



Google Ireland Transparency Report Under Regulation (EU) 2021/1232

The European Parliament and the Council have introduced Regulation (EU) 2021/1232 on a temporary derogation from certain provisions of Directive 2002/58/EC as regards the use of technologies by providers of number-independent interpersonal communications services for the processing of personal and other data for the purpose of combating online child sexual abuse (the "**Regulation**"). The providers of electronic communication services (ECS) in scope of the Regulation must publish a transparency report on the processing of personal data under this Regulation on an annual basis. This report provides information on the processing of personal data for the purpose of detecting and removing online child sexual abuse and reporting it to the National Center for Missing and Exploited Children (NCMEC) for the ECS in scope of the Regulation within the European Union (EU).

Transparency Report Under Regulation (EU) 2021/1232

Overview

Google Ireland Ltd (Google) is committed to fighting online child sexual abuse. Child sexual abuse material (CSAM) is illegal and our Terms of Service prohibit using any of Google's platforms or services to store or share this abhorrent content. Our teams work around-the-clock to identify, remove, and report this content, using a combination of industry-leading automated detection tools and specially-trained human reviewers. We report CSAM to NCMEC, the clearinghouse and comprehensive reporting center in the United States for matters related to child exploitation. NCMEC may send those reports to law enforcement agencies around the world. For more information on Google's global efforts to combat CSAM, please see Google's CSAM [Transparency Report](#) and accompanying [FAQs](#). Additionally, Google's [Protecting Children](#) site outlines our broader efforts to detect, prevent, and remove online child sexual abuse from Google's services.

This report describes Google's efforts and resources to combat online child sexual abuse through automated technologies deployed in Google's ECS in scope of the Regulation as it pertains to users in the EU. This report captures information for the period from August 2, 2021 to December 31, 2021, and will be published on an annual basis thereafter. The numbers below only cover the consumer version of Google Chat for the relevant time period for EU users. Due to technical reasons, reporting for other ECS in scope of the Regulation (Hangouts and Gmail) could not be included in this report or detection had not been conducted in the reported period. We expect to be able to provide more comprehensive metrics for future reporting periods for the services in scope of the Regulation.

Number of Google Chat accounts where online child sexual abuse was identified through automated technologies: 33¹

This metric shows the total number of Google accounts in which online child sexual abuse was identified through automated technologies for the consumer version of Google Chat for EU users.

¹Google does not currently scan text for solicitation of children in ECS in scope of the Regulation, therefore this was not included in this metric.

Number of the above Google Chat accounts disabled for online child sexual abuse where the user appealed: 8

This metric shows the number of the above Google Accounts disabled for online child sexual abuse where the user appealed the disable decision using Google's internal redress mechanism or lodged a complaint with a judicial authority.

Number of the above Google Chat accounts reinstated following appeal: 0

This metric shows the number of the above Google accounts that were reinstated following an appeal through Google's internal redress mechanism or a complaint with a judicial authority for the services in scope of the Regulation within the EU.

Additional Information under the Regulation

The type and volumes of data processed for online child sexual abuse under the Regulation

For the purpose of detecting and removing online child sexual abuse and reporting it to NCMEC in the services in scope of the Regulation within the European Union, Google may process images, videos, and other media types where people could generate CSAM. To effectively combat this abhorrent material on our platforms, Google may need to process data related to the user responsible for the content, metadata related to the content, and data related to a potential victim. Abuse operations data is also processed to help facilitate detection of online child sexual abuse. Google's processing of data under this Regulation is tailored to the subset of data in the account which is likely to contain detectable online child sexual abuse.

The specific grounds under the General Data Protection Regulation (GDPR) relied on for the processing of personal data pursuant to this Regulation

When Google processes personal data under this Regulation for the purpose of detecting and combating online child sexual abuse, it does so on the GDPR grounds that the processing is necessary in order to protect the vital interests of children and those who are the victims of online child sexual abuse. In addition, that processing is necessary for the purposes of the legitimate interests of Google to detect, prevent or otherwise address online child sexual abuse on Google's services, and to protect Google users, customers, partners, and the public from this egregious form of illegal content. The processing is also necessary for the purposes of the legitimate interests of victims of child sexual abuse and the organization to whom Google reports online child sexual abuse (NCMEC) to detect, prevent and remove online child sexual abuse from Google's services.

The European Parliament and the Council recognized that the voluntary scanning activities of providers of ECS to detect online child sexual abuse on their services and report it to law enforcement authorities or to organisations acting in the public interest against child sexual abuse are important in reducing the further dissemination of CSAM and in enabling the identification and potential rescue of child victims, whose fundamental rights to human dignity and to physical and mental integrity have been severely violated.² The European Parliament and the Council therefore passed the Regulation in order to enable those providers to continue using such voluntary measures to combat online child sexual abuse.

Please see more details on the legal grounds of processing in the [Google Privacy Policy](#).

²Recital 7 of the Regulation.

The ground relied on for transfers of personal data outside the European Union pursuant to the GDPR

Google has provided appropriate safeguards in the form of [model contract clauses](#). Please see more details in the Data transfer section of the [Google Privacy Policy](#).

Additional Information under the Regulation

The numbers and ratios of errors (false positives) of the different technologies used

Google does not apply each technology to detect online child sexual abuse in isolation. Rather, technologies are usually used in combination with one another, which may be further augmented by human review, in order to reduce errors or false positives. At Google, we approach this metric by measuring the overall appeal reinstate rate (for example, the rate at which Google reinstates a CSAM-disabled account upon the user appealing). This rate was nil, as described in the metrics above, for the services in scope of the Regulation for European Union users.

The measures applied to limit the error rate

Google regularly assesses the quality of its abuse detection technologies, both to fine tune precision (that we are detecting only online child sexual abuse) and recall (that we are not missing online child sexual abuse on our platforms).

Various safeguards, including human review and oversight, as well as appropriate quality control processes are instituted to ensure that errors are reduced, and if detected, that they are remediated expeditiously. To further ensure the accuracy of the human review, Google reviewers specialize in reviewing for online child sexual abuse and undergo robust training under guidance of counsel on how to recognize this content on Google's services. These reviewers undergo periodic quality control assessments as well.

Google users whose accounts are ultimately disabled for online child sexual abuse are also given the opportunity to appeal the decision, and each appeal undergoes human review to confirm whether the correct decision was made.

The retention policy and the data protection safeguards applied pursuant to the GDPR

When Google processes CSAM, its data protection principles ensure that there is a justified purpose for the processing, that the processing is of an acceptable level of quality, that the data used is proportional to the purpose, and that retention, access, and sharing are appropriately limited. Please see more details on data retention policy and the data protection safeguards in the [Google Privacy Policy](#).

Additionally, to ensure the accuracy of abuse decisions, Google human reviewers specialize in reviewing for online child sexual abuse and undergo robust training under guidance of counsel on how to recognize this content on Google's services, as described in the section above.

Google also has a comprehensive privacy program that ensures that data is accessed, used, or shared only in an authorized manner. Should issues arise, Google's incident response team promptly investigates any reported incidents and makes resolving them a high priority.

The names of the organisations acting in the public interest against child sexual abuse with whom data has been shared pursuant to this Regulation

Google reports apparent online child sexual abuse to the National Center for Missing and Exploited Children (NCMEC).