Pinterest

Pinterest Response to Consultation: Fraudulent Advertising Codes of Practice

Consultation Cover Sheet

Basic details

- **Consultation title**: Consultation: Fraudulent Advertising Codes of Practice
- **To (Ofcom contact):** [redacted] FraudulentAdvertisingConsultation@ofcom.org.uk
- **Name of respondent:** [redacted]
- **Representing (self or organisation/s):** Organisation
- **Email address:** [redacted]

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why:

- ☐ Nothing
- ☑ Name/contact details/job title - *personal information*
- ☐ Whole response
- ☐ Organisation
- ☐ Part of the response

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

- ☑ Yes
- ☐ No

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments. Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here. [TICKED]

Name: [redacted]

I. Introduction

Pinterest is a visual search and discovery platform where people around the world go to get inspiration to create a life they love. Pinterest shows people visual recommendations, called Pins. Pins are created by individuals and businesses by uploading photos or videos or bookmarking content from the web, with the option to provide a text caption. People can save and organise these recommendations into collections called boards. Some of our most common use cases include fashion, food, beauty, home decor and travel.

Pinterest welcomes the opportunity to respond to Ofcom's consultation published on 10 July 2026 on its proposed fraudulent advertising codes of practice, setting out what categorised services should do to tackle fraudulent advertising in line with their duties under the UK Online Safety Act (the "**OSA**") (the "**Codes**"). We share Ofcom's objective of reducing the risk of people encountering fraudulent advertising online and support clear, effective and accountable measures to prevent, detect and remove such advertisements.

In our following consultation response, we have focused on the proposals most relevant to our service and where we consider our input can meaningfully inform Ofcom's consultation to help ensure that the final Codes maintain a proportionate and adaptable approach, given the diverse range of platforms.

II. Volume I: Context - Approach to Codes

Pinterest supports Ofcom's goal of reducing fraudulent advertising and agrees that providers should have effective systems and processes to mitigate the risk of people encountering advertisements that are fraudulent or otherwise deceptive.

We welcome Ofcom's layered and service-specific approaches proposed in the draft Codes. In finalising the Codes, we encourage Ofcom to continue to focus on the effectiveness of providers' safeguards and the outcomes achieved, including the timely detection, review and removal of fraudulent advertisements, rather than prescribing a particular technical architecture or operational model in every instance. Different services have different functionalities, advertising models, user bases, risk profiles and existing controls. A flexible approach that ensures measures are proportionate to the risk presented on the specific platform will allow providers to direct resources towards interventions that are most effective for their users, while preserving the objective of robust protection against fraudulent advertising.

This is particularly important when considering the combined impact of proposed measures. Some proposals, particularly around technical controls and requirements imposed on Category 1 providers, would in combination require substantial additional engineering and operational investment. Pinterest encourages Ofcom to consider the cumulative impact of the proposed measures, as well as providers' existing and forthcoming obligations under the OSA. Ofcom should ensure that each required measure is proportionate to the risk presented by the service

and delivers a commensurate and measurable safety benefit, taking into account the effectiveness of existing controls. Ofcom should also provide for a clear and realistic implementation timetable allowing appropriate time for implementation including, where appropriate, a phased approach for more onerous measures requiring substantial technical development.

III. Volume III: Ensuring Account Integrity

Account checks and actions

Pinterest supports Ofcom's objective of preventing fraudulent advertisers from accessing advertising services and ensuring that advertisements in regulated or sensitive categories are subject to appropriate checks. Pinterest already operates a layered approach to advertiser account integrity, which combines account creation requirements, enhanced checks for certain categories of advertising and industries, advertisement moderation and account-level enforcement. Our review and validation processes are not limited to initial account creation; advertisements and accounts may be assessed in response to user reports and other content moderation signals and if we identify policy violations, we may reject or remove the relevant advertisement and where appropriate, take account-level action.

We therefore welcome an approach that recognises providers may use a range of account-level and advertisement-level controls to meet the objective of preventing fraudulent advertising. We encourage Ofcom to retain sufficient flexibility for providers to apply account checks in a risk-based manner, taking account of the advertiser, the category of advertising, the relevant jurisdiction, and the information necessary to comply with applicable legal requirements and protect users. In particular, the proposal to: (a) verify that each advertising account holder works for, or on behalf of, the individual or organisation being advertised; and (b) conduct checks for indicators that there is a material risk of posting fraudulent advertising (*FAU H1*) should be applied in a proportionate and outcomes-focused manner. Pinterest's existing onboarding and due-diligence processes provide relevant information about account holders and the businesses seeking to advertise. However, requiring a particular form of direct verification of every employment or representative relationship would be a substantial new operational undertaking and may not be necessary in every case to achieve the underlying objective. Providers should be permitted to use reliable, risk-based evidence and controls that provide equivalent protection against impersonation and fraudulent advertising. A risk-based approach would allow providers to apply proportionate initial checks to all accounts, followed by enhanced checks where fraud indicators or higher-risk advertising categories are present. Ofcom should therefore avoid prescribing a specific verification method or dataset for these checks and should instead allow providers to develop and scale appropriate, risk-based approaches over time, including on a phased basis as more effective mechanisms are built out. Data minimisation should remain central to the final approach. Providers should be able to use lower-data methods where these provide sufficient confidence for the relevant risk, rather than being expected routinely to collect and retain government identity documents, or other sensitive data from all advertisers.

Countering Account Takeover

Pinterest supports the objective of protecting legitimate advertising accounts from bad actors attempting to gain access. Pinterest already makes account-security mechanisms, including multi-factor authentication, available as an option for all users (including business accounts and ad accounts) and maintains easily accessible account takeover reporting mechanisms and support routes designed to effectively respond to potential account compromise. We also operate proactive measures designed to identify potential account compromise and activate security protocols to protect such accounts.

We encourage Ofcom to retain an outcomes-based and technology-neutral approach to account security. Providers should be able to deploy a proportionate combination of authentication, account-recovery processes and other account-security safeguards that is appropriate for their service and advertising model, rather than being required to implement a particular type or mandatory account security mechanisms and authentication for every advertising account.

Advertising Bans

Pinterest takes decisive action against advertisers that breach our Advertising Guidelines[1] or other applicable policies. Where an advertisement is found to be non-compliant, Pinterest will take appropriate enforcement action, which may include account-level action where appropriate, and provide the advertiser with an opportunity to appeal. Pinterest's multi-layered enforcement process addresses both the individual advertisement and the advertiser's account as a whole.

These existing controls demonstrate Pinterest's commitment to taking effective account-level action against fraudulent advertisers. However, determined bad actors may well seek to return using a completely new identity with a newly created account. We would therefore encourage Ofcom, in considering its proposals to prevent banned advertising account holders returning (*FAU H1 and FAU H5*) to clarify that "reasonable steps" to prevent the banned person from creating and using new advertising accounts should mean proportionate, risk-based measures that are appropriate to the provider's service and informed by the nature and severity of the violation. Providers should be able to build on existing offboarding, account-health, domain-review and fraud-intelligence measures, and to develop further controls where they are demonstrably effective. More extensive identity-linkage or cross-account recidivism controls may require substantial investment and raise important questions of accuracy, privacy and false positives and so they should not be treated as a baseline expectation in all circumstances.

IV. Volume IV: Moderation

Pinterest agrees that providers should have effective systems and processes to identify, assess and take action against suspected fraudulent advertising. Our Advertising Guidelines, which are

[1] https://policy.pinterest.com/advertising-guidelines

incorporated into our Terms of Service[2], prohibit fraudulent advertising practices that fall within the types of conduct addressed by the OSA. Specifically, the policies relating to Sensitive Content,[3] Unacceptable Business Practices,[4] Counterfeit Goods[5] and Financial Products and Services[6] disallow advertisements that include misleading, deceptive, fake, fraudulent, counterfeit, or scam content of any kind. We continually assess and iterate on our policies to ensure they remain effective and reflect the latest developments and trends. Pinterest provides reporting mechanisms for potentially policy-violating advertisements and accounts and reviews and processes reports, appeals and complaints in a timely and appropriate manner. Pinterest's advertising content moderation approach includes a combination of proactive review and review of user reports. We provide an explanation of our enforcement mechanisms in our Help Centre[7]. We use quality assurance and auditing processes to assess accuracy and to refine moderation measures over time. Our approach is therefore well-aligned with Ofcom's focus on prompt review, removal, performance monitoring, transparency, accuracy and appropriate reviewer training.

In relation to the proposal for prioritisation (*FAU C5*), Pinterest supports Ofcom's objective of ensuring that suspected fraudulent advertisements are reviewed promptly, particularly where there is a heightened risk that people may encounter harmful advertising. We would, however, caution against requiring every provider to prepare and apply a separate policy for the prioritisation of suspected fraudulent advertisements where its existing moderation arrangements already deliver swift review and enforcement. Building a distinct fraud-specific prioritisation process would entail significant engineering work to develop and maintain new technical routing and reprioritisation capabilities. Pinterest already reviews suspected fraudulent advertisements promptly through existing processes, so it is not clear that this additional requirement would provide a commensurate incremental benefit to people using the service. We therefore encourage Ofcom to clarify that providers may meet the objective of FAU C5 through their existing moderation arrangements, provided that they can demonstrate timely and effective review of suspected fraudulent advertisements. Enhanced or distinct prioritisation measures should be expected only where a provider's risk assessment or moderation performance indicates that they are necessary to reduce the likelihood of people encountering fraudulent advertising, rather than as a prescriptive requirement for all providers.

Ad libraries

Pinterest supports meaningful advertising transparency and notes Ofcom has identified Pinterest's existing ads repository[8] as an example of an ad library. We note that this ads

[2] https://policy.pinterest.com/terms-of-service
[3] https://policy.pinterest.com/advertising-guidelines#section-sensitive-content
[4] https://policy.pinterest.com/advertising-guidelines#section-unacceptable-business-practices
[5] https://policy.pinterest.com/advertising-guidelines#section-counterfeit-goods
[6] https://policy.pinterest.com/en-gb/advertising-guidelines#section-financial-products-and-services
[7] https://policy.pinterest.com/enforcement
[8] https://ads.pinterest.com/ads-repository/

repository was developed to meet applicable requirements under the EU Digital Services Act and currently does not cover advertisements capable of being encountered by UK users. Extending the existing repository to cover advertisements capable of being encountered by UK users, and adapting it to meet the proposed ads library requirements, would require substantial additional engineering and operational investment. We encourage Ofcom to recognise that adapting an existing repository to a new jurisdiction and a more extensive specification can be as resource-intensive as building new functionality. We encourage Ofcom to consider a phased and proportionate implementation approach and allow flexibility in the technical design of the library and in the information fields and functionality in light of legitimate implementation considerations. The final Codes should focus on delivering useful, accurate and accessible advertising transparency, while allowing providers to build and maintain systems in a way that is sustainable and appropriate for their services.

V. Conclusion

Pinterest is grateful for the opportunity to contribute to the important work being done by Ofcom in developing the draft Codes. We welcome further engagement as part of this process, and if it would be of assistance, we would be happy to elaborate on or discuss any of the points raised in this response or any other matters of interest to Ofcom.

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