

AMENDED Exhibit 462

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

**EXHIBIT**

24 TIKTOK 03/11/25 dv

exhibitsicker.com

Who We Are

TikTok is a global short-form video platform that provides its users with a vibrant, creative experience in a fun, joyful and safe environment. Our mission is to inspire creativity and bring joy. Millions of people come to the platform every day to express themselves creatively, share their talent, enjoy entertaining content, and engage with a diverse and global community.



Our US Presence, Leadership and Ownership

- TikTok was launched by ByteDance in May 2017. ByteDance, TikTok's parent company, is a private company incorporated in the Cayman Islands, backed by global institutional investors such as KKR, Sequoia Capital, General Atlantic, Coatue, Softbank, Fidelity, SIG, Goldman Sachs, and New Enterprise Associates, etc.
- ByteDance has a global board, including Bill Ford of General Atlantic, Arthur Dantchik of SIG, Philippe Laffont of Coatue, Neil Shen of Sequoia, and the company's founder Yiming Zhang.
- ByteDance is a global company, founded by Chinese entrepreneur Yiming Zhang, and led by an international executive team, with major regional operational centers in Los Angeles, New York, Beijing, Singapore, London, Tokyo, Mumbai, and Dublin. We recently hired top Disney executive [Kevin Mayer](#) who will serve as COO of ByteDance and CEO of TikTok. We also continue to build out key teams in the United States including a General Manager, Global General Counsel, Chief Information Security Officer, Vice President of Policy, Head of Safety, Head of Product, and Head of Human Resources.
- TikTok's team is growing rapidly in the US and we have made a steadfast commitment to a robust presence in the United States, including economic investment and job creation. Today we have several hundred employees across multiple offices, including in California, Texas, New York, Washington State, and Illinois. We are committed to further expanding our teams in the US.



User Data & Privacy

- TikTok is committed to respecting our users' privacy, protecting their data and complying with privacy laws and regulations, such as COPPA, CCPA, and the GDPR. In the US, TikTok supports a strong national privacy law.
- TikTok collects less user data than many peer companies in the mobile app space and we store the data in Virginia with a backup in Singapore. The company uses computer security and data access policies and controls to limit the number of employees who can access that data. The Chinese government has never requested access to US user data.
- We hired a 30-year cyber security expert with financial services industry & Department of Defense experience, as Chief Information Security Officer, in the US to oversee data security practices globally.
- We are engaged with the world's leading cyber security firms to accelerate our work toward advancing and validating our adherence to globally recognized security control standards like NIST CSF, ISO 27001, and SOC2.
- Transparency is the foundation of our next generation security programs underway here at TikTok, as we continue to work hard to earn our community's trust. Our Cyber Defense, Security Assurance, and Data Protection programs will be front and center in our new [Transparency Center](#) that we recently announced.
- We will continue to focus on adding new technologies and programs focused on global data residency, data movement, and data storage access protections worldwide. Read our full [privacy policy](#).



Content Moderation

- TikTok values freedom of speech and respects local regulation & cultural norms.
- The US content policy and moderation process is independently controlled and managed by the US team. TikTok US does not moderate content at the request of or under the influence of any foreign government. All content moderation occurs under the principles set forth in TikTok's [Community Guidelines](#).
- TikTok has formed an external council of leading experts to advise us on content moderation policies covering a wide range of topics. Read more about the [TikTok Content Advisory Council](#).
- TikTok is opening a new [Transparency Center](#) in Los Angeles and Washington, D.C. that will provide outside stakeholders an opportunity to directly view how our teams at TikTok go about the challenging, but critically important, day-to-day work of moderating content on the platform.

Continuing Our Engagement

Our industry is rapidly changing and so is the landscape in which we are operating. We are aware that our systems, policies, and practices are not flawless, which is why we are committed to constant improvement. As we continue our engagement with policymakers and their staffs, we look forward to your feedback and ideas. Please feel free to reach out to us at USgov@tiktok.com.

TIKTOK COVID-19 RESPONSE EFFORTS

- **TikTok is pledging \$250 million in direct cash support for front line medical workers, educators, and communities.**
 - **Additional commitments include \$25 million in ads to help trusted organizations deliver public health and \$100 million in ad credits for businesses looking to rebuild.**
-
- **TikTok Health Heroes Relief Fund:** TikTok is pledging \$150 million in funds toward medical staffing, supplies, and hardship relief for health care workers. These distributions will be focused on local organizations to support local health workers. For example, we're partnering with the CDC Foundation to donate \$15 million toward supporting surge staffing for local response efforts through state and local health departments.
 - **TikTok Community Relief Fund:** To provide critical relief to vulnerable communities, TikTok will allot \$40 million in cash to local organizations that serve groups representative of TikTok's diverse user communities, including musicians, artists, nurses, educators, and families that have come together on our platform. And since we're all in this together, we'll be further matching \$10 million in donations from our community to support those who need it most.
 - **TikTok Creative Learning Fund:** With tens of millions of students around the world out of school, educators and parents need help facilitating ongoing learning from a distance. Creative educational content on platforms like TikTok can help, and we will be providing \$50 million in grants to educators, professional experts, and nonprofits whose real-world skills and expertise can help spread educational information.
 - **Helping small and medium-sized businesses (SMBs) restart and rebuild:** TikTok is committed to helping SMBs weather this crisis, and we will be providing \$100 million in ad credits to help companies get back on their feet once economies are able to restart normal activity.
 - **Contributing to public education efforts:** Around the world, health authorities are working to inform the public as quickly as possible on a range of issues, including the importance of social distancing or proper hygiene. To facilitate that education, we are providing \$25 million in prominent in-feed ad space for NGOs, trusted health sources, and local authorities, enabling them to share important messages with millions of people and meaningfully engage the TikTok community.
 - **Supporting the emotional well-being of our community:** Cherished patterns of life are being disrupted; in-person contact with friends, family, colleagues, and communities has been altered or ceased altogether; and we're united in our concern for loved ones who are working hard on the front lines of the global health battle. There is no easy way to overcome the hurt this causes, but we are intent on supporting our inspired users who are already producing imaginative and joyful content to unite and provide comfort through efforts like #HappyAtHome.

For additional details on TikTok's COVID efforts visit [here](#)



TikTok COVID-19 Response Efforts

CHILD PRIVACY & SAFETY

- **TikTok is committed to protecting our users.**
- **TikTok is leading the way with age-based account levels that give parents and younger users added protections.**
- **TikTok has built partnerships with recognized leaders in online safety.**

- **User Safety is a Top Priority:** User safety on our platform is of utmost importance. Our US-based safety team has grown considerably over the last year, including hiring a Head of Safety and a strong team of leaders in Los Angeles that are dedicated to protecting our users. Our safety teams are made up of experienced industry professionals whose backgrounds span product, policy, compliance, child safety, law, privacy, and NGOs. Our Trust & Safety leaders collaborate closely with regional regulators, policymakers, and law enforcement agencies.
- **Recent Actions/Changes:** We recently made several platform changes in support of the Five Eyes Nations' Voluntary Principles. We are advancing our commitment to building for the safety of our users by introducing Family Pairing, which allows parents and teens to customize their safety settings based on individual needs. **Direct messaging for users under the age of 16 has been turned off entirely** and live streaming is only available for users age 16 and over. We also only allow those aged 18 and over to purchase, send, or receive virtual gifts.
- **Protections against Child Sexual Abuse Material (CSAM):** We have a zero tolerance approach to CSAM on our platform. We use image filters and sensitive words lists to detect CSAM content. We report all violations to the National Center for Missing & Exploited Children (NCMEC), an organization with which we recently entered into a significant corporate partnership.
- **Parental Controls & User Education:** As we continue to develop the TikTok platform, we have been creating measures to further protect our user community — including tools for parents to protect their teens and for users to enable additional privacy settings. TikTok developed an online Safety Center, blog series, and safety videos to educate users about the controls and settings that can help curate their experience.
- **TikTok Content Advisory Council:** We recently launched a council of outside experts to get input on some of the tough issues that we deal with on our platform. The Council is composed of experts with deep experience on a wide array of safety-related issues, including child safety, harassment and bullying, hate speech, manipulated media (deep fakes), free speech, and more.

Partnerships

- TikTok has a partnership with the National Center for Missing & Exploited Children (NCMEC), a private, non-profit organization whose mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization.
- TikTok has a partnership with the Family Online Safety Institute (FOSI), an international, non-profit organization dedicated to making the online world safer for children and their families. Through this partnership, TikTok and FOSI have launched an interactive tool where parents can download a guide for TikTok Parental Controls.
- TikTok has a partnership with ConnectSafely, a Silicon Valley, Calif.-based nonprofit organization dedicated to educating users of connected technology about safety, privacy and security. We engaged ConnectSafely to draft and publish a "Parent's Guide to TikTok", as well as to work together on important issues and events such as Safer Internet Day.
- TikTok's partnership with the National PTA's "PTA Connected" initiative has led to numerous grants across the United States which allows local PTA chapters to be connected to programs that create an informed space for families and communities to discuss digital safety.



DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-024-LARK-00034069-TIKTOK3047MDL-024-LARK-00034071

BEGATTACH: TIKTOK3047MDL-024-LARK-00034069

ENDATTACH: TIKTOK3047MDL-024-LARK-00034071

Attachment Count: 0

PRODVOL: MDL-024

Custodian: [REDACTED]

File Path: /TIKTOK3047MDL-024-LARK-00034069.PDF

Confidentiality Designation:

HASHVALUE: 3B9220E964315203C4A0BFA72667EF5B

DocType:

Author:

Create Date: 6/10/2020 12:00 AM

Last Modified Date: 6/10/2020 12:00 AM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENDATA:

Filename: TIKTOK3047MDL-024-LARK-00034069.PDF

Title: TIKTOK HILL PACKET 6.9.2.PDF

DOCEXT:

Email From:

Email To:

Email CC:

Email BCC:

Received Date:

Sent Date:

TIMEZONE:

Subject:

Case 4:22-md-03047-YGR Document 2650-24 Filed 01/20/26 Page 6 of 6

THREADID:

REDACTIONS:

REDACTION TYPE: