

TWILIO TRANSPARENCY REPORT *July 1, 2017 - December 31, 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 sixth transparency report detailing requests for customer information by municipal, state, provincial and federal governments globally for the last 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 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 2017, Twilio received 1581 government requests for user information from government agencies in 24 countries.

What government requests for user information did Twilio receive?

In the second half of 2017, Twilio received 1581 government requests for user information across 308 Twilio customer accounts.

Of the 1581 requests received, 340 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 (859), Germany (187) and the United Kingdom (65).

Requests Received from Agencies Worldwide Second Half of 2017 (July 1 - December 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and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Total Worldwide	1581	1274	171	98	38

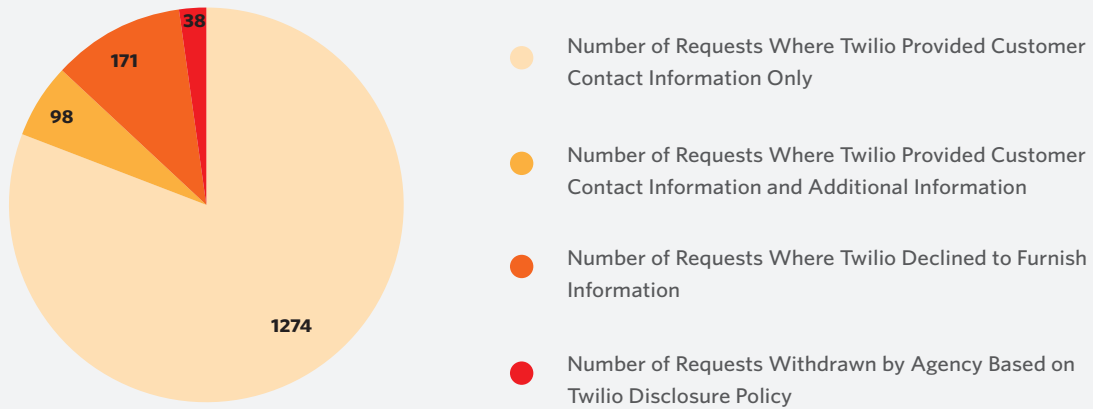
Requests Received from Agencies in the Americas Region Second Half of 2017 (July 1 - December 31)	Number of Requests Received	Number of Requests Where Twilio Provided Customer Contact Information Only	Number of Requests Where Twilio Provided Customer Contact Information and Additional Information	Number of Requests Where Twilio Declined to Furnish Information	Number of Requests Withdrawn by Agency Based on Twilio Disclosure Policy
Brazil	1	1	0	0	0
Canada	21	7	0	13	1
Mexico	0	0	0	0	0
United States	340	220	9	88	23
Total Americas	362	228	9	101	24

Requests Received from Agencies in the APAC Region Second Half of 2017 (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	9	7	0	2	0
Hong Kong	0	0	0	0	0
India	2	1	1	0	0
Japan	7	0	1	6	0
Malaysia	1	0	0	1	0
New Zealand	0	0	0	0	0
Singapore	1	0	1	0	0
Taiwan	2	1	0	1	0
Total APAC	22	9	3	10	0

Requests Received from Agencies in the EMEA Region Second Half of 2017 (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	1	0	0	0
Belgium	17	10	0	7	0
Cyprus	0	0	0	0	0
Czech Republic	3	2	0	1	0
Finland	1	1	0	0	0
France	859	836	2	21	0
Germany	187	110	74	3	0
Greece	0	0	0	0	0
Ireland	0	0	0	0	0
Israel	0	0	0	0	0
Italy	5	3	0	2	0
Latvia	0	0	0	0	0
Luxembourg	0	0	0	0	0
Netherlands	1	1	0	0	0
Poland	24	17	4	3	0
Portugal	0	0	0	0	0
Romania	2	1	0	1	0
Slovenia	1	1	0	0	0
Spain	3	1	2	0	0
Sweden	0	0	0	0	0
Switzerland	26	21	4	1	0
Turkey	0	0	0	0	0
United Arab Emirates	2	2	0	0	0
United Kingdom	65	30	0	21	14
Total EMEA	1197	1037	86	60	14

See additional information in Endnotes 1 - 3.

Number of Government Requests Received Worldwide and How Twilio Responded



Requests Received from Agencies Worldwide Second Half of 2017 (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	152	82	8	46	16
State - US	146	111	1	29	5
Local - US	42	27	0	13	2
International	1241	1054	89	83	15
Total Worldwide	1581	1274	98	171	38

See additional information in Endnotes 4 - 8.

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

In the second half of 2017, Twilio responded to 1373 requests for user information from government agencies.

Responses to Government Requests by Request Type Second Half of 2017 (July 1 - December 31)	Federal - US	State - US	Local - US	International	Total
Civil Investigative Demand	1	8	0	0	9
Court Order	37	21	0	0	58
Grand Jury Subpoena	16	11	0	0	27
Subpoena	32	50	20	0	102
Functionality Disablement	0	0	0	0	0
Search Warrant	2	17	1	0	20
Police Force Order (Intl)	0	0	0	361	361
RIPA (UK)	0	0	0	27	27
Production Order (Canada)	0	0	0	6	6
GIC (France)	0	0	0	736	736
BNetzA (Germany)	0	0	0	8	8
Other: Legal Submission	2	5	6	6	19
All Requests	90	112	27	1144	1373

See additional information in Endnotes 9 - 11.

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.

Therefore, Twilio indicates receiving between 2 and 999 National Security Letters in the time range of July 1, 2017 through December 31, 2017.

Twilio has made copies of the requests and release letters from the Department of Justice available on the Twilio website. 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.

The two National Security Letters referenced above are included in the overall metrics of the transparency report for the second half of 2017. 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	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

See additional information in Endnote 12.

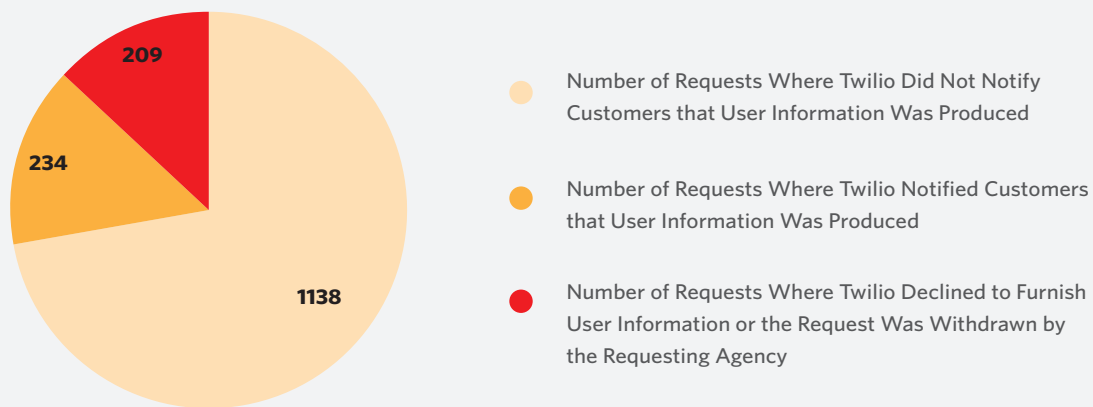
What notifications of government requests for user information did Twilio send to affected customers?

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 2017, Twilio responded to 1373 government requests for user information and notified the impacted customers of 234 of those requests.

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



Notifications by Government Type Second Half of 2017 (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
Federal - US	73	17	62
State - US	65	47	34
Local - US	5	22	15
International	995	148	98
Total Worldwide	1138	234	209

Notifications by Selected Countries Second Half of 2017 (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	2	14
France	90	748	21
Germany	2	182	3
United Kingdom	20	10	35
United States	86	143	111

See additional information in Endnote 13.

Endnotes

What government requests for user information did Twilio receive?

1. 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.
2. Twilio began receiving and responding to requests from France's Groupement Interministériel de Contrôle in 2017. In the second half of 2017, the majority of all government requests for information that Twilio received were issued by French agencies.
3. 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 received no (0) MLAT requests in the second half of 2017.

Number of Government Requests Received Worldwide and How Twilio Responded

4. "Customer Contact Information" includes information such as a Twilio customer's user name, email address, company name or company contact information, where available.
5. "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. In the second half of 2017, Twilio furnished transmittal records such as call logs or text message logs including sender, recipient and time stamp (1). Twilio furnished no message body content (0) or call recordings (0) during the second half of 2017. Twilio provided phone number creation date, address on file, and/or payment information for the other requests where Twilio provided "Additional Information" (97).
6. "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.
7. "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.
- 8) "Federal - US" includes all United States federal agencies. In the second half of 2017, Twilio received requests from the following federal agencies, followed by the number of requests in parentheses: Department of Defense: U.S. Army Criminal Investigation Command (1); Department of Homeland Security: U.S. Immigration and Customs Enforcement (24); Department of Justice: Federal Bureau of Investigation (57), Drug Enforcement Agency (37), Bureau of Alcohol, Tobacco, Firearms and Explosives (5), Office of the Inspector General (1); Health and Human Services: Office of the Inspector General (1); US Marshals Service (1); Federal Communications Commission (2); Federal Trade Commission (2); Internal Revenue Service (1); and US District Courts (29).

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

9. "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 36 exigent requests in the second half of 2017, and 21 agencies ultimately produced a court order, subpoena or search warrant in response to the request.
10. "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". In the second half of 2017, Twilio received 11 disablement requests affecting 7 customer accounts.

11. "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.

Twilio's Comment on National Security Letters

12. 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

13. In previous transparency reports Twilio reported the notification rates for each country. Moving forward, Twilio will instead highlight notable countries or those with the highest volume of requests, while continuing 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 308 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.