**Case Study: Session 6**

An online company X provides a platform for users to communicate and network, including through third party apps. The company has a user base of millions of people, in many countries. Company X collects information on users’ personal data, though it commits to keeping all user information secure and private, sharing only certain data with trusted partners.

Y is one of the third party apps and add-ons available on the platform and is a trusted partner of Company X. The Y pp uses AI to suggest articles and services personalised for each user. For this reason, the Y app collects personal data for research purposes. The Y app itself shares information with its trusted partners, which include governments and political parties. It was recently revealed that the user data of one million Company X. users (including users’ actual identities, usernames, passwords, addresses, political affiliations, and posts) was shared with political parties for campaigning purposes.

Upon learning about this connection, the board of company X blocks the Y app from their platform. Company X now wants to find a way to provide for remediation without getting the courts involved. They would like to create a private grievance mechanism to handle complaints and need your help.

Questions:

1. How should company X go about designing a grievance mechanism for this situation? How can the company involve its users to ensure the mechanism meets their needs and that they will use the mechanism? How can company X ensure that those users who were affected have a say in the design and implementation of any remedy?
2. How can company X make sure the grievance mechanism is accessible to all potentially-affected users? How can it take into account differences in language, technical literacy, physical location, etc.?
3. What would be an appropriate substantive remedy (eg. remedy may include apologies, restitution, rehabilitation, financial or non-financial compensation and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition) in this situation?
4. Had the Y app sharing of data not been revealed, how could Company X have found out about the harms associated with its data sharing practices and the scale of the impact? How can individual users find out if they were affected?