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EXHIBIT 37



Assessment of Instagram's positioning on key issues

June 2019

Example 2: Age verification

The diagram illustrates Instagram's age verification communication. It features a central text box with two main sections: 'Under-13s - comment' and 'Background'. To the right of the text box, five callout lines with dashed red borders point to specific parts of the text, each accompanied by a descriptive label. The callouts are: 1. 'Clear and unambiguous statement of Instagram's values, aligned with public values' pointing to the first sentence of the 'Under-13s' section. 2. 'Simple, compelling contextualisation of the challenges around age verification' pointing to the second sentence of the 'Under-13s' section. 3. 'Clear and simple proof points demonstrating action' pointing to the third sentence of the 'Under-13s' section. 4. 'Further compelling contextualisation of the challenge' pointing to the fourth sentence of the 'Under-13s' section. 5. 'Biggest weakness of messaging is that current approach to age verification feels largely reactive, placing reliance on honesty of users' pointing to the first bullet point of the 'Background' section.

Under-13s - comment

We don't want people who are under 13 on Instagram. Age verification is an industry wide challenge, as most young people don't have a photo ID. We currently take a number of steps to prevent people under age using Instagram. In Europe, we ask for your DOB if you're under 18. Anyone can report someone they think are under 13 through the app, or if they don't have an account, through our website. If we determine they are under age, we'll remove them. We're also working on new technology that can estimate age, for example looking for birthday candles. Age is a sensitive piece of data, so we want to get this right and we're working with other tech companies and government to find an industry wide solution.

Background

- Our community guidelines are clear you have to be 13 to use Instagram.
- We are taking a number of steps now:
 - We check age when anything gets reported for any reason
 - In Europe we ask if you're over 18, if not – we ask for age - we understand not everyone inputs their actual age, but a lot do and that helps us train the technology and estimate age
 - Anyone can report someone they think are under 13 through the app, or if they don't have an account, through our website.
- We're working on building tech to estimate age - eg sweet16 hashtags
- We are working with Facebook to engage in the UK Information Commissioner Office's consultation on age appropriate design

Source: Instagram Policy Communications Guide 2019