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**Colin Crowell**

Vice President, Public Policy,  
Government & Philanthropy

**Twitter, Inc.**

1355 Market St #900  
San Francisco, CA 94103

(000) 000-0000

name@twitter.com

@yourhandle

Mr. Peter Micek  
General Counsel  
Access Now  
P.O. Box 20429  
Greeley Square Station  
4 East 27th Street  
New York, NY 10001-9998

Dear Mr. Micek,

Thank you for your inquiry relating to Twitter's 2019 Ranking Digital Rights Corporate Accountability Index results. We welcome the chance to reflect on the progress we have made, as well as opportunities to deepen our commitment to transparency and human rights.

As you note, we have improved our disclosures about how we respond to government requests to restrict content or accounts and how we conduct due diligence on such requests. We continue our longstanding commitment to [meaningful transparency](#) through the expansion of our biannual [Twitter Transparency Report](#), which provides broad insights into content moderation, legal requests, and a number of other relevant initiatives. Our most recent report detailed that we have seen a 67% increase in the number of legal demands from governments compared to the previous six months, along with details of our proactive efforts to protect users, with over 50% of Tweets now actioned for abuse proactively surfaced by Twitter.

We continue to provide relevant requests to [Lumen](#) to enable the public, including citizens of affected countries, journalists and news media organizations, and public interest advocates, to understand the nature of the requests we receive, as well as notice directly to users, where legally permissible.

Starting in October 2018 and continuing this year, Twitter stands alone as the only major social media platform to disclose direct data on [information operations](#). We have shared [the largest archive](#) of potentially state-backed information operations to empower independent research and analysis of these threats.

With regard to human rights impact assessments, a number of processes are already in place that directly and indirectly examine the human rights risks to our users. For example, Twitter's [approach](#) to content policy development and [enforcement](#) factors in potential impacts on human rights, with harm to physical safety, privacy, and freedom of expression being among the most salient to our platform. As part of this process, we evaluate the risks to our users before launching a new policy, as well as how our policies could be exploited by bad actors.

We also examine products for their impact on user trust before launch. We assess the implications for privacy, user control, transparency, and freedom of expression, and propose mitigation strategies to address risks to users. We continue to deepen this work and will share further details in future Ranking Digital Rights assessments.

We deeply value our partnership with Access Now on supporting activists and human rights defenders around the world, both on public policy issues and the requests for assistance dealt with by the Access Now Helpline.

In 2019, we bolstered our staffing to augment resources put toward external engagements with human rights activists and organizations with additional Twitter personnel on our Public Policy team in offices internationally with both legal and civil society human rights experience, enhanced Twitter participation at human rights conferences and convenings globally—including at RightsCon in Tunis—and we have hired a Director on our Legal team focused exclusively on human rights at our San Francisco HQ. This Legal Director will be working to deepen our internal human rights assessment work, and this expanded activity will be reflected in future Ranking Digital Rights assessments.

We have also sought to open up our policy development process to [public comment](#), beginning with our [dehumanisation policy](#) in 2018. This month, published our proposed policy for [synthetic and manipulated media](#) for feedback and we would welcome your input.

Finally, Twitter has a robust global privacy program designed to ensure that teams are keeping [privacy and data protection](#) at the core of how they work. For example, products and processes go through a privacy review to determine if an impact assessment is required, including targeting advertising and machine learning systems that process new data. The privacy review is a holistic assessment of the product or process, including an assessment of the data being used, how it is used, where it is stored, how long it is kept for, if it is shared, and how the product or process may impact people when they use it. Where a product or process requires a more detailed impact assessment, a variety of stakeholders are involved to ensure that the product or process meets out standards for ensuring the privacy and the protection of the data of the people that use our services. Additionally, we have an Office of Data Protection that operates independently and works to ensure Twitter is complying with applicable privacy and data protection regulations.

Defending and respecting the rights of people using our service is one of our core values and we appreciate engagement and feedback from the human rights community. We look forward to sharing further updates as we continue to evolve our approach to transparency, human rights risk management, and how we support the use of our platform by human rights defenders globally.

Sincerely,



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