Dear Ruben,

Thank you for your correspondence.

It is regrettable that you feel that Facebook did not adequately fulfil your access request.

As set out in our previous response, we are satisfied that our response on 15 February 2019 complies with our obligations under Article 15 of the GDPR. In our previous response, we also provided an overview of the relevant provisions of the GDPR, together with relevant guidance and case law which has informed Facebook's approach to access requests. In short, Facebook ensures that users' right of access is fulfilled by providing its users with easy access to their data in a form which they can understand and from which they can assess the lawfulness of the processing of their data. To that end. we provide our users with a variety of tools – such as Access Your Information (**"AYI"**), Download Your Information (**"DYI"**), Activity Log and Ads Preferences that, altogether, give users access to, and control over, their personal data.

On June 4th, you replied that you were not satisfied that we provided you with all your data and you requested access to all the data points mentioned in our Data Policy under "What kinds of information do we collect".

To make clear that and how we provide access to this data, the table below sets out, in blue, the sections of our Data Policy that explain the data categories Facebook may hold (under *"What kinds of information do we collect?"*) and that you referenced in your follow-up query. It then explains where those data categories can be found in either AYI and/or DYI. Where a data item described in the Data Policy is not made available, the table explains why this is the case.

Things that you and others do and provide.

Information and content you provide. We collect the content, communications and other information you provide when you use our Products, including when you sign up for an account, create or share content and message or communicate with others. This can include information in or about the content that you provide (e.g. metadata), such as the location of a photo or the date a file was created. It can also include what you see through features that we provide, such as our camera, so we can do things such as suggest masks and filters that you might like, or give you tips on using portrait mode. Our systems automatically process content and communications that you and others provide to analyse context and what's in them for the purposes described below. Learn more about how you can control who can see the things you share.
- Data with special protections: You can choose to provide information in your Facebook profile fields or life events about your religious views, political views, who you are "interested in" or your health. This and other information (such as racial or ethnic origin, philosophical beliefs or trade union membership) is subject to special protections under EU law.

Data Item	Provided in AYI	Provided in DYI	If no access provided, reason why
Name	Yes: -> Settings	Yes	NA

	-> Your information -> Profile information -> About you		
Phone Number - Current	Yes: -> Your information -> Profile information -> Your contact details	Yes	NA
Phone Number - Historical	No	Yes	NA
Email Addresses - Current	Yes: -> Your information -> Profile information -> Your contact details	Yes	NA
Date of birth	Yes: -> Your information -> Profile information -> About you -> Contact and basic info	Yes	NA
Gender	Yes: -> Your information -> Profile information -> About you	Yes	NA
Profile Data	Yes: -> Your information -> Profile information -> About you - > Contact and basic info	Yes	NA
Posts	Yes: -> Your information -> Posts	Yes	NA
Major Life Events	Yes: -> Your information -> Profile information -> Life events	Yes	NA
Comments	Yes: -> Your information -> Comments	Yes	NA
Likes/Reactions	Yes: -> Your information -> Likes and reactions	Yes	NA
Pages	Yes: -> Your information -> Pages	Yes	NA
Stories	No	Yes, but only if you have archived your Story.	NA

Photos	Yes: -> Your information -> Photos and videos	Yes	NA
Location of a photo and date it was created	Yes: -> Your information -> Photos and videos	Yes	NA
Camera information (general access to camera)	See under photos	NA	NA
Videos	Yes: -> Your information -> Photos and videos	Yes	NA
Message Content	Yes: -> Your information -> Messages	Yes	NA
Voice/Video Call Content	No	No	Facebook processes this data, but doesn't store it.
ID	No	No	As set out in our Help Center under *"What categories of my Facebook data are available to me"*? (see here https://www.facebook.com/help/1701730696756992?helpref=hc_global_nav), you can submit a specific personal data request for a copy of the ID you submitted to confirm your identity and to help improve our automated systems for detecting fake IDs and related abuse - in so far you submitted this and we still hold it. We can confirm that we do not hold an ID for you.
Networks and connections. We collect information about the people, Pages, accounts, hashtags and groups that you are connected to and how you interact with them across our Products, such as people you communicate with the most or groups that you are part of. We also collect contact information if you choose to upload, sync or import it from a device (such as an address book or call log or SMS log history), which we use for things such as helping you and others find people you may know and for the other purposes listed below.			
Address Book	Yes: -> Information about you -> About you -> Your address books	Yes	NA
Groups	Yes: -> Your information -> Groups	Yes	NA

Page Membership	Yes: -> Your information -> Likes and Reactions -> Pages	Yes	NA
SMS Logs	No	No	Facebook does not store this data. We have deprecated this function and have deleted the data.
Call Logs	No	No	Facebook does not store this data. We have deprecated this function and have deleted the data.
Friends	Yes: -> Your information -> Friends	Yes	NA
Following	Yes: -> Your information -> Following and followers	Yes	NA
Followers	Yes: -> Your information -> Following and followers	Yes	NA
Friend Request (not confirmed)	Yes: -> Your information -> Friends -> Received friend requests	Yes	NA

Your usage. We collect information about how you use our Products, such as the types of content that you view or engage with, the features you use, the actions you take, the people or accounts you interact with and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products, and what posts, videos and other content you view on our Products. We also collect information about how you use features such as our camera.

Activity & Feature Usage, presence history	Yes -> Activity Log -> Security and Login Information	Yes	Note that we do not store all this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation
In-App Browser Activity	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of

			access. Please see below under the heading " Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Search History	Yes: -> Information about you -> Search history	Yes	NA
Information about transactions made on our Products. If you use our Products for purchases or other financial transactions (such as when you make a purchase in a game or make a donation), we collect information about the purchase or transaction. This includes payment information, such as your credit or debit card number and other card information, other account and authentication information, and billing, delivery and contact details.			
Payment History	Yes: -> Your information -> Payment history	Yes	NA
Payment Data	Yes: -> Your Information -> Payment History -> Account settings	Yes	NA
Things others do and information that they provide about you. We also receive and analyse content, communications and information that other people provide when they use our Products. This can include information about you, such as when others share or comment on a photo of you, send a message to you or upload, sync or import your contact information.			
Matched Contacts	No	No	As set out in our Help Center under *"What categories of my Facebook data are available to me"*? (see here https://www.facebook.com/help/1701730696756992?helpref=hc_global_nav), you can submit a specific personal data request for "matched contacts", or contact information that may be associated with your account. We cannot determine whether we hold matched contacts for you as your account is currently deactivated and scheduled for deletion. If you wish for us to look into this further, you would need to reactivate your account. Please let us know.
Photo Tags	Yes: -> Your information -> Photos and videos -> Photos and videos you're tagged in	No	NA
Post Tags	Yes: -> Your information -> Posts	No	NA

	->Posts you're tagged in		
Device attributes: information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.			
Operating system	No	No	Facebook may process this data, but does not store it.
Hardware and software versions	Yes: -> Activity Log -> Security and Login Information	No	NA
Battery level	No	No	Facebook may process this data, but does not store it.
Signal strength	No	No	Facebook may process this data, but does not store it.
Available storage space	No	No	Facebook may process this data, but does not store it.
Browser type	-> Information About You -> Security and Login Information -> Where You're Logged In	Yes	NA
App and file names and types	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Plugins	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Device operations: information about operations and behaviours performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).			
Information and behaviours performed on the device such as whether a window is	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide

foreground or mouse movements (which can help distinguish humans from bots).			access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Identifiers: unique identifiers, device IDs and other identifiers, such as from games, apps or accounts that you use, and Family Device IDs (or other identifiers unique to Facebook Company Products associated with the same device or account).			
Unique identifiers, device-IDs and other identifiers	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Device signals: Bluetooth signals, information about nearby Wi-Fi access points, beacons and mobile phone masts.			
Location data -- Location history: Location data based on data from device settings and other signals incl. wifi and other information/signals a user provides	-> Information About You -> Location -> Location History	Yes	NA
WiFi (connected)	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Bluetooth	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline

			Data Warehouse that cannot be retrieved" for a more detailed explanation.
Ambient WiFi, Cell Tower, Accelerometer, Gyroscope, Magnetometer, Air pressure, Ambient light, Proximity, motion detection, satellite information	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Data from device settings: information that you allow us to receive through device settings that you turn on, such as access to your GPS location, camera or photos.			
Camera (general access to camera)	Yes, see under photos	NA	NA
Precise GPS Location	If you have provided access to this: -> Information about you -> Location -> Location history	Yes	NA
Voice/microphone	Yes, e.g. the recordings in videos: -> Your information -> Photos and videos	Yes	NA
Network and connections: information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed and, in some cases, information about other devices that are nearby or on your network, so we can do things such as help you stream a video from your phone to your TV.			
ISP	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
IP addresses	Yes: -> Information about you -> Security and login information -> Logins and logouts	Yes	NA
Language	Yes: Not in AYI, but In the settings and privacy section in your account under "App Language"	No	NA

Timezone	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Connection speed	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Other devices	No	No	Facebook may process this data, but does not store it.
Cookie data: data from cookies stored on your device, including cookie IDs and settings. Learn more about how we use cookies in the Facebook Cookies Policy and Instagram Cookies Policy.			
Cookie Data	Yes: -> Information about you -> Security and login information -> Where you're logged-in	Yes	NA
Information from partners. Advertisers, app developers and publishers can send us information through Facebook Business Tools that they use, including our social plugins (such as the Like button), Facebook Login, our APIs and SDKs, or the Facebook pixel. These partners provide information about your activities off Facebook – including information about your device, websites you visit, purchases you make, the ads you see and how you use their services – whether or not you have a Facebook account or are logged in to Facebook. For example, a game developer could use our API to tell us what games you play, or a business could tell us about a purchase you made in its shop. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information. Partners receive your data when you visit or use their services, or through third parties that they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing us with any data Learn more about the types of partners we receive data from.			
Pixel Event Data	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below

			under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Offline Conversion API Event Data	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
SDK Event Data	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Data File from publishers for matching news publisher products	No	No	We do not store this data in a form which can be effectively retrieved and so we are unable to provide access to this data and it does not fall within the scope of your right of access. Please see below under the heading "Data stored in Facebook's offline Data Warehouse that cannot be retrieved" for a more detailed explanation.
Data File Custom Audiences	Yes: -> Information about you -> Ads and businesses -> Advertisers who uploaded a contact list with your information	Yes	NA

Data stored in Facebook's offline Data Warehouse that is non-retrievable

As stated above -- and as explained in our previous response -- part of the personal data you asked for may be stored in non-retrievable form in our offline data warehouse. The data warehouse contains technical log-level data which is stored by date, not profile (more specifically: not on an individual user level) and is not used to directly serve the live Facebook website. It is also unintelligible to average Facebook users.

Because Article 12(1) of the GDPR requires data controllers to provide data subjects with access to their data in an "intelligible" form, Facebook does not have a legal obligation to provide Data Warehouse data in its unintelligible form. The courts have further confirmed that the right of access is not a right for data subjects to access their personal data in its "original material form" (i.e. the form in which such data appears in our Data Warehouse). The right may be satisfied by providing the data in an up-levelled "intelligible form". Accordingly, Facebook provides its users with tools to access their personal data which Facebook controls in a form that is intelligible and meaningful to them which satisfies the requirements of Article 15 and 12(1) of the GDPR. Such intelligible information can be accessed in the "Access Your Information" and "Download Your Information" section of your account and your Activity Log - that altogether form our means of access within the meaning of article 15 GDPR.

The courts have also confirmed that, in cases where the right to data protection runs up against other fundamental rights, it is necessary to strike a "fair balance" between the various competing interests. The right of access does not require the imposition of an "excessive burden" on the data controller. This case law is consistent with the GDPR. Given the excessive burden of retrieving log-level data stored in our Data Warehouse, the nominal value of this information in this format to the user, and the intelligible and meaningful access that Facebook provides to its users (which includes access to information about their data in our Data Warehouse, as explained above) via its tools, we consider our practices to be fully compliant with our obligations under Article 15 GDPR.

Please note that with respect to the off-Facebook data -- such as browsing data, cookie data, pixel data, API and SDK data are currently stored in non-retrievable form (see table under "Data form Partners) -- we'll be implementing a new feature (https://newsroom.fb.com/news/2018/05/clear-history-2/) which is intended to allow you to see information about the websites and apps that send us information when you use them and have more control over this data going forward.

We trust the above is informative and demonstrates that we have in fact fulfilled your access request by instructing you how to access you data in our response of February 15th. We will be closing out this matter.

As mentioned previously, you have a right to lodge a complaint with the Irish Data Protection Commission, which is Facebook's lead supervisory authority (please see http://www.dataprotection.ie) or your local supervisory authority.

Kind regards

Facebook Ireland