

# January 2025 LinkedIn Report pursuant to Article 3, Subsection (g)(vii) of Regulation (EU) 2021/1232

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As described in our [Professional Community Policies](#), LinkedIn has zero tolerance for content that depicts the sexual exploitation of children. Our policies strictly forbid members from sharing, posting, transmitting, or soliciting Child Sexual Abuse Material (“CSAM”) through or using our platform.

To detect and combat the spread of CSAM, LinkedIn analyzes individual image and video files sent via messaging using hash-matching technology, including PhotoDNA (for images) and CSAI Match (for videos). Hash-matching technology works by using a mathematical algorithm to create a unique signature (known as a “hash”) for digital images and videos. The hashing technology then compares the hashes calculated from user-generated content with hashes of reported (known) CSAM. If a potential match is detected, LinkedIn employs follow-up measures, including additional hash checks and human review, to determine whether the file indeed contains CSAM. LinkedIn restricts accounts that we confirm to have shared CSAM and reports them to the National Center for Missing and Exploited Children (NCMEC).

Pursuant to Article 3, Subsection (g)(vii) of Regulation (EU) 2021/1232, LinkedIn provides the following report on its data processing activities in the European Union in connection with the use of technology to detect CSAM (specific to LinkedIn Number-Independent Interpersonal Communications Services [NI-ICS]) for January 1, 2024 through December 31, 2024.

## **1. Type and volumes of data processed during the reporting period:**

Over 22 million individual image files originating from the EU were processed.

Over 2 million individual video files originating from the EU were processed.

## **2. Specific ground relied on for the processing pursuant to Regulation (EU) 2016/679:**

Regulation (EU) 2021/1232 and public interest under GDPR Article 6(1)(e).

## **3. The ground relied on for transfers of personal data outside the European Union pursuant to Chapter V of Regulation (EU) 2016/679, where applicable:**

We do not share any personal data with third parties for the purpose of hash matching. LinkedIn will only transfer personal data to third countries in compliance with applicable laws, including Chapter V of GDPR. LinkedIn currently relies on the EU-U.S. Data Privacy Framework for the purpose of transferring data from LinkedIn Ireland Unlimited Company to LinkedIn Corporation. For transfers of

personal data to NCMEC, LinkedIn may rely on a derogation, to the extent applicable, permitted under Article 49(1) of GDPR.

**4. The number of cases of online child sexual abuse identified, differentiating between online child sexual abuse material and solicitation of children:**

Both types of actions violate LinkedIn's policies, but at this time we are unable to distinguish between online CSAM and the specific context of each piece of material, such as the solicitation of children. Of the files listed in response to Category 1, above, 1 image file was confirmed as CSAM, and it was reported to NCMEC. LinkedIn did not detect CSAM in any of the video files described in response Category 1, above.

**5. Number of cases in which a user has lodged a complaint with the internal redress mechanism or with a judicial authority, and the outcome of such complaints:**

One case, which was denied.

**6. Number and ratios of errors (false positives) of the different technologies used:**

During the reporting period, there were zero LinkedIn members who appealed CSAM-based account restrictions and had their restriction reversed due to an error in our detection.

**7. Measures applied to limit the numbers and ratios of errors (false positives) of the different technologies used:**

LinkedIn uses a layered approach to detect and combat the spread of CSAM. LinkedIn analyzes individual image and video files sent via messaging using hash-matching technology. This technology then compares the hashes calculated from user-generated content with hashes of known CSAM. If there is no match, then transmission of the image/video to the message recipient proceeds. On the other hand, if a potential match is detected, LinkedIn then employs follow-up measures, including additional hash checks and human review, to determine whether the file indeed contains CSAM. Members whose accounts have been restricted for sharing CSAM can appeal their restriction and have their case reviewed for errors.

**8. The retention policy and data protection safeguards applied pursuant to Regulation (EU) 2016/679:**

Where content is confirmed as CSAM, the data is reported to NCMEC and retained for up to 365 days, after which it is purged.

**9. The names of organizations acting in the public interest against child sexual abuse with which data has been shared:**

The National Center for Missing and Exploited Children.

