

TWILIO TRANSPARENCY REPORT January 1, 2017 - June 30, 2017

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 fifth transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the first six months of 2017. 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 first half of 2017, Twilio received 1169 government requests for user information compared to 268 requests in the first half of 2015. Twilio's historical transparency reports can be found at https://www.twil-io.com/legal/transparency.

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.

What government requests for user information did Twilio receive?

In the first half of 2017, Twilio received 1169 government requests for user information across 363 Twilio customer accounts.

Of the 1169 requests received, 389 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 (325), Germany (263) and the United Kingdom (92).





Requests Received from Agencies Worldwide First Half of 2017 (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and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based or Twilio Disclosure Policy
Total Worldwide	1169	471	385	260	53

Requests Received from Agencies in the Americas Region First Half of 2017 (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
Canada	37	9	0	26	2
Mexico	0	0	0	0	0
United States	389	199	12	136	42
Total Americas	426	208	12	162	44

Requests Received from Agencies in the APAC Region First Half of 2017 (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	8	1	2	4	1
Hong Kong	0	0	0	0	0
India	0	0	0	0	0
Japan	4	1	0	3	0
Malaysia	1	1	0	0	0
New Zealand	3	1	0	2	0
Singapore	1	0	1	0	0
Taiwan	1	1	0	0	0
Total APAC	18	5	3	9	1





Latvia Luxembourg Poland Portugal	0 2 5 0	0 1 2 0	0 0 0	0 1 3 0	0 0 0
Israel Italy	0 10	0 4	0	0	0
Greece	2	2	0	0	0
France Germany	325 263	75	187	5	0
Finland	0	0	0	0	0
Cyprus Czech Republic	6	0	1	0	0
Belgium	6	0	0	6	0
Requests Received from Agencies in the EMEA Region First Half of 2017 (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 or Twilio Disclosure Policy 0

Footnotes

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

* 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 began receiving and responding to requests from France's Groupement Interministériel de Contrôle in 2017, and these requests will be included in the Twilio transparency report moving forward.







Requests Received from Number of Number of Number of Number of Number of Requests Where Requests Where Requests Requests Where Reauests Agencies Worldwide Twilio Provided Twilio Provided Twilio Declined to Received Withdrawn by First Half of 2017 Customer Customer Furnish Agency Based on (January 1 - June 30) Contact Contact Information Twilio Disclosure Information Only Information and Policy by Government Type Additional Information Federal - US 57 34 166 6 69 State - US 5 160 108 41 6 Local - US 34 1 26 2 63 International 780 272 373 124 11 Total 1169 471 385 260 53

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, subpeena, court order or administrative order.

In the first half of 2017, 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 or IP address registration associated with a phone number (382); Number utilization such as when a number was added to an account (199); Transmittal records such as call logs or text message logs including sender, recipient and time stamp (S). Twilio furnished no message body content (O) or call recordings (O) during the first half of 2017. * "Twilio Declined to Furnish" means Twilio did not provide Customer Contact Information or Additional Information. This could be due to insufficient documentation, concerns

* "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 first half of 2017, Twilio received requests from the following federal agencies, followed by the number of requests in parentheses: Department of Treasury (2); Department of Justice: Federal Bureau of Investigation (55), Drug Enforcement Agency (33), Bureau of Alcohol, Tobacco, Firearms and Explosives (4), Office of the Inspector General (2) and US Marshals Service (2); Federal Communications Commission (2); Federal Trade Commission (5); Securities and Explosives (3), and US District Courts (22).





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

In the first half of 2017, Twilio responded to 856 requests for user information from government agencies.

All Requests	63	113	35	645	856
Other: Legal Submission	2	4	4	5	15
GIC (France)	0	0	0	187	187
Production Order (Canada)	0	0	0	2	2
RIPA (UK)	0	0	0	31	31
Police Force Order (Intl)	0	0	0	416	416
Search Warrant	1	11	8	0	20
Functionality Disablement	0	0	0	1	1
Subpoena	12	43	16	1	72
Grand Jury Subpoena	15	9	1	0	25
Court Order	28	32	6	2	68
Civil Investigative Demand	5	14	0	0	19
Responses to Government Requests by Request Type First Half of 2017 (January 1 - June 30)	Federal - US	State - US	Local - US	International	Total

* "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 25 exigent requests in the first half of 2017, and 16 agencies ultimately produced a court order, subpoena or search

* "Police Force Order" refers to an international government or law enforcement agency making a direct requests in Canada, federal police requests. In certain countries we have distinguished the format of requests in Canada, federal police requests and be used in the form of Production of the label. Orders, in the United Kingdom, Regulatory of Investigatory Powers Act of 2000 (RIPA), in Germany police force orders and in France, Groupement Interministériel de Contrôle (GIC) requests.





Twilio's Comment on National Security Letters

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

Companies are broadly 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 January 1, 2017 through June 30, 2017.

Twilio is encouraged that in accordance with the USA Freedom Act of 2015, the Department of Justice notified some companies that the nondisclosure order on National Security Letters expired, and accordingly, these companies published the letters and retroactively restated the ranges of the National Security Letters they received to positively indicate they received requests over a set time period. Twilio is encouraged by this effort to increase transparency and encourages the new Department of Justice leadership to maintain this practice.

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.

Twilio believes that judicial review provides necessary oversight. Should Twilio receive 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.



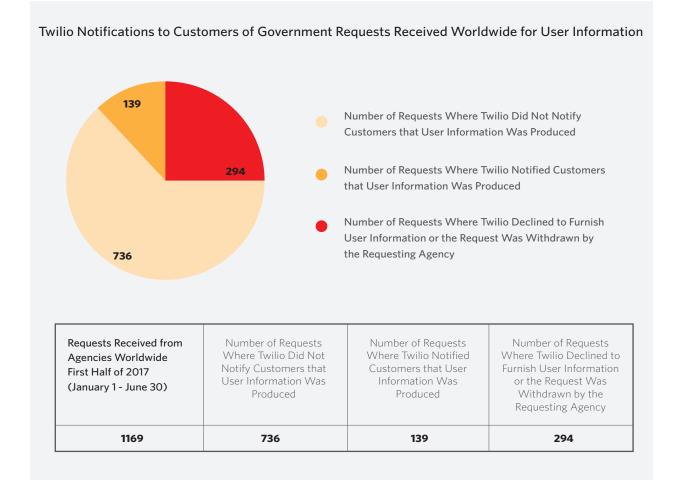


What notifications of government requests for user information did Twilio send to affected customers?

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 and 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 2017, Twilio responded to 875 government requests for user information and notified the impacted customers of 139 of those requests.







Requests Received from Agencies in the Americas Region First Half of 2017 (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	8	5	24
Mexico	0	0	0
United States	168	54	167
Total Americas	176	59	191

Requests Received from Agencies in the APAC Region First Half of 2017 (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
Australia	2	1	5
Hong Kong	0	0	0
India	0	0	0
Japan	1	0	3
Malaysia	1	0	0
New Zealand	1	0	2
Singapore	1	0	0
Taiwan	1	0	0
Total APAC	7	1	10



Requests Received from Agencies in the EMEA Region First Half of 2017 (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
Austria	1	1	0
Belgium	0	0	6
Cyprus	1	0	0
Czech Republic	5	0	1
Finland	0	0	0
France	267	52	6
Germany	246	1	16
Greece	1	1	0
Ireland	0	0	1
Israel	0	0	0
Italy	8	0	2
Latvia	0	0	0
Luxembourg	0	1	1
Poland	2	0	3
Portugal	0	0	0
Spain	0	1	0
Sweden	1	0	2
Switzerland	3	0	1
Turkey	2	0	0
United Kingdom	16	22	54
Total EMEA	553	79	93

Footnotes: * The percentage of requests where Twilio notified a customer decreased from 20% to 12% between the Second Half of 2016 and the First Half of 2017 Transparency Reports. Twilio attributes this reduction two two factors: 1) an increase in international requests where disclosure is prohibited by regulation and 2) an increase in the number of agencies who submitted a nondisclosure demand after being notified of Twilio's privacy policy.





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 363 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.