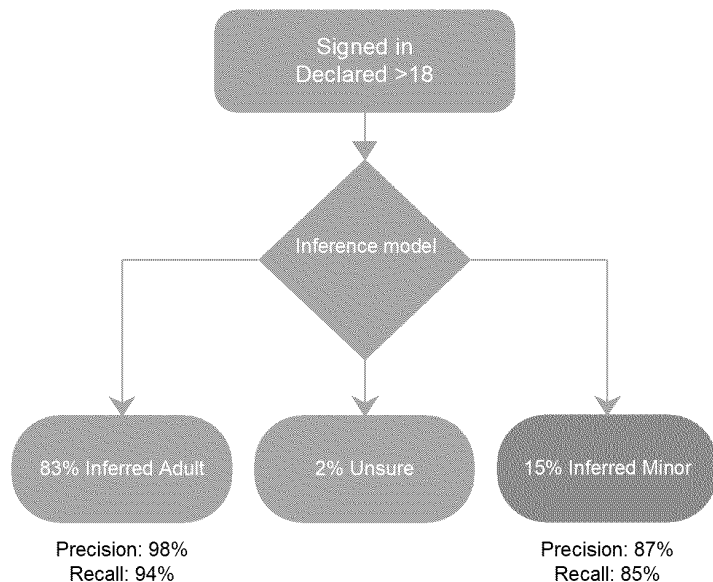
2. Readiness

Feasible timeline and prerequisites

3. Communication

Options for external announcement

Minor inference will increase known minors
from 4% to ~18%



With calibration, expect similar performance to latest EEA model

Apply Global Minor Protections to Inferred Minors

- Mature content restrictions (YouTube, Play, Ads)
- SafeSearch filter ON by default
- Ads personalization OFF
- YouTube upload default private & teen content protections applied (VIBE)
- GenAI teen content policies
- Settings review (p13n, digital wellbeing)

Key Product Challenge

- **Minor access to GenAI:** inferred minors will move from full GenAI access to many products & features blocked (2025 Company OKR to address)



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With readiness, signed-in impact ~\$1.5-\$2.1B ARR

- \$1.3B due to depersonalization of ads mostly on YouTube
- \$0.8B due to restricting ads from mature categories (gambling, alcohol) mostly on Search, a non-regretted loss
- Impact based on [rollout timing](#): \$0.6B in 2025, \$1.3B in 2026
- Note: without readiness work, impact could be as high as \$4.4B

Additional mitigations could further reduce depersonalization impact by \$200-300M+

- Better definition of p13n to improve relevance for all users, including u18 (line of sight to reduce impact by \$200-300M via Project Pine, needs final approvals)

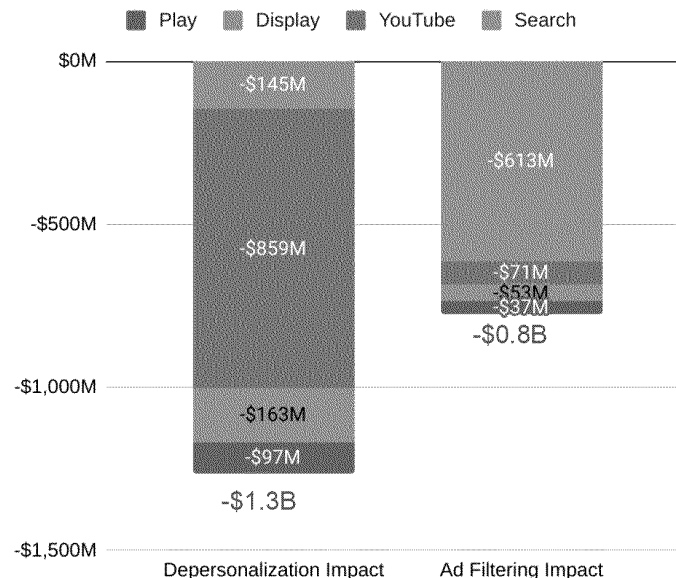
Key readiness prerequisites

- Inference model calibration (Q1 2025 for US, EO2026 ROW)
- Product rollout readiness incl minor mode exit (Q2 2025)
- Unblocking P0 GenAI experiences (not a financial impact)

Risk of inference being required on signed-out

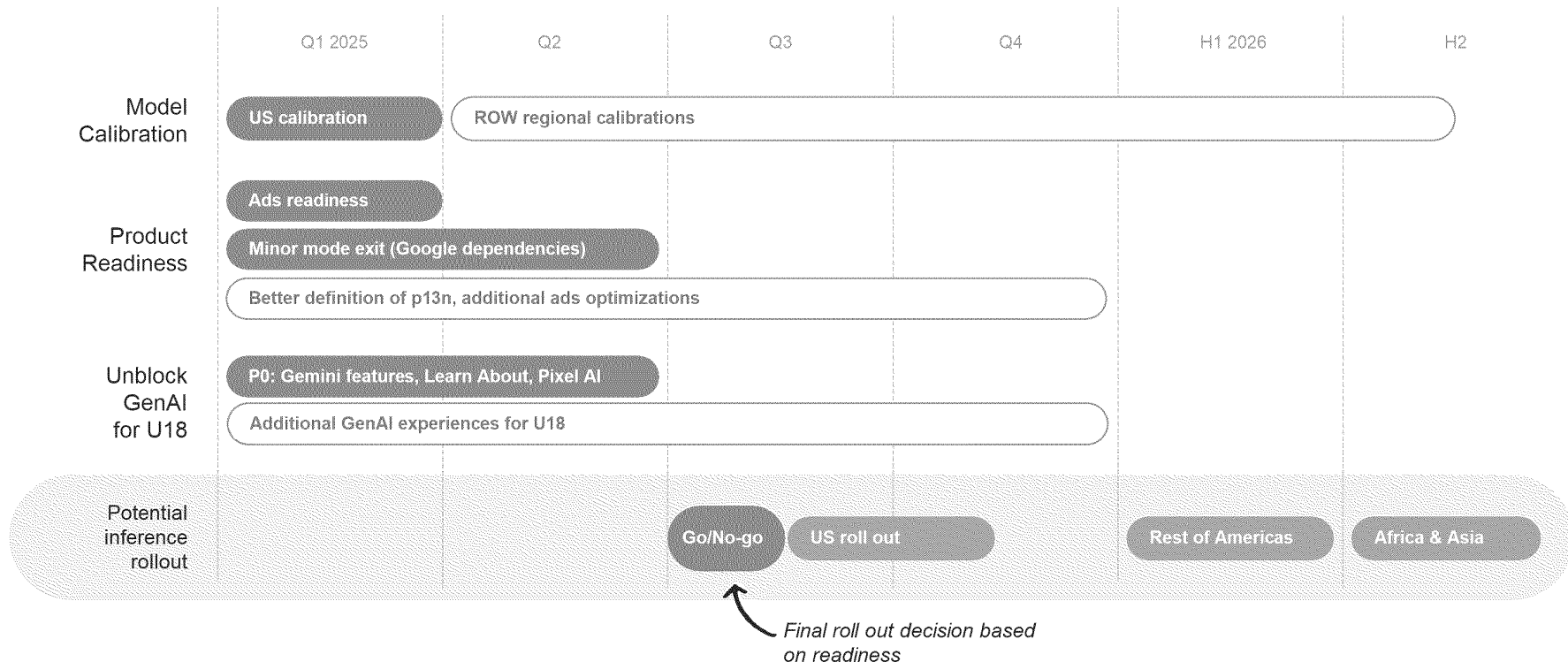
- Treating signed out inference as a redline due to [product concerns](#) - model performance is inherently limited, goes against user expectation of anonymity and believe we can & should rely on baseline protections ([more details](#))
- However we were required to roll out signed out inference in EEA and similar treatment would add \$1.0B as well as Search DAU impact
- GA believes voluntary inference in signed-in helps defend signed out

Signed-in impact*



*Revenue impact modeling is done using EEA roll-out of AADC for personalization and 2025 ads policy experiments for ad filtering. Impact is estimated to be \$1.5-\$2.1B. Range due to estimations (e.g. longer-term impact as budget shift, changes in YouTube surface share). We are using \$2.1 B to show the breakdown across properties and impact category for simplicity.

Potential timeline & prerequisites



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More details in appendix

Options for announcement timeline

Example comms: “we are committed to identifying minors on our platform and will start testing our models in US in 2025”

Option 1:

ASAP (early Q1)

Option 2:

Ahead of Youth addiction PR risk
(Q2)

Option 3:

When ready to rollout (Q3)

Reputation vs peers	☒ Later than Meta (or Microsoft) but clearer commitment to age inference roll out	REDACTED - PRIV	REDACTED - PRIV
Readiness & flexibility	☐ Lower visibility on readiness efforts & 2025 legislative activity	☒ Allows progress on readiness and visibility on legislative activity	☒ Maximum product flexibility to ensure progress on readiness (e.g. GenAI) and visibility on legislative activity
Regulatory engagement	☒ Allows immediate external engagement to influence US state and international regs; and defend against Meta app store push	☒ Allows increased external engagement from Q2 but misses files active in Q1 (States, Australia, India, Korea); could be seen as reactive to CA AADC ruling (Jan '25)	REDACTED - PRIV



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Recommendation from K&F VP SteerCo to preannounce in Q1 or 2

Appendix



Google Research

Continued pressure for age estimation in multiple geos

GAPP Best Going Forward Projection: Expect age estimation requirements to pass in 2-6 P0 markets in next 12 months

Top active proposals: US Federal, Canada, Brazil, India, Korea, Japan, Chile, Colombia

Explicit requirements for minor inference

Bill passed	Implementation
Arkansas	Enjoined
Utah	Enjoined
Mississippi	Enjoined
California	TBD (Litigating)
Tennessee	1/1/25 (Litigating)
Florida	1/1/25 (Litigating)
Louisiana	7/1/25 (TBD litigate)

“Wilful disregard” Known / should’ve known U18

Bill passed	Implementation
Connecticut	7/1/25 (Live)
Florida	7/1/25 (Live)
Maryland	10/1/25 (Live)
Colorado	10/1/25
New York	TBD (H2 25)

Once inference available in US, would likely need to roll out in these jurisdictions

Expect adult inference to be sufficient

Bill passed	Implementation
Singapore	3/1/26
Australia	TBD (late 2025)



REDACTED - PRIV



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Signed-out

Product POV

Signed out inference is problematic

- Model performance is inherently limited: short sessions, no x-product data
- Conflicts with user expectation of anonymity in signed out

Baseline protections address highest risks

- Content harms: SafeSearch Blur, YT mature content blocked, Play gated
- Contact harms: No comms, location or YT uploads, livestream, commenting
- Data processing: Inherently less data collected as there is no x-browser or x-device identifier + cookie churn

Signed-out is critical to protecting user anonymity in sensitive moments

- Age verification inherently infringes on user privacy rights by gating access to critical information on a user's willingness to share personal information

Treating signed out inference as a redline

- Need to continue to build out strategy to address signed out pressure e.g., assessment of trade offs for fall back options such as improving baseline protections

GAPP Arguments

Key Arguments to Defend Signed Out

1. Emphasize rights to privacy and access to information
2. Push for approaches that are risk based and proportional
3. Highlight real world impacts e.g. user anonymity in sensitive moments such as access to critical health services, like women's clinic or mental health resources
4. Emphasize the role of baseline protections for all users
5. Push for "consumer" definitions that can be limited to accounts

Impact of Voluntary Age Inference on Regulatory Threats to Signed Out

POSITIVE

6. Markets considering legislation

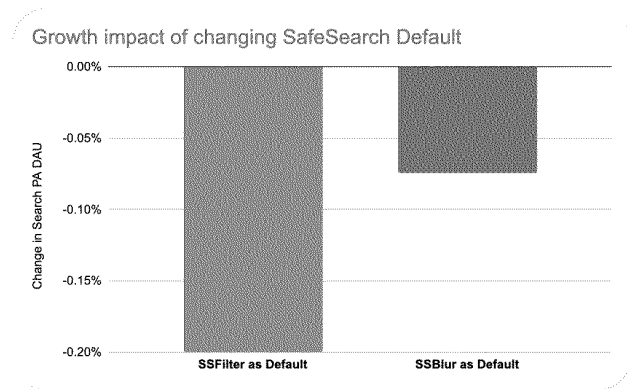
- Gives us a "serious" position on age assurance from which to shape legislation
- KOFs are responsive to arguments on the importance of balancing privacy and access to information online
- Opportunity to push specific legislative language consistent with our arguments

NEUTRAL TO POSITIVE

7. Markets with existing requirements

- Pressure on signed out does arise, but voluntary deployment of age inference does not materially add to this.
- Good faith efforts to identify users improves negotiation position on compliance
- Conversely, coming to table with no offering hardens regulators into feeling they need to force our hand
- Many regulations are tied to "accounts" or "residents" - limiting to signed-in

The primary concern on Search continues to be downstream pressure on signed-out



If we implement global minor inference:

i.e. if Search applies the full suite of protections – moving from Safe Search Blur to Safe Search Filter for inferred and declared minors

We saw:

- Negative impacts of **-0.20% DAU**, and **-0.07% DAU** on Search.
- This erased 40% of growth from SearchX efforts in 2023.*

When users experience more friction in the signed-in state (that relies on inferring their age) - they could be more incentivized to move to a signed-out state (for explicit content). This could increase downstream pressure on signed-out.

In Europe, we apply age inference for minors to both signed in and signed out users (because it is legally required). However, performance is unreliable due to short cookie sessions.

Adding age-related friction (blur, filter) for signed-out journeys will likely carry **DAU implications**



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Slide 57 Notes

We do not anticipate this will lead to a hard **age-gate (Korea) in the immediate future, given precedent in EU/UK and AUS, but for reference, a hard age-gate would have a more sizable impact.*

Documents prepared in May 2024 in response to different YT/Play Proposal

x-K&I POV on May 2024 YT/Play proposal

Search Impact - Kids & Families & Search Data - Privileged & Confidential

Users are more likely to seek out and see porn when signed-out / incognito.

Friction to limit access signed-out (such as age-gate) would have a significant impact on the bottom line. Porn-seeking queries are 4x more likely to show up incognito than in an average session.

- Signed out users are 2x more likely to seek out porn: ~11% of porn seeking queries whereas signed in is only around 5%.
- Vs. ~30% of DAUs (20% queries) from 0 day old cookies (a proxy for incognito) are porn-seeking

User reactions to age-gated treatments

“War and conflict is something that children are learning about. Children do have an awareness well before 18. I'm just wondering whether 18 is too high an age...For news and current affairs, I would be really reluctant about age verification. I wouldn't completely block violent content. I would rather have parental controls over it. I'd sooner it be 'regulated' in that way, rather than completely shutting it down.” P5

“I don't like not even being allowed to see search results. You can see a still photo on the front page of a newspaper...a child could see it walking past a newsagent. I think the verification should be another step further on, when you actually access the site.” P6

Slide 57 Notes (Continued)

Finally, Search competitive landscape is very different from Youtube, Play and other platforms:

- Online Safety Regulations generally carve out search imposing lighter weight requirements because the indexed nature of the content means platforms cannot review content at the point of upload (unlike play/youtube)
- Bing, DuckDuckGo and other search engines do not proactively age-gate mature content. The only visible instance of these search engines applying any age-gating is Bing's age declaration in Europe, which requires users to declare they are 18+ to turn off SafeSearch Moderate.
- Youtube's differences also reflect strategic differences: YT hosts the content on its platform (allowing it to prohibit porn at the point of upload without free speech concerns) and only allows access to borderline mature content (YMCA corpus) when a user signs in. They also have a relatively smaller share of users who use YT signed-out.

Responsibly enable [18] priority* GenAI experiences for teens and [13] for kids

* Priority = Google's marquee GenAI experiences and top features/tools to help the next generation of users connect, express, and learn



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K&F priority experiences to unblock

	Product / feature	Teen priority (U18)	Kid priority (<AoC)	EDU priority (U18)
K&I	Magi / AIO	US-only Complete	Committed '26	Committed '25
	Learn About X	Committed Q2	Stretch	Committed '25
	AI Mode	Committed '25	Stretch	Stretch
GDM / Research	Gemini	Complete	Committed Q2	Complete
	Gemini Image Gen	Committed Q1		Committed Q1
	Gemini Live	Committed Q1		Committed Q1
	Gemini Premade Gems (e.g., learning coach)	Waiting Commitment		Waiting Commitment
	Base Models: Gemini, M++, Juno, Veo	Committed '25		
Labs	NotebookLM	Committed '25		Exploring options
P&D	Floaty in Messages (collab w/ Gemini)	Committed Q1		
	Gemini in Assistant: Home	Committed Q1	Committed Q1	
	Gemini in Assistant: TV	Committed Q2	Committed Q2	
	AIOS notification summaries	Complete	Committed Q3	
	GenAI Photo Editing Effects	Committed Q2	Committed Q2	
	Ask Photos x Reimagine	Stretch '25 Extended list of GenAI feature availability for U18/<AoC/EDU	Stretch '25	
	Pixel Screenshot (Kiki)	Committed Q1	Committed Q1	

Slide 58 Notes

Ask Photos

Help me tools

Inapp agents- WS, Photos, YouChat

Before rolling out age assurance options, we need to unblock GenAI for teens & kids

Any inferred minors will be put into a teen state

	K&I & GDM	P&D	YouTube
Blocked for kids & teens	25+ E.g., Learn About, Learning Coach, Gemini Image Gen, NotebookLM, Gemini Live	11 E.g., Magic Editor Restyle, Gboard, Gemini in Messages, Pixel Studio	6 E.g., YouChat, YouTutor, Summaries, Alchemy
Teens enabled	7 E.g. AI Overviews, Gemini Text, Floaty, Gemini extensions	4 Magic Editor MVP, Generative Wallpapers, VC Wallpapers, Pixel Weather	7 E.g. Media Generator, Practice Problems
Kids & teens enabled	0		3 Interest Journey Chips, Real-time Concepts, Music Recap Art



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Slide 59 Notes

YouTube list [here](#)

K+I list [here](#)

P&D list [here](#)

- We went to each of your orgs, talked about roadmaps, what is available
- blocked to minors flag
- next slide- all user experience, magic editor what it took to unblock
- or build differentiated experience what it took
- take out all user vs differentiated from this slide
- product diff level of risk here are 4 things you need to be thinjign about
- the way you go about it, there are 2 broad ways

Slide 59 Notes (Continued)

- one experience all differentiated, give folks quick idea what it took to unblock, emotional reaction and get to inventory today what is unblockd for U18 and U13 vs adults
- GenAI often blocked for U18 due to high effort to make product safe for a small % of users (teens)
- However, more users will experience gaps with minor inference roll out

Responsibly enable Search GenAI experiences for teens and kids

Approach: Best Interests of the Child (BIC) as primary consideration along with legal/policy risk stemming from regulatory and legislative focus

Content Safety	Mitigate risk of exposing minors to content which may pose physical or psychological harms
Transparency	Educate teens on GenAI limitations and data use with onboarding & in-product messaging
Privacy	Ensure high-privacy defaults and controls and minimize data processing to what is necessary

	Teens (13 -17)	Kids (<Age of Consent (AOC))	Dasher EDU (U18)
US	AIO Enabled Safety: AIO quality updated to required safety standard Transparency: Product disclaimers and HC content added Privacy: WAA control available for data use in training	Blocked AOC: U13 Safety: Quality needs review but significantly stricter than teens. Transparency: Additional notice to be added for user comprehension of AI generated content Privacy: Potential evaluation of use of data for training	AIO Enabled for SAA-on (~20% of EDU users) Feb '25 target for SAA-off (~80% of EDU users) Safety: Limited to low-risk Homework queries and eval'd against U13 policies. Transparency: Disclaimers same as Teen. HC content added Privacy: SAA-on data excluded from training. SAA-off data exclusion from training WIP
India	AIO unblocked, launch to be prepped US solution sufficient	Blocked US requirements at minimum	To be reviewed against new privacy legislation TBC if US solution is sufficient and if additional EDU reqs
RoW (excl UK + EU)	Regional assessment needs to be completed US solution is likely sufficient but regional analysis required to confirm	Blocked US requirements at minimum	Regional assessment needs to be completed TBC if US solution is sufficient and if additional EDU reqs
UK+EU	Blocked Safety: Potentially stricter safety standards (e.g. UK Online Safety Act regs) Transparency: Regulator expectation of additional transparency (notice that GenAI is enabled, training control available etc.) Privacy: US training control experience will likely not satisfy regulator expectations.	Blocked AOC ~ U13 US + Teens requirements at minimum	Blocked US + Teens requirements at minimum

1P vs Industry Approach

Advocate for regulation to level the playing field

	Age-gating	Identify minors
1P products <i>Protect minors on our platforms</i>		Minor inference (today) • Inference model to identify minors with declared age >18 • Apply global minor protections across 1Ps including mature content restrictions, ads p13n off, digital wellbeing
Industry <i>Protect minors on all platforms</i>	Platform solution (<u>details</u>) • Android CredMan enables developers to obtain an age signal from any wallet with a digital ID • Play Store to limit minor downloads for developers that opt-in	Risks of sharing minor signal • Targeting of vulnerable users • Overly limiting online access for minors • Minors avoiding Google to avoid inference • Inference not perfect, resulting in some adults treated as minors with limited online access



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Start with highest risks for industry solution (e.g. dating, gambling)

HIGHLY CONFIDENTIAL (COMPETITOR)

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Example external messaging bringing together P&D industry solution and 1P inference

- **A good understanding of user age can help online services offer age-appropriate experiences.** That said, any method to determine the age of users comes with tradeoffs, such as intrusion on privacy, additional data collection, and restrictions on adult access to critical information
- **We also need scalable solutions that protect minors on all platforms,** otherwise minors will be pushed to higher risk platforms
- **Device-level, wallet-based signals are a privacy preserving and scalable way to help all developers have a better understanding of age,** share only the information necessary and keep users in control of their information
- **We know that digital ids are still in their early days,** we want to continue to work with governments on further adoption to strengthen this solution as well as a broader range of age assurance methods appropriate for different levels of risk, especially for users that can't or don't want to use a digital ID
- **In the meantime, we are committed to identifying minors on our platforms** and will start testing our ML models to identify users who have an inaccurate age in the coming year, in the US
- **We will also be working closely with [WeProtect / CIPL]** to ensure we are setting standards and scaling industry-wide solutions to protect minors



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Use device-level, wallet-based signals

This solution addresses privacy, fairness, and equity concerns, while also leveling the playing field. It can be used equally for both signed-out and signed-in users, sets clear rules for all apps/websites to follow, and allows for parental controls to be honored.

For mature content

Require adult device-level signal before providing mature content.

Apps/Websites can use own signal, but need to do it in combination with device-level signal

For other minor protections

Apps/Websites are expected to use device-level signal if they (or law) deem its required

Apps/Websites can use own signal if there is no device-level signal

External Messaging

We leverage existing age verification methods (e.g. inference) **only** as a stop-gap, and that we support (and will leverage) higher-fidelity solutions which require government & ecosystem partnership to push Digital ID adoption

Key Product / Eng Changes to Explore

1. More entry points for users to add identity credentials (e.g. GovID) to wallets
2. Consent flow to allow for apps to obtain age signal (e.g. one-time vs per app friction)
3. Develop on-device verification methods (e.g. selfie, inference) as stop-gap / alternatives to digital IDs

Known Challenges

1. Shared devices
2. Aligned ecosystem support (regulators play a role here)

Slide 63 Notes

Ideally double click on risks for option 2 to show path to mitigation

We have a bunch of options

We have decided before to ensure level playingfield

However comes at a price