



TWILIO TRANSPARENCY REPORT *July 1, 2016 - December 31, 2016*

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 fourth transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the last six months of 2016. 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 that spirit, this report's objective is to inform you of the total volume of government requests for information received by Twilio in the last six months of 2016, how Twilio responded to the requests and how often Twilio notified its users of the requests.

What government requests for user information did Twilio receive?

In the second half of 2016, Twilio received 699 government requests for user information across 360 Twilio customer accounts.

Of the 699 requests received, 375 requests came from federal, state and local agencies within the United States, and 324 requests were issued by international agencies.



Requests Received from Agencies Worldwide Second Half of 2016 (July 1 - December 31)	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and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy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	699	303	138	194	64

Requests Received from Agencies in the Americas Region Second Half of 2016 (July 1 - December 31)	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and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Canada	40	10	0	29	1
Mexico	0	0	0	0	0
United States	375	197	21	99	58
Total Americas	415	207	21	128	59

Requests Received from Agencies in the APAC Region Second Half of 2016 (July 1 - December 31)	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	2	0	2	1
Hong Kong	0	0	0	0	0
India	2	1	0	1	0
Japan	2	0	2	0	0
New Zealand	1	0	1	0	0
Singapore	0	0	0	0	0
Total APAC	10	3	3	3	1



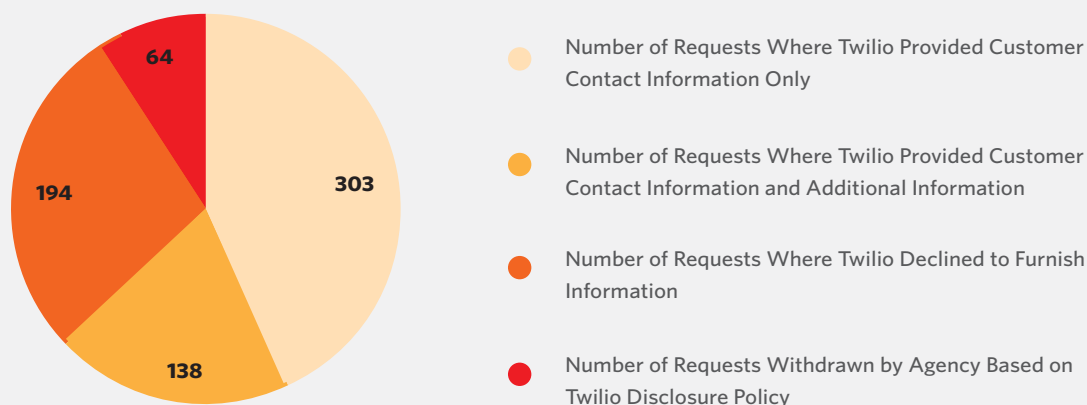
Requests Received from Agencies in the EMEA Region Second Half of 2016 (July 1 - December 31)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Austria	1	0	0	1	0
Belgium	11	1	1	9	0
Cyprus	1	1	0	0	0
Czech Republic	3	0	0	3	0
Finland	2	1	0	1	0
France	49	25	2	22	0
Germany	132	25	103	4	0
Greece*	2	0	0	2	0
Israel	0	0	0	0	0
Italy	12	5	3	4	0
Latvia	2	0	1	1	0
Poland	1	0	0	1	0
Portugal	1	0	1	0	0
Spain	2	0	0	2	0
Switzerland	10	2	1	7	0
United Kingdom	45	33	2	6	4
Total EMEA	274	93	114	63	4

Footnotes:

* 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 applies the same scrutiny to international requests as for domestic requests.



Number of Government Requests Received Worldwide and How Twilio Responded



Requests Received from Agencies Worldwide Second Half of 2016 (July 1 - December 31) 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	168	53	10	57	48
State - US	190	135	9	36	10
Local - US	17	9	2	6	0
International	324	106	117	95	6
Total	699	303	138	194	64

Footnotes:

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

* "Additional Information" includes any information provided beyond the Customer Contact Information described above. This may include call logs, message logs, message body content, phone number creation date, address on file for a specific phone number or other information. Twilio only produced the user content specifically demanded in the applicable warrant, subpoena, court order or administrative order.

In the second half of 2016, Twilio furnished the following Additional Information, followed by the number of times that information was furnished in parentheses: Billing or payment information, or physical address associated with a phone number (124); Number utilization such as when a number was added to an account (114); Transmittal records such as call logs or text message logs including sender, recipient and time stamp (6). Twilio furnished Message body content once (1) during the second half of 2016.



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

In the second half of 2016, Twilio responded to 699 requests for user information from government agencies.

Responses to Government Requests by Request Type Second Half of 2016 (July 1 - December 31)	Federal - US	State - US	Local - US	International	Total
Civil Investigative Demand	5	13	0	3	21
Court Order	33	38	3	5	79
Grand Jury Subpoena	22	32	0	0	54
Subpoena	90	76	5	4	175
Takedown Requests	14	0	0	10	24
Preservation Requests	3	5	3	16	27
Search Warrant	0	15	2	2	19
Other: Exigent Request	1	8	4	3	16
Other	0	1	0	1	2
Police Force Order	0	2	0	280	282
All Requests	168	190	17	324	699

Footnotes page 4 continued:

* "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.

* "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.

* "Federal - US" includes all United States federal agencies. In the second half of 2016, Twilio received requests from the following federal agencies, followed by the number of requests in parentheses: Department of Treasury (15); Department of Homeland Security (17); Department of Justice: Federal Bureau of Investigation (60), Drug Enforcement Agency (48), Bureau of Alcohol, Tobacco, Firearms and Explosives (4), Office of the Inspector General (2) and US Marshals Service (1); Federal Communications Commission (1); Federal Trade Commission (4); Securities and Exchange Commission (5); and US District Courts (11).

Footnotes:

* "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 second half of 2016, and 13 agencies ultimately produced a court order, subpoena or search warrant in response to the request.

* "Police Force Order" refers to an international law enforcement agency making a direct request to Twilio. Twilio applies the same scrutiny to international requests as for domestic requests.



Twilio's Comment on Content Removal Requests

In the second half of 2016, Twilio received 24 takedown requests from government agencies to disable functionality on phone numbers associated with Twilio customers' accounts.

A "takedown request" typically means a government agency has requested a company remove functionality or content hosted online. Given Twilio's platform, takedown requests typically involve a government agency requesting that Twilio disable a phone number or phone numbers associated with suspected unlawful activity.

Twilio applies the same scrutiny to government requests to remove content or disable phone number functionality as government requests for user information. Twilio applies internal criteria to determine whether the takedown request identifies behavior that violates Twilio's Acceptable Use Policy. If behavior that violates Twilio's AUP is identified, Twilio may opt to accommodate the takedown request.

In the second half of 2016, Twilio received government agency requests to disable phone number functionality affecting 13 customer accounts.

Twilio's Comment on National Security Letters

The data above does not reflect any National Security Letters Twilio may have received.

Companies are prohibited by law from disclosing the specific number of National Security Letters they receive. The US Department of Justice has maintained that companies may only disclose the number of National Security Letters it has received in set ranges.

Therefore, Twilio indicates receiving between 0 and 999 National Security Letters in the time range of July 1, 2016 through December 31, 2016.

Recently, in accordance with the USA Freedom Act of 2015, some companies have been permitted to restate ranges of the National Security Letters they have received to positively conclude that they have received requests. Twilio is encouraged by this effort to increase transparency. Twilio continues to oppose the prohibition to disclose the specific number of National Security Letters received by a company, based on the belief that government requests should not be issued in secret, and should only be issued with proper transparency, accountability and oversight.

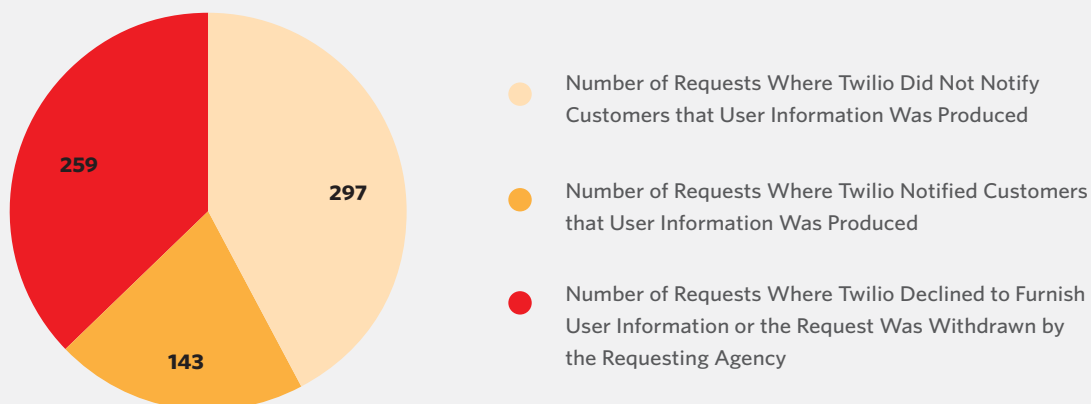


What notifications of government requests for user information did Twilio send to affected customers?

In the second half of 2016, Twilio responded to 440 government requests for user information and notified the impacted customers of 142 of those requests.

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.

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



Requests Received from Agencies Worldwide Second Half of 2016 (July 1 - December 31)	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
699	297	143	259



Requests Received from Agencies in the Americas Region Second Half of 2016 (July 1 - December 31)	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	5	5	31
Mexico	0	0	0
United States	135	82	157
Total Americas	140	87	188

Requests Received from Agencies in the APAC Region Second Half of 2016 (July 1 - December 31)	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
Australia	0	2	3
Hong Kong	0	0	0
India	1	0	1
Japan	2	0	0
New Zealand	1	0	0
Singapore	0	0	0
Total APAC	4	2	4



Requests Received from Agencies in the EMEA Region Second Half of 2016 July 1 - December 31)	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
Austria	0	0	1
Belgium	1	1	9
Cyprus	0	1	0
Czech Republic	0	0	3
Finland	0	1	1
France	9	18	22
Germany	128	0	4
Greece	0	0	2
Israel	0	0	0
Italy	6	2	4
Latvia	1	0	1
Poland	0	0	1
Portugal	1	0	0
Spain	0	0	2
Switzerland	1	2	7
United Kingdom	6	29	10
Total EMEA	153	54	67

Footnotes

* Twilio applies the same scrutiny to international requests as for domestic requests. Certain statutes in the United States, such as the federal Electronic Communications Privacy Act and certain state criminal laws, allow requesting agencies to present Twilio with a “gag order” in connection with a request for information. In accordance with certain countries’ statutes, such as German criminal law, Twilio is prohibited by statute from ever notifying the impacted customer, and law enforcement may require non-disclosure even without a special showing to the court. In line with Twilio’s objections to the prohibition on disclosing the specific number of National Security Letters, Twilio also objects to the overbroad application of gag orders based on the belief that government requests should only be issued with proper transparency, accountability and oversight.



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 160 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, this report does not include any 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.