

TWILIO TRANSPARENCY REPORT *January 1, 2018 - June 30, 2018*

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 government requests received.

This is Twilio's seventh transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the first six months of 2018. 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 2018, Twilio received 1474 government requests for user information from government agencies in 22 countries. Twilio responded to 1193 of these requests and notified our customers of 239 of these requests.

What government requests for user information did Twilio receive?

In the first half of 2018, Twilio received 1474 government requests for user information across 366 Twilio customer accounts.

Of the 1474 requests received, 427 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 669, Germany 215, the United Kingdom 85, and Canada 33.

Requests Received from Agencies Worldwide First Half of 2018 (January 1 - June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Total Worldwide	1474	1119	74	129	152

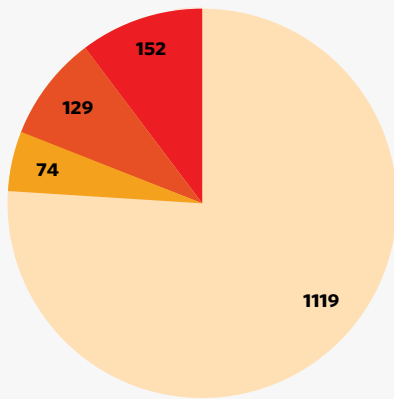
Requests Received from Agencies in the Americas Region First Half of 2018 (January 1 - June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Brazil	0	0	0	0	0
Canada	33	11	0	21	1
Mexico	0	0	0	0	0
United States	427	248	3	64	112
Total Americas	460	259	3	85	113

Requests Received from Agencies in the APAC Region First Half of 2018 (January 1 - June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Australia	5	3	1	0	1
Hong Kong	0	0	0	0	0
India	2	2	0	0	0
Japan	3	0	0	3	0
Malaysia	0	0	0	0	0
New Zealand	1	0	0	1	0
Singapore	0	0	0	0	0
Taiwan	1	1	0	0	0
Total APAC	12	6	1	4	1

Requests Received from Agencies in the EMEA Region First Half of 2018 (January 1 - June 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Austria	4	0	0	4	0
Belgium	8	1	1	6	0
Cyprus	0	0	0	0	0
Czech Republic	0	0	0	0	0
Finland	0	0	0	0	0
France	669	664	2	2	1
Germany	215	143	62	10	0
Greece	2	1	0	1	0
Ireland	2	1	0	1	0
Israel	0	0	0	0	0
Italy	4	0	0	4	0
Jordan	1	1	0	0	0
Latvia	0	0	0	0	0
Luxembourg	0	0	0	0	0
Morocco	1	0	1	0	0
Netherlands	1	1	0	0	0
Poland	2	0	0	2	0
Portugal	0	0	0	0	0
Romania	0	0	0	0	0
Russia	1	0	0	1	0
Slovenia	0	0	0	0	0
Spain	0	0	0	0	0
Sweden	0	0	0	0	0
Switzerland	4	2	0	2	0
Turkey	0	0	0	0	0
United Arab Emirates	3	0	2	1	0
United Kingdom	85	40	2	6	37
Total EMEA	1002	854	70	40	38

See additional information in Endnotes 1 - 3.

Number of Government Requests Received Worldwide and How Twilio Responded



- Number of Requests Where Twilio Provided Customer Contact Information Only
- Number of Requests Where Twilio Provided Customer Contact Information and Additional Information
- Number of Requests Where Twilio Declined to Furnish Information
- Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy

Requests Received from Agencies Worldwide First Half of 2018 (January 1 - June 30) by Government Type	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Federal - US	187	82	2	28	75
State - US	205	151	0	17	37
Local - US	35	15	1	19	0
International	1047	871	71	65	40
Total Worldwide	1474	1119	74	129	152

See additional information in Endnotes 4 - 8.

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

In the first half of 2018, Twilio responded to 1193 requests for user information from government agencies.

Responses to Government Requests by Request Type First Half of 2018 (January 1 - June 30)	Federal - US	State - US	Local - US	International	Total
Civil Investigative Demand	2	10	0	1	13
Court Order	32	28	0	1	61
Grand Jury Subpoena	21	13	0	0	34
Subpoena	27	77	3	1	108
Functionality Disablement	0	0	0	6	6
Search Warrant	0	21	0	3	24
Police Force Order (International)	0	0	3	293	296
RIPA (United Kingdom)	0	0	0	40	40
Production Order (Canada)	0	0	0	4	4
GIC (France)	0	0	0	585	585
BNetzA (Germany)	0	0	0	5	5
Other: Legal Submission	2	2	10	3	17
All Requests	84	151	16	942	1193

See additional information in Endnotes 9 - 11.

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 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 in the second half of 2017, Twilio received permission from the U.S. Department of Justice to publish two National Security Letters and included 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 we received for a set time period.

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 Letters.

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

See additional information in Endnote 12.

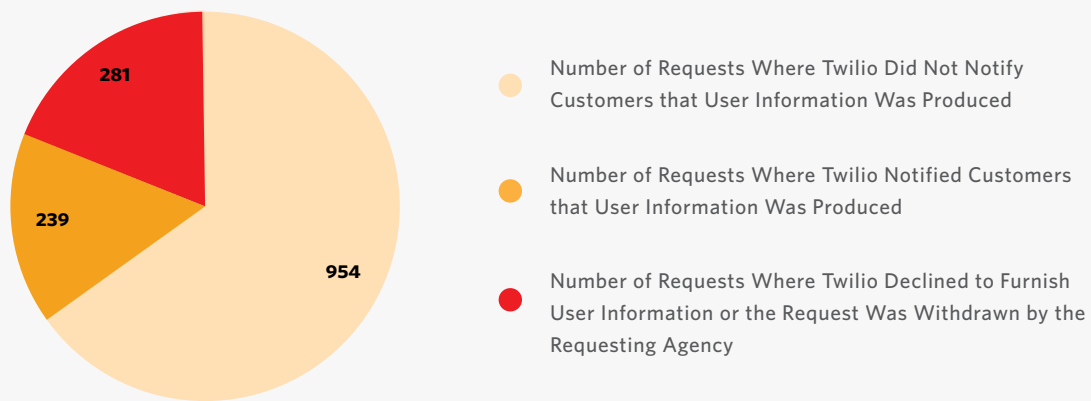
What notifications of government requests for user information did Twilio send to affected customers?

In accordance with Twilio’s Privacy Policy, Twilio notifies customers of compliance with a government request whenever 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 2018, Twilio responded to 1193 government requests for user information and notified the impacted customers of 239 of those requests.

Twilio Notifications to Customers of Government Request Received Worldwide for User Information



Notifications by Government Type First Half of 2018 (January 1 - June 30)	Number of Requests Where Twilio Did Not Notify Customers that User Information Was Produced	Number of Requests Where Twilio Notified Customers that User Information Was Produced	Number of Requests Where Twilio Declined to Furnish User Information or the Request Was Withdrawn by the Requesting Agency
Federal - US	62	22	103
State - US	65	86	54
Local - US	3	13	19
International	824	118	105
Total Worldwide	954	239	281

Notifications by Selected Countries First Half of 2018 (January 1 - June 30)	Number of Requests Where Twilio Did Not Notify Customers that User Information Was Produced	Number of Requests Where Twilio Notified Customers that User Information Was Produced	Number of Requests Where Twilio Declined to Furnish User Information or the Request Was Withdrawn by the Requesting Agency
Canada	6	5	22
France	594	72	3
Germany	205	0	10
United Kingdom	8	34	43
United States	130	121	176

See additional information in Endnote 13.

Endnotes

What government requests for user information did Twilio receive?

1. 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.
2. Twilio began receiving and responding to requests from France's Groupement Interministériel de Contrôle in 2017. In the first half of 2018, the majority of all government requests for information that Twilio received were issued by French agencies.
3. Twilio tracks mutual legal assistance treaty (MLAT) requests served by the United States Department of Justice - Office of International Affairs according to the country that originates the request. Twilio received 2 MLAT requests in the first half of 2018.

Number of Government Requests Received Worldwide and How Twilio Responded

4. "Customer Contact Information" includes information such as a Twilio customer's user name, email address, company name or company contact information, where available.
5. "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, address on file for a specific phone number or other information. Twilio only produces the data specifically demanded in the applicable warrant, subpoena, court order or administrative order. During the first half of 2018, Twilio did not furnish transmittal records such as call logs or text message logs including sender, recipient and time stamp, and 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.
6. "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.
7. "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.

8. "Federal - US" includes all United States federal agencies. In the first half of 2018, Twilio received requests from the following federal agencies, followed by the number of requests in parentheses: Department of Defense: Office of the Inspector General (1), U.S. Air Force (1); Department of Homeland Security: U.S. Immigration and Customs Enforcement (26); U.S. Secret Service (1); Department of Justice: Federal Bureau of Investigation (31), Drug Enforcement Agency (49), Office of the Inspector General (11), and U.S. Marshals Service (1); Federal Trade Commission (2); Internal Revenue Service (5); Securities and Exchange Commission (3); U.S. Postal Service: Office of Inspector General (1); and U.S. District Courts (55).

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

9. "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. Twilio responded to 30 exigent requests in the first half of 2018, and 13 agencies ultimately produced a court order, subpoena or search warrant in response to the request.

10. "Functionality Disablement" means a government agency requested or required Twilio remove phone numbers from service. In previous versions of Twilio transparency reports this category was known as "takedown requests". In the first half of 2018, Twilio received 29 disablement requests.

11. "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.

Twilio's Comment on National Security Letters

12. 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

13. In previous transparency reports Twilio reported the notification rates for each country. Moving forward, Twilio will instead highlight notable countries or those with the highest volume of requests, while continuing 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 366 customers for whom Twilio received government requests as indicated in this report represent 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 Letters.

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 and Github.