AMENDED Exhibit 687

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

Addressing Minor Safety Notes

Bytedance: Addressing Minor Safety

Introduction

The primary purpose of this document is to assess the current landscape of Minor Safety projects across Bytedance and to increase transparency into cross-functional initiatives. Some projects and proposals in this doc are owned by different teams but are listed here to reflect the ongoing work that the company is doing to address these concerns.

The secondary purpose of this document is to clearly define which of these projects belong to other teams and which projects T&S should add to their 2020 roadmap.

Child Sexual Exploitation Must Be Addressed to Ensure the Safety of Minors

- A journalist is twice as likely to find child sexual exploitation on TikTok than our competitors.
- That said, we have significantly less CSAM on our platform than our competitors, meaning our biggest problems are predation, grooming, and facilitating access to CSAM.
- [Project Cairo Deck.pdf]

Child Sexual Exploitation Maturity Analysis

Maturity: 0 = Nothing, 1 = Basic, 2 = Measurable, 3 = Mature, 4 = Industry leading

Importance P0, P12, P2, P3

Category	Sub-Category	Maturity	Importance	Notes	Docs
Policy	Policies	1	P0	There is significant policy confusion between Adult Nudity and Minor Nudity and a lot of Minor Nudity/sexual activity is not being tagged appropriately.	[HYPERLINK [redacted]

EXHIBIT
30
ULUCAY 2/10/25

			Grooming policies currently live under 'Account Policy' and only US-Solo has launched these in English.	[redacted]
Ops	1	P0	We are under-reporting CSAM because we are not tagging Minor Nudity/Sexual Activity. We do not have a workflow for removing known sex offenders that are reported to us by users, police, or media. We do not report CSAM/grooming content in APAC.	[HYPERLINK [redacted] [redacted] _Advice_on_Reporting_of

					_Minor_Safety_Violations_(RT03.06.20)(sent).pdf]
Data / Metrics	Data (Daily Basics like volume, quality, precision, recall)	0	P1	We do not have daily reports to monitor CSAM/grooming trends and we do not measure whether this content was proactively ID'd by us.	[HYPERLINK [redacted]
CSAM/ Predator Detection	Video	3	P0	We use an internal ML model to detect Child Pornography. Pursuing partnership with YouTube CSAI match for external model.	Child Pornography labelling standard[HYPERLINK [redacted]

Audio	0	P2	Testing sexual audio model for Adult. We could perhaps build out something that detects sexual audio + L1 users in video.	
Account	3	P0	Predator queue detects inappropriate engagement with minors as well as inappropriate sexual behavior (outside of minor exploitation) in the US. This needs to be rolled out globally. Predator model addressed account behavior (comments, follows) It does not take into consideration search history or whether their comments were blocked in DM model. We don't have any models to detect 'high risk children' who might be at a higher risk of predation.	[HYPERLINK [redacted]
Comment	3	P0	Sensitive word list & NLP models being rolled out across countries: ○ [HYPERLINK "https://bytedance.feishu.cn/docs/doccnVSI7Z7Xxm6aRbY5VGBZvry" \h] Predator model runs on	[HYPERLINK [redacted]

			comments as well. We need to 'own' the keyword list and ensure it is up-to-date, translated, and reflects new trends.	444g6 Wmh" \h] [HYPERLINK [redacted]
	Live stream	3	P0	Use the same models for video.	Child Pornography labelling standard[HYPERLINK [redacted]
	Chat	1	P0	DM Predator Queue for LERT (transferred from DM report).	[HYPERLINK

			Testing predator model on DM NLP and user behaviors.	[redacted]
Search	3	P0	Sensitive word list - not able to search for something. This is the same keyword list we use for comments. Search suggestion list - inappropriate search suggestions will not appear We need to 'own' the keyword list and ensure it is up-to-date, translated, and reflects new trends.	[HYPERLINK [redacted] MT Sug Sensitive word list - [HYPERLINK [redacted]

				[redacted]
Underage detection	3	P0	Level Model: AI determines age based on video L0: 0-2 L1: 3-14 L2: 15-17 L3: 18-24 L4: 25-34 L5: 35+ Underage rating: Combines comments, captions, bio, and video (all behavior) to determine age. This model is in testing.	[HYPERLI NK [redacted]
Bad URL Lists	0	PO	We have models to detect porn sites and are currently building models to look into pushing users offsite for sex solicitation (ex: dropbox, whatsapp). We will fold in grooming here as well. We can potentially add in pushing people to high risk off-platform spaces (Dropbox/Telegram/What sapp) into predator model (ex: L5 users sends x number of messages pushing people offsite).	[redacted]

	PII Sharing	0	P0	We do not have any models that detect asking for/offering PII such as home address, location, full name or contact information.	
	Risk Analysis	0	P3	If RIsk Analysis sees reports of predators on other social media platforms, this should prompt an internal review to see if they are also on TikTok.	
3rd Party tools	Cairo	0	P1	Trial ongoing.	
	NCMEC	1	P0	Currently NCMEC case repository provides 3 formats: Md5, Sha1, PhotoDNA. Md5 and sha1 are for videos, but these are unreliable; if it is altered in any way, then the video will not match. PhotoDNA only applies to photos and doesn't work so well with videos---- and that's why later we move to YouTube CSAI for alternative. According to LERT, it's imperative that we at least partner with them for credibility.	
	Thorn/Microsoft	1	P0	We have received the API key for Thorn and will begin testing.	[HYPERLINK [redacted]

				Artemis is another free grooming solution they offer and we should role this out ASAP.	[redacted]
	IWF	0	P4	We do not recommend partnering with them for now as their accuracy rates are extremely low and they require the ability to check our servers to ensure content was actually deleted.	
	Canadian Center for Child Exploitation	0	P1		
	YouTube CSAI Match	1	P0	We must partner with them as they have the most relevant data (video) for TikTok.	
Product	DM		P0	We do not proactively moderate DMs for grooming or predatory behavior - for now; relevant model is under testing. Moderators cannot view DMs for suspected groomers (NLP models,	[HYPERLINK [redacted]

			Predator queue, sensitive word lists) - mods can only review reported messages.	[redacted]
	Download function		P2	Predators can download innocuous content featuring minors. We currently turn off the ability to download a user's content if they are under 16, NOT if the content depicts someone who is under 16.
	Livestream		P0	We use our CSAM models to detect CP in livestream but this is still a high risk area for us. Facebook quickly saw an increase of livestreaming CP and the facilitation of payment for this when they launched. This is a very high risk area for us.
	Comments		P0	Facebook and YouTube experienced a huge backlash after pedophilic comments were exposed on otherwise innocuous content; we have the same problem.
	External CSAM links		P0	Pushing users offsite is always high risk for minors but very difficult to enforce on. That said, a bare minimum of not allowing links to known CSAM sites is a must.

	Dueting	P1	High risk for predators to create 'fantasy' scenarios with minors. We have parental controls to limit whether a minor can have duets made with their content but we do not limit this feature for minor account holders or on content featuring a minor.
	Account	P0	We do not proactively prevent known sex offenders from onboarding or retroactively reference databases if we receive a report that a user is a sex offender. We could potentially partner with Defender's Watch or scrape US registry. We do not have an 'underage user' reporting option.
	Related Accounts	P0	We do not proactively link related accounts to known predators (ex: Device IDs, IP addresses) to prevent them from creating another account.
	In-app education		Add some in-product education for minors, for example "did you know

				you can report something? Here is how', and simple tip on 'be cautious when interacting with people you don't know, ask you parents/guardian. Etc'. Doing this could lift the number of user reports, and would be very very well received externally	
Partnerships	Tech Coalition	1?		Waiting to hear back from them.	
	NCMEC	0?	P0	We have a partnership with them.	
	PhotoDNA	0?	P0		
	Crimes Against Children	0?			
	Thorn	1?			
	inHope	1		We are joining. We already take reports from the hotlines so membership doesn't impact our systems.	
	WeProtect Global Alliance	0		We are joining. Global network of Governments, experts and tech companies tasked with implementing Five Eyes Principles.	[HYPERLINK [redacted]

	Law Enforcement	0?			[redacted]

Minor Safety Policies Must Be Applied Consistently and Measurably In Order To Address Minor Safety Risks

In order to better understand the risk landscape of Minor Safety, our data must be reliable and robust.

Category	Sub-Category	Maturity	Importance	Notes	Docs
Policy	Title application (labeling)	1	P1	Minor Safety violations account for 50% of all actions we take on the platform but the Internal Badness Reports consistently show that the content reviewed is largely innocuous. We need to deep dive into these policy titltes to review and identify policy gaps.	[HYPERLINK [redacted] [HYPERLINK [redacted]
	CSAM	0	P0	We do not have daily reports to monitor CSAM/grooming trends and we do not measure whether this content was proactively ID'd by us.	

Auto-removal		We cannot decipher how many pieces of content were removed for MS if they were removed automatically. If we remove content automatically, we no longer automatically escalate the account for review in moderation teams.	
NR		There are no policy tags added for NR content.	

Underage Users are on TikTok and We Must Identify Their Accounts and Delete Their Data

- Identifying underage users is extremely difficult but we are under increasing regulatory pressure to do so better and to promptly remove them from the platform and delete their data.
- To fulfil our existing and imminent regulatory obligations (especially in the EU), we need to know with sufficient certainty the age of our minor users.
- In addition to our legal obligations, TikTok is committed to leading the field on minor safety.
- Age appropriate design falls down if we don't know how old our users are. Unless and until we address this challenge, praise for our continued efforts to enhance our safety ecosystem for minors will always be qualified.

Category	Sub-Category	Maturity	Importance	Notes	Docs
Policies	Policies	1	P0	It is difficult to identify if someone is a minor or an adult. We are experimenting with	[HYPERLINK [redacted]

				more strict policies in Thailand but this must be paired with an appeal process. We need a global stance on sharent accounts. Having a clear understanding of the age of our users is an important part of the AADC.	[redacted]
	Ops	1	P2	The US teams are launching stricter policies for underage users to address concerns from the FTC and pairing this with option for users to appeal by uploading legal documentation that proves their age. We need a global stance on this issue.	[HYPERLINK [redacted]
Product and Tools	AI Detection	3	P0	Level Model: AI determines age based on video L0: 0-2 L1: 3-14 L2: 15-17 L3: 18-24 L4: 25-34 L5: 35+ Underage rating:	[HYPERLINK [redacted] [HYPERLINK [redacted]

			Combines comments, captions, bio, and video (all behavior) to determine age. This model is in testing. It is unclear whether using AI for age-detection increases our legal exposure and expectation to remove these users. Having a clear understanding of the age of our users is an important part of the AADC but using AI to detect age may infringe on restrictions from GDPR.	
Cairo	1	P2	Cairo has unearthed a number or mechanisms to help us identify underage users. We can lean on them to help us build out identification.	[Project Cairo Deck.pdf]
Age-gating	1	P0	Age-gating currently allows users to re-enter their birthdays. Product is currently working on re-routing users the registration page. It is unclear if global users have been age-gated prior to April 2017. Accounts that	[HYPERLINK [redacted]

		indicated to be under 13, their account will be physically deleted with a restoration window of 30 days. If the user is 13 or over, then relevant restrictions will be applied (e.g. live-streaming).	

Children's data processing and privacy settings may not meet current/future regulatory standards or reflect best practice

Child safety and child privacy are paramount to TikTok as we continue to grow and attract younger users. We must ensure that our platform is safe for under 18 users and that their personal data are handled correctly and lawfully.

Category	Sub-Category	Maturity	Importance	Notes	Docs
Privacy Settings	Minor-specific Privacy Policy Summary			This work is managed by other teams.	[HYPERLINK [redacted]
	Default privacy settings			This work is managed by other teams.	[HYPERLINK [redacted]
	Profiling			This work is managed by other teams.	[HYPERLINK [redacted]

Content on TikTok May Adversely Affect Minors

We will seek to anticipate and mitigate risk to minors in the design of our platform. This means that, where appropriate, we will modify or restrict access to some aspects of our service or build in additional safety features.

Category	Sub-Category	Maturity	Importance	Notes	Docs
Content Classification	Content Curation			Content standard setting. Provide content that is safe and suitable for children. Only allow profiling if you have appropriate measures in place to protect the child from any harmful effects (in particular, being fed content that is detrimental to their health or wellbeing).	[HYPERLINK [redacted] [HYPERLINK [redacted]
	Comment Filtering			Building out better mechanism for filtering out inappropriate comments (ex: bullying/harassment).	
	Trigger Warnings & Content Advisories			Blur imagery that may be offensive to viewers, particularly minors.	[HYPERLINK [redacted]

	Restricted Mode		Add in setting for 'Restricted Mode' that will hide/remove offensive content from users with this setting activated.	
Under 13 User-Experience			It is unclear how we are curating content for the Under-13 experience in the US. We've received reports that content there is inappropriate.	

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-042-LARK-00237494-TIKTOK3047MDL-042-LARK-00237512

BEGATTACH:

ENDATTACH:

Attachment Count: 0

PRODVOL: MDL-042; TB003

Custodian: CLASSEN, AMY

File Path: /TIKTOK3047MDL-042-LARK-00237494.PDF

Confidentiality Designation: CONFIDENTIAL

HASHVALUE:

DocType:

Author:

Create Date: 6/25/2020 12:00 AM

Last Modified Date: 12/31/9999 7:00 PM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENDATA:

Filename: TIKTOK3047MDL-042-LARK-00237494.PDF

Title: ADDRESSING MINOR SAFETY NOTES

DOCEXT:

Email From:

Email To:

Email CC:

Email BCC:

Received Date: 12/31/9999 7:00 PM

Sent Date: 12/31/9999 7:00 PM

TIMEZONE:

Subject:

THREADID:

REDACTIONS:

REDACTION TYPE: