eco COMPLAINTS OFFICE

ANNUAL REPORT | 2018

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Dr. Tobias Schmid
Director of the Media Authority of North-Rhine Westphalia

Foreword

Dear Members, Partners, and Friends of the eco Complaints Office, dear Readers,

the Internet is a place of seemingly boundless possibilities and 2018 also showed what great opportunities it offers its users, media and Internet companies, politics – in short, our entire democratic society. These opportunities and their related freedoms must be rigorously protected. We must set boundaries, where these provide protection, and break down boundaries, where they make cooperation more difficult.

Hate speech is a particular challenge in this context. For some years now, it has been observed that the online debate has started to take on a harsher and sometimes unacceptable tone. The boundaries of good taste and factual debate are often ignored or even deliberately overstepped. Structures were originally created on the Internet to promote the free exchange of information and opinions. Today, however, this exchange is too often threatened by hatred and incitement to hatred. Hate speech on the Internet is thus taking on a dimension that threatens democracy.

Free speech and a functioning rule of law are basic prerequisites for a developed democracy. Against this background, the initiative "Verfolgen statt nur Löschen" ("Prosecute, don't just delete") was founded in February 2017. It brings together representatives from media supervisory authorities, law enforcement agencies, and media companies, and we are particularly pleased that, asof 2019, eco – Association of the Internet Industry has

joined in this successful project as a strong partner. The aim of the initiative is to protect freedom of expression through defining the very limits of such freedom of expression. The working group has made it its task to confront hate commentaries on the Internet with criminal law and to establish efficient law enforcement on the Internet.

Here, the enforcement of the law must not fail at either jurisdictional or national borders. As such, networked cooperative work, such as that achieved with "Prosecute, don't just delete", is becoming increasingly important. The substantial national and European interest in the "Prosecute, don't just delete" initiative is a clear indicator of this.

The eco Complaints Office has likewise been a pioneer in this field, going back many years. With its members and partners, it ensures that legal infringements on the Internet are dealt with on a cross-border basis. Collectively, we are proving that the Internet is not a legal vacuum.

Together, let us use the instruments of our democracy to protect freedom of expression – for an open Internet, for freedom of expression and diversity, for discourse and democracy. Thank you for committing to this important goal with us.

Sincerely,
Your

Dr. Tobias Schmid
Director of the Media Authority of North-Rhine Westphalia

Tiemo Wölken
Member of the European Parliament

Foreword

Dear Members of the eco Complaints Office, dear Readers,

we can no longer contemplate going without what the Internet can offer us. Quickly looking up what time the bus will arrive or what the weather will be like, staying in touch with our friends via social networks: it's simply impossible to imagine our digital life in the absence of such benefits.

At the same time, the Internet can also be a platform for spreading illegal content. The article inciting hatred on Facebook, or the youth-endangering Youtube video – such content can spread quickly and radicalize or harm people.

When such cases arise, it is essential that a competent point of contact exists to which Internet users can turn quickly and easily. In order not to jeopardize freedom of expression on the Internet, experts are needed who can unambiguously distinguish between permitted content and illegal material.

I am very pleased that the work of the eco Complaints Office continued to be highly successful in 2018, with its overall international success rate in combatting illegal Internet content registering at 96.3 percent. Last year, over a third of the complaints received were designated as illegal content. The fact that these could be identified and taken down or, in extreme cases, passed on to the law enforcement agencies, qualifies as a great achievement.

Overall, the annual report demonstrates that cooperation between providers and law enforcement agencies is a model for success.

In order to fight illegal content even more effectively in the future, however, we have to adopt a whole-society approach. We need to teach children and young people how to critically assess and question online sources. Such skills can best be taught at school, which is why I think raising awareness of these issues and training teachers is something that is long overdue. But adults must alsobe taught that the Internet is not a legal vacuum. Hiding oneself in the anonymity of the Internet is simply unacceptable.

At European level, the subject of online media is dealt with in a multitude of ways. In the European Parliament, for example, we adopted the amendment to the Audiovisual Directive in October 2018. Among other things, this provides for improved protection for children and stricter advertising regulations. Going forward, adapting the law to meet the needs of the rapidly changing digital world will remain a constant challenge.

Tiemo Wölken
Member of the European Parliament

Alexandra Koch-Skiba, Attorney-at-Law
Head of eco Complaints Office

Preface

With this annual report, the eco Complaints Office looks back on an eventful year, which was characterized in particular by three core areas of activity: the promotion of transparency, the exchange of experience, and knowledge transfer.

Transparency creates trust. Which is why, for many years now, we have been reporting transparently on the working methods and achievements of the eco Complaints Office. Last year, for the first time, we also launched our annual report in the European Parliament in Brussels. The new website of the eco Complaints Office also provides more transparency for the outside world: here information and competencies are engagingly presented in corporate design, thus optimally rounding off the eco Complaints Office's portfolio.

In order to effectively combat illegal Internet content, the eco Complaints Office cooperates and exchanges information nationally and internationally with many relevant stakeholders. Building on these important relationships and intensifying the exchange of experience was one of the focal points of our activities in 2018. I would particularly like to highlight our valuable interchange with the Commission for the Protection of Minors in the Media, and with the Media Authority of North-Rhine Westphalia.

The intensive level of cooperation with providers, law enforcement agencies, and partner complaint offices, as well as the active support of committees and initiatives – on a national and international level – continued to make us the ideal mediator between the industry and state bodies last year.

There were two particular highlights in 2018: the strong PR presence of the Complaints Office, and the well-attended workshops on the topic of information requests for judges and public prosecutors, which were initiated together with the Central Bureau and Contact Office for Cybercrime North-Rhine Westphalia (ZAC NRW), Google, and Facebook.

In the political context, the announced amendment to the youth media protection legislation loomed large. This topic featured prominently at the Youth Media Protection Expert Lunch, which was attended by representatives of the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth (BMFSFJ) and the German Federal Review Board for Media Harmful to Minors (BPjM). We also contributed to

the Future Workshop on Youth Media Protection, which was instigated by the BPjM.

The ongoing discussions on the Network Enforcement Act (NetzDG) also kept us busy. With great anticipation, we awaited companies' first half-yearly reports on the implementation of the NetzDG regulations, the complaints received, and the take-down rates. One year after the NetzDG came into force, it is quite clear that companies are removing content mainly on the basis of violations of their own community standards, which they themselves monitor in any case. Legal violations such as hatred, incitement, and insults are also taken very seriously in the digital world.

This fact – that the digital world also takes violations of the law seriously – was also clear from our own work in 2018: Disregarding spam and Usenet content, a total of 8,671 cases were reported to the eco Complaints Office, 3,096 of which were ultimately justified. In 2018, these justified complaints once more consisted primarily of complaints about depictions of abuse of children and minors (72%).

Only 2% of the justified complaints related to reports on racist online content. Reports on the type of illegal content aimed at originally by the NetzDG therefore played a very minor role in the overall balance.

With the NetzDG, the intention was to solve a complex problem with great haste. However, if fundamental rights are to be accorded a central role in the assessment of content, then high-quality legal assessment needs to be prioritized. Any legislative amendment must therefore not fall prey to old mistakes. Above all, better human resources are needed to be able to more quickly remove content that is justifiably objected to from the Internet.

At the eco Complaints Office, we will continue to showcase a best-practice working environment going forward, in which the legal assessment of reported content such as depictions of hate and violence is carried out solely by experts. This is why there are seven employees with legal backgrounds currently working on such cases in our Cologne team, with the core team comprised exclusively of fully qualified lawyers. In addition, we will also continue to report content that is relevant under criminal law to the authorities in our handling of complaints. Because we believe that rigorous criminal prosecution is essential in order to effectively combat criminal offenses on the Internet. We are therefore particularly pleased to be a partner in the "Prosecute, don't just delete" initiative.

I am pleased to be able to present the third edition of the independent annual report of the eco Complaints Office, with details on our work and statistics for the year 2018, and look forward to our ongoing discourse in 2019.

Alexandra Koch-Skiba, Attorney-at-Law
Head of eco Complaints Office

1. eco Complaints Office: Who we are and what we do

Dedicated to combatting illegal content on the Internet.

The eco Complaints Office (international.eco.de/eco-complaints-office) has been fighting illegal content on the Internet for over 20 years. It is embedded in the system of regulated self-regulation and has, in particular, the task of improving youth protection in the Internet.

Currently, the eco Complaints Office team consists of seven staff members with a legal background: the Head of the Complaints Office, three Complaints Offices Consultants, and three Content Analysts.

Internet users can make a free and anonymous report on youth-endangering and prohibited content under international.eco.de/internet-complaints-office.html, www.internet-beschwerdestelle.de/en/index.html (a joint portal operated by eco and the FSM – the German Association for Voluntary Self-Regulation of Digital Media service providers) or by email to hotline@eco.de.

In addition, the eco Complaints Office is a partner of the information platform for young people, jugend.support, and processes reports submitted there together with the network of complaints offices (on an international level also known as hotlines) of the FSM and jugendschutz.net.

In order to effectively fight illegal online content, cooperation with other relevant players is essential.

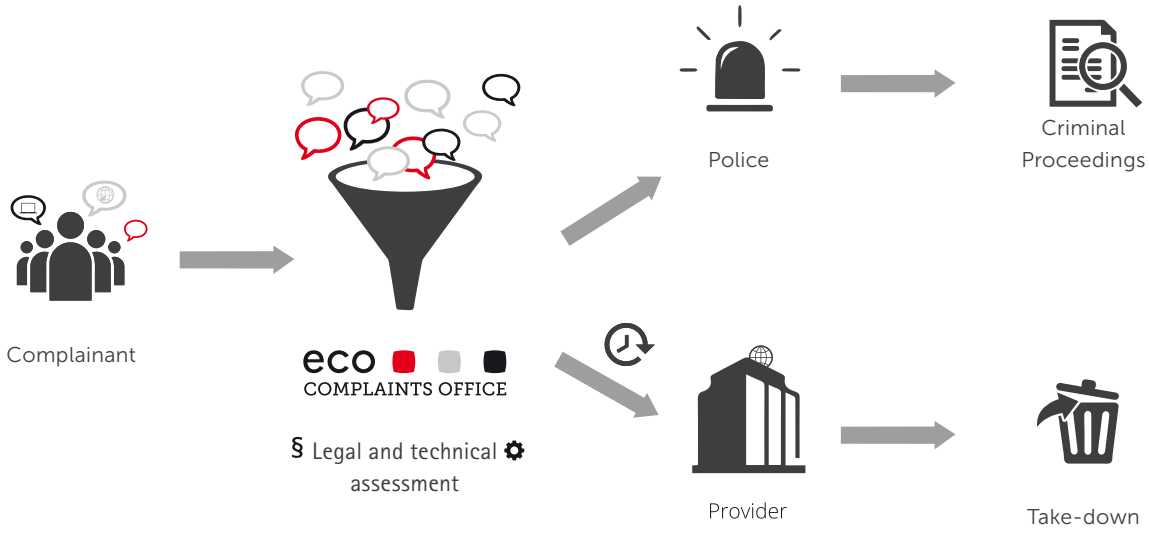
Therefore, eco cooperates with providers, partner hotlines, and law enforcement agencies, among others. eco is also a founding member of the International Network of Internet Hotlines, INHOPE, and is part of the German Safer Internet Centre.

In all of this, the eco Complaints Office serves as a model for neutral and transparent processes and acts as the contact partner for members, the state, society, and politics.

1.1 Simply and anonymously: Submitting a complaint

The eco Complaints Office accepts complaints regarding all Internet services: world wide web, emails, file-sharing, chats, newsgroups, discussion forums, and mobile content.

The content can be hosted on either German or foreign servers.



** This infographic gives a simplified representation of the processing of German cases*

1.2 What kinds of illegal content does the eco Complaints Office deal with?

Incoming complaints initially undergo a comprehensive legal assessment. Our assessment standard focuses on youth media protection, including related criminal offenses. In particular, we deal with complaints concerning the following illegal Internet content.

- Sections 4, 5 German Interstate Treaty on the Protection of Minors in the Media (JMStV), youth-endangering and development-impairing content as well as the corresponding criminal regulations:
  - Section 184 et seq. German Criminal Code (StGB), freely accessible adult pornography, pornography depicting violence, animals, children, or juveniles
  - Section 86, 86a StGB, dissemination of symbols and propaganda material of unconstitutional organizations
  - Section 130 StGB, incitement of the masses
  - Section 130a StGB, attempting to cause the commission of offenses
  - Section 131 StGB, depictions of extreme violence
- Section 176 StGB, grooming
- Section 201a StGB, dissemination of naked images of minors for profit
- Section 111 StGB, public incitement to crime

In addition, the eco Complaints Office handles reports on unsolicited sending of advertising emails and newsletters.

You can find further information and definitions of the various offenses at:
https://go.eco.de/eco-Complaints-Office-Legal-Basis

1.3 "Take-down instead of blocking": Self-regulation instead of Internet censorship

In the fight against prohibited content, the "take-down" of content from the Internet – in other words, its removal – is the core and most effective approach. The method is fast, effective, and long-lasting, which is why the eco Complaints Office has followed this approach from the very beginning.

The Internet industry's self-regulation mechanisms for the fight against unsolicited and unlawful online content work very well at both the national and international levels.

1.4 Measures taken by the eco Complaints Office

After a thorough assessment of the content, action is taken depending on the severity of the offense and the location of the server (in Germany or in other countries):

Punishable content hosted in Germany is always reported to the authorities. In addition, the Complaints Office asks that the hosting provider makes the relevant data available to the law enforcement agency on request and takes appropriate measures to prevent further access to the illegal content.

Should **absolutely prohibited Internet content** be hosted in Germany, the eco Complaints Office asks the hosting provider to take the content down (disconnect). For other youth-endangering or developmentally-impairing content, the provider will be required to ensure that the content is made legally compliant (for example, through implementation of an age verification system).

Content hosted abroad is initially forwarded to the appropriate INHOPE partner hotline. This hotline then takes over the further processing of the complaint, with the objective of removal or legalization of the content and also works "locally" with the responsible law enforcement agency. If there is no INHOPE member in the country where the server is located, or if the content reported does not fall within the mandate of the INHOPE partner hotline, eco will contact the hosting provider directly. In addition to this, criminal content hosted abroad is also reported to the authorities, if the given content is punishable internationally or is subject to universal jurisdiction as foreseen in the German Criminal Code.

2. Complaints 2018: Facts and Figures

2.1 Number of complaints and measures taken in 2018

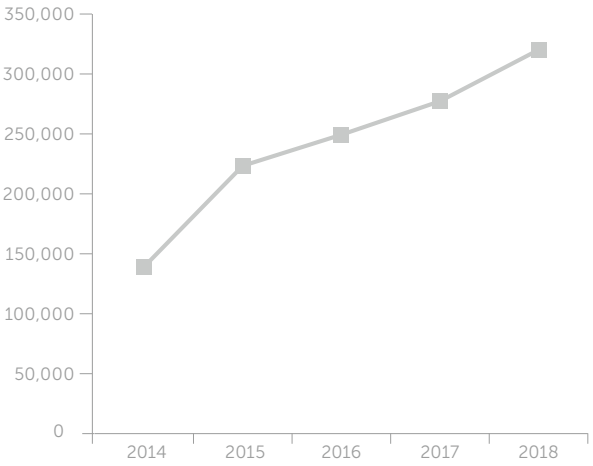
In 2018, the eco Complaints Office received a total of 320,094 complaints. This again represented a significant increase of 15.5% in the number of reports in comparison to the previous year.

For many years now, a majority of complaints have been in regard to the unsolicited sending of email marketing ("spam") and depictions of the sexual abuse and sexual exploitation of minors. This was also the case in 2018.

Compared to previous years, the number of justified complaints in 2018 decreased by 23.78% to 3,097 cases (2017: 4,063 cases) (excluding complaints concerning advertising emails). A complaint is considered as justified if a violation of the law is detected and measures are consequently taken. As a matter of principle, measures are taken for every violation of the law unless we are reasonably confident that the necessary measures have already been taken (e.g. reporting to the police and to us in one email, knowledge of measures taken by partner hotlines, etc.). As in previous years, a large proportion of the justified complaints concerned WWW/web-based content.

When compared with the previous year, the gap between received and justified complaints has remained largely unchanged, with "only" 35.71% of the complaints received justified (disregarding Usenet and email). Here it should be noted that the Complaints Office regularly receives reports which fall outside its mandate for processing, which in turn influences the ratio of reports submitted to justified complaints.

Growth in Number of Complaints in Annual Comparison



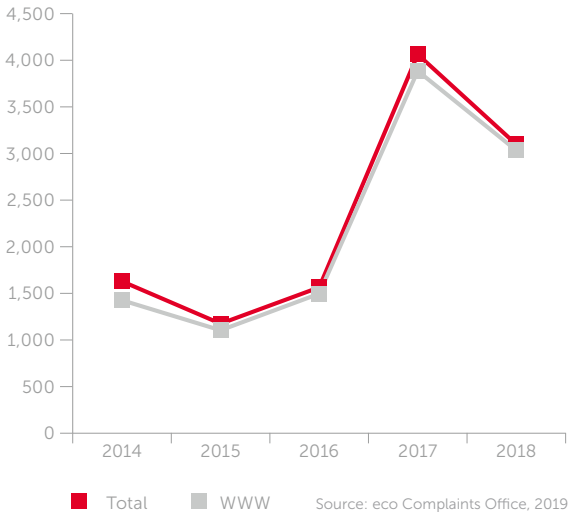
Source: eco Complaints Office, 2019

From a content perspective – as in previous years – the majority of complaints dealt with images of the sexual abuse and sexual exploitation of children, defined as "Child Pornography"* in Section 184b of the German Criminal Code.

In that respect, when we look at the proportion of justified complaints, this actually increased by 9 percentage points compared to 2017, although the absolute number of justified complaints declined compared to the previous year.

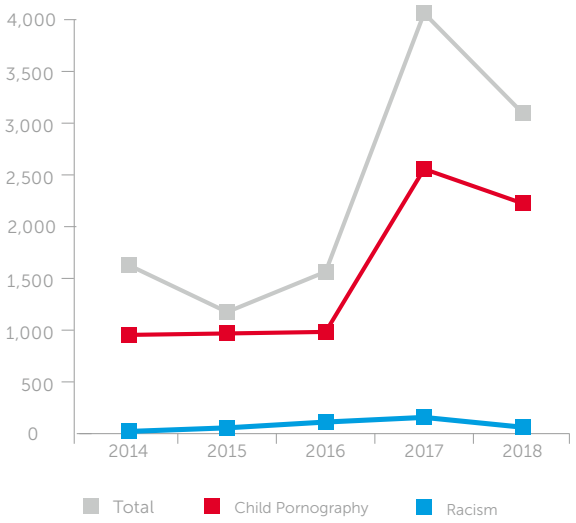
When we refer to "Child Pornography" (CP), we are referring to a specific offense, defined in Section 184b of the German Criminal Code.

Development of Justified Complaints in Annual Comparison



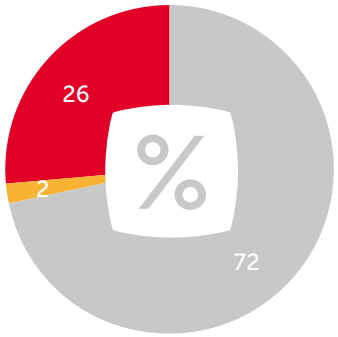
Source: eco Complaints Office, 2019

Development of Justified Complaints



Source: eco Complaints Office, 2019

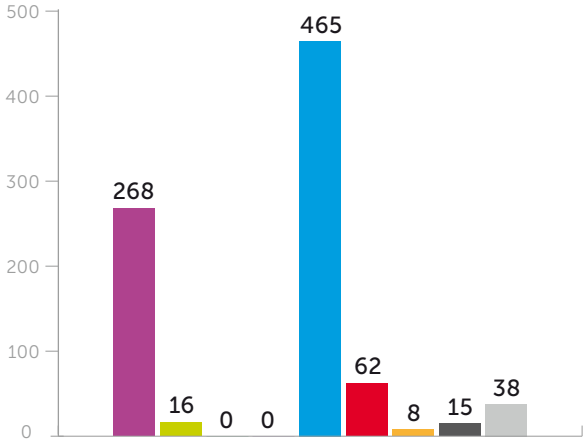
Justified Complaints (2018) (Without Spam)



Child Pornography
Remainder
Racism

Source: eco Complaints Office, 2019

Justified Complaints by Type of Offense (2018) (Without Spam and Without Child Pornography)

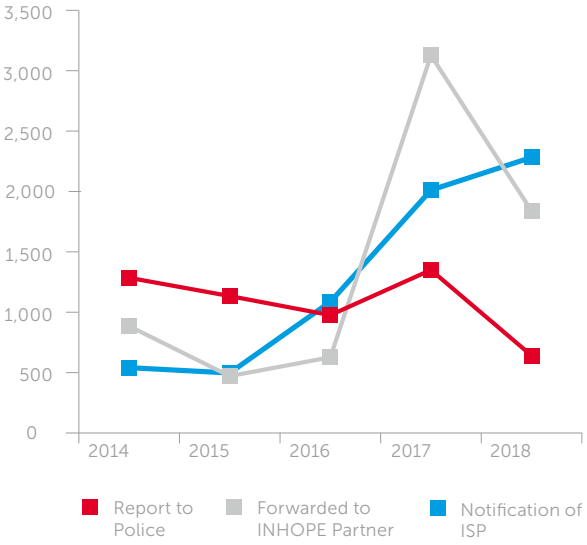


Youth Pornography
§ 4 I Nr. 9 JMStV
§ 201a
Grooming
184
Racism
Depictions of Violence
5 JMStV
Other

Source : eco Complaints Office, 2019

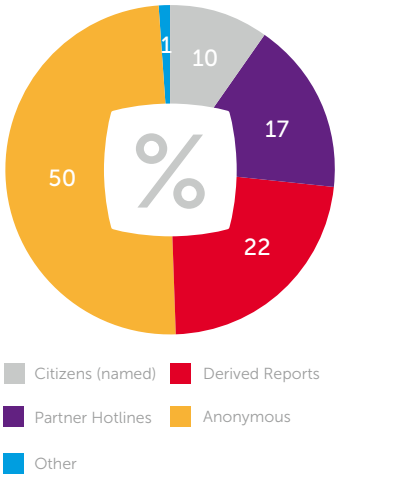
**When we refer to "Youth Pornography" (YP), we are referring to youth pornography as defined in Section 184c of the German Criminal Code (StGB)*

Measures Taken in Annual Comparison (2014-2018)



Source: eco Complaints Office, 2019

Source of Justified Complaints



Source: eco Complaints Office, 2019

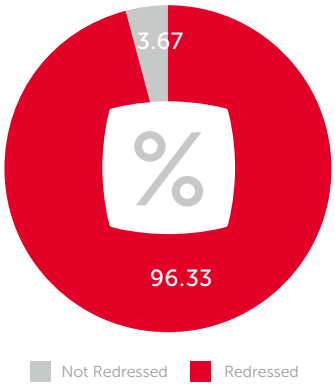
In 2018, the eco Complaints Office sent a total of 4,762 notifications to the police, INHOPE partner hotlines, and/or ISPs – not including reminders. The relatively low proportion of reports to the police is due to a changed procedure for processing reports of child abuse: If, in cases of reports made on content hosted abroad, an INHOPE member is contacted who, in turn, informs the prosecution authorities, reports are generally not registered with the German Federal Criminal Police Office (BKA).

2.2 Success rate for web-based content

96.33% of the content reported upon by the Complaints Office was taken down or otherwise legalized (e.g. through the implementation of an age verification system); in just 13% of the cases, the reported URL was initially moved to another provider (so-called "moved cases").

This demonstrates that self-regulation works – also internationally – because only around one fifth of the reported URLs (17.1%) were hosted in Germany.

Total Success Rate (2018)



Source: eco Complaints Office, 2019

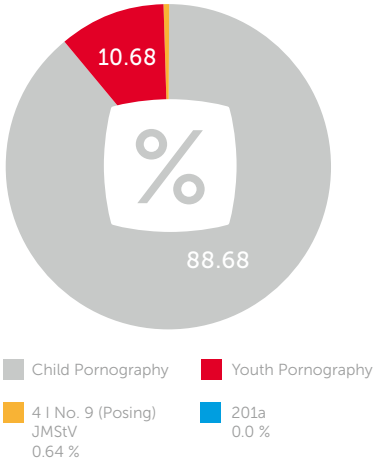
2.3 Complaints about depictions of the sexual abuse and sexual exploitation of minors in detail

From the total of 2,509 cases from the area of depictions of the sexual abuse and sexual exploitation of minors, the majority of complaints were regarding content that qualified as Child Pornography as defined in Section 184b of the German Criminal Code.

Since January 2015, the offense of Child Pornography makes provision for three different varieties: depictions of the sexual abuse of children, images of partially or completely naked children in an unnatural sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children. As in the previous year, approximately half of the justified Child Pornography complaints in 2018 concerned the first variety (depictions of the sexual abuse of children).

A good third of the justified complaints about images of the sexual abuse and sexual exploitation of children and minors pertained to images of Posing. This is also equivalent to the findings of the previous year. Posing is defined as images of children and minors in an unnatural sexualized pose. According to German law, such content must not be disseminated online. Depending on the age of the person shown and the kind of depiction, Posing may represent purely an infringement of media law (Section 4 (1) 9, German Interstate Treaty on the Protection of Minors in the Media (JMStV)) or is punishable as Child Pornography or Youth Pornography (Section 184b (1) 1b and Section 184c (1) 1b, German Criminal Code).

Depictions of Sexual Abuse and the Sexual Exploitation of Minors (CSAM) in Detail



Source: eco Complaints Office, 2019

2.3.1 Notable Challenges in 2018

From a technical viewpoint, referrer cases and the use of Content Delivery Networks (CDNs) are particularly noteworthy:

Depictions of the sexual abuse and sexual exploitation of minors are not infrequently only accessible with a so-called referrer. Here, the user must come from a specific "source" site, which refers across through a link. The "destination" site registers where the user has come from and shows different content depending on the request. Technically, this process can be simulated using particular tools. A more complex, but comparable, method triggers this technical path-setting through the use of cookies. In both cases, different content will be shown depending on the digital path followed or simulated.

The involvement of so-called Content Delivery Networks (CDNs) also made it more difficult to process cases – for example, in instances where there was a delay in reporting back to the actual host provider, or when the take-down check before a reminder was sent required a renewed response from the CDN to identify the actual host provider.

It is also worth drawing attention to tracing peculiarities that emerged in relation to a platform abused for the distribution of illegal content. In this respect, the staff of the eco Complaints Office had to deal with the phenomenon that the particular tracing result was location-dependent. For example, when tracing out of Germany, Russia was used as the server location and vice versa. Within the INHOPE network, this also led to increased communication outlay. In the end, in these cases, the illegal content could be taken down through direct contact with the platform provider.

Legally, the boundary between the different varieties of offense in relation to Child Pornography as defined in Section 184b of the German Criminal Code and the boundary between Child Pornography and other relevant regulations in the area of images of the sexual abuse and sexual exploitation of minors frequently poses challenges, especially with regard to statistical recording. Particular examples which should be mentioned here relate to an assessment of the age of a child, and the distinction between images of children in an unnatural sexualized pose and the sexually provocative reproduction of the unclothed genitalia or the naked buttocks of a child.

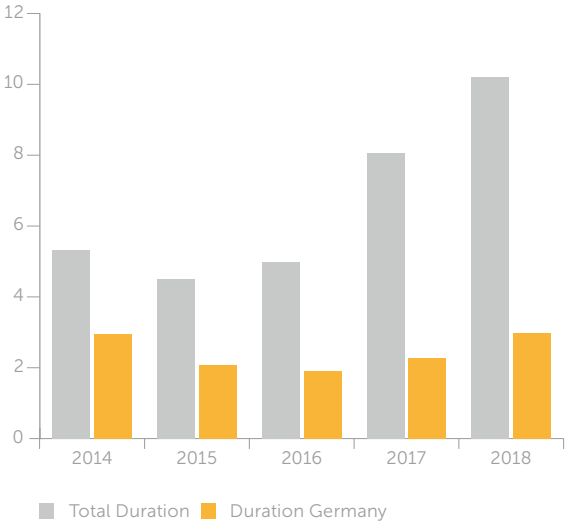
A further challenge is presented by the different legal situations of countries, particularly in the area of Posing, virtual Child Pornography and links to Child Pornography.

Unfortunately this year, contrary to the norm, in the case of two providers with German server locations, an increased degree of communication effort was required before the reported content was removed. In addition, one hosting provider from abroad consistently ignored every notice from us (and from others), as well as the request for the take-down of content, regardless of the content involved.

2.3.2 Overview of the reaction times for web-based Child Pornography cases

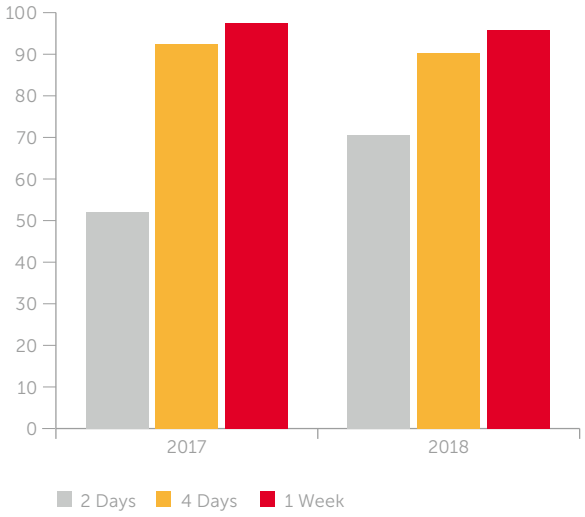
It should be borne in mind when considering the following figures and graphs on reaction times for CSAM-related web content, as well as for cases of Posing and racism, that these do not necessarily represent the effective or actual reaction time of the Internet service provider, but rather the time from eco receiving the report until verification by eco of take-down. Here, the checking frequency to ascertain take-down also influences the reaction times. The more often checks are made to see whether the content has been taken offline, the more exact and conclusive statements regarding reaction time are. eco checks for take-down as a rule on week days and does not remove weekends and public holidays on which eco does not work from the calculation of the accessibility and success rates.

Average Duration until Take-Down in Annual Comparison (Child Pornography)



Source: eco Complaints Office, 2019

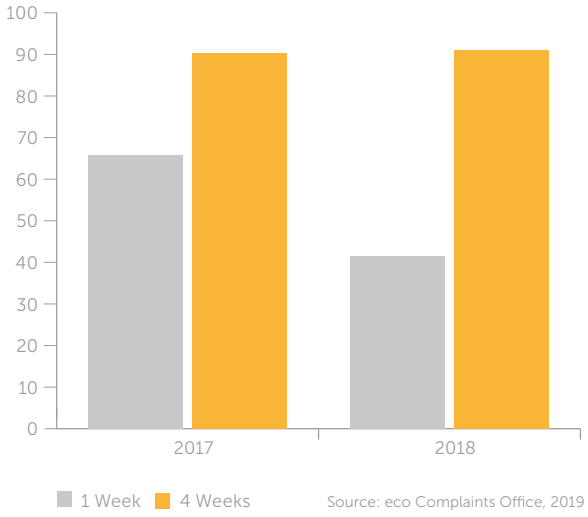
Take-Down Rates Child Pornography (German Cases)



Source: eco Complaints Office, 2019

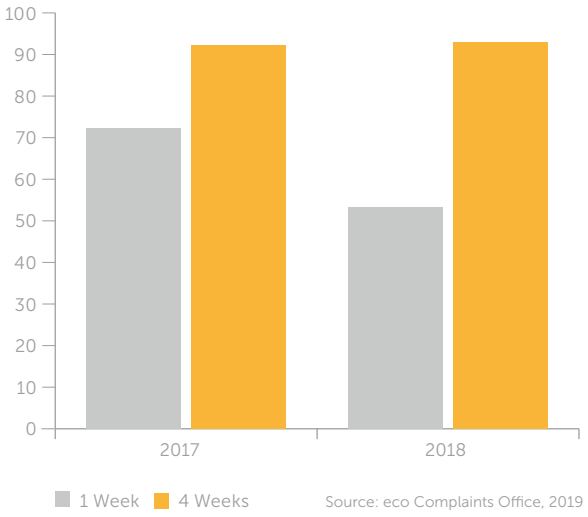
The processing of reports of depictions of the sexual abuse of children has top priority for the eco Complaints Office. However, the strong rise in the number of complaints inevitably had an impact on take-down times. In comparison to previous years, minimally longer take-down times could therefore be ascertained. Websites with Child Pornography hosted in Germany were offline within 2.97 days on average ("taken down"), whereas globally it took 10.21 days.

Take-Down Rates Child Pornography (Outside of Germany)



Source: eco Complaints Office, 2019

Take-Down Rates Child Pornography (All Cases)



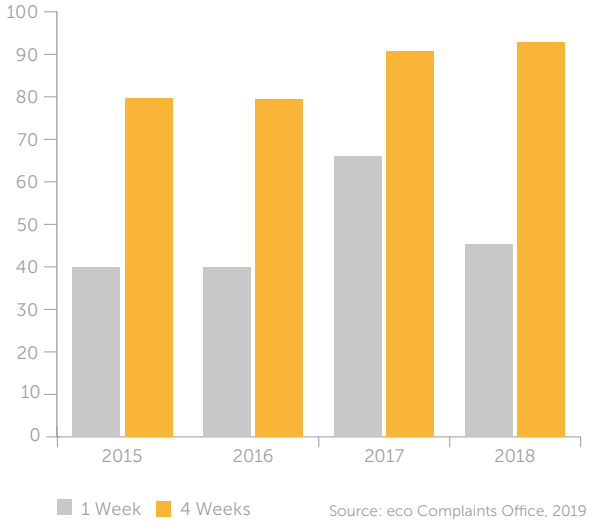
Source: eco Complaints Office, 2019

2.3.3 Overview of reaction times for web-based Posing cases

As in the previous year, the take-down times of so-called Posing of minors did not differ significantly from the take-down times for images of the sexual abuse of children. Worldwide, it took on average 10.35 days from the report being submitted to eco until the content had disappeared.

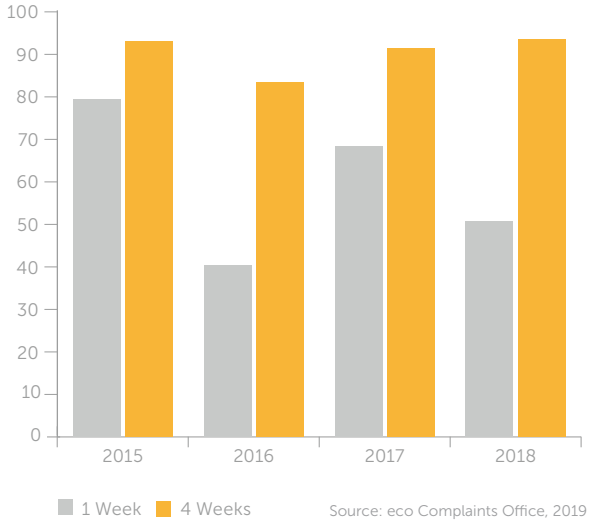
Content hosted in Germany was no longer available on average after 3.37 days. (These figures also include public holidays and weekends.)

Take-Down Rates Posing Cases* (Outside of Germany)



Source: eco Complaints Office, 2019
*Legal amendment since 2015

Take-Down Rates Posing Cases* (All Cases)



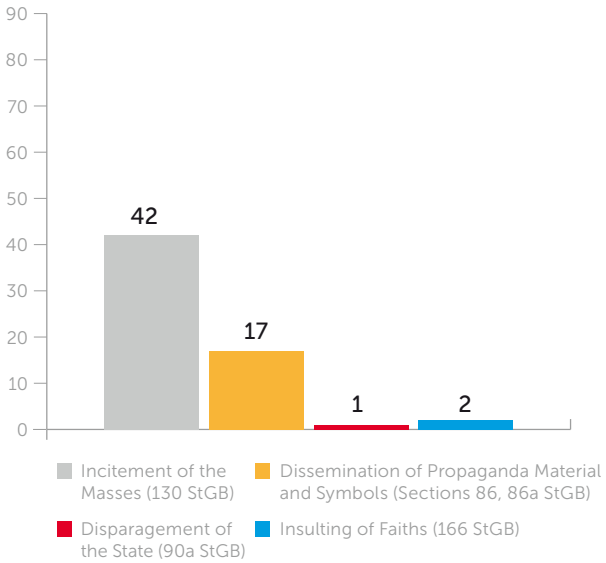
Source: eco Complaints Office, 2019
*Legal amendment since 2015

2.4 Cases of "hate speech" in detail

In 2018, 2% of justified complaints (62 cases) could be categorized within the area of "racism" (in the broad sense): incitement of the masses (Section 130 StGB), dissemination of propaganda material of unconstitutional organizations (Section 86 StGB), use of symbols of unconstitutional organizations (Section 86a StGB), disparagement of the State (Section 90a StGB), insulting of faiths (Section 166 StGB). The cases reported to us concerned a wide range of services. Two-thirds of the complaints were attributed to the area of incitement of the masses.

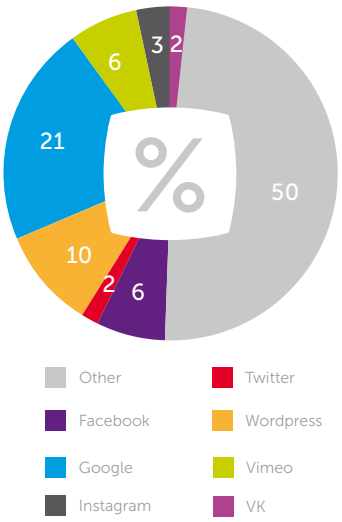
Only about one fifth of the cases (21%) were clear violations, while in the other cases an intensive legal assessment was required.

Racism/Hate Speech in Detail (Total)



Source: eco Complaints Office, 2019

Distribution of Racism Complaints by Service (2018)

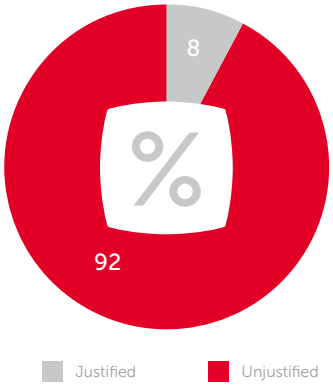


Source: eco Complaints Office, 2019

The low proportion of justified complaints in this offense sector is striking. This makes it clear that complainants in this area are sensitized to possible legal infringements. At the same time, it is also clear that the legal hurdles for actual violations are high, especially as a result of freedom of expression.

This again serves to prove how important a thorough and – as a result – time-consuming assessment of the content is, so that freedom of expression can be ensured within the framework of existing law, and that permissible statements are not simply deleted as undesirable.

Ratio of Unjustified to Justified Racism Complaints (2018)



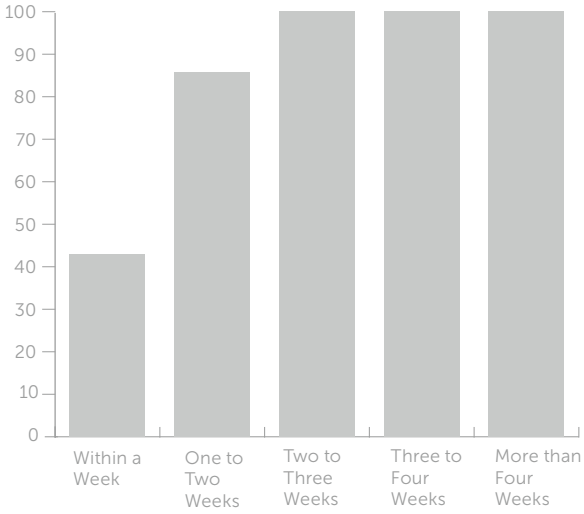
Source: eco Complaints Office, 2019

2.4.1 Overview of the reaction times for web-based racist content

The reaction times for web-based content in the area of "racism" have shortened compared to previous years. On average, content hosted in Germany was no longer available after 7.26 days; worldwide it took 17.75 days (in each case, including weekends and public holidays, and from the time of the eco Complaints Office report).

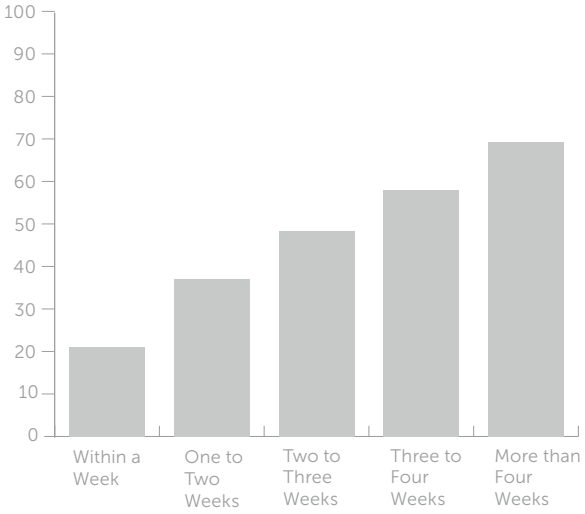
In total, 69.35% of the content reported by the Complaints Office was taken down in the year under review. Compared to the previous year, this represents a drop of around 10 percentage points. Due to the decline in the overall number of cases, the lack of reaction from a provider is particularly conspicuous. It should also be emphasized that only around 5% of the cases of reported content were hosted in Germany. In contrast to depictions of sexual abuse of

Success Rates for Racism Complaints 2018 (German Cases)



Source: eco Complaints Office, 2019

Success Rates for Racism Complaints 2018 (All Cases)

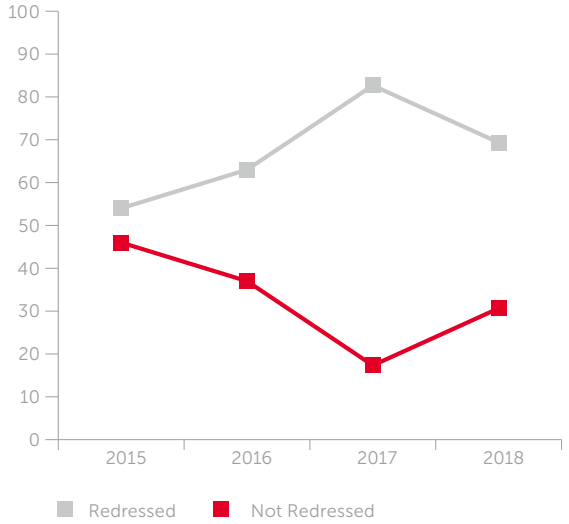


Source: eco Complaints Office, 2019

children, incitement of the masses and other racist content is not equally prohibited around the world. Despite this, in around two thirds of cases, success (=redress) could be achieved, because the hosting provider mostly took measures on the basis of prevailing law or the company's own T&Cs.

The relatively long take-down times in comparison to child sexual abuse material is, among other things, also due to the fact that the eco Complaints Office must take account of a longer waiting period between the report being made to the police and to the ISP (3 working days instead of 6 hours). In addition, the legal assessment is not always a simple matter – complex cases require a thorough and therefore also a more time-consuming legal assessment. Different legal situations in different countries can also lead to a more time-consuming assessment and greater need for clarification and consideration, and can thus have an influence on the take-down times.

Success Rates for Racism Complaints (2015 – 2018)



Source: eco Complaints Office, 2019

2.5 Processing of complaints of spam

The eco Complaints Office also follows a self-regulatory approach when it comes to the processing of complaints about the impermissible sending of marketing emails and newsletters. The senders of such emails are informed of the legal requirements for permissible email marketing – with a request for compliance. If required, the addressing of the provider used for the sending of emails can be signaled, and the provider can take further measures, e.g. in the case of spam being sent via a botnet or by senders who do not immediately respond appropriately.

In the case of complaints about the impermissible sending of marketing emails and newsletters that pertain to one of the senders participating in the whitelisting project, the Certified Senders Alliance (CSA), there is more intensive processing of the complaint. If the complainant mandates this, a comprehensive consideration of the facts takes place (in particular regarding data collection), and in the case of non-compliance with the CSA regulations, measures will be taken to ensure compliant sending in future.

3. Our Network

Nationally and internationally connected: Together for a safe Internet

The Internet knows no state borders – for the complaints offices to work effectively, it is therefore important for them to be well connected worldwide. As such, the eco Complaints Office works together with a large number of parties, promotes cooperation, and engages in committees and initiatives. A sample:

3.1 INHOPE

Given that effectively fighting illegal Internet content can only be achieved through international cooperation, eight organizations, including eco, with support from the European Commission's Safer Internet Action Plan, founded INHOPE (International Association of Internet Hotlines) in November 1999.

INHOPE is the international umbrella association of Internet hotlines, which operate worldwide and accept complaints about illegal online content, with a particular focus on images of the sexual abuse of minors. The network now consists of more than 45 hotlines in over 40 countries.

Within the network, reports based on complaints concerning illegal content can be forwarded to the relevant responsible partner. In this way, complaints can be investigated in the respective country of origin. The cooperation of the complaints offices with the law enforcement agencies also delivers advantages in terms of prosecution. Complaints about illegal online content which is not hosted in Germany are therefore

"As one of the founding members of INHOPE in 1999, eco has been at the center of INHOPE's work since it began. The success of eco in its work against CSAM can be traced to the attitude of 'cooperation & professionalism' with all of its stakeholders including industry partners, law enforcement and the INHOPE network. eco as an organization representing the Internet industry in Germany with a responsible self-regulation approach to CSAM – has shown that by cooperation and working together an industry can achieve a greater impact."

Denton Howard
Executive Director, INHOPE – International Association of Internet Hotlines

forwarded by eco to the INHOPE member responsible in the particular case involved.

This cooperation has proven its worth: Through its members, the INHOPE network covers many countries where depictions of sexual abuse and sexual exploitation of minors are hosted. The rapid and secure exchange of information across national borders has also led to the breaking up of numerous child pornography rings.

INHOPE itself is not a hotline, but supports the cooperation of the member hotlines in the individual countries. The umbrella organization, among other things, sets minimum standards for the processing of complaints and the exchange of complaints on the depictions of the sexual abuse and sexual exploitation of minors within the INHOPE network, and offers regular training for the staff of the affiliated hotlines.

At the INHOPE board elections of June 2018, Peter-Paul Urlaub, eco Complaints Office Consultant, was elected to the INHOPE executive board.

INTERNATIONAL ASSOCIATION OF INTERNET HOTLINES
INHOPE

3.2 German Safer Internet Centre (saferinternet.de)

Since 2004, the eco Complaints Office and the German Association for Voluntary Self-Regulation of Digital Media service providers (FSM e.V.) jointly operate the portal www.internet-beschwerdestelle.de/en , in order to offer Internet users a joint point of contact for reports of illegal Internet content, as well as providing further information and links to further advice. Since 2008, it has been part of the German Safer Internet Centre (saferinternet.de) – together with klicksafe, jugendschutz.net and "Nummer gegen Kummer". The German Safer Internet Centre is co-funded by the European Union as part of the "Connecting Europe Facility". In 2018, the consortium successfully submitted a new application for further EU funding for the period 2019 - 2020.

Within the framework of this cooperative initiative, the eco Complaints Office once again participated in the international conference "Keeping Children and Young People Safe Online" in 2018, on this occasion delivering a talk on hate speech and the NetzDG. In addition, on the occasion of the Safer Internet Day 2018, the factsheet "Respectable behavior online: participate, communicate, and join in" was jointly published (in the German language) with the FSM and jugendschutz.net partner complaint offices.

safer internet de

In 2018, we once again played an active part in the "European Day on the Protection of Children against Sexual Exploitation and Sexual Abuse". Through the medium of a joint video, the three German complaint offices - FSM e.V. (Voluntary Self-regulation of Digital Media service providers), jugendschutz.net, and eco (Association of the Internet Industry) - informed attendees about Internet users' reporting options, the working approach of the complaints offices, and the many years of important cooperation with the BKA.

3.3 fragFINN.de

FragFINN e. V., of which eco is also a founding member, has been offering a protected surfing space for children for over ten years, based on a so-called whitelist for Internet sites suitable for children. This whitelist has been developed by fragFINN and is regularly checked by experienced media pedagogues. In the portal "**fragFINN.de**", children are provided with, among other things, a search engine which simplifies for them access to Internet sites which are designed to be safe for children.

eco supports fragFINN among other things through participation in its working group criteria.

fragFINN.de

3.4 Network "No Grey Areas on the Internet"

In November 2014, the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth launched the network "No Grey Areas on the Internet" against the abuse and sexual exploitation of children. The network works to combat the proliferation of images of children and young people in an unnatural sexualized pose (frequently also referred to as Posing) or in a sexualized context, and to have this prohibited internationally. In the focus of the network is a competence center which sheds light on the grey zones in sexual exploitation in the Internet.

The eco Complaints Office actively supports the work of the network. The year 2018 saw a continued exchange of experiences with the competence center in dealing with complaints concerning images of minors in an unnatural sexualized pose. In addition, the Complaints Office shared findings with the competence center and the "No Grey Areas on the Internet" network concerning the dissemination of images of minors in an unnatural sexualized pose or in a sexualized context in Usenet. Over a period of twelve months, eco analyzed such complaints statistically by type of violation, age, gender, and number of persons depicted. The eco Complaints Office found that the content reported on in Usenet and the WWW differed considerably: In Usenet, for example, about 20% of the verified reports showed images of abuse, i.e. sexual acts in front of or by children, while this category accounted for about 40% of cases in the WWW. While in the WWW cases, all age groups were represented approximately equally, in Usenet cases it was particularly apparent that the age group "0-5 years" did not exist and that the persons depicted were mainly assigned to the age group "6-13 years".

This work and the comprehensive processing of reports of images of minors in an unnatural sexualized pose in the Internet, along with the recording of statistics and analysis, is funded by the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth.

3.5 Cooperation with law enforcement agencies

From the very outset of the Complaints Office's work, eco has been committed to ensuring that illegal material is deleted and that punishable offenses are reported to the authorities. The eco Complaints Office therefore cooperates with law enforcement agencies at both the federal and state levels. Particularly in the area of combatting images of the sexual abuse of children, close and effective cooperation with the German Federal Criminal Police Office (BKA) has existed for many years, with this also reflected in the German Federal Government's report on the success in deleting Child Pornographic web content. This report has been published by the German Federal Government since 2013 and shows that the principle of "take-down instead of blocking" and the cooperation of the complaints offices, the BKA, and the Federal Review Board for Media Harmful to Minors (BPjM) are very effective means for combatting illegal Internet

content. Aside from the regular exchange of information in the area of combatting images of the sexual abuse of children, the collaboration with the BKA has, for more than ten years, included a written cooperation agreement between the complaint offices (eco, FSM, jugendschutz.net), the BKA, and the BPjM. This agreement has been adapted several times to reflect the most current developments, most recently in 2017.

In the area of state security offenses, the eco Complaints Office cooperates with the police at both the federal and state levels.

In addition, the collaborative work between the eco Complaints Office and the police at state level is part of a cooperation agreement between eco, Networker NRW, and the North Rhine-Westphalia Criminal Police Office. As part of this cooperation, the eco Complaints Office once again took part in the annual "Official Staff Meeting: Cybercrime in its broader sense" of the NRW Criminal Police Office in 2018, where it was also able to present its work.

In its liaison role as an intermediary between industry and law enforcement agencies, the eco Complaints Office – in cooperation with the Central Bureau and Contact Office for Cybercrime North-Rhine Westphalia (ZAC NRW), the Office of the Attorney General of Hesse, and the Office of the Attorney General of Berlin – brought together representatives of Google and Facebook at three locations with state and public prosecutors, judges, and police officers.

At these further training events, the industry representatives presented the procedures and tools of their respective companies for information requests from investigating authorities, and had the opportunity for an interchange with the course participants. Through these events, the eco Complaints Office was also able to increase its visibility among the attending judicial officers and police officers.

"An effective fight against cybercrime can only succeed if undertaken as a joint task of law enforcement agencies, industry, and society. I am therefore particularly pleased that we have a strong partner in eco. In 2018, jointly organized events on the topic of 'transatlantic data access' provided important impetus. Now the focus is on combatting hate crime on the Internet: Great to have eco on board for 'Prosecute, don't just delete'"

Markus Hartmann
Senior Public Prosecutor & Head of the Central Bureau and Contact Office for Cybercrime North-Rhine Westphalia (ZAC NRW)

The eco Complaints Office is also active at the local level – one example is "SUSII" (Safe-and-Secure-on-the-Internet), a safety and security project that eco established together with the Cologne Police Headquarters in 2016. SUSII (**susii.nrw**) is a free and non-commercial Internet safety and security portal, targeted at citizens (of Cologne), as well as small and medium-sized enterprises (SMEs), and in the meantime extended to cover the districts of Leverkusen and Rhine-Erft. As part of the Cyber Security Month 2018, the eco Complaints Office together with the Cologne Police and the Rhine-Erft district held the "SUSII Day". Throughout this day, citizens and representatives of SMEs were informed about Internet security issues at various lectures and information stands in the city centers, and were able to put questions to the experts from eco and the police.

3.6 Exchange with other relevant parties in the field of youth media protection

In 2018, the eco Complaints Office intensified its exchange with other relevant state actors in the field of youth media protection. Several meetings were held with the Commission for the Protection of Minors in the Media (KJM) and the State Media Authority NRW (LFM NRW). Here the particular focus was on exchange of experience related to applying the relevant provisions of youth media protection law, as well as on future opportunities for cooperation.

The Federal Review Board for Media Harmful to Minors (BPjM) is responsible not only for indexing content harmful to young people, but also for the further development of youth media protection. This being the case, the eco Complaints Office was in continuous exchange with the BPjM and, through its participation in the launch event for the future workshop ("Digital welfare – from the child's perspective") in October 2018, was involved right from the outset in the BPjM's further development processes for youth media protection.

3.7 Imparting media skills

Media education is a major challenge and responsibility. The responsible adults often come up against their own limits. Due to the fast-moving pace of life, knowing how to use and handle social networks, messenger services, etc. that are popular with children and adolescents is not always easy.

This is why we make ourselves available, among other things, for parents' evenings and teacher training courses, in order to sensitize people to legal risks and thus promote the positive use of all online services. In 2018, we organized a parents' evening at a comprehensive school in Neuss and held a workshop at the specialist day of the Oberbergisch district media initiative.

Since December 2018, we have also been a network partner of the "s.i.n.us" project, "Safely underway with the Internet". This is an association of institutions in the Rhine Neuss district involving schools, parents, police, youth welfare, and addiction support services, and has been established to promote the media skills of pupils, teachers, and parents through different activities such as training events.

"Digitalization presents an immense opportunity for Germany as a location – our future and the future of our children is digital. That's why we need to focus now on promoting media competency for future generations: Children and young people must learn to deal with digital media critically and responsibly. But they should also be able to use them safely. I therefore hope that the eco Complaints Office will continue its conscientious work in the fight against illegal Internet content with the same degree of success."

Thomas Sattelberger
Member of the German Bundestag

4. Online Youth Protection for Companies

Extra benefits for member companies

From the very outset, youth protection has been an important part of the eco Complaints Office's assessment standard. The eco Complaints Office was established on the initiative of our member companies in 1996 and can now look back on more than 20 years of expertise in this field.

Legal expertise

The eco Complaints Office offers eco member companies continual support, e.g. through initial legal assessments of complaints. This allows unjustified complaints to be filtered out so that providers do not have to deal with them.

Close to politics

As part of eco's Policy, Law & Regulations division, the eco Complaints Office accompanies and monitors political issues and legislative processes at national and international levels and actively brings its expertise and many years of experience to bear on these processes. The complaints office work at international level means that we are always very much in tune with world political events – here we closely monitor processes and can thus immediately recognize and react to new developments.

Network of experts and committee work at national and international levels

The eco Complaints Office as your voice: Years of successful cooperation with law enforcement agencies and other complaints offices, as well as the active support of national and international committees and initiatives, make the eco Complaints Office the ideal mediator between the industry and state bodies.

Sustainable offers in the field of youth media protection

In addition to the full legal qualifications of our staff, who assess online content and any measures to be taken, member companies can profit from 20 years of expertise in the field of youth media protection. A particular contribution is made by separate services of the eco Complaints Office, which are offered independently of the general complaint work service.

4.1 Youth Media Protection Expert Lunch

Our "Youth Media Protection Expert Lunch" is an open forum targeted exclusively at association members who are active in the field of youth media protection, with the aims of enhancing exchange of ideas and experiences, gathering information, and allowing dialogue to be initiated with us and amongst members. The meetings take place two to three times a year, with additional relevant parties and external experts sometimes also invited to contribute. The focus is on the following topics: the application of the German Interstate Treaty on the Protection of Minors in the Media (JMStV) and the corresponding regulations in the German Criminal Code (StGB); legal developments in youth media protection in its broadest sense; "digital trends"; and the activities of the eco Complaints Office.

"The exchange with eco has always been and continues to be instructive and fruitful. As a 'trusted reporter', the eco Complaints Office is a very important partner for us. The cooperation with the team of the Complaints Office is therefore an important building block for Twitter in its efforts to realize the goal of a constructive discussion on our platform."

Nina Morschhaeuser
Head of Public Policy, Government and Philanthropy, twitter Deutschland

4.2 eco Youth Protection Officer Service

The functions of the youth protection officer:

- Advisory service for the provider
- Contact person for users
- Point of contact for official oversight

Youth protection on the Internet is a task for society as a whole. With the eco Youth Protection Officer Service, both eco members and external companies have the opportunity to make their contribution to this cause. Certain telemedia providers with content that is developmentally-impairing or youth-endangering, as well as providers of search engines, may also be obliged to appoint a Youth Protection Officer in accordance with Section 7 of the German Interstate Treaty on the Protection of Minors in the Media (JMStV).

With the eco Youth Protection Officer Service, the eco Complaints Office is happy to support telemedia providers in the implementation of this obligation or in the voluntary appointment of a Youth Protection Officer, and offers:

- Comprehensive consultation on matters relating to youth protection
- A neutral point of contact between you and your users
- A minimization of liability risk
- Prevention of official fines and written warnings
- An increase in user trust through effective youth protection
- Current information and updates on developments and legal changes in the area of youth media protection
- A service tailored to the type of provider
- A seal of quality/logo for your website

If you are interested in availing of or finding out more about this service, we'd be happy to hear from you at the following email address: **jugendschutzbeauftragte@eco.de**

5. Events, Representation, and Political Work 2018

The eco Complaints Office was once more "on location" in 2018 to report on its work, challenges and successes, and also to discuss current and future trends. Here is a selection of our activities:

- **Safer Internet Day 2018 "Living and learning in the digital world – with a concept" (06.02.2018)**

In order to learn how to use the Internet responsibly and respectfully, children and minors need to be accompanied along the way and supported by adults. The Cologne Police Headquarters therefore took Safer Internet Day 2018 as an opportunity to inform Internet users, teachers, and adults with child-rearing responsibilities about responsible media use for educational, teaching, and learning purposes.

Under the banner of, "Living and learning in the digital world – with a concept", experts from the Cologne Police Force, the NRW Consumer Association, the City of Cologne's School Psychology Service, the Competence Centre for Media Consultancy, and the eco Complaints Office reported on measures for a mindful and considered use of the Internet and offered advice and tips to this end. Kira Peek, eco Complaints Office Consultant, delivered a talk on the topic of "Submit complaints simply and anonymously online".

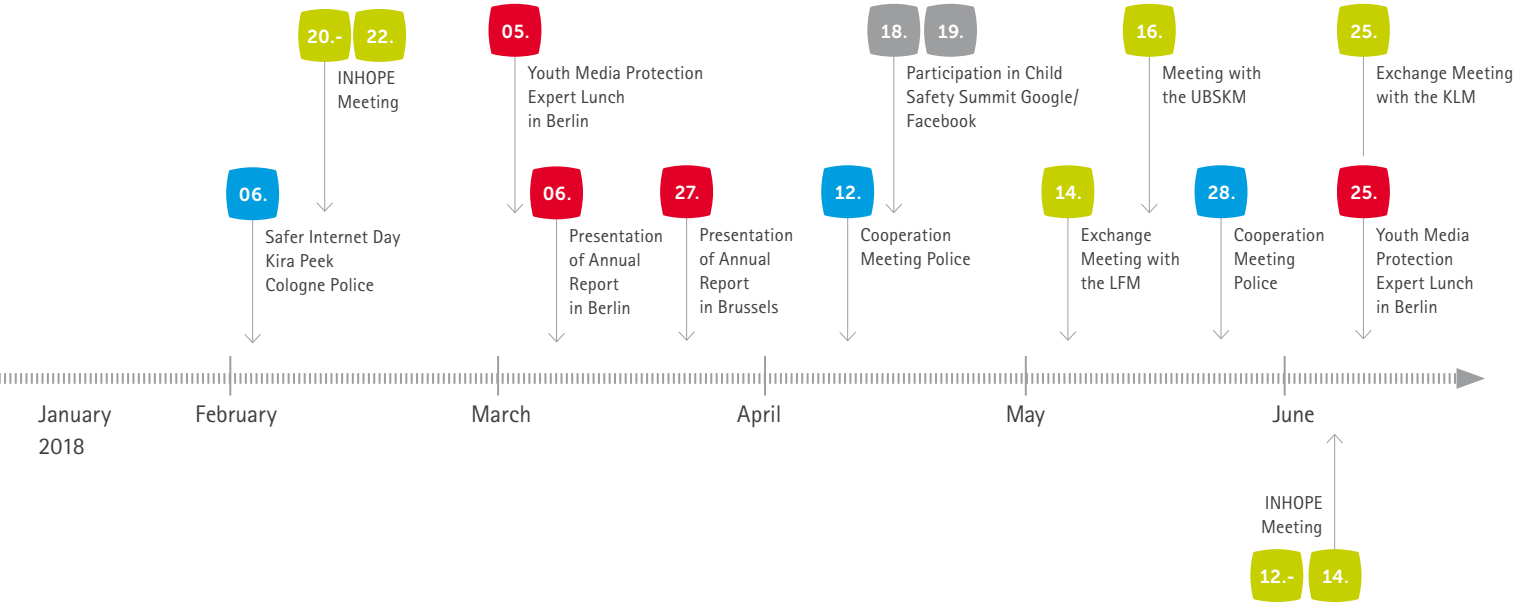
- **Review of 2017: Presentation of the eco Complaints Office's annual report in Berlin and Brussels**

On 6 March 2018, during a political breakfast, Alexandra Koch-Skiba, together with Renate Künast, Member of the German Bundestag (Bündnis 90/Die Grünen – the Greens), presented the eco Complaints Office's second independent annual report in the eco Capital Office.

As the report showed, 2017 had proven to be an eventful and challenging year for the eco Complaints Office. On the one hand, the number of complaints received had risen: A total of 27,660 complaints (disregarding spam and Usenet) were submitted to the eco Complaints Office in that year, 4,063 of which were justified. Worldwide, about 95% of the URLs reported by eco were removed from the Internet (of which about one fifth were hosted in Germany). On the other hand, the legislative initiative revolving around the controversial Network Enforcement Act was a central topic for the eco Complaints Office, given that it brought phenomena such as "hate speech & co." increasingly into the public eye.

The frequently contentious political debates on the Network Enforcement Act in 2017 showed once again how important transparency is, especially for political work. This was also acknowledged by Renate Künast, who on the occasion of the publication of the Annual Report in the eco Capital Office, personally thanked the employees of the eco Complaints Office for their transparent and comprehensible work.

On 27 March 2018, once again during a political breakfast, the eco Complaints Office presented the English version of the 2017 annual report for the first time in the European Parliament. Among the guests were members of the European



Parliament, representatives of the national delegations, and company representatives.

In her keynote address, Sabine Verheyen – Member of the European Parliament (CDU), who together with eco hosted the publication of the annual report in the EU Parliament – emphasized in particular the important role of the eco Complaints Office as an active shaper of prevention work through the promotion of media competence and sensitization on the Internet, at both German and European levels.

Youth Media Protection Expert Lunch (05.03.2018/25.06.2018/12.11.2018)

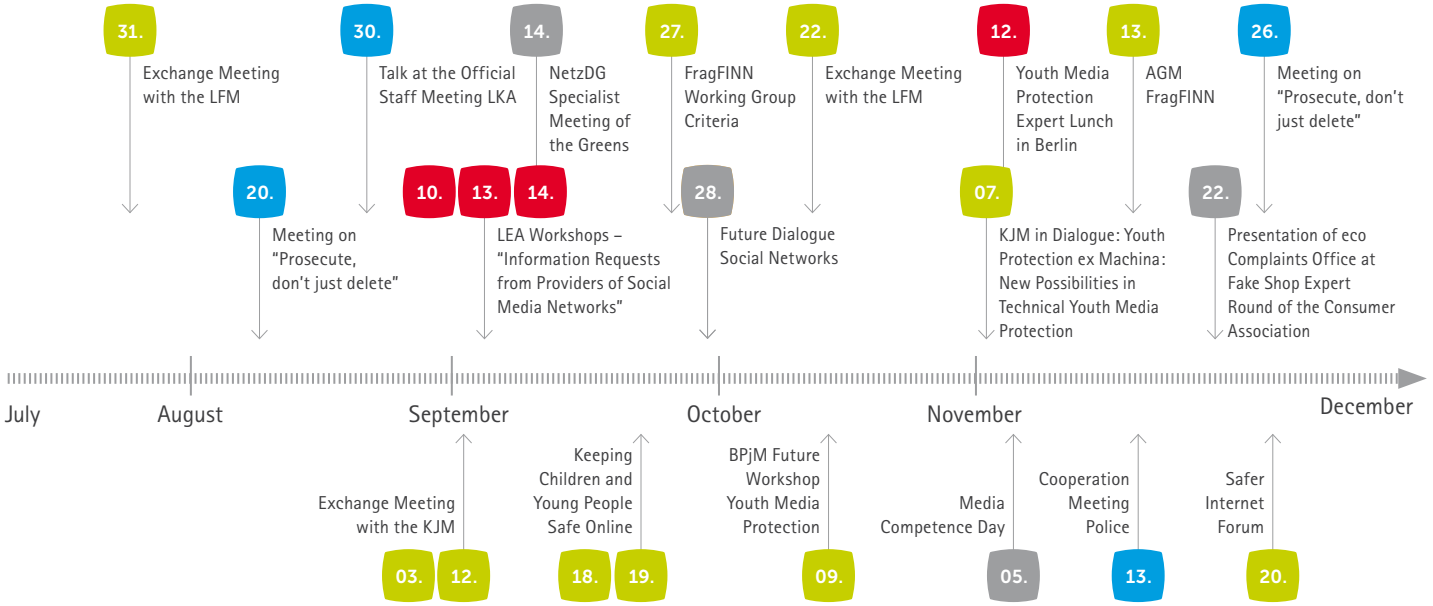
The "Youth Media Protection Expert Lunch" is a format targeted exclusively at eco members and entails an open forum aimed at increasing the exchange of ideas and experiences, gathering information, and allowing dialogue to be initiated with the Complaints Office and with other members. In 2018, three in-person meetings took place. An important focus of all three meetings was the further development of youth media protection. In this respect, we were able to secure representatives of two key bodies – the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth, as well as the Federal Review Board for Media Harmful to Minors – as external guests and experts for the event on 25 June 2018.

The meetings also addressed the experiences of the eco Complaints Office in combatting illegal Internet content, the implementation of the Network Enforcement Act, and new political activities in the field of Notice & Action.

For the year 2019, three more exciting live meetings are planned.

EMEA Child Safety Summit (18./19.4.2018)

On 18 and 19 April 2018, Google and Facebook hosted the



third EMEA Child Safety Summit in Dublin. At the summit each year, NGOs, government representatives, and companies from Europe, the Middle East, and Africa meet to exchange ideas and experiences – discussing, for example, the major challenge of optimally preparing parents and children for the opportunities and risks on the Internet. The discussion in 2018 focused, among other things, on the question of further technical developments over the next 15 years in combatting illegal Internet content, with attendees concurring that the context is enormously important and that a combination of technology and legal evaluation will therefore always be necessary.

Conference "Keeping Children and Young People Safe Online" (18./19.9.2018)

Last year the conference "Keeping Children and Young People Safe Online", organized by the German and Polish Safer Internet Centres and attended by more than 100 participants, was held again in Warsaw. As part of the conference, the eco Complaints Office delivered a talk on hate speech and the Network Enforcement Act, and provided an update on how things stand in Germany.

Future Dialogue on Social Networks (28.9.2018)

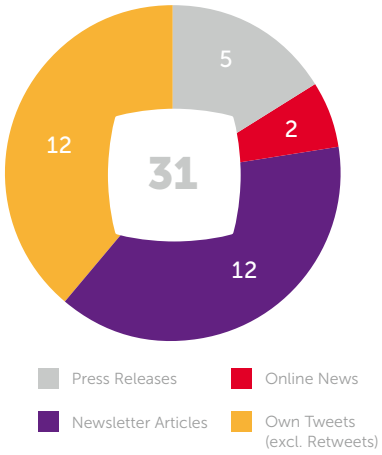
The Federal Ministry of Justice and Consumer Protection (BMJV) launched a "Future Dialogue on Social Networks" in 2018, the inaugural meeting of which took place on 28 September. The eco Complaints Office also took part in the Future Dialogue. The discussion focused primarily on the implementation, impacts, and possible further developments of the Network Enforcement Act, in particular with regard to the regulated self-regulation envisaged in this Act, as well as strategies and commitments against hate speech on the Internet. The "Future Dialogue on Social Networks" has thus become the successor to the task force on hate speech.

6. Public Relations Work

6.1 Successful Media Output 2018

2018 was a very successful PR year for the eco Complaints Office. Key topics such as the political debate on hate speech in connection with the Network Enforcement Act, which came into force at the end of 2017, as well as the topics of child and youth media protection on a national and international level, were strategically accompanied by political communication. The work of the Complaints Office in this area was frequently relayed and positioned in the media and the public domain.

PR Activities Complaints Office 2018



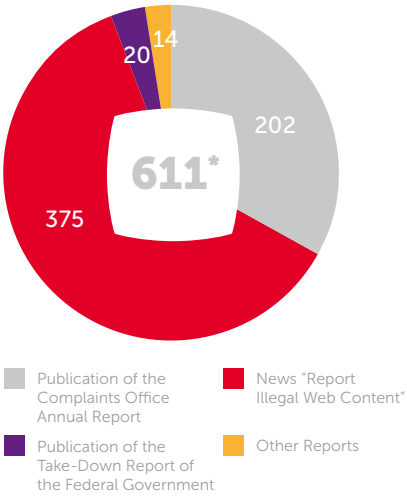
Source: eco Complaints Office, 2019

Selection of Complaints Office tweets:

Best practice in the debate on self-regulation and the Network Enforcement Act

Another highlight in 2018 was the very effective PR flanking of the debate on the topic of hate speech and the associated hastily adopted Network Enforcement Act, which came into force in October 2017. Within the scope of its political PR activities, the eco Complaints Office was able to position itself as an expert on the subject and to play a key role in shaping the debate in various leading media, news agencies such as dpa, and especially on TV. A very good springboard for this work was the second independent annual report of the eco Complaints Office, which was presented to representatives of the press and politics in Berlin and Brussels in spring 2018.

Complaints Office Media Resonance



*Total number of clippings

Source: eco Complaints Office, 2019

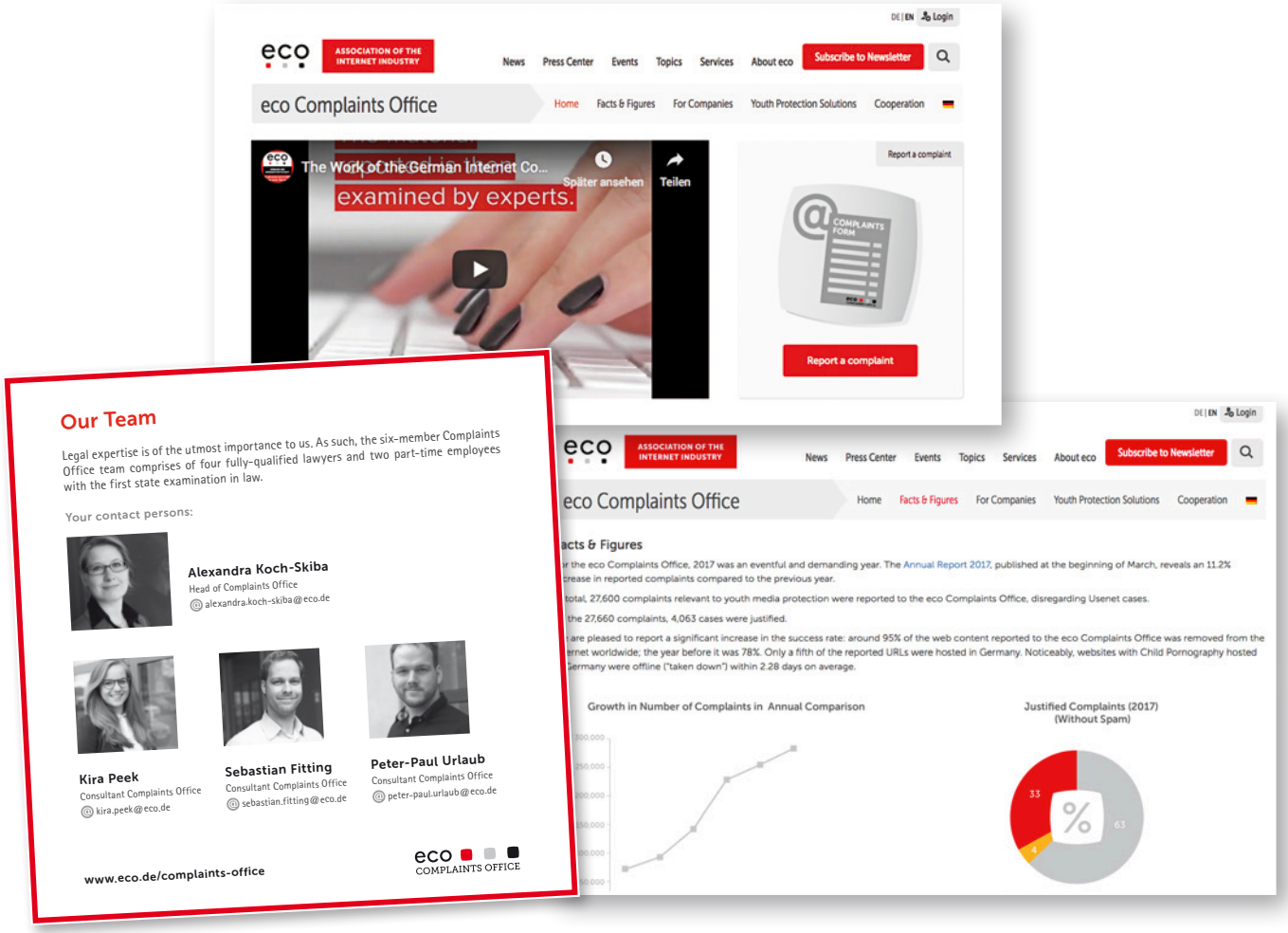
Topic highlights:
Complaints Office annual report: Hate speech is on the rise (March 2018: 202 clippings)

Report illegal web content and spam to the eco Complaints Office (October/November/December 2018: 375 clippings)

New Portfolio: InfoFlyer & relaunch of the homepage in the eco Complaints Office corporate design

The optimization of the public presence of the eco Complaints Office was a focal point of the year 2018. The website of the eco Complaints Office benefited from a major makeover. Since the beginning of 2019, visitors to beschwerdestelle.eco.de and the English-language international.eco.de/eco-complaints-office/ have been able to find all information on the eco Complaints Office in a structured and compact form in the new corporate design. In addition, the new InfoFlyer and InfoCards supplement the portfolio of the eco Complaints Office's public presence and provide a quick overview of how the office works, how complaints are handled, the assessment standard, and the various services offered by the eco Complaints Office.

Selection of eco Publications & Homepage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Our Team
Legal expertise is of the utmost importance to us. As such, the six-member Complaints Office team comprises of four fully-qualified lawyers and two part-time employees with the first state examination in law.
Your contact persons:
Alexandra Koch-Skiba
Head of Complaints Office
alexandra.koch-skiba@eco.de
Kira Peek
Consultant Complaints Office
kira.peek@eco.de
Sebastian Fitting
Consultant Complaints Office
sebastian.fitting@eco.de
Peter-Paul Urlaub
Consultant Complaints Office
peter-paul.urlaub@eco.de
www.eco.de/complaints-office
eco COMPLAINTS OFFICE
Facts & Figures
Annual Report 2017
Growth in Number of Complaints in Annual Comparison
Justified Complaints (2017)
(Without Spam)
33
63
4

What can you do?

Every report counts in the fight against illegal content! In 2018, the eco Complaints Office was responsible for child pornographic websites hosted in Germany being taken down within 2.97 days (including weekends and public holidays). If you come across content online that you believe is illegal, don't hesitate: Report it to the eco Complaints Office – simply and anonymously.
https://international.eco.de/internet-complaints-office.html

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