

# TWILIO TRANSPARENCY REPORT *June 1, 2018 - December 6, 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 second half of 2018, Twilio received 1740 government requests for user information from government agencies in 19 countries. Twilio responded to 1420 of these requests and notified our customers of 140 of these requests.

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

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

In the second half of 2018, Twilio received 1740 government requests for user information across 407 Twilio customer accounts.

Of the 1740 requests received, 377 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 833, Germany 351, the United Kingdom 62, and Canada 65.

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

Government Requests by Request Type Second Half of 2018 (July 1 - December 6)	Federal - US	State - US	Local - US	International	Total
Civil Investigative Demand	0	20	0	1	21
Court Order	31	22	0	2	55
Grand Jury Subpoena	28	28	0	2	58
Subpoena	104	69	17	4	194
Functionality Disablement	0	0	1	60	61
Search Warrant	0	9	2	3	14
Police Force Order (International)	0	0	0	479	479
RIPA (United Kingdom)	0	0	0	59	59
Production Order (Canada)	0	0	0	15	15
GIC (France)	0	0	0	711	711
BNetzA (Germany)	0	0	0	5	5
Other: Legal Submission	11	3	24	30	68
<b>All Requests</b>	<b>174</b>	<b>151</b>	<b>44</b>	<b>1371</b>	<b>1740</b>

See additional information in Endnotes 2 - 5.

Which countries issued government requests for information from Twilio?

Requests Received from Agencies Worldwide Second Half of 2018 (July 1 - December 6)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
<b>Total Worldwide</b>	<b>1740</b>	<b>1420</b>

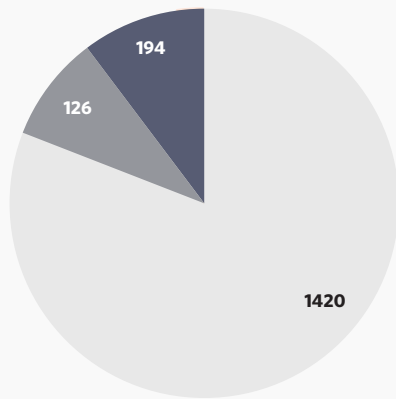
Requests Received from Agencies in the Americas Region Second Half of 2018 (July 1 - December 6)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Argentina	2	2
Brazil	0	0
Canada	65	25
Mexico	0	0
United States	377	202
<b>Total Americas</b>	<b>444</b>	<b>229</b>

Requests Received from Agencies in the APAC Region Second Half of 2018 (July 1 - December 6)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Australia	13	5
Hong Kong	0	0
India	1	1
Japan	5	1
Korea	2	0
Malaysia	1	1
New Zealand	0	0
Singapore	0	0
Taiwan	0	0
<b>Total APAC</b>	<b>22</b>	<b>8</b>

Requests Received from Agencies in the EMEA Region Second Half of 2018 (July 1 - December 6)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Austria	4	3
Belgium	2	2
Cyprus	0	0
Czech Republic	0	0
Denmark	1	0
Finland	0	0
France	833	793
Germany	351	340
Greece	0	0
Ireland	0	0
Israel	0	0
Italy	2	2

Requests Received from Agencies in the EMEA Region Second Half of 2018 (July 1 - December 6)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Jordan	0	0
Latvia	1	1
Luxembourg	0	0
Morocco	0	0
Netherlands	2	0
Poland	0	0
Portugal	0	0
Romania	0	0
Russia	0	0
Slovenia	0	0
Spain	0	0
Sweden	1	0
Switzerland	15	11
Turkey	0	0
United Arab Emirates	0	0
United Kingdom	62	31
<b>Total EMEA</b>	<b>1274</b>	<b>1183</b>

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



- Number of Requests Where Twilio Provided Customer Contact 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 Second Half of 2018 (July 1 - December 6) by Government Type	Number of Requests Received	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
<b>Total Worldwide</b>	<b>1740</b>	<b>1420</b>	<b>126</b>	<b>194</b>

See additional information in Endnotes 6 - 9.

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

In the second half of 2018, Twilio responded to 1420 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 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 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 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
<b>2018 - Second Half</b>	<b>0-999</b>	<b>0-999</b>

*See additional information in Endnote 10.*

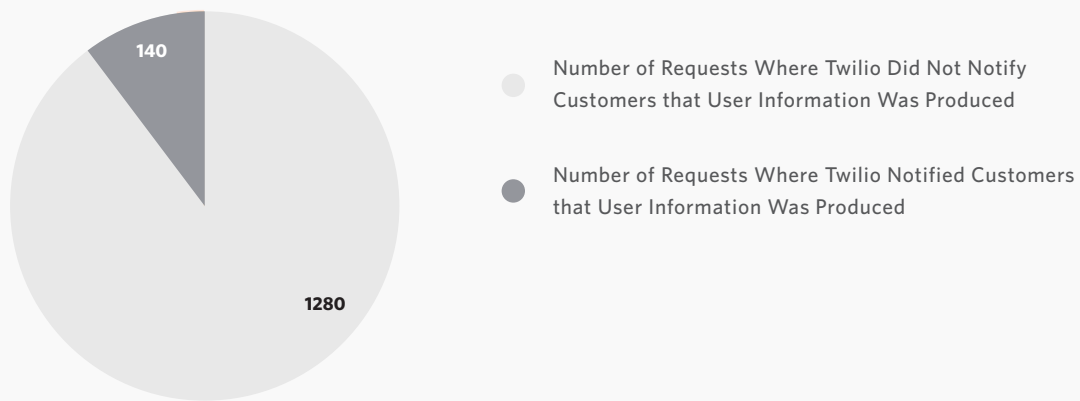
## What notifications of government requests for user information did Twilio send to affected customers?

In accordance with Twilio’s Privacy Policy, Twilio notifies customers of compliance with a government request 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 second half of 2018, Twilio responded to 1420 government requests for user information and notified the impacted customers of 140 of those requests.

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



Notifications by Government Type Second Half of 2018 (July 1 - December 6)	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
<b>Total Worldwide</b>	<b>1280</b>	<b>140</b>

See additional information in Endnote 11.



## Endnotes

### Twilio Transparency Report

1. Starting with this Transparency Report for the Second Half of 2018, 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 requested or required 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 user name, email address, company name or company contact information, where available.

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, 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 Second 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.

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 407 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.