

**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING'S BENCH DIVISION**

**BETWEEN:-**

**TANYA O'CARROLL**

**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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# Claim Form

**In the** High Court of England and Wales, King's Bench Division, Media and Communication List

**Fee Account no.**

**Help with Fees - Ref no.** (if applicable) **H W F** -   -

**You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.**

	For court use only
Claim no.	
Issue date	

## Claimant(s) name(s) and address(es) including postcode

Tanya O'Carroll  
[REDACTED]  
[REDACTED]  
[REDACTED]



KB-2022-004365

## Defendant(s) name and address(es) including postcode

Meta Platforms Ireland Limited  
4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Dublin  
Ireland  
D02 X525

## Brief details of claim

Claim for the following relief:

- (1) A declaration that the Defendant has acted, and continues to act, in contravention of the requirements under Articles 21(2)-(3) of the UK GDPR (as defined in the Particulars of Claim) to cease processing the Claimant's personal data for the purposes of direct marketing (including its obligation to cease profiling the Claimant to the extent that such profiling is related to direct marketing).
- (2) A compliance order pursuant to section 167 of the Data Protection Act 2018, for the Defendant to stop processing the Claimant's personal data for the purposes of direct marketing (including profiling the Claimant to the extent that such profiling is related to such direct marketing).

Full details of the claim and relief sought by the Claimant is set out in the Particulars of Claim.

## Value

Not applicable

Defendant's name and address for service including postcode

Meta Platforms Ireland Limited,  
4 Grand Canal Square,  
Grand Canal Harbour,  
Dublin 2,  
Dublin,  
Ireland,  
D02 X525

	£
Amount claimed	Not applicable
Court fee	569
Legal representative's costs	TBC
<b>Total amount</b>	<b>TBC</b>

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here  
(see notes for guidance)

Edmonton County Court

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Does, or will, your claim include any issues under the Human Rights Act 1998?

Yes

No

Claim no.

Particulars of Claim

attached

to follow

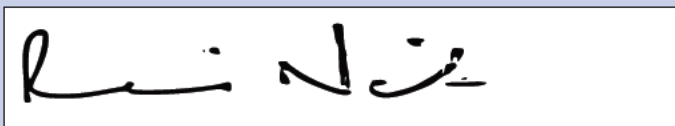
## Statement of truth

**Note:** you are reminded that a copy of this claim form must be served on all other parties.

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day                      Month                      Year

### Full name

### Name of claimant's legal representative's firm

### If signing on behalf of firm or company give position or office held

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

2 John Street

Second line of address

Town or city

London

County (optional)

Postcode

W C 1 N 2 E S

If applicable

Phone number

07966143682

DX number

Your Ref.

RN/67

Email

ravi@awo.legal





**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING’S BENCH DIVISION**

**BETWEEN:-**

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**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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**PARTICULARS OF CLAIM**

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**A. SUMMARY OF CLAIM**

1. The Claimant is a user of the Facebook social media platform (“**Facebook**”), which is operated and controlled in Europe by the Defendant, Meta Platforms Ireland Limited (“**Meta**”). The Claimant has exercised her right under Article 21(2) of the UK General Data Protection Regulation<sup>1</sup> (“**UK GDPR**”) to object to Meta continuing to process her personal data for the purposes of direct marketing (including profiling of the Claimant which is related to such direct marketing). Despite Meta’s obligation under Article 21(3) of the UK GDPR to cease processing the Claimant’s personal data for such purposes (and to cease all profiling of the Claimant related to such purposes) Meta has continued to do so.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation), as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as modified by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019

2. The Claimant therefore seeks a declaration that Meta has acted, and continues to act, in contravention of the requirements under Article 21(2)-(3) of the UK GDPR and has thereby infringed and continued to infringe her rights under that data protection legislation. She also seeks a compliance order under section 167 of the Data Protection Act 2018 (“**DPA 2018**”) requiring Meta to cease processing her personal data for direct marketing purposes (including by ceasing all profiling of the Claimant to the extent that it is related to such direct marketing).

## **B. THE PARTIES**

3. The Claimant is a British citizen who resides in London, England. Since 6 November 2005, the Claimant has had an account with Facebook. The Claimant primarily uses Facebook for socialising and keeping in touch with friends and family, for sharing life updates and events, such as the birth of her children, sharing photos and videos, and articles of interest.
4. Meta is a social media, technology and advertising company incorporated in Ireland. Meta is responsible for operating and controlling Facebook throughout Europe (including in the United Kingdom). Facebook is provided to the Claimant by Meta. Meta is a subsidiary of Meta Platforms Inc. In 2021, Meta Platforms Inc generated total annual revenue of more than USD 117 billion. The significant majority of its annual revenue is derived from the sale of online advertising to advertisers who wish to advertise products or services to users of Facebook and other social media services operated by Meta Platforms Inc. and its subsidiaries.

## **C. META’S PROCESSING OF FACEBOOK USERS’ PERSONAL DATA FOR DIRECT MARKETING PURPOSES (INCLUDING BY PROFILING RELATED TO DIRECT MARKETING)**

### **Direct marketing to users of Facebook**

5. All users of Facebook, including the Claimant, have an “account” with Facebook through which they receive content relating to other users of Facebook as well as other content, including direct marketing material (“the **Direct Marketing Material**”). The Direct Marketing Material includes both:

- 5.1. advertisements for commercial products and services; and
  - 5.2. sponsored/promoted commercial content and pages (e.g. Facebook pages relating to particular products and services which Meta has been paid to promote to users of Facebook).
6. For the purposes of determining what Direct Marketing Material is delivered to an individual user of Facebook, setting the price charged for that Direct Marketing Material and then delivering that Direct Marketing Material to the user, Meta processes the personal data of that user within the meaning of Article 4(1)-(2) of the UK GDPR, including by profiling them within the meaning of Article 4(4) of the UK GDPR. Meta refers to this process of selecting and delivering Direct Marketing Material as “personalised advertising”, which involves the “personalisation of adverts” by reference to known or inferred characteristics, traits, activities and interests of the Facebook user and by reference to other thematic categories assigned by Meta to the Facebook user.

#### **Personal data collected and obtained by Meta for direct marketing purposes**

7. According to information published by Meta, the types of personal data which are collected and obtained by Meta for the purpose of delivering “personalised advertising” to a user of Facebook include:
- 7.1. The user’s age, gender, location and the device(s) they use to access Facebook;
  - 7.2. The user’s activity on Facebook (such as ‘liking’ a page or clicking on advertisements shown to the user, or ‘checking in’ at particular locations) and, if the user has ‘linked’ their Facebook and Instagram accounts, their activity on Instagram;
  - 7.3. The content that the user has made or interacted with on Facebook and/or Instagram, as well as information from the user’s Facebook and Instagram profile;
  - 7.4. Other personal data about the user which is held by advertisers, their partners and Meta’s marketing partners (for example, information about

purchases the user has made at a particular shop, or information about an email newsletter or a voucher or discount that the user has signed up for with a particular retailer, or email addresses held by partners or marketing partners) and which those advertisers/partners/marketing partners have shared with Meta; and

- 7.5. Other information about the user's activity on other non-Facebook websites and applications (for example, viewing particular webpages on those websites, downloading particular applications or purchasing particular products), which is provided to Meta by those websites/applications.
8. The collection and obtaining by Meta of the personal data described in paragraph 7 above constitutes the processing by Meta of that personal data.

**Processing of personal data undertaken by Meta for purpose of selecting and delivering Direct Marketing Material to a particular user of Facebook**

9. For the purpose of determining what Direct Marketing Material is shown to a particular user of Facebook (and for the purpose of then delivering that Direct Marketing Material to the user) Meta engages in further processing of the personal data which it has collected and obtained in relation to that user. In particular, Meta collates and analyses the personal data described in paragraph 7 above in order:
  - 9.1. to draw, at any time, inferences regarding the personal characteristics, traits, activities and interests of the particular user to whom the personal data relates; and
  - 9.2. to create a profile of that user's known or inferred characteristics, traits, activities and interests.
10. In the course of the data processing described in paragraph 9 above, Meta assigns certain categories of interests and topics to each user of Facebook. Based on the information currently available to the Claimant, the categories of interests and topics assigned by Meta to each user of Facebook include:

10.1. **“Ad Interests” / “Interest categories”**: “Ad Interests” / “Interest categories” are specific categories which relate to known or inferred characteristics, traits, activities and interests of a user. As to this:

- (a) Information published by Meta and/or made available by Meta to users of Facebook refers to both “*Ad interests*” and “*Interest categories*”. The Claimant understands that these expressions are synonymous and refer to exactly the same set of interest-based categories assigned by Meta to a particular Facebook user. On this basis and for the sake of clarity, the Claimant uses the expression “Ad Interests” in these Particulars of Claim to refer to those interest-based categories.
- (b) According to statements published by Meta, “Ad Interests” are “*Your interests based on your Facebook activity and other actions that help us show you relevant ads*”.
- (c) The “Ad Interests” assigned to a user are updated by Meta on an ongoing basis by reference to new personal data obtained and analysed in respect of the user.
- (d) Examples of the “Ad Interests” which have been assigned to the Claimant are set out at paragraph 17.1 below.

10.2. **“Ad Topics”**:

- (a) According to statements published by Meta, “Ad Topics” are the “*topics that advertisers can use to reach*” a particular Facebook user and comprise “*a list of topics that you may be targeted against based on your stated likes, interests and other data you put in your timeline*”.
- (b) The “Ad Topics” assigned to a user are updated by Meta on an ongoing basis by reference to new personal data obtained and analysed by Meta in respect of the user. In the circumstances it can be inferred that the particular “Ad Topics” assigned to a user are likely to be determined, at least in part, by the particular “Ad Interests”

assigned to that user. The precise nature and extent of the relationship between “Ad Topics” and “Ad Interests” is, however, outside the knowledge of the Claimant and is exclusively in the knowledge of Meta.

- (c) Examples of the “Ad Topics” which have been assigned to the Claimant are set out at paragraph 17.2 below.

### 10.3. “Your Topics”:

- (a) According to statements published by Meta, “Your Topics” are *“topics determined by your activity on Facebook that is used to create recommendations for you in different areas of Facebook such as Feed, News and Watch”*.
- (b) The “Your Topics” assigned to a user are updated by Meta on an ongoing basis by reference to new personal data obtained and analysed by Meta in respect of the user.
- (c) Examples of the “Your Topics” which have been assigned to the Claimant are set out at paragraph 17.3 below.

11. Meta uses the inferred interests and profiling described at paragraph 9 to 10 above, including the “Ad Interests”, “Ad Topics” and/or “Your Topics” assigned to each Facebook user as described at paragraph 10 above, to determine what Direct Marketing Material is shown to each user and, following that determination, to deliver that Direct Marketing Material to the user. This includes enabling advertisers to target their advertisements at individuals who have one or more of a user’s known or inferred characteristics, traits, activities and interests to target their advertisements at the user (and other Facebook users who share those known or inferred characteristics, traits, activities and interests).

12. The inferences drawn, profiles created, and categories of interests and topics which are assigned by Meta to a particular user:

12.1. are assigned through a process which involves the processing of that user’s personal data; and

12.2. constitute further personal data of that user.

### **Processing for direct marketing purposes and/or profiling related to such direct marketing**

13. All of the processing of personal data described in paragraphs 7 to 12 above constitutes processing of personal data for direct marketing purposes and/or profiling related to such direct marketing within the meaning of Article 21(2) of the UK GDPR.

### **Reservation**

14. Without prejudice to the generality of the averments in paragraph 13 above, the examples described at paragraphs 7.1 to 7.5 and 10.1 to 10.3 above are based on information published by Meta about the types of personal data that Meta collects and obtains for (and in relation to) the purpose of delivering “personalised adverts” to users of Facebook and the types of processing Meta undertakes for the purpose of selecting and delivering Direct Marketing Material to users of Facebook. In light of:

14.1. the significant asymmetry of information between the Claimant and Meta regarding:

- (a) the types of personal data which Meta collects and obtains in relation to users of Facebook; and
- (b) the processing activities which Meta undertakes on those personal data for the purpose of selecting and delivering Direct Marketing Material to users of Facebook; and

14.2. the fact that the examples published by Meta do not purport to be an exhaustive list of either:

- (a) the types of personal data which Meta collects and obtains in relation to users of Facebook; or

- (b) the processing which Meta undertakes on those personal data for the purpose of selecting and delivering Direct Marketing Material to users of Facebook,

it can be inferred that Meta also collects and obtains other types of personal data for (and in relation to) direct marketing purposes and that Meta engages in other processing activities on those personal data for the purpose of selecting and delivering Direct Marketing Material to users of Facebook.

- 15. The Claimant accordingly reserves the right to plead further details regarding both:

- 15.1. the types of personal data which Meta collects and obtains for (and in relation to) direct marketing purposes; and

- 15.2. the processing activities which Meta undertakes on those personal data for (and in relation to) direct marketing purposes,

following the disclosure by Meta of relevant documents (including internal documents which are not currently publicly accessible) in these proceedings.

**D. META’S PROCESSING OF THE CLAIMANT’S PERSONAL DATA FOR DIRECT MARKETING PURPOSES (INCLUDING PROFILING RELATED TO SUCH DIRECT MARKETING)**

- 16. Meta has collected and obtained the Claimant’s personal data, including the types of personal data described in paragraph 7 above. Meta has collected and obtained that personal data for the purpose of delivering Direct Marketing Material to the Claimant.

- 17. Meta has processed and continues to process the Claimant’s personal data including in the manner described in paragraph 7 to 12 above. The full extent and nature of that processing is outside the Claimant’s knowledge. The following particulars are based on the information about that processing which is accessible to the Claimant as at the date of this statement of case:

- 17.1. As to “**Ad Interests**”:



- (a) The number of “Ad Interests” assigned by Meta to the Claimant has varied over time and has increased significantly since the Claimant first exercised her right to object to the processing by Meta of her personal data for direct marketing purposes on 18 June 2021. (The facts concerning the Claimant’s exercise of that right are set out at paragraphs 23 to 27 below.) In particular, according to information downloaded by the Claimant from Facebook:
- (i) At **16 June 2021** (two days before the Claimant first exercised her right to object to processing of her personal data for direct marketing purposes), Meta had assigned a total of **203** “Ad Interests” to the Claimant. A full alphabetical list of those 203 “Ad Interests” is contained in **Schedule 1** to these Particulars of Claim.
  - (ii) At **9 June 2022** (approximately 50 weeks after the Claimant first exercised her right to object to processing of her personal data for direct marketing purposes) Meta had assigned a total of **709** “Ad Interests” to the Claimant. A full alphabetical list of those 709 “Ad Interests” is contained in **Schedule 2** to these Particulars of Claim.
  - (iii) At **14 October 2022** (approximately 16 months after the Claimant first exercised her right to object to processing of her personal data for direct marketing purposes), Meta had assigned a total of **523** “Ad Interests” to the Claimant. A full alphabetical list of those 523 “Ad Interests” is contained in **Schedule 3** to these Particulars of Claim.
- (b) The “Ad Interests” which have been consistently assigned to the Claimant throughout the period between 16 June 2021 and 14 October 2022 comprise “Ad Interests” relating to:
- (i) Health, medical, relationship and family matters (“*Child*”, “*Fitness and wellness*”, “*Parenting*”, “*Physical exercise*”, “*Yoga*”);

- (ii) Political matters (“*Political party*”);
  - (iii) Leisure interests and pastimes (“*Culture*”, “*Dance*”, “*Games*”, “*Handicraft*”, “*Illustration*”, “*Nightclubs*”, “*Theatre*”, “*Travel*”, “*Yoga*”, “*West End Theatre*”);
  - (iv) Media, music and film interests (“*Blog*”, “*Comedy Films*”, “*Comedy-drama*”, “*Cosmopolitan (magazine)*”, “*Facebook*”, “*Documentary Films*”, “*Frozen (2013 film)*”, “*Fantasy films*”, “*Drama Films*”, “*Films*”, “*Independent film*”, “*ITV (ITN network)*”, “*Musical film*”, “*Musical theatre*”, “*Short film*”, “*Television programme*”);
  - (v) General interests (“*Education*”, “*Home*”, “*Learning*”, “*Science*”);
  - (vi) Travel and places of interest (“*Honduras*”, “*Fjord*”, “*London*”, “*Scotland*”, “*United Kingdom*”); and
  - (vii) Clothing, food and other consumer products (“*Coffee*”, “*Food*”, “*Online shopping*”).
- (c) In addition, the “Ad Interests” which have been assigned to the Claimant for some, but not all, of the period between 16 June 2021 and 14 October 2022 include (but are not limited to) “Ad Interests” concerning:
- (i) Health, medical, relationship and family matters (e.g., “*Behavioural sciences*” “*Stress (biology)*”, “*Homosexuality*”, “*Infant*”, “*Childbirth*”, “*Coming out*”, “*Great Ormond Street Hospital*”, “*Beautiful skin*”, “*Emotional intelligence*”, “*Homeschooling*”, “*Mind-body problem*”, “*Mothercare*”, “*Personal care*”, “*Personal development*”, “*Psychology*”, “*Quality of Life*”, “*Self-confidence*”, “*Self-esteem*”, “*Self-knowledge (psychology)*”);

- (ii) Political and philosophical viewpoints and interests (e.g. “*Activism*”, “*Ethical consumerism*”, “*Human rights*”, “*Happiness*”, “*Humanities*”, “*Feminism*”, “*Labour Party (UK)*”, “*Political freedom*”, “*Political movement*”, “*Political campaign*”, “*Political science*”, “*Politics*”, “*Pragmatism*”, “*Philosophy*”, “*Philosophy of the Mind*”, “*Independent politician*”, “*Social movement*”, “*Toleration*”);
  - (iii) Legal matters (e.g. “*Damages*”, “*Lawyer*”, “*Negligence*”);
  - (iv) Clothing and consumer products (e.g. “*Bikini*”, “*Champion (sportswear)*”, “*Lingerie*”, “*Moisturizer*”, “*Toilet paper*”, “*List of Google products*”, “*Home construction*”);
  - (v) Media, music and film interests (e.g. “*BBC iPlayer*”, “*BuzzFeed*”, “*Channel 4 News*”, “*Comedy films*”, “*Cosmopolitan (magazine)*”, “*Daily Mail*”, “*Double bass*”, “*Emma (1996 theatrical film)*”, “*Fantasy films*”, “*Frozen (2013 film)*”, “*Gwen Stefani*”, “*His Dark Materials*”, “*ITV (TV network)*”, “*Lionsgate Films*”, “*Lost (TV series)*”, “*Olivia Colman*”, “*Rising Appalachia Music*”, “*Short film*”, “*Stars (Canadian Band)*”, “*The Guardian*”, “*The Independent*”, “*Time (magazine)*”);
  - (vi) Leisure interests and food and drink (e.g. “*Banana*”, “*Cake*”, “*Camping*”, “*Cherry*”, “*Chocolate*”, “*Doughnut*”, “*Handicraft*”, “*Orange (fruit)*”, “*Ice cream*”, “*Massage*”, “*Tea*”, “*West End Theatre*”, “*Yoga*”); and
  - (vii) Travel and countries of interest (e.g. “*Air travel*”, “*Ghana*”, “*Guatemala*”, “*Honduras*”, “*Iran*”, “*Mexico*”, “*Rome*”, “*Scotland*”, “*Sweden*”, “*Weed, California*”, “*Sertaneja, Paraná*”, “*Provinces and territories of Canada*”).
- (d) Despite Meta’s position that it affected changes, finalised in March 2022, by which it “*removed as targeting options topics that people*

*may perceive as sensitive*”, a range of sensitive Ad Interests remained assigned to the Claimant at 14 October 2022, including:

- (i) Relationships and family matters (e.g. “Love”, “Pleasure”, “Female”; “Woman”, “Parent”, “Parenting”, “Parenting (magazine)”, “Parents (magazine)”, “Child”, “Childcare”, “Homeschooling”, “Wedding photography”, “Wedding”, “Pride”);
- (ii) Ancestry and identity (e.g. “Ancestry”, “Ancestry.com”, “Female”, “Woman”, “Genealogy”);
- (iii) Psychological matters (e.g. “Self-awareness”, “Self-confidence”, “Self-esteem”, “Self-knowledge (Psychology)”, “Personal development”, “Developmental psychology”, “Well-being”); and
- (iv) Political and philosophical viewpoints and interests (e.g. “Activism”, “Ethical consumerism”, “Gender studies”, “Humanities”, “Philanthropy”, “Philosophy”, “Political campaign”, “Political party”, “Political science”, “Politics”, “Social Science”).

17.2. As to “**Ad Topics**”:

- (a) According to information downloaded by the Claimant from Facebook, as at 14 October 2022, Meta had assigned **708** “Ad Topics” to the Claimant. A full alphabetical list of those 708 “Ad Topics” is contained in **Schedule 4** to these Particulars of Claim. The “Ad Topics” include (but are not limited to) “Ad Topics” concerning:
  - (i) Health, medical, relationship and family matters (e.g. “Bringing Up Baby”, “Child”, “Child Care”, “Developmental psychology”, “Diets & Nutrition”, “Home Schools”, “Infant”, “Interpersonal relationship”, “Kids”, “Love”, “Love & Sex”, “Medical Services”, “Parent”, “Personal Care”, “Pride”, “Pleasure” “Self-

- awareness”, “Self-confidence”, “Self-esteem”, “Toddler”, “Weddings”, “Wedding Photography”, “Woman”);
- (ii) Financial matters (e.g. “First-time buyer”, “First-time home buyer grant”, “Pre-qualification (Lending)”);
  - (iii) Political and philosophical viewpoints and interests (e.g. “Activism”, “Ethical consumerism”, “Gender studies”, “Human Behavior and Psychology”, “Philosophy”, “Political campaign”, “Political party”, “Political science”, “Politics”);
  - (iv) Psychological matters (e.g. “Developmental psychology”, “Quality of life”, “Self-awareness”, “Self-knowledge (psychology)”, “Self-confidence”);
  - (v) Legal matters (e.g. “Wills, Trusts and Probates”);
  - (vi) Ancestry and identity (e.g. “Ancestry”, “Ancestry.com”, “Genealogy”);
  - (vii) Leisure interests and pastimes (e.g. “Ballet”, “Cabaret”, “Crafts”, “Celtic FC”, “Knitting”, “Online Betting Gambling”, “Trumpet”, “Writing Classes & Lessons”, “Sadler’s Wells Theatre”);
  - (viii) Clothing, food and other consumer products (e.g. “Asda”, “Baby sling”, “Burgers”, “Baby & Toddler Food”, “Boho-chic”, “Canned & Dry Milk”, “Cat Litter Boxes & Accessories”, “Debenhams”, “Earrings”, “Energy bar”, “ERGO Baby”, “Fair trade coffee”, “Infant bed”, “Marks & Spencer”, “Plumbing Fixtures: Toilets”, “Sainsbury”, “Sanitary napkin”, “Toilet Paper”);
  - (ix) Alcoholic products (e.g. “Champagne”, “Cocktails”, “Red wine”, “Sparkling wine”, “White wine”, “Wine cellar”, “Wine & Spirits”);

- (x) Topics of general interest (e.g. “*Conservation biology*”, “*Dinosaurs & Fossils (Life Sciences)*”, “*Sustainable fashion*”, “*Sustainable energy*”);
  - (xi) Media, music and film interests (e.g. “*12 Years a Slave (film)*”, “*Afrobeat*”, “*BBC iPlayer*”, “*Cosmopolitan (magazine)*”, “*Despicable Me 2*”, “*Elle (magazine)*”, “*Emma Thompson*”, “*Fantasy movies*”, “*Film Independent Spirit Awards*”, “*Frozen (2013 film)*” “*Harry Potter fandom*”, “*Indo pop*”, “*Jujubee (drag queen)*”, “*Laurence Olivier Award*”, “*Love & Sex*”, “*Married...with Children*”, “*Mexican pop music*”, “*Minions (film)*”, “*Moana (2016 film)*”, “*New Wave Music*”, “*Odeon Cinemas*”, “*Parenting (magazine)*”, “*Psychedelic music*”, “*Raindance Film Festival*”, “*Sex Tape (film)*”, “*Time Out (magazine)*”, “*Thai pop music*”, “*The Boy in the Striped Pyjamas*”, “*The Color Purple (film)*”, “*Trombones*”, “*V for Vendetta (film)*”); and
  - (xii) Travel and places of interest (e.g. “*Amman*”, “*Australia Travel & Tourism*”, “*Bali*”, “*Brisbane*”, “*Bologna*”, “*Brazil Travel & Tourism*”, “*French Riviera*”, “*Germany Travel & Tourism*”, “*Guatemala*”, “*Haiti*”, “*Honduras*”, “*Ireland Travel & Tourism*”, “*Italy Travel & Tourism*”, “*Jordan Travel & Tourism*”, “*Melbourne*”, “*Philippines Travel & Tourism*”, “*Rail Travel & Trains*”, “*Regions of Italy*”, “*Scottish Highlands*”, “*Sydney*”, “*United States Travel & Tourism*”, “*West Papua (province)*”).
- (b) The Claimant does not know the number or content of the “Ad Topics” that Meta assigned to her between the period when she first exercised her right to object to processing of her personal data for direct marketing purposes on 18 June 2021 and 14 October 2022. In the circumstances, it can be inferred that:
- (i) The number of “Ad Topics” assigned by Meta to the Claimant varied during that period but was at all times significant.

- (ii) Many or all of the 708 “Ad Topics” listed in Schedule 4 to these Particulars of Claim were assigned to the Claimant throughout the entirety of that period.
- (iii) In addition, a substantial number of other “Ad Topics” beyond those listed in Schedule 4 to the Particulars of Claim were assigned to the Claimant at various times during that period.

17.3. As to “**Your Topics**”:

- (a) According to information downloaded by the Claimant from Facebook, on 14 October 2022, Meta had assigned **40** “Your Topics” to the Claimant. A full alphabetical list of those 40 “Your Topics” is contained in **Schedule 5** to these Particulars of Claim. These include (but are not limited to) “Your Topics” concerning:
  - (i) Prominent public figures (e.g. “*Pete Davidson*”, “*Ridley Scott*”, “*Benedict Cumberbatch*”, “*Lady Gaga (US actor, music artist)*”, “*Joaquin Phoenix*”, “*Angelina Jolie*”, “*Adele (GB music artist)*”);
  - (ii) Topics of general interest (e.g. “*Environmental Science*”, “*Atmospheric Science*”, and “*Earth Science*”);
  - (iii) Travel and countries of interest (e.g. “*United Kingdom Travel*”; “*Northern Europe Travel & Tourism*”; “*England Travel & Tourism*”, “*Travel & Tourism in Europe*” “*London Travel & Tourism*”); and
  - (iv) Media, music and film interests (e.g. “*Game of Thrones (2011-2019 tv series)*”, “*HBO (US television network)*”, “*Fantasy TV Shows & Movies*”, “*Historical Drama TV Shows & Movies*”, “*Superhero TV Shows & Movies*”, “*TV & Movie Awards*”, “*Academy Awards (Oscars)*”, “*Film & Television Industry*”, “*Netflix (Media provider)*”).

(b) The Claimant does not know the number or content of the “Your Topics” that Meta had assigned to her between the period when she first exercised her right to object to processing of her personal data for direct marketing purposes on 18 June 2021 and 14 October 2022. In the circumstances, it can be inferred that:

(i) The number of “Your Topics” assigned by Meta to the Claimant varied during that period but was at all times significant.

(ii) Many or all of the 40 “Your Topics” listed in Schedule 5 to these Particulars of Claim were assigned to the Claimant throughout the entirety of that period.

(iii) In addition, a substantial number of other “Your Topics” beyond those listed in Schedule 5 to the Particulars of Claim were assigned to the Claimant at various times during that period.

18. At all material times, Meta has used (and continues to use) the Claimant’s personal data, including the “Ad Interests”, “Ad Topics” and/or “Your Topics” which it has assigned to the Claimant, and the inferred interests and profiling it has carried out in respect of the Claimant, for the purpose of selecting and delivering Direct Marketing Material to the Claimant.

19. Pending disclosure by Meta, the Claimant reserves the right to plead further particulars both in relation to the types of the Claimant’s personal data which Meta has obtained and the ways in which those personal data have been processed for direct marketing purposes. Paragraphs 14 and 15 above are repeated.

**E. THE CLAIMANT’S EXERCISE OF HER RIGHT TO OBJECT TO PROCESSING OF HER PERSONAL DATA UNDER ARTICLE 21(2)-(3) OF THE UK GDPR, AND META’S RESPONSE**



20. Meta is a controller of the Claimant's personal data within the meaning of Article 4(7) of the UK GDPR. As such, Meta is required to comply with the requirements of the UK GDPR in relation to all processing of the Claimant's personal data by Meta.

21. Article 21(2)-(3) of the UK GDPR provides:

*“2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.*

*3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.”*

22. On or around 19 February 2021, the Claimant logged in to her Facebook account, accessed the “*ad settings*” page of the Facebook platform, and selected the option which purported to disapply the application of “*demographic and behavioural*” interest categories to her Facebook account. Notwithstanding the selection of that option by the Claimant, Meta continued thereafter to use demographic and behavioural based “Ad Interests”, “Ad Topics” and/or “Your Topics” for the purpose of selecting and delivering Direct Marketing Material to the Claimant. The Claimant repeated this process again on 15 June 2021.

23. On 18 June 2021, the Claimant's solicitors, AWO, sent a letter on behalf of the Claimant to Meta which (amongst other things) expressly objected to Meta processing the Claimant's personal data for direct marketing purposes. The letter expressly stated that the Claimant “*relies on Article 21(2) and (3) UK GDPR for her objection to any form of processing for the purposes of marketing*”.

24. On 20 September 2021, solicitors instructed by Meta, Linklaters, sent a letter which responded to the Claimant's letter dated 18 June 2021. The letter from Linklaters stated amongst other things that:

24.1. “*Your client objects to the processing of her personal data for advertising-related “profiling”, “segmentation” and the targeting of Ads. [Meta] does not rely on legitimate interests under Article 6(1)(f) to personalise the Ads*

*shown to your client. This is instead carried out for the performance of a contract under Article 6(1)(b) and so the objection right in Article 21(1), UK GDPR is not applicable.”*

24.2. All “commercial content (e.g. Ads, offers and sponsored content and pages)” provided to users of Facebook is “tailored to their interests and activity. Personalisation, including personalised advertising, is an essential, contracted-for component of the Facebook service... Users cannot turn off personalisation because this is the essence of the service for which they have contracted.”

24.3. The “personalisation of adverts” on Facebook is “partly based on a human decision to target particular types of users and partly on automated delivery of Ads to users”.

24.4. Meta “use[s] data that advertisers and other partners provide about user activity off of Facebook, to show the user Ads on Facebook and on websites, apps, and devices that use Facebook’s advertising services”.

25. The letter from Linklaters dated 20 September 2021 did not make any reference to the Claimant’s attempt to exercise her right under Article 21(2) of the UK GDPR to object to the continued processing of her personal data for direct marketing purposes or Meta’s obligation under Article 21(3) of the UK GDPR to cease such processing following the exercise of that right by the Claimant.

26. On 28 January 2022, the Claimant sent a letter before action to Meta (“the **Letter Before Action**”). The Letter Before Action explained that the Claimant had exercised her right to object to the processing of her personal data for the purposes of direct advertising and reiterated that objection. The Letter Before Action stated amongst other things that:

*“[The Claimant] has an unqualified right under Article 21(2) to object to the processing of her personal data for “direct marketing purposes”. [The Claimant] accordingly objects to*

- i. *The use of interest categories, “Ad interests” and assigning of traits or inferred characteristics by [Meta] for the delivery of “commercial content”; and*
- ii. *The use of [the Claimant’s] personal data to promote pages and groups.*

*Having exercised that unqualified right to object to such processing, [Meta] is under an obligation under Article 21(3) UK GDPR to ensure that “the personal data shall no longer be processed for such purposes”.*

27. On 28 April 2022, Linklaters sent a response to the Letter Before Action on behalf of Meta. The response denied that Article 21(2) of the UK GDPR has any application to personalised advertisements delivered on Facebook and therefore denied that the Claimant had a right to object under Article 21(2) to the processing of her personal data for the delivery of such personalised advertising.

#### **F. META’S CONTRAVENTION OF ARTICLE 21(2)-(3) UK GDPR**

28. The Claimant expressly notified Meta that she objected to Meta processing any of her personal data for direct marketing purposes:

28.1. in the letter from AWO dated 18 June 2021, referred to at paragraph 22 above; and

28.2. in the Letter Before Action.

29. As a result of the Claimant exercising her right under Article 21(2) of the UK GDPR to object to Meta processing her personal data for direct marketing purposes, Meta was required by Article 21(3) of the UK GDPR to cease processing her personal data for such purposes (including ceasing profiling the Claimant to the extent that such profiling is related to direct marketing).

30. Meta has, however, continued to process the Claimant’s personal data for direct marketing purposes, including by:

30.1. Using known or inferred characteristics, traits, activities and interests and assigned “Ad Interests”, “Ad Topics” and/or “Your Topics” for the purpose of

selecting and delivering Direct Marketing Material, in the form of personalised advertising, to the Claimant;

30.2. Using known or inferred characteristics, traits, activities and interests and “Ad Interests”, “Ad Topics” and/or “Your Topics” for the purpose of selecting and delivering Direct Marketing Material, in the form of sponsored/promoted Facebook pages and groups, to the Claimant; and

30.3. The profiling of the Claimant related to the matters described in paragraph 30.1 and 30.2 above.

31. By reason of the matters set out at paragraphs 16 to 30 above, Meta has contravened, and is continuing to contravene, the requirements under Article 21(2)-(3) of the UK GDPR and has thereby infringed the Claimant’s rights under Article 21(2)-(3) of the UK GDPR.

#### **G. REMEDIES SOUGHT**

32. The Claimant seeks:

32.1. A declaration that Meta has acted, and continues to act in contravention of, the requirements under Article 21(2)-(3) of the UK GDPR to cease processing the Claimant’s personal data for the purposes of direct marketing (including its obligation to cease profiling the Claimant to the extent that such profiling is related to direct marketing) and has thereby infringed the Claimant’s rights under Article 21(2)-(3) of the UK GDPR; and

32.2. A compliance order pursuant to s. 167 of the DPA 2018 requiring Meta to cease processing the Claimant’s personal data for direct marketing purposes (including profiling the Claimant to the extent that such profiling is related to such direct marketing), including (but not limited to) ceasing:

- (a) obtaining, collating, analysing or otherwise processing the Claimant’s personal data in order to establish or draw inferences regarding the Claimant’s personal characteristics, traits, activities and interests, for the purpose of selecting and/or delivering

advertising and/or sponsored/promoted Facebook pages and groups to her;

- (b) assigning "Ad Interests", "Ad Topics" and/or "Your Topics" to the Claimant for the purpose of selecting and/or delivering advertising and/or sponsored/promoted Facebook pages and groups to her; and
- (c) engaging in any other profiling of the Claimant related to such direct marketing activities.

**GERRY FACENNA KC  
EDWARD CRAVEN  
JENNIFER MacLEOD**

**AWO**

**8 November 2022**

**STATEMENT OF TRUTH**

I believe that the facts stated in these Particulars of Claim are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to make, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:  .....

Name: **Tanya O'Carroll**

Dated: 9 November 2022



**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING'S BENCH DIVISION**

**BETWEEN:-**

**TANYA O'CARROLL**

**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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**SCHEDULE 1:**

**“AD INTERESTS” ON 16 JUNE 2021**

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38 Degrees
Adolescence
Air travel
Amnesty International
aristegui noticias
Banana
BBC
BBC iPlayer
BBC One
Bee
Bikini
Blog
Blogger (service)
Brixton
Bustle
BuzzFeed
Cake

Camping
Carmen Aristegui
Carrie Underwood
Casting (performing arts)
Champion (sportswear)
Channel 4
Channel 4 News
Cheering
Cherry
Child
Childbirth
Chocolate
Clothing
Cluedo
Coffee
Collagen
Comedy films
Comedy-drama
Coming out
Cosmopolitan (magazine)
Cosmopolitan UK
Costume
Culture
Curzon Cinemas
Daily Mail
Dakota Johnson
Damages
Dance
Delivery (commerce)
Documentary films
Double bass
Doughnut
Drama films
Education
Elena Ferrante
Elizabeth II
Emily Blunt



Emma (1996 theatrical film)
Empathy
Entrepreneurship
Facebook
Fantasy films
Feature film
Feminism
Fiction books
Film directors
Films
Fitness and wellness
Fjord
Food
For Reading Addicts
Friendship
Frozen (2013 film)
Games
Ghana
Giant (mythology)
Global studies
Great Ormond Street Hospital
Guatemala
Gwen Stefani
Hair (film)
Handicraft
Hardcore punk
Heroes (TV series)
His Dark Materials
Home
Homosexuality
Honduras
Horror films
Human
Human rights
Ice cream
Illustration
Independent film

Independent politician
Infant
Injury
Iodine
Iran
Iron
ITV (TV network)
James (band)
Jamie Dornan
John Legend
Kent
Labour Party (UK)
Language
Lawyer
Learning
Let the Right One In (film)
Liberty
Lifestyle (sociology)
Lily James
Lingerie
Lions Gate Entertainment
Lionsgate Films
London
London Evening Standard
Lost (TV series)
Love
Massage
Matcha
Metro Puerto Rico
Mexico
Mezcal
Mirror
Moisturizer
Move D
Muscle
Music videos
Musical film

Musical theatre
Negligence
Netflix
Network (film)
New York Post
Nightclubs
Obsessed (2009 film)
Obstetrics
Olivia Colman
Online shopping
Orange (fruit)
Orlando Magic
Parent
Parenting
Physical exercise
Pinterest
Plastic
Play (telecommunications)
Political freedom
Political party
Pragmatism
Pre-production
Quantum of Solace
Reading
Reality
Recycling
Rent (film)
Rhythm and blues music
Rising Appalachia Music
Role model
Romance film
Rome
Santa Monica, California
Science
Scotland
Seaweed
Shambala Festival

Short film
Sight & Sound
SilkFred.com
Singer-songwriter
Skin
Spanish language
Special effect
Stars (Canadian band)
Stress (biology)
Sun
Surrealism
Sweden
Tea
Teacher
Team
Television programme
Textile
Thank You (2011 film)
The Comeback (American football)
The Crown (TV series)
The Economist
The Guardian
The Help
The Independent
The Mirror (1975 film)
The Observer
The Walt Disney Company
Theatre
Time (magazine)
Toilet paper
Toleration
Touch (TV series)
Training and development
Travel
United Kingdom
United States Senate
West End theatre

Yoga



**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING'S BENCH DIVISION**

**BETWEEN:-**

**TANYA O'CARROLL**

**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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**SCHEDULE 2:**

**“AD INTERESTS” ON 9 JUNE 2022**

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Academy Award for Best Supporting Actress
Academy Awards
Acid jazz
Acting
Activism
AdSense
Adult
Adventure films
Advertising
Aerobic exercise
Aesthetics
Afrobeat
Agricultural show
Agriculture
Airbnb
Airline
Airport

Alice in Wonderland (2010 film)
All-news radio
America's Next Top Model
American folk music
American rock
ancestry
Android (operating system)
Angelina Jolie
Animated films
Antenna (radio)
Anthropology
Anti-aging cream
AOL
Apple
Architectural style
Architecture
Art exhibition
Art film
Art movement
art music
Arts administration
Arts and music
Arts festival
Asia
Astrology
Auckland
Australia
Avant-garde jazz
Bagel
Bakeries
Baking
Barbecue
Barre (ballet)
Bars
Bass guitar
BBC Radio
Beautiful Skin



Beer
Beer festival
Beer in Mexico
Beer style
Behavioural sciences
Big band
Billy Bob Thornton
Biofuel
Biology
Birds
Biscuits
Blog
Bluegrass music
Blues music
Board games
Bodybuilding
Books
Boots UK
Bossa nova
Boston
Brazil
Bread
Breakfast
Breaking news
Brick Lane
British Columbia
British cuisine
Britpop
Broadcasting
Broadway theatre
Building
Butter
Buy one, get one free
Cabaret
Cake
Calgary
California

Canada
Canadian cuisine
Canberra
Cantopop
Career
Career development
Caribbean
Cat food
Cats
Celebrity
Central America
Central Europe
Ceramic
Cereal
Charitable organisation
Charity and causes
Charli XCX
Cheese
Child
Cider
Cinema of the United States
CITV
Classical music
Clothing
Cocktail
Coffee
Coffee bean
Coffee preparation
Coffeehouses
Cognitive science
Collagen
Colombia
Combat sport
Comedy films
Comedy-drama
Comic book
Comics

Commerce
Communication
Communication design
Community issues
Competition
Composition (language)
Computer network
Conceptual art
Concerts
Conducting
Condé Nast
Connecticut
Construction
Consumer electronics
Contemporary art
Contemporary R&B
Contract
Cooking
Corporations
Cosmopolitan (magazine)
Cosmopolitan UK
Crafts
Cream
Creative Commons
Creative writing
Critical illness insurance
Crop
CrossFit
Crossword
Cuba
Cuisine
Culinary art
Culture
Current events
Customer Service
Dance
Decorative arts

Delivery order
Demi Lovato
Democracy
Deodorant
Design
Developmental psychology
Devon
Digital audio
Digital electronics
Digital media
Digital photography
Digital television
Dinner
Disco
Discounts and allowances
Disney Cruise Line
Display device
Distance education
Distilled drinks
Documentary films
Dog walking
Dogs
Domino's Pizza
Dough
Drama films
Drama school
Drawing
Dream pop
Dresses
Drinks
Drop shipping
E!
Eastern Europe
Eating
eBooks
eCommerce
Economics

Education
Educational technology
Educational television
Election
Electro (music)
Electronic music
Electronic publishing
Electronica
Electronics
Elle (magazine)
Elle Decor
Elon Musk
eMAG
Emotion
Emotional intelligence
Employment
Endurance training
Energy
Energy bar
England
Entertainment
Entertainment News
Environmental science
Epidemiology
Estate (law)
Ethics
Ethiopia
Europe
European Union
Fabletics
Face
Facebook
Factory
FamilyFun
Fantasy films
Fashion (magazine)
Fast food

Fast food restaurants
Female
Ferret
Festival
Fiber
Fiction books
Film score
Filmmaking
Films
Finance
Fine art
Fitness and wellness
Fjord
Flatbread
Florida
Flour
Folk music
Folklore
Food
Food festival
Food processing
Food shop
Foodie
Freesat
Freeview (UK)
Frozen (2013 film)
Frying pan
Funk
G-funk
Games
Gawker
Gender
Gender studies
Genetics
Geography
Girl
Glamour (magazine)

Golden Globe Award
Google
Graphic design
Grappling
Greater London
Greater Vancouver
Green Man Festival
Guardian film
Hamlet
Handicraft
Happiness
Happy hour
Harvest
Hatha yoga
Haute couture
Health & wellness
Healthy diet
Herb
High-definition television
History
Holiday
Hollywood Life
Home
Homeschooling
Homeschooling in the United States
Honduras
Hong Kong Disneyland Resort
Horoscope
Hors d'oeuvre
Horticulture
Hot yoga
Hotels
House
House music
Humanities
Hypermarket
Iberia (airline)

Illustration
In-N-Out Burger
Income
Independent film
Independent music
Indian pop
Indie pop
Indiewire
Individual
Indo pop
Indonesia
Industrial design
Industrial Revolution
Information
Instagram
Installation art
Instrumental
Insurance
Insurance policy
Interior design
iOS
IPTV
Italian cuisine
Italy
ITV (TV channel)
ITV (TV network)
ITV2
ITVBe
J-pop
Jalopnik
Jamaica
Jazz music
Jeff Bridges
Jogging
John Williams
Jon Voight
Jonathan Groff



Jonny Lee Miller
Josh Gad
Joules
Journalism
Juice
Juilliard School
K-pop
Kate Tempest
KFC
Kinesiology
Kingfisher (beer)
Knowledge
Krispy Kreme
Kundalini yoga
Lana Del Rey
Landlord
Language
Latin jazz
Latin pop
Law
Leadership
Learning
Leisure
libro
Life
Life & Style (magazine)
Life insurance
Lifestyle brand
Light
Light beer
Lisbon
List of fashion magazines
List of Google products
Literature
Litter box
Livestock
Lo-fi music

Loan
Local food
Local news
London
London Stock Exchange
Los Angeles
Loudspeaker
Lululemon Athletica
Machine
Madagascar
Madison Beer
Magazines
Mambo (music)
Mammal
Management
Manila Sound
Manufacturing
Marketing
Martial arts
Marvel Comics
Mass media
Massachusetts
Massage table
Massive open online course
McDonald's
Meal
Meat
Media (communication)
Mediterranean cuisine
Melbourne
Member states of the Council of Europe
Mexican pop music
Microphone
Middle East
Milk
Mind
Mind–body problem

Mixed drink
Mixed martial arts
Modernity
Money
Mothercare
Motivation
Museum
Music
Music festivals
Music genre
Music industry
Musical film
Musical instrument
Musical theatre
Natural environment
Natural product
Nature
NBC
New England
New wave music
New York City
New Zealand
News broadcasting
News media
Newspapers
Nightclubs
Nightwear
NME
Non-alcoholic beverage
Non-governmental organization
Non-profit organisation
Novels
Nutrient
Obituary
Oceania
Online
Online food ordering

Online marketplace
Online shopping
Organization
Origami
Outdoor recreation
Oven
Pacific Northwest
Painting
Paper
Papua New Guinea
Papyrus
Parade
Parenting
Parties
Pastry
PayPal
People
Performance art
Performing arts
Personal care
Personal development
Personal finance
Perspiration
Pet food
Pets
Philosophy
Philosophy of mind
Photograph
Photographer
Photography
Physical exercise
Physical fitness
Physics
Pilates
Pizza delivery
Pizza Hut
Planets in astrology

Planning
Plays
Pleasure
Poetry
Polish cuisine
Political movement
Political party
Political science
Politics
Polynesia
Pop music
Popular culture
Popular music
Porto
Portugal
Poster
Potato chip
Pottery
Primary education
Primary school
Printing
Printmaking
Privately held company
Profession
Projection screen
Promotion (marketing)
Property
Property management
Protein
Provinces and territories of Canada
Psychology
Publishing
Punk rock
Quality of life
QVC
Racing
Radar

Radio
Radio broadcasting
Recreation
Research
Resorts
Restaurants
Retail
Rhetoric
Rhythm and blues music
Rich Froning Jr.
Rock and roll
Rock music
Room
Running
Russian pop
Ryan Seacrest
Sales
Satellite television
Saxophone
School/University
Science
Scotland
Scrapbooking
Screen Actors Guild Award
Screenwriting
Sculpture
Sea
Secondary education
Secondary school
Seed
Self care
Self-confidence
Self-defense
Self-esteem
Sheep
Shirts
Shopping

Short film
Short story
Silk
Simple living
Singing
Ska
Skin
Skin care
Skirt
Sky Go
Smartphones
Snack food
Social media
Social movement
Social network
Social science
socializing
Society
Soft rock
Software development
Soho Theatre
Song
Soul music
Sound
Sound recording and reproduction
Space Shuttle Endeavour
Spanish language
Speakers bureau
Stagecraft
Storytelling
Street food
Stretching
Student
Subscription business model
Sun
Supermarket
Supply chain

Sweaty Betty
Swing music
Swisscom
Sydney
Tablecloth
Tabletop game
Take-out
Tea
Team sport
Technology
Teen Vogue
Tegucigalpa
Telecommunication
Television programme
Televisions
Textile
Textile industry
Thai pop music
Thanksgiving
The arts
Theatre
Theme parks
Therapy
Tool
Toronto
Tourism
Tradition
Traditional pop music
Transport
Travel
Trip hop
Trombone
Trumpet
U.S. state
Ubereats
UGC
Undergarment



United Kingdom
United States
University
University
V-pop
Vacation rental
Vancouver
Variety (magazine)
Variety show
Video
Video game industry
Video hosting service
Video on demand
Videotelephony
Vincent van Gogh
Vinyl Records
Virgin Media
Visual arts
Visual perception
Vogue (magazine)
Walking
Walt Disney Parks and Resorts
Walt Disney World
Waste
Water
Wealth
Weather
Weaving
Web development
Web fiction
Web portal
Web server
Website
Weddings
Weed, California
Weedeater (band)
Weeds (TV series)

Well-being
Wellington
West End theatre
Western Asia
Western swing
Western United States
Wheat beer
Wikipedia
Wildlife
Wine
Wireless
WNYC
Woman
Woodworking
Words of Wisdom
Work of art
Workshop
World Health Organization
World music
World Wide Web
Writing
Yarn
Yemen
Yoga
Yoga pants
YouTube

**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING'S BENCH DIVISION**

**BETWEEN:-**

**TANYA O'CARROLL**

**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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**SCHEDULE 3:**

**“AD INTERESTS” ON 14 OCTOBER 2022**

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12 Years a Slave (film)
Acting
Activism
Adelaide
AdSense
Adventure films
Advertising
Aesthetics
Airplane
Airport
Alternative rock
Amman
ancestry
Ancestry.com

Android (operating system)
Animated films
Architecture
Art exhibition
Art film
Art movement
Arts and music
Audible.com
Australia
Automobiles
Babyshop
Ballet
Barbican Centre
Bars
Bass guitar
BBC iPlayer
Beautiful Skin
Behavioural sciences
Berlin
Better Homes and Gardens (magazine)
BFI London Film Festival
Biology
Blog
Board games
Bohemia
Boho-chic
Bollywood films
Bologna
Books
Brave (2012 film)

Brazil
Breakfast
Brisbane
British Columbia
Broadcasting
Broadway theatre
Building
Cabaret
Cantopop
Cat food
Cats
Central America
Ceremony
Charitable organisation
Charity and causes
Child
Childcare
Children's clothing
Cineworld
Classical music
Cocktail
Coffee
Coffeehouses
Cognitive science
Columbia Pictures
Comedy films
Comedy-drama
Communication
Communication design
Community issues

Competition
Computer network
Conceptual art
Concerts
Conducting
Conglomerate (company)
Conservation biology
Construction
Consumer electronics
Contemporary art
Contemporary dance
Contemporary R&B
Cosmopolitan (magazine)
Crafts
Creative Commons
Creative writing
Crossword
Crystal
Culture
Current events
Curzon Cinemas
Dance
Dance Academy
Dance studio
Dance Theatre of Harlem
Decorative arts
Design
Despicable Me 2
Developmental psychology
Digital audio

Digital electronics
Digital media
Dinosaur
Disco
Disney Cruise Line
DIY
Do the Right Thing
Documentary films
Dogs
Drama films
Drama school
Drawing
Drop shipping
Dublin
E4 (TV channel)
Earring
Eating
Edinburgh Festival Fringe
Education
Election
Electronic music
Electronic publishing
Elle (magazine)
Emma Thompson
Emotion
Empire (film magazine)
Energy bar
Engine
Engineering
England

Entertainment
Entertainment News
Entrepreneurship
Estonia
Ethical consumerism
Europe
European Union
Everyman Cinema
Everyman Cinemas
Facebook
Factory
Fair trade coffee
FamilyFun
Fantasy films
Female
Festival
Film festival
Film Independent Spirit Awards
Film score
Film4
Filmmaking
Films
Fine art
Fitness and wellness
Fjord
Flower
Folklore
Food
French Riviera
Frozen (2013 film)



Furniture
Game of Thrones
Games
Garden
Garden design
Gemstones
Gender studies
Genealogy
Germany
Gift
Google
Graduation
Graphic design
Greater London
Guardian film
Guatemala
Gustavo Cerati
Gymnastics
Hair care
Hair products
Haiti
Hamburger
Hamlet
Handicraft
Harry Potter fandom
Harvest
Healthcare
Healthy diet
Hip-hop dance
History

Hobby
Holiday
Home
Home cinema
Home construction
Homemaking
Homeschooling
Honduras
Hong Kong Disneyland Resort
Hotel Rwanda
House
Humanities
Ideal Home
IKEA
Illustration
Independent film
Indian pop
Indiewire
Indo pop
Industrial design
Industrial Revolution
Infant
Information
Instagram
Installation art
Interior design
Interpersonal relationship
iOS
Ireland
Italy

ITV (TV channel)
ITV (TV network)
ITV2
J-pop
Jazz music
Jeff Bridges
Jewellery
Jonathan Groff
Jordan
Josh Gad
Journalism
Jujubee (drag queen)
K-pop
Kew Gardens
Knowledge
Latin
Latin music (genre)
Latin pop
Laurence Olivier Award
Law
Learning
Leisure
libro
Life
Lin-Manuel Miranda
List of fashion magazines
List of Google products
Literature
Litter box
Little White Lies (magazine)

Local food
London
Loudspeaker
Love
Lumber
Machine
Magazines
Malcolm X (1992 film)
Manufacturing
Married... with Children
Mass media
Media (communication)
Melbourne
Member states of the Council of Europe
Mexican pop music
Mexico
Microphone
Minions (film)
Moana (2016 film)
Modern art
Modern dance
Modern furniture
Modernity
Mothercare
Motivation
Movie theater
Multinational corporation
Music
Music festivals
Music genre

Music industry
Musical film
Musical instrument
Musical theatre
National Theatre Live
Natural product
Nature (science)
Necklace
New Jersey
New wave music
New York City
News broadcasting
News media
Newspapers
Nightclubs
Nightlife
Nobel Peace Prize
Non-profit organisation
Novels
Now TV (UK)
Obituary
Odeon Cinemas
Office Space
Old-school hip hop
Online
Online gambling
Online shopping
Optics
Organic food
Organization

Outdoor cooking
Outdoor enthusiast
Oxford
Painting
Paper
Papyrus
Paraná (state)
Parent
Parenting
Parenting (magazine)
Parents (magazine)
Parties
PayPal
Performance art
Performing arts
Personal care
Personal development
Philanthropy
Philippines
Philosophy
Photographer
Photographic film
Photography
Physical exercise
Physical fitness
Physics
Picturehouse Cinemas
Pilates
Pinterest
Plays

Pleasure
Poetry
Political campaign
Political party
Political science
Politics
Pop music
Popular culture
Popular music
Portland, Maine
Portland, Oregon
Pride
Primary education
Primary school
Princeton University
Printing
Privately held company
Profession
Projection screen
Psychedelic music
Publishing
Quality of life
Quartz
Radio
Radio Times
Raindance Film Festival
Raven (drag queen)
Regions of Italy
Renovation
Republic of Ireland

Research
Restaurants
Retro style
Rhetoric
Rock and roll
Rock music
Roger Deakins
Romance novels
Room
Rotten Tomatoes
Royal National Theatre
RuPaul
Russian pop
Sadler's Wells Theatre
Schindler's List
School/University
Science
Scotland
Scottish Highlands
Screen Gems
Screenwriting
Secondary education
Secondary school
Secret London
Self-awareness
Self-confidence
Self-esteem
Self-knowledge (psychology)
Semiconductor
Sertaneja, Paraná



Shambala Festival
Shambhala (music festival)
Shopify
Shopping
Short film
Short story
Showcase Cinemas
Sight & Sound
Singing
Sky Go
Social media
Social movement
Social network
Social science
Soda Stereo
Soho Theatre
Song
Sony
Sony Pictures Classics
Sony Pictures Entertainment
Sony Pictures Home Entertainment
Sound
Spain
Speakers bureau
Spoken word
Sporting Cristal
Sports club
Stainless steel
States of Germany
Storytelling

Street dance
Street food
Streetwear
Student
Stylist (magazine)
Subscription business model
Sundance Film Festival
Sustainable fashion
Sydney
Tabletop game
Tangled
Tate Modern
Team sport
Technology
Tegucigalpa
Telecommunication
Television programme
Television set
Televisions
Thai pop music
Thanksgiving
The arts
The Boy in the Striped Pyjamas (film)
The Color Purple (film)
The Constant Gardener (film)
The Glenlivet distillery
The Help (film)
The Pleasance
Theatre
Timber framing

Time Out (magazine)
To Kill a Mockingbird (film)
Toilet
Toilet paper
Tool
Toronto
Total Film
Tourism
Toys
Traditional pop music
Trap (music)
Travel
Trust law
TV chat shows
TV game shows
TV reality shows
Twitter
UGC
Underground hip hop
United Kingdom
United States
University of Bologna
V for Vendetta (film)
V-pop
Variety (magazine)
Variety show
Vernacular architecture
Video
Video hosting service
Video on demand

Vincent van Gogh
Visual arts
Volunteering
Vue Cinemas
Walt Disney Parks and Resorts
Walt Disney World
Wargaming
Water supply
Web server
Website
Wedding photography
Weddings
Well-being
West End theatre
Wholesale
Wikipedia
Wing
WNYC
Woman
WooCommerce
Wood
Woodworking
Work of art
Workshop
World music
World Wide Web
Writing
Yoga
YouTube

**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING'S BENCH DIVISION**

**BETWEEN:-**

**TANYA O'CARROLL**

**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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**SCHEDULE 4:**

**“AD TOPICS” ON 14 OCTOBER 2022**

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**Please turn over for the “Ad Topics” as printed from the Defendant’s “Facebook” platform.**





# Ad topics

Manage ad topics and search for what you want to see less of. [Learn more.](#)

## Ad topics that advertisers can use to reach you

Advertisers can choose to reach you based on topics that we think you like from your activity. If you don't want to be reached on a topic, you can choose to see less.



Moana (2016 film)



Music Industry News



Mass media



Science



Haiti



Boho-chic



Organic food



Household Management



Modern art



Film Independent Spirit Awards



The arts



A073



Laurence Olivier Award



Schindler's List



Electronic publishing



Acting



Italy Travel & Tourism



Film festival



Cocktails



Subscription business model



Machine



Sony Pictures Entertainment



Cat Litter Boxes & Accessories



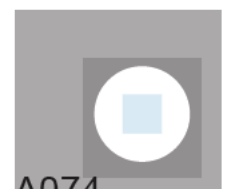
Toilet Paper



Mexican pop music



Western Classical Music



A074





Live Theater



Radio Times



Storytelling



Humanities Classes & Lessons



Concerts



Fantasy Movies



Speakers (Audio Components)



Media Industry



Genealogy



Cosmopolitan (magazine)



Crossword



Movie & Television Video Streaming (Software & Apps)



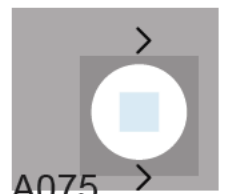
House



Visual Art & Design



Creative writing



A075





Entertainment News



Projection Screens



Voice & Singing



Video hosting service



Traditional pop music



Eating



Digital media



Contemporary art



Factory



Royal National Theatre



libro



Party & Celebration Gifts



Music



Drama school



List of fashion magazines



A076



Arts and music



Electronics Networking



Wing



Odeon Cinemas



Swing Music



Community issues



Sporting Cristal



Primary education



Nonprofit organization



Publishing



Time Out (magazine)



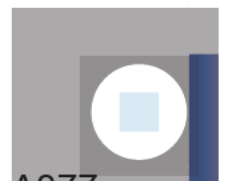
Josh Gad



Musical Instruments



Toys



A077



1



6



Australia Travel & Tourism



Physics & Cosmology



Indian pop



Jujubee (drag queen)



Modern dance



French Riviera



Self-awareness



Philosophy



Psychedelic music



Adelaide



United Kingdom Travel & Tourism



Gender studies



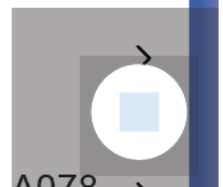
Social movement



Latin pop



Partial text



A078



Curzon Cinemas



Graphic Design



Independent film



Handicraft



Rock and roll



Crafts



Rhetoric



Tangled



Broadcast Media



Street Food



Wholesalers



Quality of life



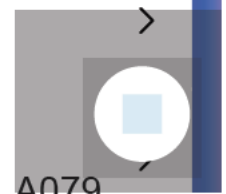
Speakers bureau



Music festivals



Total Film



A079



1



6



Aesthetics



J-Pop



Earrings



Conglomerate (company)



Workshop



Motor Vehicle Engines



Holidays & Celebrations



Obituary



Shambala Festival



Coffee Shops & Roasteries



Variety (magazine)



Tegucigalpa



Pride



National Theatre Live



A080



1



6



Dance Academy



Underground hip hop



Animated movies



Wills, Trusts, & Probates



Conceptual art



Personal Care



Married... with Children



Ancestry.com



Home Decorative Artwork



Volunteering



Sight & Sound



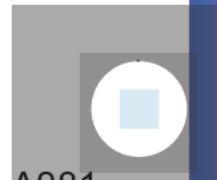
Wargaming



Movies



Short film



A081



Columbia Pictures



Painting



Conducting



Schools



Jazz



Greater London



Occasions and Themes



Big Band Music



Festival



Quartz



Gustavo Cerati



Online Betting Gambling



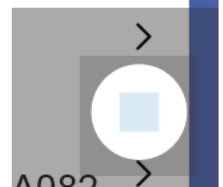
Performing Arts



Berlin



Bars & Pubs



A082





Nobel Peace Prize



Bollywood movies



Pilates



Plumbing Fixtures: Toilets



Pet Cats



Hobbies & Crafts



Team sport



Comedy Movies



Malcolm X (1992 film)



Saxophones



Tate Modern



The Help (film)



TV Talk Shows



Motivation



Television



A083



1



6



Spoken word



Disney Cruise Line



Philippines Travel & Tourism



Cars, Trucks, & Vans



Contemporary R&B



Bologna



Artwork



Camera Film



Love



Woman



Secondary education



Cantopop



Self-knowledge (psychology)



Fine Art



A084



1



6



Brazil Travel & Tourism



Optics



Showcase Cinemas



Song



Popular culture



Popular music



Poetry Books



Regions of Italy



Cat Food



Magazines



World Wide Web



News broadcasting



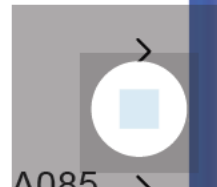
Romance Books



Activism



Boroné (stato)



A085



Raven (drag queen)



West End theatre



Film4



Charitable organization



Toronto



Culture



Television Parts & Accessories



Energy bar



Barbican Centre



World Music



Natural product



Shopify



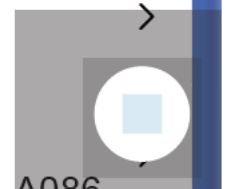
Political party



High school



Airports



A086



1



6



Learning



University of Bologna



Do the Right Thing



Short story



Home Schools



Sony Pictures Classics



Graduations & Commencement Events



Journalism



Ballet



Literature



Variety show



Leisure



History



Engineering



A087



1



6



Sound



Princeton University



Modernity



Flower



Local food



Collectible Rocks & Crystals



Spain Travel & Tourism



Shopping



Breakfast



Types of Food



European Union



Jewelry



Pleasure



TV Reality Shows



A088



Brisbane



Fair trade coffee



Latin



Web server



Fitness & Exercise



Contemporary dance



Creative Commons



Trumpet



Screen Gems



Musical Films



Ethical consumerism



Indo pop



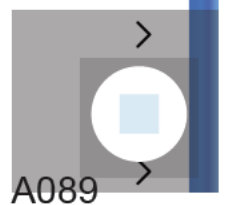
To Kill a Mockingbird (film)



Picturehouse Cinemas



WNYC





Telecommunications (Technology Industry)



Current events



Portland, Maine



AdSense



Jeff Bridges



Dance Studios



Streetwear



The Boy in the Striped Pyjamas (film)



Elle (magazine)



UGC



Retro style



Communication design



Yoga



Alternative rock



Building Tools



A090





1



6



Walt Disney Parks and Resorts



Harry Potter fandom



Garden



Disco



Roger Deakins



Infant



Secret London



Indiewire



Russian pop



ancestry



Burgers



Semiconductors



Education & Learning



Ceremony



A091



Organization



Parent



Bohemia



Woodworking



Raindance Film Festival



Home Theater Systems



Sydney



K-Pop



Jordan Travel & Tourism



Pop Music



Child Care



Old-school hip hop



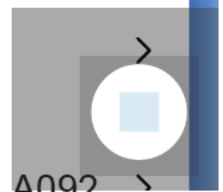
Student



Board Games



Social network



A092



Life



Child



ITV (TV channel)



Online shopping



Industrial Design



Brave (2012 film)



Illustration



Timber framing



Wedding Photography



Entertainment



Scottish Highlands



Musicals



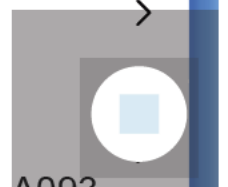
Election



Street Dance



Soho Theatre



A093



1



6



Nature (science)



Night Clubs



Empire (film magazine)



Sony Pictures Home Entertainment



Multinational corporation



Jonathan Groff



Hamlet



PayPal



Movie & TV Screenwriting



Conservation biology



United States Travel & Tourism



Documentary Movies



Manufacturing Industry



Ireland Travel & Tourism



A094



1



6



Drama Movies



Everyman Cinema



Nightlife Attractions



London



Sadler's Wells Theatre



Travel & Tourism in Europe



Sustainable fashion



RuPaul



E4 (TV channel)



V for Vendetta (film)



Amman



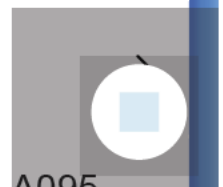
Diets & Nutrition



Lumber & Sheet Stock



Water supply



A095



New Jersey



Folklore



Knowledge



Film score



Human Behavior & Psychology



Construction Industry



Bass guitar



Mothercare



Sundance Film Festival



Interpersonal relationship



Biology



Hong Kong Disneyland Resort



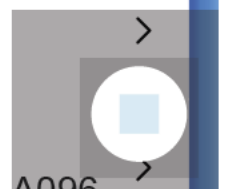
Germany Travel & Tourism



Household Room Design



Weddings





1



6



Radios



Children's Clothing



Plays (Performing Arts)



Dinosaurs & Fossils (Life Sciences)



Home



British Columbia



Lin-Manuel Miranda



Self-confidence



Charitable & Philanthropic Organizations



Hair Care



Dance



Emotion



Little White Lies (magazine)



Installation art



Types of Travel



A097



BBC iPlayer



Self-esteem



Ireland



The Glenlivet distillery



Restaurants & Dining Topics



England



Elementary Schools



Musical Artists, Bands & Recordings



Guatemala



Hair Styling Products



Political campaign



Beautiful Skin



Books



Portland, Oregon



A098





Twitter



Medical Services



The Constant Gardener (film)



Scotland



Gymnastics



Emma Thompson



Paper



Melbourne



Google



Everyman Cinemas



Hotel Rwanda



Sony



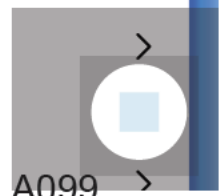
Political science



Building



Oxford



A099





Shambhala (music festival)



Sports Clubs



Sports Competitions



The Pleasance



ITV2



Dublin



IOS



Movie Theaters



Wikipedia



Parents (magazine)



Video



Vernacular architecture



Performance art



Honduras



Cognitive science



A100



1



6



Hip Hop Dance



Trombones



Android



The Color Purple (film)



Necklaces



Television Sets



Dance Theatre of Harlem



Cineworld



Comedy-drama



Rock Music



Advertising



Writing Classes & Lessons



Edinburgh Festival Fringe



Social Sciences



A101



Industrial Revolution



Coffee



Thanksgiving



Digital electronics



Cabaret



Stainless steel



Design (Visual Arts)



Harvest



Politics



Instagram



Walt Disney World



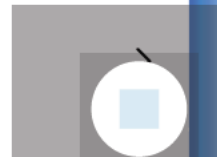
Digital audio



Website



Novel



A102



Rotten Tomatoes



Filmmaking



BFI London Film Festival



Electronics Accessories



Research



Sky Go



Print Media



Art movement



Soda Stereo



Communication



Parenting (magazine)



Microphones



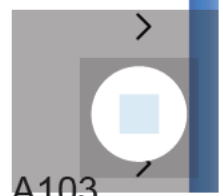
Art film



Personal development



Stylist (magazine)



A103



Pinterest



Online



Drawing



FamilyFun



Photography



Electronic Music



Kew Gardens



News media



Papyrus



Game of Thrones



Wood



New York City



Technology



Gemstone



Social Media



A104



Newspapers



Developmental psychology



Physical exercise



New Wave Music



Architecture



YouTube



Travel



Photographers



Information



Music & Arts



Sertaneja, Paraná



Despicable Me 2



List of Google products



V-pop



A105



12 Years a Slave (film)



Now TV (UK)



Healthy Living



Airplanes



ITV (TV network)



Trap (music)



Frozen (2013 film)



Minions (film)



Guardian film



WooCommerce



Babyshop



Thai pop music



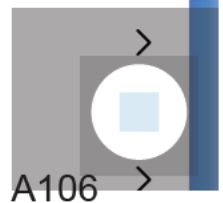
Latin Music



The Crown (TV series)



MatahariMall.com







JoJo Siwa



Efficient Energy Use



JBL



Architecture & Design



Studio Pilates



Pilates Anytime



Aceh



Riau



Rightmove



Depok



Safari



Aerobic Workouts



Disney Princess



Nuit Blanche



Land and Houses



A107



British Museum



Chloë Grace Moretz



InStyle



Kuliner Indonesia



Harrods



Royal Wedding



Jayapura



Content marketing



Gumtree South Africa



Golf Channel



Mortgage calculator



Electronic Sports World Cup



Men's Fitness



Debenhams



A108



1



6



Science & Technology



Celtic FC



Gold Star Mothers Club



Medan



Tangerang



Knitting



Unreal Engine



Kotex



Marks & Spencer



Stretching Workouts



Saunas & Steam Rooms



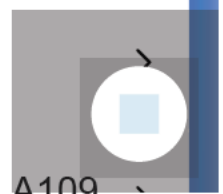
Recruitment & Hiring



Sport Bild



Big Ben



A109



Superdrug



Asda



Afrikaans



Bridesmaid



Property finder



Union Pacific Railroad



Buckingham Palace



Baby Nursery Room Design



Lululemon Athletica



Maine-Anjou cattle



For sale by owner



First-time buyer



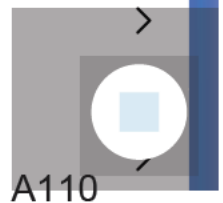
Cars.com



Khan Academy



East Kalimantan





Semarang



Unity (game engine)



Canned & Dry Milk



Coach Sportif



Robotics



Day Spas



Surabaya



Love & Sex



Metropolitan Museum of Art



Charlotte Tilbury



Museum of Modern Art



Central Sulawesi



mode



West Kalimantan



A111



1



6



Renewable energy



Wineries



Google Trends



Monarchy



Philips AVENT



Sainsbury's



Chicco



Sennheiser



Moxie



Grandfather Mountain



Bekasi



Holiday cottage



Trains (magazine)



Baby Bottles



A112



Vineyard



KykNET



Patagonia (clothing)



World of Tanks



Woolworths (supermarket)



Trulia



Texas FFA Association



Playtex



Gorontalo (city)



London Eye



Wine Tasting



National FFA Organization



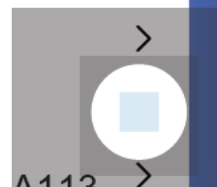
Muscle & Fitness



Renting & Leasing Real Estate Services



Real Estate & Development



A113



Bali



Wine (software)



Wolfenstein (series)



Solar Panels (Power & Electrical Supplies)



Teaching English as a Foreign Language



Next plc



Hungarian Grey cattle



JibJab



Cotton On



Freelancer



Champagne



BAZARCHIC



Sparkling wine



Endurance training



Sedan (automobile)



A114





1



6



AutoTrader.com



Real estate appraisal



Rail Travel & Trains



Software Engineering



Bringing Up Baby



West Papua (province)



Eikaiwa school



Sustainable energy



Kids



Toddler



Solar Energy



Baby & Toddler Car Seats



Emergency management



Social shopping





Thermae



Afrobeat



Bandung



Infant bed



Super Rugby



Lifestyles



Bogor



Therme Erding



Waitrose



Middle school



Wine & Spirits



Wine cellar



New Cars



House of Fraser



Delombok



A116



Horse Racing



Special Region of Yogyakarta



Este, Veneto



Baby & Toddler Food



Graco (baby products)



Kalimantan



Used Cars



Yogyakarta



Zillow



AutoTraderSA



Sanitary napkin



Santé et bien être



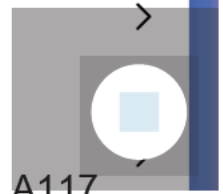
House Hunting



Baby sling



Job hunting



A117



Beauty Dior



Starter home



Sevilla FC



Red wine



White wine



Made.com



First-time home buyer grant



Pre-qualification (lending)



Dev Bootcamp



Nymphomaniac (film)



Ministry of Transport (Malaysia)



War Thunder



Unique Teaching Resources



ERGO Baby



A118



Onzie Yoga Apparel



Resultados Digitais



Splits59



Therme



Ariana Grande discography



Arnhem Clothing Byron Bay



Sex Tape (film)



Very (online retailer)



[See less](#)

### Ad topics that you see less of

Ad topics that you've chosen to see less of. You can update these topics at any time.



Beauty & Personal Care



Cosmetics & Makeup



Monarch



[See More](#)



A119

**IN THE HIGH COURT OF JUSTICE**

**Claim No.**

**KING'S BENCH DIVISION**

**BETWEEN:-**

**TANYA O'CARROLL**

**Claimant**

**– and –**

**META PLATFORMS IRELAND LIMITED**

**Defendant**

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**SCHEDULE 5:**

**“YOUR TOPICS” ON 14 OCTOBER 2022**

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Action TV Shows & Movies
Film & Television Industry
Rock Music
Pete Davidson
Netflix (media provider)
Ridley Scott
Benedict Cumberbatch
Comedy TV Shows & Movies
Lady Gaga (US actor, music artist)
HBO (US television network)
Fantasy TV Shows & Movies
Pop Music
Theater
Game of Thrones (2011-2019 tv series)
Joaquin Phoenix
Restaurants & Dining
TV & Movie Reviews
Aquatic Animals

Academy Awards (Oscars)
TV & Movie Awards
Historical Drama TV Shows & Movies
Superhero TV Shows & Movies
Travel & Tourism in Europe
London Travel & Tourism
Drawing & Sketching
Pizza
Dance Pop Music
Baked Goods
Writing
Dogs
Angelina Jolie
England Travel & Tourism
United Kingdom Travel
Northern Europe Travel & Tourism
Environmental Science
Musical Performances
Bicycles (product)
Adele (GB music artist)
Atmospheric Science
Earth Science

N510

# Notice for Service out of the jurisdiction where permission of the court is not required (CPR 6.34)

In the High Court of England and Wales, KBD,  
Media & Communications List

Claim no.

Name of claimant Tanya O'Carroll

Name of defendant Meta Platforms Ireland Limited

## Note:

Where Civil Procedure Rule (CPR 6.34) applies this form must be completed and filed at court with the claim form ([www.justice.gov.uk/courts/procedure-rules/civil](http://www.justice.gov.uk/courts/procedure-rules/civil)). A copy of the form must **in addition** be served with the claim form.

Where a claim form for service on a defendant out of the jurisdiction under CPR 6.34 is not accompanied by this form, the claim form may only be served once this form is filed with the court or if the court gives permission (CPR 6.34(2)).

Where a claim form is served without particulars of claim, it must be accompanied by a copy of form N1D – Notes for defendant on replying to the claim form out of the jurisdiction.

Please **tick one** of the following boxes being your statement as to why the claim form can be served out of the jurisdiction without the permission of the court. Also delete anything in square brackets that does not apply. Please use Part 1 if the claim form to be served in Scotland or Northern Ireland or Part 2 if the claim form is to be served outside of England and Wales, Scotland or Northern Ireland.

## PART 1 – Service of the claim form in Scotland and Northern Ireland (CPR 6.32)

In proceedings to which CPR 6.32(1)(a) and 6.32(1)(b)(i) apply the statement is:-

- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the Court has power to determine under the Civil Jurisdiction and Judgments Act 1982 and
- (a) no proceedings between the parties concerning the same claim are pending in the Courts of any other part of the United Kingdom; and
  - (b) the defendant is domiciled in the United Kingdom.”

In proceedings to which CPR 6.32(1)(a) and 6.32(1)(b)(ii) apply the statement is:-

- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the Court has power to determine under the Civil Jurisdiction and Judgments Act 1982 and
- (a) no proceedings between the parties concerning the same claim are pending in the Courts of any other part of the United Kingdom; and
  - (b) the proceedings are within paragraph 11 of Schedule 4 of the said Act.”

In proceedings to which CPR 6.32(1)(a) and 6.32(1)(b)(iii) apply, the statement is:-

- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the Court has power to determine under the Civil Jurisdiction and Judgments Act 1982 and
- (a) no proceedings between the parties concerning the same claim are pending in the Courts of any other part of the United Kingdom; and
  - (b) the defendant is a party to an agreement conferring jurisdiction, within paragraph 12 of Schedule 4 to the said Act.”



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**In proceedings to which CPR 6.32(2) applies the statement is:**

- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the Court has power to determine under an enactment other than the Civil Jurisdiction and Judgments Act 1982, namely (state the provisions of the enactment relied on to confer the power) notwithstanding that
- (a) the defendant is not within the jurisdiction; or
  - (b) the facts giving rise to the claim did not occur within the jurisdiction.”
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**PART 2 – Service of the claim form in any jurisdiction other than England and Wales, Scotland and Northern Ireland**

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**In proceedings to which CPR 6.33(2) applies the statement is:**

- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the court has power to determine and
- (a) there are no proceedings between the parties concerning the same claim are pending in the courts of any other part of the United Kingdom; and
  - (b) (i) the defendant is not a consumer, but is a party to a consumer contract within section 15B(1) of the Civil Jurisdiction and Judgments Act 1982 Act; or
  - (ii) the defendant is an employer and a party to a contract of employment within section 15C(1) of the Civil Jurisdiction and Judgments Act 1982 Act.”
- 

**In proceedings to which CPR 6.33(2B)(a) applies, the statement is:**

- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the court has power to determine under the 2005 Hague Convention and the defendant is a party to an exclusive choice of court agreement conferring jurisdiction on that court within the meaning of Article 3 of the 2005 Hague Convention.”
- 

**In proceedings to which CPR 6.33(2B) (b) or (c) applies, the statement is:**

- “I state that each claim made against the defendant to be served and included in the claim form is a claim made pursuant to or in respect of a contract which contains a term to the effect that the court shall have jurisdiction to determine that claim.”
- 

**In proceedings to which CPR 6.33(3) applies, the statement is:**


- “I state that each claim made against the defendant to be served and included in the claim form is a claim which the court has power to determine other than under the 2005 Hague Convention, notwithstanding that–
- (a) the person against whom the claim is made is not within the jurisdiction; or
  - (b) the facts giving rise to the claim did not occur within the jurisdiction.”
-

## Statement of truth

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I **believe** that the facts stated in this notice are true.
- The Claimant** believes that the facts stated in this notice are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend  
(where judgment creditor is a child or a protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day                      Month                      Year

16	Nov	2022
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### Full name

Ravi Naik

### Name of claimant's legal representative's firm

AWO

### If signing on behalf of firm or company give position or office held

Legal Director / Solicitor