

# TWILIO TRANSPARENCY REPORT *January 1, 2020 - June 30, 2020*

Twilio's developer ecosystem, customers and end users expect Twilio to protect their personal information, sensitive data and user privacy. That responsibility includes how Twilio handles received government requests for customer information.

This is Twilio's eleventh transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the first six months of 2020. As part of Twilio's [commitment to the privacy of your data](#), and consistent with our core value of "no shenanigans," we compile this semi-annual report to provide visibility to the Twilio community around governmental requests received.

In the spirit of trust and "no shenanigans," the objective of this report is to inform you of the total volume of government requests for information received by Twilio in the preceding six month period; how Twilio responded to the requests and how often Twilio notified its users of the requests.

In the first half of 2020, Twilio received 1336 government requests for user information from government agencies in 22 countries. Twilio responded to 1025 of these requests and notified our customers of 102 of these requests.

## **What government requests for user information did Twilio receive?**

In the first half of 2020, Twilio received 1336 government requests for user information across 557 Twilio customer accounts.

Of the 1336 requests received, 520 requests came from federal, state and local agencies within the United States. The majority of the other requests were issued by international agencies, primarily in France 428, Germany 248, the United Kingdom 55, and Canada 21.

*See additional information about the content of Twilio's Transparency Report in Endnote 1.*

## What type of government requests for user information did Twilio receive?

Government Requests by Request Type First Half of 2020 (January 1 - June 30)	Federal - US	State - US	Local - US	International	Total
Civil Investigative Demand	0	13	0	0	13
Court Order	11	44	0	0	55
Grand Jury Subpoena	56	43	0	0	99
Subpoena	132	89	2	0	223
Functionality Disablement	1	0	0	10	11
Search Warrant	8	30	0	3	41
Police Force Order (International)	0	0	0	411	411
RIPA (United Kingdom)	0	0	0	53	53
Production Order (Canada)	0	0	0	12	12
GIC (France)	0	0	0	301	301
BNetzA (Germany)	0	0	0	24	24
Other	11	9	18	55	93
<b>All Requests</b>	<b>219</b>	<b>228</b>	<b>20</b>	<b>869</b>	<b>1336</b>

See additional information in Endnote 2 - 5.

## Which countries issued government requests for information to Twilio?

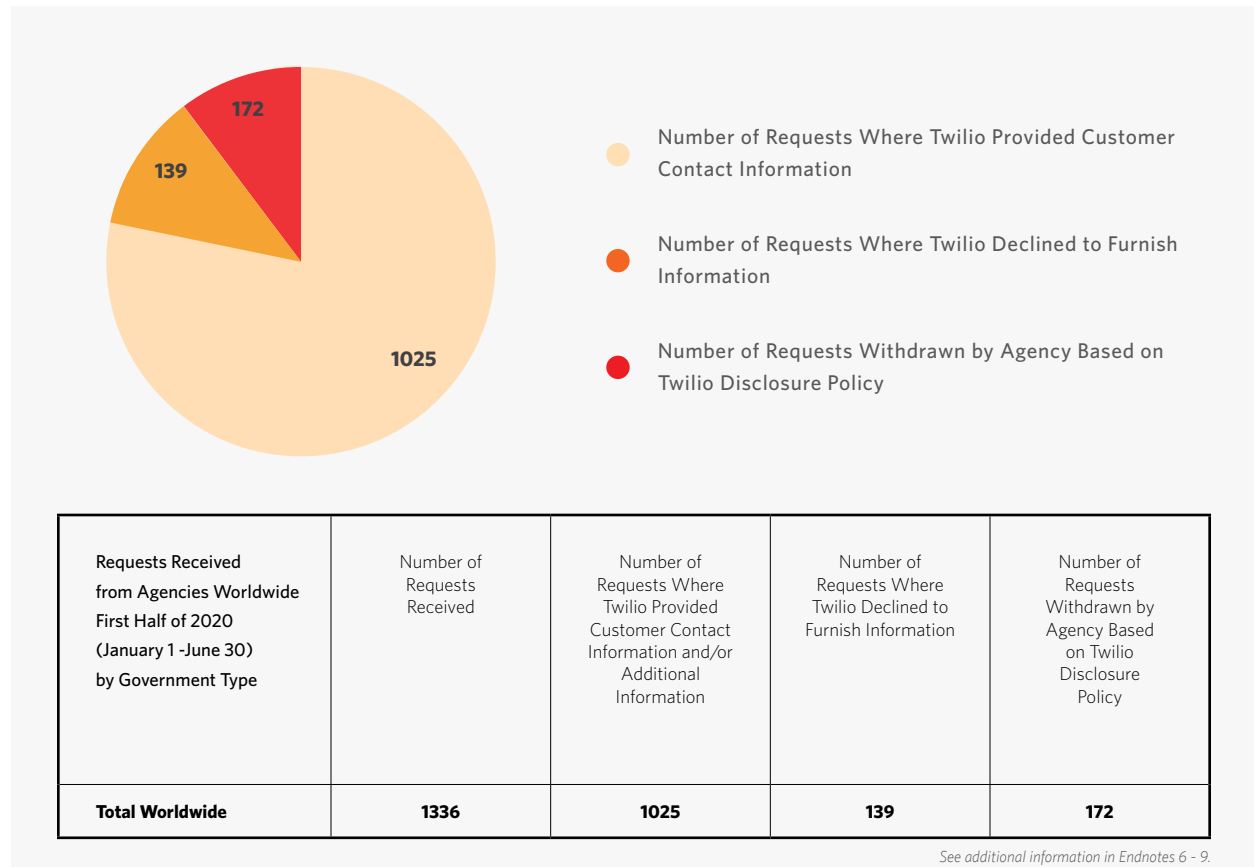
Requests Received from Agencies Worldwide First Half of 2020 (January 1 -June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
<b>Total Worldwide</b>	<b>1336</b>	<b>1025</b>

Requests Received from Agencies Americas Region First Half of 2020 (January 1 -June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Argentina	0	0
Brazil	1	0
Canada	21	15
Mexico	0	0
United States	487	288
<b>Total Americans</b>	<b>509</b>	<b>303</b>

Requests Received from Agencies APAC Region First Half of 2020 (January 1 -June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Australia	10	0
Hong Kong	0	0
India	4	3
Japan	17	15
Korea	0	0
Malaysia	1	1
New Zealand	0	0
Singapore	4	2
China	0	0
Taiwan	2	1
<b>Total APAC</b>	<b>38</b>	<b>22</b>

Requests Received from Agencies EMEA Region First Half of 2020 (January 1 - June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Austria	1	0
Belgium	19	1
Cyprus	0	0
Czech Republic	1	1
Denmark	0	0
Finland	0	0
France	429	402
Germany	248	236
Greece	0	0
Estonia	2	2
Ireland	0	0
Israel	0	0
Italy	3	3
Jordan	0	0
Latvia	0	0
Luxembourg	0	0
Morocco	0	0
Netherlands	1	0
Poland	0	0
Portugal	0	0
Romania	0	0
Russia	0	0
Slovenia	0	0
Spain	9	6
Sweden	1	0
Switzerland	20	15
Turkey	0	0
United Arab Emirates	0	0
United Kingdom	55	24
Norway	0	0
<b>Total EMEA</b>	<b>789</b>	<b>700</b>

## Number of Government Requests Received Worldwide and How Twilio Responded



### What responses to government requests for user information did Twilio provide?

In the first half of 2020, Twilio responded to 1025 requests for user information from government agencies.

### Twilio's Comment on National Security Letters

When Twilio receives requests that are issued without the review of a court, such as National Security Letters, Twilio will ask the investigating agent to instead produce a court order or withdraw the nondisclosure component of the request.

In response to this best practice, Twilio is encouraged that, previously, in the second half of 2017, Twilio received permission from the U.S. Department of Justice to publish two National Security Letters and include these two specific requests in Twilio's semi-annual transparency report.

Twilio will continue to publish any future letters where Twilio seeks and obtains permission from the Department of Justice to do so; and will restate the ranges of National Security Letters received, for the time period it was received in.

However, due to the restraint on free speech imposed by current law, Twilio continues to be prohibited from providing a full accounting of requests that may have been subject to National Security Letter restrictions.

Twilio continues to oppose the prohibition on companies from disclosing the specific number of National Security Letters received by a company. Twilio opposes this prohibition based on the belief that government requests should not be issued in secret, and should only be issued with proper transparency, accountability and oversight.

Reporting Period	National Security Letters Received and Responded to by Twilio	Accounts Affected by National Security Letter Requests
2015 - First Half	0-999	0-999
2015 - Second Half	0-999	0-999
2016 - First Half	0-999	0-999
2016 - Second Half	0-999	0-999
2017 - First Half	0-999	0-999
2017 - Second Half	2-999	2-999
2018 - First Half	0-999	0-999
2018 - Second Half	0-999	0-999

Reporting Period	National Security Letters Received and Responded to by Twilio	Accounts Affected by National Security Letter Requests
2019 - First Half	0-999	0-999
2019 - Second Half	0-999	0-999
2020 - First Half	0-999	0-999

*See additional information in Endnote 10.*

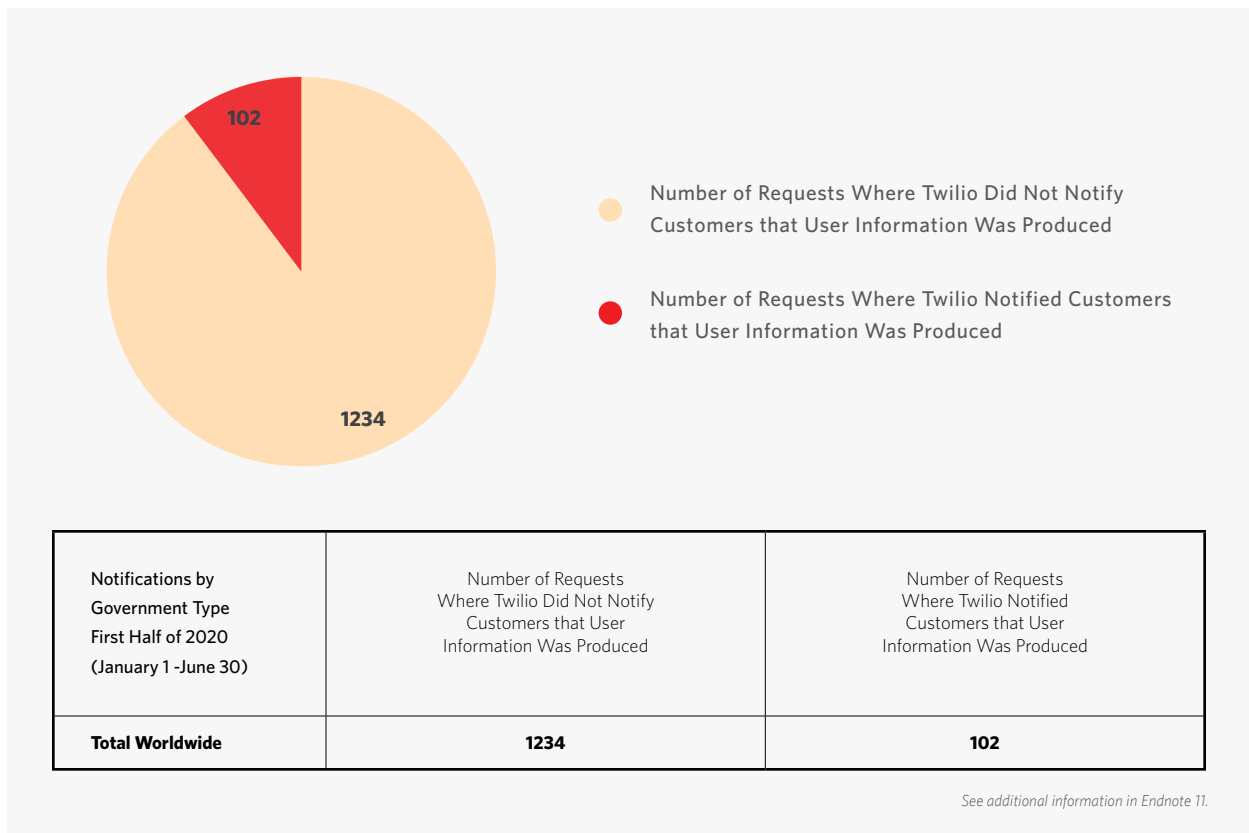
## What notifications of government requests for user information did Twilio send to affected customers?

In accordance with Twilio's [Privacy Policy](#), Twilio notifies customers of compliance with a government request, if not prohibited from doing so by statute, subpoena or court or administrative order.

In the United States, France and the United Kingdom, Twilio's ability to notify customers depends on whether a request contains a non-disclosure order. This is in contrast to some countries, most notably Germany and Japan, where certain regulations statutorily prohibit companies from disclosing to their customers that they have responded to requests for information.

In the first half of 2020, Twilio received 1336 government requests for user information and notified the impacted customers of 102 of those request

### Twilio Notifications to Customers of Government Requests Received Worldwide for User Information



## Endnotes

### Twilio Transparency Report

1. Starting with this Transparency Report for the first half of 2020, Twilio has streamlined the level of detail provided in our transparency reporting, while maintaining public documentation of the overall volume of requests, the source of requests received, and how Twilio responded to said requests. We welcome feedback on the new format or additional questions about the report at: [transparency@twilio.com](mailto:transparency@twilio.com).

#### What type of government requests for user information did Twilio receive?

2. In some cases, Twilio's carrier partners furnish a phone number's end user information on behalf of Twilio and Twilio does not receive notice of the underlying request. The recipient agency would obtain the information that is entered by a Twilio customer in order to register for a phone number with address requirements. In any instance where Twilio receives a copy of a government request for information, Twilio applies the same scrutiny to international requests as for domestic requests.

3. "Exigent Requests" are responses where Twilio may have provided information in advance of receiving a fully executed request from law enforcement. Under Twilio's Privacy Policy, Twilio may disclose information to law enforcement in the case of an emergency where there is a danger of death or serious physical injury to a person that Twilio may have information necessary to prevent.

4. "Functionality Disablement" means a government agency required that Twilio remove phone numbers from service. In previous versions of Twilio transparency reports this category was known as "takedown requests."

5. "Police Force Order" refers to an international government or law enforcement agency making a direct request to Twilio. Twilio applies the same scrutiny to international requests as for domestic requests. In certain countries Twilio has distinguished the format of requests: in Canada, federal police requests can be issued in the form of Production Orders; in the United Kingdom, Regulatory of Investigatory Powers Act of 2000 (RIPA); in Germany, police force orders or requests from Bundesnetzagentur (BNetzA); and in France, police force orders or Groupement Interministériel de Contrôle (GIC) requests.

#### Number of Government Requests Received Worldwide and How Twilio Responded

6. "Customer Contact Information" includes information such as a Twilio customer's username, email address, company name or company contact information, where available.

#### What type of government requests for user information did Twilio receive?

7. "Additional Information" includes any information provided beyond the Customer Contact Information described above. This may include call logs, message logs, message body content, call recordings,



payment information, phone number creation date, SendGrid email accounts, address on file for a specific phone number or other information i.e. SendGrid email address. Twilio only produces the data specifically demanded in the applicable warrant, subpoena, court order or administrative order. During the first half of 2020, Twilio did furnish transmittal records such as call logs or text message logs including sender, recipient and time stamp. Twilio did not furnish message body content or call recordings in response to any requests. For the requests where Twilio provided “Additional Information,” Twilio provided only phone number creation date, address on file, and/or payment information.

8. “Twilio Declined to Furnish” means Twilio did not provide Customer Contact Information or Additional Information. This could be due to insufficient documentation, concerns about jurisdiction or unavailable records.

9. “Requests Withdrawn” means a government agency submitted and subsequently withdrew a request. Upon receiving a government request, Twilio notifies agencies that Twilio intends to disclose the existence of the request to a customer unless explicitly prohibited from doing so by law, thus allowing agencies to withdraw the request to prevent disclosure.

#### **Twilio’s Comment on National Security Letters**

10. Twilio’s first published transparency report covered the first half of 2015. If Twilio received National Security Letters prior to this time frame and if Twilio obtains permission to publish any such letters, Twilio will revise the bands accordingly.

#### **Twilio Notifications to Customers of Government Requests Received Worldwide for User Information**

11. In previous transparency reports Twilio reported the notification rates for each country. Moving forward, Twilio will instead continue to report the overall notification rate for all requests received.

## Conclusion

Twilio's developers, customers and end users expect the Twilio platform to be secure and private. Twilio is mindful of these expectations and takes seriously the trust that users place when choosing the Twilio platform.

The 557 customers for whom Twilio received government requests as indicated in this report represents a fraction of a percentage of all Twilio accounts.

Due to the restraint on free speech imposed by current law, Twilio continues to be prohibited from providing a full accounting of requests that may have been subject to National Security Letter restrictions.

Twilio will continue to publish a semiannual transparency report. Please be advised that Twilio may restate data going forward if more complete information becomes available or if Twilio changes classifications. Current and archival transparency reports are available on the Twilio [website](#).