

2024 Snap DSA Audit Implementation Report

SECTION A: General Information

1. Audited provider:
Snap Group Limited with Snap B.V. as the designated representative of Snap Group Limited in the European Union.
2. Address of the audited provider:
**Snap Group Limited
50 Cowcross Street, Floor 2,
London, EC1M 6AL
United Kingdom**

**Snap Group Limited's designated representative for the European Union:
Snap B.V.
Keizersgracht 165, 1016 DP
Amsterdam, The Netherlands**
3. Audit report on which this implementation report is based
Date of adoption of the audit report: August 30, 2024
Reference to the audit report (for example an URL): DSA Independent Audit Report - Snapchat 2024
4. Information on the underlying audit and the involved parties (refer to sections A and B of the audit report of reference):
The audit of the Snapchat service was conducted by EY as the independent audit provider and included an assessment of compliance with the obligations and commitments referred to in Article 37(1) of Regulation (EU) 2022/2065.
The audit covered the audit period from August 25, 2023 to June 30, 2024.
5. Does the audit implementation report refer to an audit report on compliance with all the obligations and commitments pursuant to Article 37(1) of Regulation (EU) 2022/2065 applicable to the audited provider?
Yes
6. Where applicable, references to other audit reports resulting from audits pursuant to Article 37 of Regulation (EU) 2022/2065 that the audited provider is or will be subject to concerning the audited period:
N/A

SECTION B: Follow-up to the operational recommendations concerning audited obligations set out in Chapter III of Regulation (EU) 2022/2065

B.1 - Recommendation around Article 14.2

Recommendation: The audited provider should implement a process to document the rationale for identifying a change to Terms of Service as "significant" or not contemporaneous with the review and approval of such change and before the change is affected in the Terms of Service.

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): N/A

(b) Timing for implementation: N/A

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures: While Snap has previously been assessing and documenting changes, in response to the recommendation, we implemented a more centralized process to document our assessment, rationale, and outcome whether a change to our Terms of Service is material/significant or not before such changes go into effect.

b) Time when the measure(s) were implemented or are planned to be implemented:

Jul 1, 2024

c) Result (include references to external resources, for example links to websites, as applicable): N/A, internal documentation

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: Implemented as recommended.

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

B.2 - Recommendation around Article 15.1

Recommendation: The audited provider should more clearly describe in its sets of transparency reports how the information included therein addresses the disclosure requirements enumerated in points 15.1 (a), (b), (c), and (e).

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): In our upcoming transparency reports, including our H1 2024 Transparency Report covering the time period from January 1, 2024 to June 30, 2024, we will more clearly describe how the information included therein addresses the disclosure requirements enumerated in DSA Article 15.1(a), (b), (c) and (e).

(b) Timing for implementation: By October 25, 2024 when we launch our next Transparency Report.

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures: N/A

b) Time when the measure(s) were implemented or are planned to be implemented:
N/A

c) Result (include references to external resources, for example links to websites, as applicable): N/A

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: N/A

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

B.3 - Recommendation around Article 24.2

Recommendation: The audited provider should retain the average monthly active recipients (AMAR) of the service as of 17 February 2023 and 17 August 2023 within historic Transparency Reports published on the Privacy, Safety and Policy Hub site.

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): N/A

(b) Timing for implementation: N/A

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures: We added the AMAR for 17 February 2023 to the Privacy, Safety and Policy Hub archive in July 2024. We also included the AMAR that was published on 17 August 2023 in the Transparency Report posted on 25 October 2023.

b) Time when the measure(s) were implemented or are planned to be implemented: Refer to a) above.

c) Result (include references to external resources, for example links to websites, as applicable):

- [AMAR published on 17 February 2023](#)
- [AMAR published on 17 August 2023](#)

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: Implemented as recommended.

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

B.4 - Recommendation around Article 25.1

Recommendation:

- 1) The audited provider should include an option within the Snapchat Android mobile application settings to initiate the account deactivation process.
- 2) The audited provider should formalize the periodic assessment of products and features released to validate the product or feature does not contain dark patterns as defined within the audited provider's policies.

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): N/A

(b) Timing for implementation: N/A

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures:

- 1) We included an option within the Snapchat Android mobile application settings to initiate the account deactivation process.
- 2) We formalized the periodic assessment of products and features released to validate the product or feature does not contain dark patterns as defined within Snap's guidance documents.

b) Time when the measure(s) were implemented or are planned to be implemented:

- 1) Aug 23, 2024
- 2) Jul 1, 2024

c) Result (include references to external resources, for example links to websites, as applicable): N/A

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: Implemented as recommended.

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

B.5 - Recommendation around Article 34.1

Recommendation:

- 1) The audited provider should formalize the periodic assessment of products and features released to validate the product or feature does require an update to the systemic risk assessment.
- 2) The audited provider should enhance its specific considerations around risks related to generative algorithms and/or models in its systemic risk assessment. Risk factors should consider governance of content generated by Generative AI techniques, contents generated by AI that are not identified or distinguished from manual created content, misleading information, etc.

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): N/A

(b) Timing for implementation: N/A

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures:

- 1) We formalized the periodic assessment of products and features released to validate if the product or feature does require an update to the systemic risk assessment.
- 2) Generative AI was not a significant topic at the time our 2023 DSA risk assessment was being prepared and out of scope. Since the 2023 risk assessment, generative AI has become more significant and a point of focus for the Commission. As a result, although the vast majority of Snapchat's generative AI features continue to be out of scope, we had already added a section in our 2024 DSA Risk Assessment Report around creation and dissemination risks related to generative algorithms and/or models for context prior to and independently of this audit recommendation.

b) Time when the measure(s) were implemented or are planned to be implemented:

- 1) Jul 1, 2024
- 2) Our 2024 DSA Risk Assessment Report was prepared during May to August 2024 and submitted to the European Commission on Aug 26, 2024 .

c) Result (include references to external resources, for example links to websites, as applicable):

- 1) N/A, internal documentation
- 2) Refer to Snap's 2024 DSA Risk Assessment Report that we submitted to the European Commission

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: Implemented as recommended.

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

B.6 - Recommendation around Article 39.1

Recommendation: The audited provider should expand on the functionality of the Commercial Content interface in the Ads Gallery.

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): We will add search functionality to Snap's Ads Gallery so that Commercial Content can be searched by Creator Name.

(b) Timing for implementation: Current timing for implementation is Q4 2024 / Q1 2025.

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures: N/A

b) Time when the measure(s) were implemented or are planned to be implemented:
N/A

c) Result (include references to external resources, for example links to websites, as applicable): N/A

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: N/A

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

B.7 - Recommendation around Article 42.2

Recommendation: The audited provider should more clearly describe in its sets of transparency reports how the information included therein addresses the disclosures requirements enumerated in point 42.2 (c).

1. Measures to implement the operational recommendation

1.1. Planned measure(s)

(a) Description of the measure(s) (indicate the objective(s), any milestones, revision steps and, where applicable, performance indicators): In our upcoming transparency reports, including our H1 2024 Transparency Report covering the time period from January 1, 2024 to June 30, 2024, we will more clearly describe how the information included therein addresses the disclosure requirements enumerated in DSA Article 42.2(c).

(b) Timing for implementation: By October 25, 2024

1.2. Measures taken since the end of the period on which the audit report is based

a) Description of the measures: N/A

b) Time when the measure(s) were implemented or are planned to be implemented:
N/A

c) Result (include references to external resources, for example links to websites, as applicable): N/A

d) Explanation of how the measure(s) implement the recommendation from the audit report effectively and why the resulting situation constitutes compliance or how the effects of the measures will lead to compliance, where this is not immediately observable: N/A

1.3. Where applicable, description of any measure(s) to adjust benchmarks for compliance and internal controls: N/A

2. Reasons for not implementing the recommendation, if applicable

a) Justification for not implementing the recommendation: N/A

b) Alternative measure(s) taken to achieve compliance: N/A

SECTION C (where applicable): Follow-up to the operational recommendations concerning audited commitments undertaken by the audited provider pursuant to the codes of conduct referred to in Articles 45 and 46 of Regulation (EU) 2022/2065 and the crisis protocols referred to Article 48 of Regulation (EU) 2022/2065

Section C is not applicable to Snap's 2024 DSA Audit Report.

SECTION D: Any other information the audited provider wishes to convey:

- Snap is committed to providing transparency around our content moderation processes and have published related Transparency Reports since 2015. Our H1 2023 Transparency Report covered the time period from January 1, 2023 to June 30, 2023. At the time we were still preparing for DSA compliance and were working with the European Commission on formatting questions related to our transparency reporting, and conducting stress tests, and therefore our H1 2023 Transparency Report did not include all metrics or breakouts as required by the DSA given that the coverage period of the report was before the DSA effective date of August 25, 2023. However, given that our H1 2023 Transparency Report was issued on October 25, 2023 which was within the DSA audit period, our DSA auditors considered the entire report to be in scope and therefore pointed out missing metrics and breakouts related to Art. 15.1. We would like to make the European Commission aware of this interpretation, as we had a different interpretation, and re-emphasize the need for additional guidance to remove uncertainty and avoid interpretations of the requirements. It should be noted that our H2 2023 Transparency Report did comply with applicable reporting requirements with noted recommendations described above.