

EXHIBIT 191

UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE LODGED UNDER SEAL

From: Justin Osofsky </O=THEFACEBOOK/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=JOSOFISKY>
Sent: Monday, August 20, 2012 6:21 PM
To: Sam Lessin; Brian Boland; Douglas Purdy
Cc: Mike Vernal
Subject: Re: CRM (Experian deck) and Platform data

As you outline, it seems like we need to:

1. Tighten our policies. I can work with Ali on the platform side. Brian, is there anyone we should loop in from the ads policy team or is Ali appropriate to run point?
2. Enforce aggressively. We can communicate concerns and enforcement actions through the appropriate partner managers depending on whether they are platform partners (e.g., Tripadvisor) or PMDs.

From: Sam Lessin <sl@fb.com>
Date: Mon, 20 Aug 2012 09:58:45 -0700
To: Brian Boland <btboland@fb.com>, Justin Osofsky <josofsky@fb.com>, Douglas Purdy <dmp@fb.com>
Cc: Mike Vernal <vernal@fb.com>
Subject: Re: CRM (Experian deck) and Platform data

Boland + Osofsky + Purdy

It seems like you guys are the right people to figure this out across ads and platform (add anyone if needed). My sense is we should just massively tighten our language / explanation around uses of data for an on-site experience, make this type of stuff pretty explicitly verboten, and shut down anyone who seems to be skirting the line aggressively... how do we go about making sure this is true on a platform and ads side and then making sure all our partner touch points are in sync on this?

Sam

From: Douglas Purdy <dmp@fb.com>
Date: Sunday, August 19, 2012 9:12 PM
To: Sam Lessin <sl@fb.com>
Cc: Mike Vernal <vernal@fb.com>, Zach Rait <zach@fb.com>, Justin Osofsky <josofsky@fb.com>, Dan Rose <drose@fb.com>, Sheryl Sandberg <sheryl@fb.com>, Mark Zuckerberg <zuck@fb.com>
Subject: Re: CRM (Experian deck) and Platform data

Agreed.

We already prohibit them (or other brokers/ad networks) from doing this directly.

We do need to be vigilant here, however, lots of 3rd party services are in the grey zone with regard to these scenarios.

On Aug 19, 2012, at 11:29 AM, "Sam Lessin" <sl@fb.com> wrote:

Just want to make sure you all see this .. This is both the oppy and what we need to make sure we are NOT enabling others to do via platform. The more we open up things like instant personalization, etc the more we have to make sure aggregators are not stitching it back together on the other end and erasing our value beyond just our raw impression inventory.

Those on the "to" line, ahead of / even instead of any actual changes to the API we should think about / make sure we are in lock step on the policy side that this is NOT ok (or debate it if anyone thinks it is)

Sent from my blackberry wireless

Begin forwarded message:

From: Matt Trainer <mtrainer@fb.com>
Date: August 17, 2012, 5:14:21 PM PDT
To: Allison Hendrix <ahendrix@fb.com>, Sam Lessin <sl@fb.com>
Subject: Re: CRM (Experian deck) and Platform data

Here's Salesforce's (via Buddymedia) request:

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Two things to understand though. First, this is all purely exploratory. We have not begun or committed to any of these types of databases in any way. Second, this is stuff that we'd love to do and as such is pretty strategic to Salesforce, so please keep this confidential.

Database:

- We'd like a database of every user who has ever posted on a branded page, commented on a page, or liked a comment. We'd like to make this database searchable by topic of posts (kept internally by us). We can already do most of this today without authentication given that it's all publicly available information via opengraph, but it's not completely clear whether facebook likes people doing this.
- We'd like to post messages on a wall that direct people to an in-tab experience or a dotcom experience powered by facebook. This experience may include a facebook authentication mechanism for identification. We'd like to add users identified through this mechanism to our database. In the process, we would likely cookie the users.
- As a tangent, we would like to cookie the users so that we can detect them on other experiences in-tab or on a dot-com without authentication and attribute that visit to the user's profile in our database. We'd also use this technique to identify the same user clicking a link in a tweet and thus connecting their facebook/twitter accounts.
- We'd like to do email users from a brands existing email database and direct them to an in-tab experience or a dotcom experience powered by facebook. This experience may also include a facebook authentication mechanism or may not. We would use this technique to try to link existing email properties to social profiles in our database.

How would we use this data?

- We'd like to mine authenticated users interests and friend graphs to build an aggregate model a brands customers/fans.
- We'd like to build a system that allows us to add social data to email lists so we can do social interest targeting through email

- We'd like use our cookies to identify users when they come to promotional content (in-tab or on dotcoms) to tailor content to the viewer.
- We'd like to use this data to augment internal CRM's like loyalty card members.
- We'd like to power all of this with salesforce CRM.

Lastly, I'd love to jump on a screenshare with you and show you a draft glimpse of the Marketing Cloud keynote demo that we'll be doing with Benioff on day one at Dreamforce. It doesn't necessarily address any of this just yet from a Facebook point of view, but I'd love to get your feedback.

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**From:** Allison Hendrix <[ahendrix@fb.com](mailto:ahendrix@fb.com)>  
**Date:** Friday, August 17, 2012 2:53 PM  
**To:** Matt Trainer <[mtrainer@fb.com](mailto:mtrainer@fb.com)>, Sam Lessin <[sl@fb.com](mailto:sl@fb.com)>  
**Subject:** RE: CRM (Experian deck) and Platform data

Not unless they are working directly with us, otherwise that is a violation. I didn't open the attachment but will dive in and schedule time for us to meet, including Daniel.

The top line is that we consider Experian to be a data broker, and as such they fall under II.6 and must not collect any data from us (directly or indirectly).

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**From:** Matt Trainer  
**Sent:** Friday, August 17, 2012 2:39 PM  
**To:** Sam Lessin; Allison Hendrix  
**Subject:** Re: CRM (Experian deck) and Platform data

Experian is the developer

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**From:** Sam Lessin <[sl@fb.com](mailto:sl@fb.com)>  
**Date:** Friday, August 17, 2012 2:13 PM  
**To:** Allison Hendrix <[ahendrix@fb.com](mailto:ahendrix@fb.com)>, Matt Trainer <[mtrainer@fb.com](mailto:mtrainer@fb.com)>  
**Subject:** Re: CRM (Experian deck) and Platform data

That sounds right for now :)

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**From:** Allison Hendrix <[ahendrix@fb.com](mailto:ahendrix@fb.com)>  
**Date:** Friday, August 17, 2012 5:12 PM  
**To:** Sam Lessin <[sl@fb.com](mailto:sl@fb.com)>, Matt Trainer <[mtrainer@fb.com](mailto:mtrainer@fb.com)>  
**Subject:** RE: CRM (Experian deck) and Platform data

Thanks, Sam. Please loop me in if we decide to make any changes to the general data policies and don't hesitate to contact me if you have any questions as to our current data policies.

Matt – in the meantime, our developers and advertisers should not share any data obtained from us with Experian b/c that violates II.6. Thanks! - Ali

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**From:** Sam Lessin  
**Sent:** Friday, August 17, 2012 2:03 PM  
**To:** Matt Trainer  
**Cc:** Allison Hendrix  
**Subject:** Re: CRM (Experian deck) and Platform data

The right people to iron it out are probably me + doug purdy + vernal + justin osofsky... first, and then we can think form there -- let me take it as an action item to follow up on this

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**From:** Matt Trainer <mtrainer@fb.com>  
**Date:** Friday, August 17, 2012 2:30 PM  
**To:** Sam Lessin <sl@fb.com>  
**Cc:** Allison Hendrix <ahendrix@fb.com>  
**Subject:** Re: CRM (Experian deck) and Platform data

Adding a follow-up from Experian here:

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this is the kind of rhetoric we've stayed away from, but it's out there.

http://www.clickz.com/clickz/column/2199132/6-ways-to-get-social-data-working-for-your-brand?wt.mc_ev=click&WT.tsrc=Email&utm_term=&utm_content=6%20Ways%20to%20Get%20Social%20Data%20Working%20for%20Your%20Brand&utm_campaign=08%2F16%2F12%20-%20ClickZ%20Today&utm_source=ClickZ%20Today%20Newsletter&utm_medium=Email

Attached are the Spotify screenshots we spoke about, and I also included one from TripAdvisor. It would be great to know if this is an acceptable use case.

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**From:** Matt Trainer <mtrainer@fb.com>  
**Date:** Friday, August 17, 2012 10:58 AM  
**To:** Sam Lessin <sl@fb.com>  
**Cc:** Allison Hendrix <ahendrix@fb.com>  
**Subject:** Re: CRM (Experian deck) and Platform data

Talked more with Experian and Oracle yesterday.

Tl;dr - our policies say that Platform data can only be used "to improve the application experience", but we don't have a good definition of what the boundaries on "application experience" are.

There are use-cases at the Platform policy level that we need to align ourselves on immediately.

- 1/ Using social data in emails to app users
- 2/ Using social data in off-line activities

Re 1/: Today, Spotify, Tripadvisor, and others ALREADY send emails using social data (what songs friends listened to, what locations you might be interested in based on interests). There are ~10 companies doing this today, yet our policy team regularly tells developers that it's not allowed.

Re 2/: Today, some PMDs enable event websites with Facebook login, and they attach Facebook Ids to event passes (or ski lift passes) to enable photos and OG activities to be synced to Facebook. Again, this stretches our traditional definition of what an 'application' is.

When those use-cases are added together, we're really at a point where the definition of "application experience" can be infinitely extended. Yet our policy team seems to view things more restrictively, and businesses aren't fully clear how our current policies are enforced.

Who are the right people to iron this out?

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**From:** Sam Lessin <[sl@fb.com](mailto:sl@fb.com)>  
**Date:** Wednesday, August 15, 2012 12:28 PM  
**To:** Matt Trainer <[mtrainer@fb.com](mailto:mtrainer@fb.com)>  
**Subject:** Re: CRM (Experian deck)

This is pretty interesting... thx.

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**From:** Matt Trainer <[mtrainer@fb.com](mailto:mtrainer@fb.com)>  
**Date:** Wednesday, August 15, 2012 2:55 PM  
**To:** Sam Lessin <[sl@fb.com](mailto:sl@fb.com)>  
**Subject:** CRM (Experian deck)

First – the RC group: <https://www.facebook.com/groups/rcatthebook/>

Attached is the proposal I was sent on what Experian wants to do. It's pretty thorough.

Here's what the follow-up convo has looked like (her answers are in bold):

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Done – please arrive at the lobby for building 15.

I've reviewed the document that you attached (in classic second-try fashion), and have a few questions. Great document, by the way. I think it makes the use cases very clear.

Page 1:

Social attribution – is auth involved in this process? **No, but it can be.**

I assume you're wrapping our plugins in your own javascript – correct? **Correct.**

SMART Facebook connect – What Facebook data might be used when delivering messages to prospective customers? Is it PII? Are you planning on using PII or aggregate FB information in advertising in non-FB channels? How? When you say "other channels", it's a bit too ambiguous to evaluate. I think we'll need to get extremely specific on which use cases are OK or not OK – I doubt the team would be comfortable approving implementations that don't clearly define when information is gathered or exactly where it is used.

See below based on client examples. We can also discuss this more offline.

Page 2:

re: maximizing return on Facebook spend – the data will inform content in "other off-line channels" ...where? Again, I think non-specifics will scare the folks over here.

OK. If we could agree to email, website and POS we'd be happy.

Page 3:

In tv-client background, "merge this data with other sources" - is Facebook data being passed to other 3rd parties, either PII or aggregate? Are we talking about other data-brokers (besides Experian)?

Bottom line is that clients would like to be able to merge data gleaned from Apps with their larger customer databases to help build out a more complete profile of their users. This goes for all verticals – if we're saying FB data is interesting and that social data can help inform advertising, then clients want to see this data with their other data.

No third parties, ever. Just Experian, acting on behalf of the client.

In insurance background, "ages of users connected friends" & "use friend data" - Are users giving walloping amounts of permissions here? Regardless, my sense is that we'd be MUCH more restrictive of how friend data is used, regardless of the primary users' consent, when it comes to using friend data outside of improving the immediate experience of an app.

That is very helpful, thank you.

"as an example" - again, non-specifics will have to be eliminated.

In general, the insurance use-case is the 'scariest' and biggest PR risk, most likely.

We're aware and agree, but these are a lot of the clients who are most interested in social data.

Page 4:

In 2), regarding experian databases – is data gained on behalf of one client made available in any way (PII or aggregate) to other clients or companies?

Aggregate only for insights like for PR, whitepapers, etc. (not dissimilar to Comscore's recent study), we never share data between clients.

In general, using FB data to improve the user's experience within an application is explicitly allowed by policy already.

Thanks. I think the clarification we may be looking for here is exactly what is meant by "within the application."

Page 5:

Re 6) - Highly doubtful, and I'd recommend not broaching the topic until we've gone through 'safer' use cases for a while. Allowing Experian to build a cross-client database of Facebook user information would be the use case that our policies explicitly forbid today.

OK. I think we were a little unclear about this. We can talk about this offline.