Written evidence submitted by 89up

mainstreamnetwork.co.uk

Facebook and Twitter claim they have tightened up on the promotion of Fake News on their platforms. 89up has found a pro-Brexit, anti-Chequers website, which is being promoted heavily on Facebook with advertising estimated at £257,000 in just over 10 months. This advertising is designed to specifically influence MPs. To put this in context, UKIP has declared just £114,000 since 2018 started. Mainstream Network has potentially a bigger budget than UKIP, and is aiming to influence MPs, yet there is no transparency whatsoever over who is paying for this website or why they are spreading their news on Facebook? Facebook claims to be tackling Fake News but individuals or groups with a political agenda can still use remain entirely anonymous on the platform and reach millions of people.

Using a basic methodology, 89up estimates the website content has reached 10.9 million users on Facebook alone. With little organic social media traction, advertising on the platform is likely to have driven a significant amount of this reach.

The website is highly leading and contains no information on the authors of the content, nor any legally required information for GDPR compliance. With the level of spending estimated, it is possible this website is in breach of both GDPR and also Electoral Commission rules on non-party campaigners. The first record of the site being live is on February 15 2018.

The site is currently running over 70 ads on Facebook and eight on Twitter in the last week. These ads are intended to influence voters through microtargeting, meaning that whoever owns the site could be violating electoral regulation. Furthermore, the site is likely collecting and harvesting user data in violation of GDPR.

Who runs it?

We currently have no way of telling who owns the platform. The domain ownership is protected (Godaddy.com is given as the registrar). Also, the <u>Facebook Page</u> doesn't list any names of individuals or organisations other than the below:

CONTACT DETAILS			
~	m.me/MainstreamUK 1		
	https://mainstreamnetwork.co.uk		
y	MainstreamUK		
*	Media/news company		

What is it? - mainstreamnetwork.co.uk

What at first seems appears to be a low-quality template based website (the sort of site that can be created without coding skills) is in fact running, what could amount to, a potentially highly sophisticated pro-Brexit campaign.

Indeed, its 20 most popular articles have had over 140k social media engagements (see appendix for details). With the vast majority of these coming on Facebook it would suggest a substantial amount of money is being used to promote content and/or bots.

Furthermore, the site has a sophisticated approach to content, with over 700 pages indexed on Google (see details here). We have reason to believe that this is part of a sophisticated advertising campaign, with pages setup to target users in every key constituency in the UK, with bespoke localised messaging; encouraging users to lobby their respective MPs. See example below and link here:



WE VOTED TO TAKE BACK CONTROL OF OUR MONEY AND BORDERS - BOB NEILL



We voted to leave the EU and take back control of our borders and our money.

The Chequers Deal does not deliver this.

Click below to tell your local MP to bin Chequers before it's too late.

Click to email Bob Neil

How are they using Facebook?

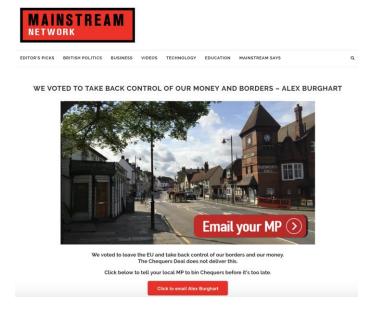
Using Facebook's latest transparency tools we have been able to see over 70 ads the site is currently running (see full list of ongoing ads here and example below and more examples in Appendix II).

The vast majority of these ads appear to use imagery relevant to the constituency of the MP that the landing pages in the ads link to. Although Facebook does not allow us to see the targeting specified by the advertiser, it is highly likely that each of these ads are only

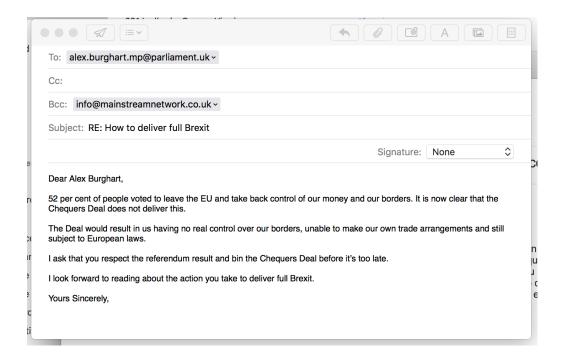
reaching those within the constituencies the ads and accompanying landing pages are relevant to. For example, the below ad links to a page specifically asking users to email Alex Burghart MP. See below and this link



Link ad takes users to:



Once users are taken to the respective localised landing pages from ads, they are asked to email their MP. When a user does this, its default email client opens up an email as per below:



How are they potentially in breach of GDPR?

As can be seen, whenever a user emails their MP from the site, the site puts its own email in the BCC field (see above). The only assumption that can be made about this, is that this user's data (the user's email) is being stored and used for marketing purposes e.g. to target users with bespoke ads on Facebook using the 'Custom Audiences' feature.

With Custom Audiences, you can reach users "you already know with ads on Facebook. Just upload a list of contact info like email addresses or phone numbers....We'll deliver your ad to those people if they're on Facebook" (source: <u>Facebook</u>)

Given that there are no specific data opt-ins on <u>mainstreamnetwork.co.uk</u> it is highly likely that this process and the subsequent likely storing of user emails is a breach of GDPR.

How are they using Twitter?

The site's presence on Twitter is negligible compared to Facebook but it is running adverts - 8 in the past days according to <u>Twitter's transparency centre</u>. See ad examples in Appendix: III

General questions:

- Who owns the site?
- Is the site registered on with the Electoral Commission?
- Who is paying for the ads?
- Is GDPR being breached?

Question for Facebook & Twitter:

• What currency are these ads being paid for? How can we be sure they're not being paid for with Russian or other foreign money?

- What company is registered as running these ads?
- Why are political campaigns being undertaken without transparency as to who is running them?
- Why are political campaigns in the UK not required to registers as running "ads related to politics or issues of national importance" as per Facebook's requirement in the US and India?

October 2018

Appendix: I 20 most shared articles on social media

title	url	total engageme nts	facebook engageme nts	twitter shares	published date
George Soros' Best For Britain fined by Electoral Commission over donation and spending issues – Mainstream	http://mainstreamnet work.co.uk/george- soros-best-britain- fined-electoral- commission- donation-spending- issues/	18884	18282	583	2018-07-
Mrs May the people have spoken: Full Brexit or no deal – Mainstream	http://mainstreamnet work.co.uk/mrs- may-people-spoken- full-brexit-no-deal/	15969	15942	27	2018-07- 07
Mogg says May's plan 'worse than a no deal' – Mainstream	http://mainstreamnet work.co.uk/mogg- says-mays-plan- worse-no-deal/	9708	9699	9	2018-07- 07
Boycott them' Superdry under fire for donating £1 million to stop Brexit – Mainstream	http://mainstreamnet work.co.uk/boycott- superdry-fire- donating-1-million- stop-brexit/	7803	7797	6	2018-08- 19
New data shows if the Tories betray the people over Brexit, they will lose the election – Mainstream	http://mainstreamnet work.co.uk/new- data-shows-tories- betray-people- brexit-will-lose- election/	7742	7697	43	2018-07- 06
Brexit deal 'keeps UK in EU' says expert in EU law – Mainstream	http://mainstreamnet work.co.uk/brexit- deal-keeps-uk-eu- says-top-eu-lawyer/	7682	7603	79	2018-07- 07
If we embrace it, Brexit can supercharge British technology and refocus minds on global trade.' Says James Dyson – Mainstream	http://mainstreamnet work.co.uk/embrace -brexit-can- supercharge-british- technology-refocus- minds-global-trade- says-james-dyson/	7620	7615	5	2018-08-31
Adolescent Politics Defines London's Mayor – Mainstream	http://mainstreamnet work.co.uk/adolesce nt-politics-defines-	7463	7454	9	2018-07- 06

	londons-mayor/				
Petition to abolish House of Lords reaches 50,000 in two days – Mainstream	http://mainstreamnet work.co.uk/petition- abolish-house-lords- reaches-50000-two- days/	7115	7098	17	2018-04-
Chequers is worse than remaining in the EU' says David Davis – Mainstream	http://mainstreamnet work.co.uk/chequer s-worse-remaining- eu-says-david-davis/	6507	6495	12	2018-09-
Priti Patel Warns PM to Chuck Chequers – Mainstream	http://mainstreamnet work.co.uk/priti- patel-warns-pm- chuck-chequers/	5950	5891	59	2018-08- 28
80 Tory MPs set to reject Chequers according to former minister – Mainstream	http://mainstreamnet work.co.uk/80-tory- mps-set-reject- chequers-according- former-minister/	5839	5839	0	2018-09-
Brits would rather have a No Deal Brexit than back Theresa May's plan – Mainstream	http://mainstreamnet work.co.uk/brits- rather-no-deal- brexit-back-theresa- mays-plan/	5828	5828	0	2018-07- 17
Exclusive: The rebel's response to May's Chequers deal – Mainstream	http://mainstreamnet work.co.uk/exclusiv e-rebels-response- mays-chequers-deal/	5736	5734	2	2018-08-
Plan A+ means a UK- US trade deal can be signed NOW – Mainstream	http://mainstreamnet work.co.uk/plan- means-uk-us-trade- deal-can-signed- now/	5406	5401	5	2018-09- 24
Revealed: George Soros' plan to ensure Labour thwarts Brexit – Mainstream	http://mainstreamnet work.co.uk/revealed -george-soros-plan- ensure-labour- thwarts-brexit/	5263	5261	2	2018-05- 24
The UK would be better outside the EU in any scenario' as UK unveils no deal Brexit plans — Mainstream	http://mainstreamnet work.co.uk/uk- better-outside-eu- scenario-uk-unveils- no-deal-brexit- plans/	5238	5232	6	2018-08-

Former PMs Chief of	http://mainstreamnet	4803	4802	1	2018-08-
Staff: Chequers not	work.co.uk/former-				30
our only option –	pms-chief-staff-				
Mainstream	chequers-not-				
	option/				
Official data reveals	http://mainstreamnet	4561	4532	29	2018-09-
only 18% of Britons	work.co.uk/official-				05
support Chequers –	data-reveals-18-				
Mainstream	britons-support-				
	chequers/				

Appendix: II Facebook ads



We voted to leave the EU, to take back control of our money and borders. The Chequers proposal does not deliver this.



MAINSTREAMNETWORK.CO.UK

Click to tell your local MP to bin Chequers

Mainstream brings you the latest news and opinion...

Learn More



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MAINSTREAMNETWORK.CO.UK

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Mainstream brings you the latest news and opinion...

Learn More

Appendix III:

Twitter ads



Mainstream @MainstreamUK · Oct 1

Conservatives have always done what's best for Britain – chucking Chequers is a must.

#ChuckChequers



Conservatives have always done what's best for Britain -

'For what is the Tory Party unless it represents national feelir mainstreamnetwork.co.uk

Promoted



Mainstream @MainstreamUK · Oct 4

O 11

17 4

We now have an alternative to Chequers – let's use it and deliver the best Brexit mainstreamnetwork.co.uk/now-alternativ...



Promoted



Mainstream @MainstreamUK · Oct 8

Unilever makes U-turn to show faith in the UK mainstreamnetwork.co.uk/unilever-makes...



Promoted