



10 April 2024

Rt Hon Caroline Nokes MP
Chair, Women and Equalities Committee
House of Commons
Palace of Westminster
London
SW1A 0AA

RE: Non-Consensual Intimate Images

Dear Ms. Nokes,

Thank you for your letter, dated 28 March 2024, regarding the image hashing technology offered by StopNCII.org. We share the Committee's commitment to fostering a safe and positive online environment, and as such we welcome the opportunity to provide information on measures taken by Pinterest to prevent the sharing of non-consensual intimate images (NCII), including our decision-making process regarding adoption of technological solutions.

Pinterest has a longstanding commitment to making our platform a safe place for our users, who we call "Pinner." We view a positive, inspiring atmosphere as essential to our user experience, and accordingly, we have developed industry-leading content policies and robust content moderation practices. These efforts are highly effective in limiting the prevalence and reach of harmful content on Pinterest, but we know that the work needed to achieve our goal of providing a safe and positive platform for everyone will never end. Indeed, as a founding signatory of The Inspired Internet Pledge, Pinterest has publicly pledged to centre its commitment to making the internet a healthier place through its product, thought leadership, policies, and strategic giving.¹ Our CEO Bill Ready has also been outspoken regarding his intention to make Pinner's well-being central to Pinterest's mission as a company.²

¹ For more information on The Inspired Internet Pledge, please see:
<https://inspiredinternet.org/signatory/pinterest/>

² A recent op-ed by Mr. Ready on this topic, originally published in The Hill on 29 January 2024, can be accessed at:
<https://newsroom.pinterest.com/news/pinterest-ceo-big-tech-must-reject-big-tobaccos-model/>³ P
interest's Community Guidelines can be accessed at:
<https://policy.pinterest.com/community-guidelines>



Keeping our community safe is an ongoing, industry-wide challenge as online trends and technological solutions continue to evolve, and we remain committed to exploring the best ways to achieve this goal. That is why we continually review and update our safety policies, tools, and technologies, including working with trusted third parties and the wider industry to enhance our work.

Our approach to content moderation and NCII

Our mission is to bring everyone the inspiration to create a life they love. However, we recognise that not everything on the internet is inspiring, and so we have a moderation approach centred on Community Guidelines which are strictly enforced through a combination of automated, manual, and hybrid content moderation processes.

Pinterest's Community Guidelines, which outline what content is and is not allowed on Pinterest, strictly prohibit non-consensual images, defined as images of a private or sexual nature that are obtained or published without consent, as well as any other content that risks sexual, physical, or financial exploitation. Our Community Guidelines also prohibit adult content, including nudity as well as sexualized content. ³

Pinterest's policies are enforced through a mix of automated tools, manual review, and hybrid approaches that combine elements of both. Our automated tools use a combination of signals to identify and take action against specific types of harmful and policy-violating content. Where a system detects policy-violating content, it will deactivate or limit the distribution of the content, depending on the violation type and severity. Among other harmful content, we utilise these automated tools to detect nudity or other adult content, and we are continually investing in them to improve their performance.

We also manually act on some Pins through our human review process. Pins actioned through this process may include those identified internally, those reported to us by third parties, and those reported to us by users. Pinterest uses manual review teams to review and take appropriate action on reports of harmful and illegal content and behaviour on our platform. Hybrid actions include those where a team member determines that a Pin violates policy, and automated systems help expand that decision to enforce against machine-identified matching Pins.

It is also notable that Pinterest's functionalities are not prone to disseminating content easily, quickly or widely, particularly harmful content. Rather than prioritising content simply because it is new or trending, Pinterest's recommender system is designed to



serve content based on the individual Pinner's engagement with our service, such as recent searches they've made, the content they save, Pins they view, and other Pinner's they follow; as well as explicit signals that Pinner's provide to us such as age, gender, and selected topics of interest. Our approach is intended to show content we think will be relevant, inspiring, and personal to each Pinner's tastes and interests. This stands in contrast to some other online platforms which have surfaces that are explicitly designed to uprank new content, or whose defining purpose is to connect users with other people, allowing content to achieve "viral" status as it becomes widely shared through peer-to-peer interactions.

As a result of Pinterest's strict content safety policies, robust content moderation systems, and lack of susceptibility to viral content, complaints of NCII on Pinterest are extremely rare. We would be happy to provide this data to the Chair if requested, but prefer to submit it confidentially, as it could potentially be used to circumvent our content moderation methods if publicly disclosed.

Our approach to content moderation tools

As mentioned earlier, we recognise that the work to keep Pinner's safe on our platform is never complete. We continually monitor trends on Pinterest as well as in the broader online ecosystem, as well as evaluate new online safety tools as they become available. Deployment of all of these tools require engineering and operational resources to be used sustainably, so it is imperative for platforms to determine how to best deploy their resources to utilise the technology that will be most effective for their platforms and the content challenges they face.

Prior to receiving your letter, our team had studied the StopNCII.org tool and determined not to implement it as of this time. Sexually explicit images, whether consensual or not, violate our Community Guidelines. As such, we have existing automated tools deployed to action sexually explicit images which are proving very effective, as instances of NCII sharing on Pinterest are extremely rare, and reach very few users. According to Pinterest's most recent global transparency report, 98% of all adult content (which is inclusive of NCII as defined by StopNCII.org) we removed was seen by fewer than 100 users.³ As with all available content moderation tools, we will

³ Accessible at:
<https://policy.pinterest.com/transparency-report>



continue to monitor this issue and may choose to deploy the StopNCII.org tool or similar tools in the future.

Engagement with Ofcom

Finally, your letter asks whether we have been in conversation with Ofcom in relation to the Online Safety Act (OSA) and its implications for handling cases of NCII image abuse. We welcome the OSA and the contributions it can make to promoting a safe and inclusive online environment, and view implementation of its requirements as a continuation of our longstanding commitment to making Pinterest a positive and welcoming place for everyone.

We have been deeply engaged with Ofcom to prepare for the OSA's implementation, including participating in several calls for evidence and consultations regarding online safety and meeting directly with representatives of Ofcom on multiple occasions. While these discussions have not yet specifically addressed NCII, we would be happy to discuss with Ofcom the measures we take to tackle the sharing of NCII and receive feedback on potential improvements.

Thank you for the opportunity to support the Committee's efforts to tackle NCII abuse online. If you require any further information from Pinterest, please do not hesitate to reach out to us. We look forward to further engagement with you as you continue this important work, and would be happy to meet to discuss in more detail if it would be of assistance to the Committee.

Best regards,

Shaun McElhenny
Sr. Counsel, Global Litigation & Regulatory