

## TWILIO TRANSPARENCY REPORT *December 7, 2018 - June 30, 2019*

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 ninth transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the first six months of 2019. 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 2019, Twilio received 1959 government requests for user information from government agencies in 19 countries. Twilio responded to 1533 of these requests and notified our customers of 170 of these requests.

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

In the first half of 2019, Twilio received 1959 government requests for user information across 566 Twilio customer accounts.

Of the 1959 requests received, 542 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 708, Germany 452, the United Kingdom 80, and Canada 60.

*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 2019 (December 7 - June 30)	Federal - US	State - US	Local - US	International	Total
Civil Investigative Demand	3	22	0	0	25
Court Order	42	72	0	0	114
Grand Jury Subpoena	42	34	0	0	76
Subpoena	127	112	6	0	245
Functionality Disablement	0	0	2	95	97
Search Warrant	4	15	0	29	48
Police Force Order (International)	0	0	0	674	674
RIPA (United Kingdom)	0	0	0	70	70
Production Order (Canada)	0	0	0	13	13
GIC (France)	0	0	0	469	469
BNetzA (Germany)	0	0	0	30	30
<b>Other</b>	14	8	13	63	98
<b>All Requests</b>	<b>232</b>	<b>263</b>	<b>21</b>	<b>1443</b>	<b>1959</b>

See additional information in Endnote 2 - 5.

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

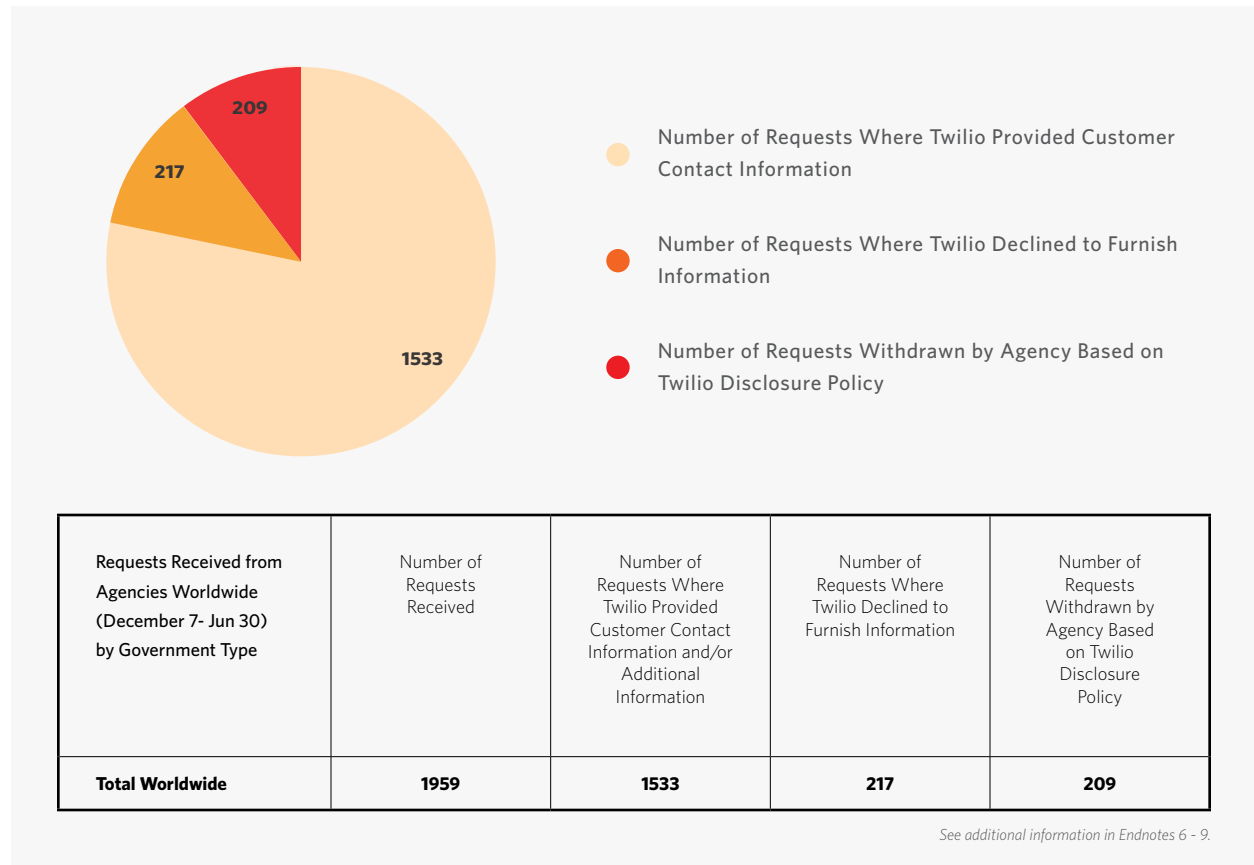
Requests Received from Agencies Worldwide First Half of 2019 (December 7- Jun 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
<b>Total Worldwide</b>	<b>1959</b>	<b>1533</b>

Requests Received from Agencies Worldwide First Half of 2019 (December 7- Jun 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Argentina	5	4
Brazil	1	1
Canada	60	45
Mexico	0	0
United States	543	309
<b>Total Americas</b>	<b>609</b>	<b>359</b>

Requests Received from Agencies Worldwide First Half of 2019 (December 7- Jun 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Australia	13	2
Hong Kong	0	0
India	2	2
Japan	25	13
Korea	0	0
Malaysia	0	0
New Zealand	0	0
Singapore	0	0
Taiwan	0	0
<b>Total APAC</b>	<b>40</b>	<b>17</b>

Requests Received from Agencies Worldwide First Half of 2019 (December 7- Jun 30)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information
Austria	1	1
Belgium	8	8
Cyprus	0	0
Czech Republic	1	1
Denmark	0	0
Finland	0	0
France	708	652
Germany	452	404
Greece	2	2
Ireland	0	0
Israel	0	0
Italy	18	16
Jordan	0	0
Latvia	1	1
Luxembourg	0	0
Morocco	0	0
Netherlands	3	1
Poland	0	0
Portugal	0	0
Romania	0	0
Russia	0	0
Slovenia	0	0
Spain	4	4
Sweden	2	0
Switzerland	28	26
Turkey	0	0
United Arab Emirates	0	0
United Kingdom	80	39
Norway	2	2
<b>Total EMEA</b>	<b>1310</b>	<b>1157</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 2019, Twilio responded to 1533 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
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

*See additional information in Endnote 10.*

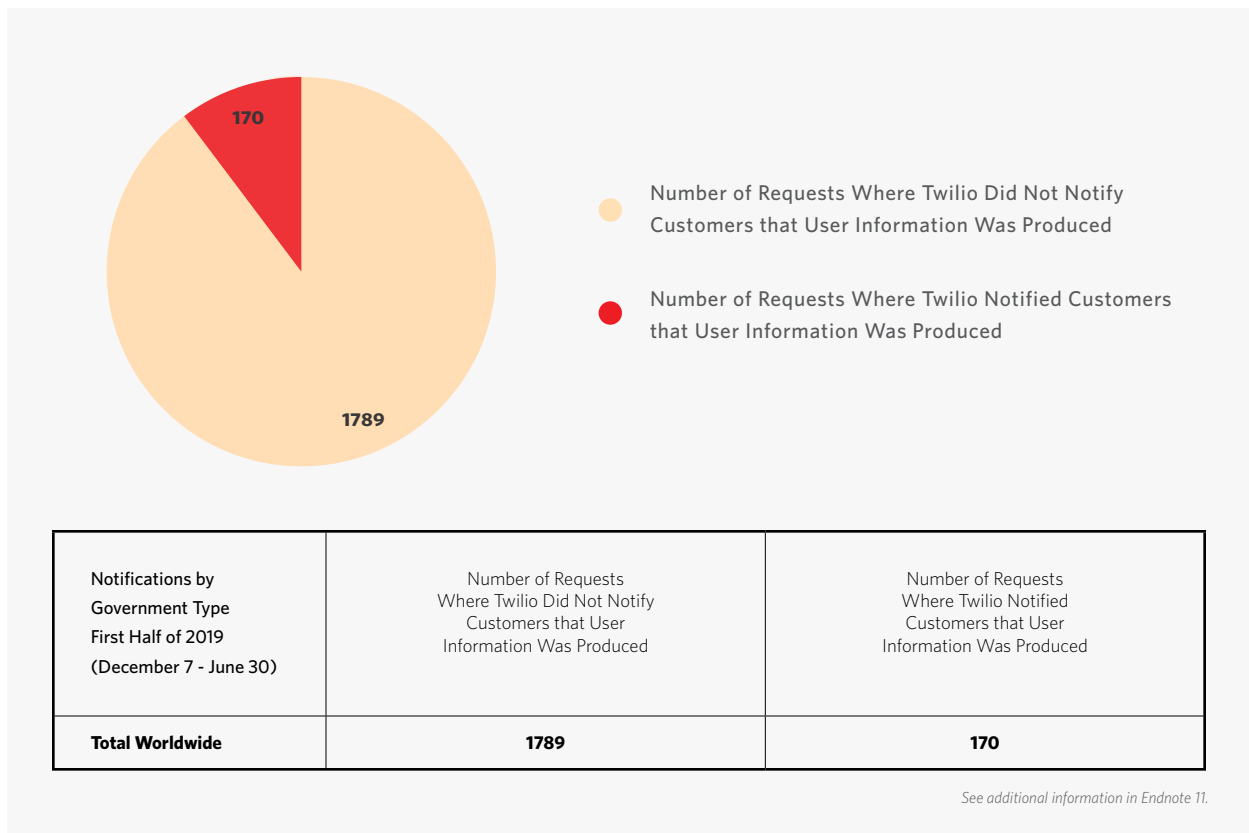
## What notifications of government requests for user information did Twilio send to affected customers?

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 first half of 2019, Twilio responded to 1959 government requests for user information and notified the impacted customers of 170 of those requests.

### 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 2019, 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.

#### 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, 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 2019, Twilio did 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 566 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 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](#).