

TWILIO TRANSPARENCY REPORT *July 1, 2020 - December 31, 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 twelfth transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the last 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 second half of 2020, Twilio received 1910 government requests for user information from government agencies in 26 countries. Twilio responded to 1501 of these requests and notified our customers of 196 of these requests.

What government requests for user information did Twilio receive?

In the second half of 2020, Twilio received 1910 government requests for user information across 657 Twilio customer accounts.

Of the 1910 requests received, 677 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 633, Germany 263, Japan 106, the United Kingdom 67, and Canada 31.

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 Second Half of 2020 (July 1 -December 31) | Federal - US | State - US | Local - US | International | Total |
|---|--------------|------------|------------|---------------|-------------|
| Civil Investigative Demand | 2 | 10 | 0 | 0 | 12 |
| Court Order | 18 | 64 | 0 | 11 | 93 |
| Grand Jury Subpoena | 106 | 51 | 0 | 0 | 157 |
| Subpoena | 152 | 130 | 6 | 2 | 290 |
| Functionality Disablement | 0 | 0 | 4 | 11 | 15 |
| Search Warrant | 3 | 48 | 0 | 3 | 54 |
| Police Force Order (International) | 0 | 0 | 1 | 565 | 566 |
| RIPA (United Kingdom) | 0 | 0 | 0 | 57 | 57 |
| Production Order (Canada) | 0 | 0 | 0 | 10 | 10 |
| GIC (France) | 0 | 0 | 0 | 470 | 470 |
| BNetzA (Germany) | 0 | 0 | 0 | 13 | 13 |
| Other | 31 | 9 | 42 | 91 | 173 |
| All Requests | 312 | 312 | 53 | 1233 | 1910 |

See additional information in Endnote 2 - 5.

Which countries issued government requests for information to Twilio?

| Requests Received from Agencies Worldwide Second Half of 2020 (July 1 -December 31) | Number of Requests Received | Number of Requests Where Twilio Provided Customer Contact Information |
|---|-----------------------------|---|
| Total Worldwide | 1910 | 1501 |

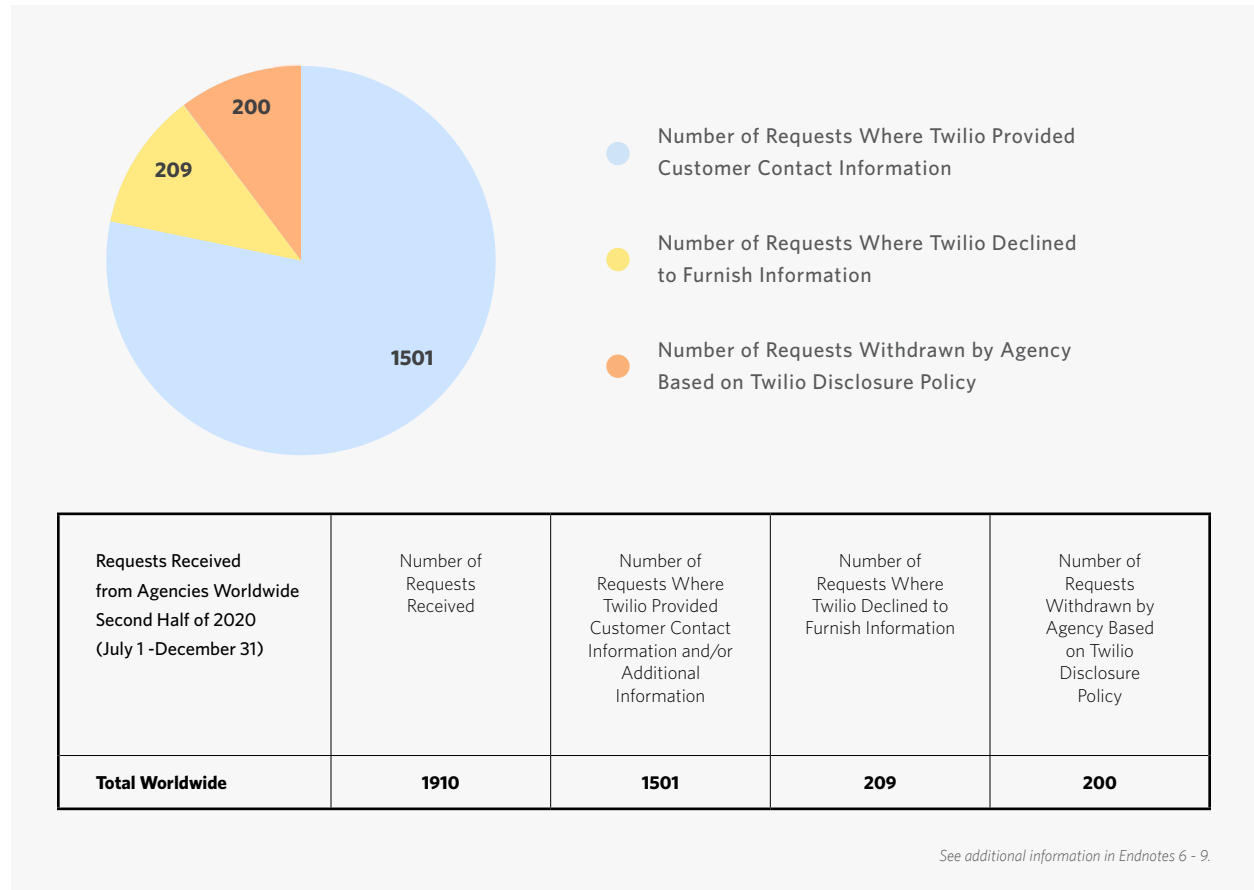
| Requests Received from Agencies Worldwide Second Half of 2020 (July 1 -December 31) | Number of Requests Received | Number of Requests Where Twilio Provided Customer Contact Information |
|---|-----------------------------|---|
| Argentina | 0 | 0 |
| Brazil | 1 | 0 |
| Canada | 31 | 19 |
| Mexico | 1 | 0 |
| United States | 677 | 437 |
| Total Americans | 710 | 456 |

| Requests Received from Agencies Worldwide Second Half of 2020 (July 1 -December 31) | Number of Requests Received | Number of Requests Where Twilio Provided Customer Contact Information |
|---|-----------------------------|---|
| Australia | 22 | 1 |
| Hong Kong | 0 | 0 |
| India | 6 | 4 |
| Japan | 106 | 96 |
| Korea | 0 | 0 |
| Malaysia | 0 | 0 |
| New Zealand | 0 | 0 |
| Singapore | 14 | 14 |
| China | 0 | 0 |
| Taiwan | 1 | 1 |
| Total APAC | 149 | 116 |

| Requests Received from Agencies Worldwide Second Half of 2020 (July 1 -December 31) | Number of Requests Received | Number of Requests Where Twilio Provided Customer Contact Information |
|---|-----------------------------|---|
| Austria | 1 | 0 |
| Belgium | 49 | 22 |
| Cyprus | 0 | 0 |
| Czech Republic | 0 | 0 |
| Denmark | 0 | 0 |
| Finland | 0 | 0 |
| France | 633 | 591 |
| Germany | 263 | 251 |
| Greece | 0 | 0 |
| Estonia | 0 | 0 |
| Iceland | 2 | 1 |
| Ireland | 0 | 0 |
| Israel | 0 | 0 |
| Hungary | 1 | 0 |
| Italy | 4 | 3 |
| Jordan | 0 | 0 |
| Latvia | 0 | 0 |
| Luxembourg | 0 | 0 |
| Morocco | 0 | 0 |
| Netherlands | 2 | 1 |
| Poland | 2 | 1 |
| Portugal | 0 | 0 |
| Romania | 2 | 1 |
| Russia | 0 | 0 |
| Slovenia | 0 | 0 |
| Spain | 5 | 2 |

| | | |
|----------------------|-------------|------------|
| Sweden | 1 | 1 |
| Switzerland | 16 | 14 |
| Turkey | 0 | 0 |
| United Arab Emirates | 1 | 1 |
| Ukraine | 1 | 0 |
| United Kingdom | 67 | 40 |
| Norway | 1 | 0 |
| Total EMEA | 1051 | 929 |

Number of Government Requests Received Worldwide and How Twilio Responded



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

In the second half of 2020, Twilio responded to 1501 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 |
| 2020 - Second Half | 0-999 | 0-999 |

See additional information in Endnote 10.

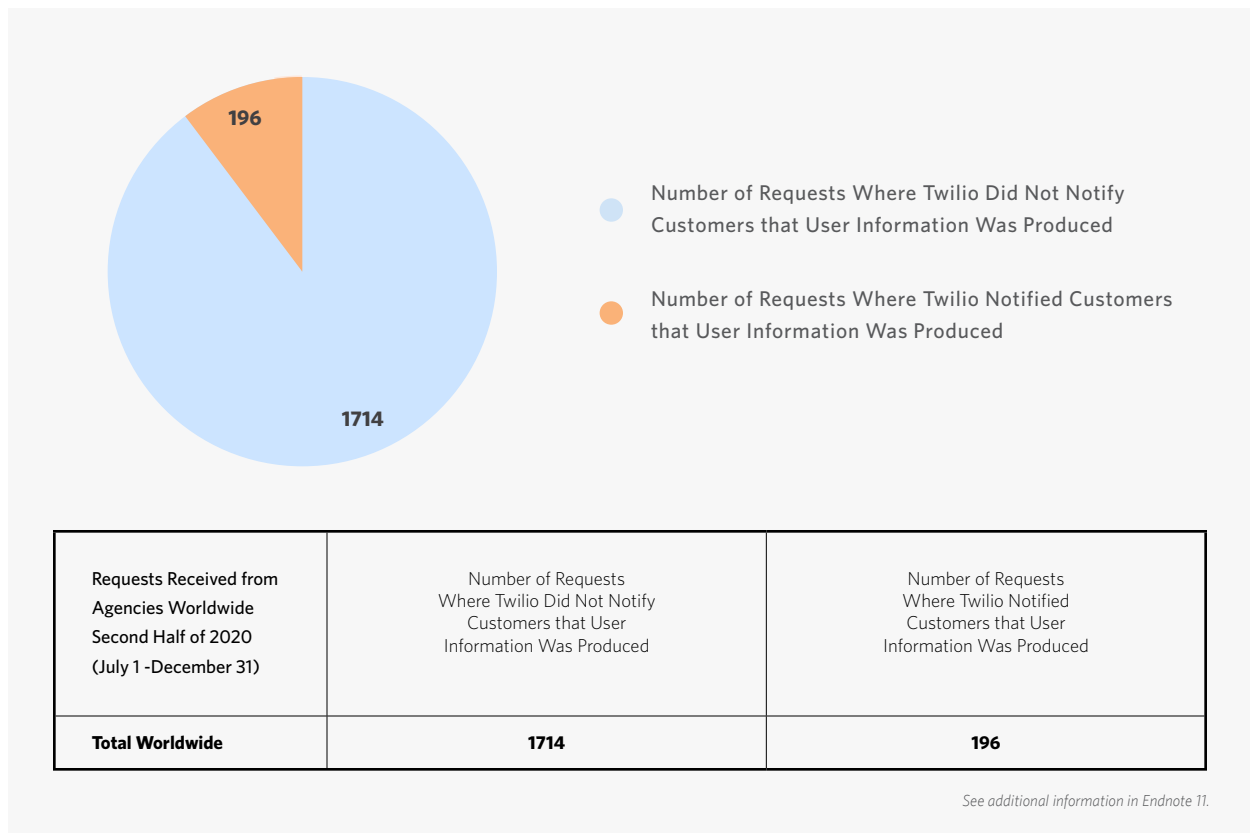
What notifications of government requests for user information did Twilio send to affected customers?

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 second half of 2020, Twilio received 1910 government requests for user information and notified the impacted customers of 196 of those requests.

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



SendGrid government requests for User Information

In February 2019, to further accelerate its vision of creating one platform for all channels, Twilio acquired SendGrid, the leading cloud API for email.

Therefore, among the 1910 requests for user information received in the second half of 2020, 41 concerned SendGrid accounts.

In the second half of 2020, Twilio received 41 SendGrid government requests for user information from government agencies in 7 countries.

| SendGrid Requests Received from Agencies Worldwide Second Half of 2020 (July 1 -December 31) | Number of SendGrid Requests Received | Number of SendGrid Requests Where Twilio Provided Customer Contact Information and/or Additional Information | Number of SendGrid Requests Where Twilio Declined to Furnish Information | Number of SendGrid Requests Withdrawn by Agency Based on Twilio Disclosure Policy |
|--|--------------------------------------|--|--|---|
| Total Worldwide | 41 | 24 | 17 | 0 |

Twilio responded to 24 of these requests and notified our customers of 2 of these requests.

| SendGrid Requests Received from Agencies Worldwide Second Half of 2020 (July 1 -December 31) | Number of SendGrid Requests Where Twilio Did Not Notify Customers that User Information Was Produced | Number of SendGrid Requests Where Twilio Notified Customers that User Information Was Produced |
|--|--|--|
| Total Worldwide | 39 | 2 |

Endnotes

Twilio Transparency Report

1. Starting with this Transparency Report for the second 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.

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.

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.

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 second half of 2020, Twilio furnished 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 all published transparency reports 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 657 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](#).