Five years of the Right to be Forgotten

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Right to be Forgotten (RTBF)

Delist “inaccurate, inadequate, irrelevant, or excessive” information surfaced by search queries containing the name of the requester.
Balancing between individual privacy, public interest
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Decision made by search provider via manual review
Example of balancing test

**Request**

A former politician requested to delist 3 URLs from Google Search reporting on his recent departure from politics in connection with a drug scandal.

**Outcome**

Google delisted the 3 URLs as they disclosed the politician’s private home addresses, not just information about the scandal.
**Example of balancing test**

**Request**

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**Outcome**

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Over the last five years then...

- **3M** Requested URLs
- **45%** URLs delisted
- **502,000** Requesters
Our measurement study

Types of sites requested

Information present on site

Entities creating requests
Provider greater transparency around how the RTBF is applied in practice
Review process & dataset
Data present in a request

- Email address
- URLs to delist
- Country
- Timestamp
Manual annotations added during review

- Type of site
  - Social, directory, news, government records

- Information on page
  - Personal information, professional information, crime, political, self-authored...

- Requesting entity
  - Minor, government official, corporate entity...
Five years of data, since implementation

47,000
Average URLs per month
Average time to arrive at a decision

85 days

2014
Average time to arrive at a decision

- 2014: 85 days
- 2019: 6 days
Which sites are requested for delisting?
Two dominant intents for delistings

16% Directory
13% Social media

Personal information

19% News
2% Government

Legal history
Influenced by regional privacy attitudes and local norms

France
42%
Directory, Social media
(vs. 29% across Europe)

Italy
33%
News
(vs. 19% across Europe)

Spain
10%
Government
(vs. 2% across Europe)
Delisting rates reflect public interest balancing

- 19% Government
- 35% News
- 53% Directory, Social media
Increasing share of requests to news

Examples include:

dailymail.co.uk
ouest-france.fr
telegraph.co.uk
repubblica.it
Declining share of requests to social media

Examples include:
- facebook.com
- twitter.com
- youtube.com
- plus.google.com
- instagram.com
Influence of GDPR on directory requests

After GDPR, only 55% of the top 500 requested directory sites remain online.

Examples include:
118712.fr
societe.com
192.com
What information is requested for delisting?
Professional & personal information most common

- Professional information: 24%
- Personal information: 8%
- Sensitive personal information: 2%

Professional activities, contact information, phone numbers, and mailing addresses.

34% of all requested URLs
Criminal records and negative reviews also common

- Crime: 9%
- Professional wrongdoing: 8%

17% of all requested URLs

Convictions, acquittals, or negative reviews.
Remaining types of common information

- Political: 20%
- Self-authored: 9%
- Name not found: 4%

33% of requested URLs
Affinity of types of information to different sites

**News**

<table>
<thead>
<tr>
<th>Type of Information</th>
<th>Affinity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Professional information</td>
<td>18%</td>
</tr>
<tr>
<td>Personal information</td>
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<td>5%</td>
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<td>10%</td>
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</tbody>
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...
## Affinity of types of information to different sites

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<tr>
<th>Type</th>
<th>News</th>
<th>Social Media</th>
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</table>
Delisting rates reflect public interest

- Criticism of platform or activities: 3%
- Personal addresses, contact info, photos: 97%
- Crime: 48%
- Personal information: 97%

Political
Who makes delisting requests?
Majority of requested URLs come from private individuals

- 84% Private individual
- 6% Minor
- 4% Public figure
- 4% Politician
- 2% Corporate entity
Small number of requesters make heavy use of RTBF

34% Requested URLs from just 10K requesters
Long tail of hundreds of thousands of requesters

- 34% Requested URLs from just 10K requesters
- 29% Requested URLs from 400K requesters
## Requester activity varies by country

<table>
<thead>
<tr>
<th>Country</th>
<th>URLs requested per 1000 Internet users</th>
</tr>
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<tbody>
<tr>
<td>France</td>
<td>12</td>
</tr>
<tr>
<td>Italy</td>
<td>7</td>
</tr>
<tr>
<td>Greece</td>
<td>3</td>
</tr>
</tbody>
</table>
Decreasing number of new requesters

6,800
Average new requesters per month
## Relationship between requester’s origin and audience

<table>
<thead>
<tr>
<th>News Site</th>
<th>Belgium</th>
<th>Germany</th>
<th>Spain</th>
<th>France</th>
<th>UK</th>
</tr>
</thead>
<tbody>
<tr>
<td>hln.be</td>
<td>89%</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
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<tr>
<td>nieuwsblad.be</td>
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Over 89% of requests to top Belgian news sites come from local requesters.
## Relationship between requester’s origin and audience

### Origin of requester, by volume of requested URLs

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<td>0%</td>
<td>1%</td>
<td>0%</td>
<td>2%</td>
<td>92%</td>
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Conclusion

Nuanced, dynamic usage of the RTBF over last five years.

Influenced in part by local privacy concerns and media norms.

Challenge in providing transparency without de-anonymizing specific requesters.
Research now reflected in Transparency Report

http://transparencyreport.google.com/eu-privacy/

Requests to delist content under European privacy law

In a May 2014 ruling, the Court of Justice of the European Union found that individuals have the right to ask search engines like Google to delist certain results about them. This report provides data on the volume of requests, the URLs delisted, the individuals submitting requests, and the content of websites and URLs identified in requests.

Delisting URLs from Google Search for privacy

<table>
<thead>
<tr>
<th>Requests to delist</th>
<th>URLs requested to be delisted</th>
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<tr>
<td>859,846</td>
<td>3,231,694</td>
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Thanks!
kurtthomas@google.com