

TWITTER, INC.

● Internet and Mobile

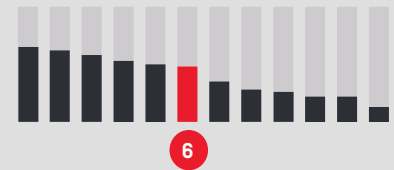
Key Findings:

- Twitter lagged behind most other U.S. companies in disclosing how it has institutionalized its commitments to respect freedom of expression and privacy across its global operations.
- Twitter's flagship social networking service led the field for its disclosure of government and private requests it receives to restrict content and accounts.
- It was unclear if Twitter's policies applied to other services operated by the company, such as Vine and Periscope, bringing down Twitter's overall score.

OVERALL SCORE

48%

INTERNET AND MOBILE RANK



SERVICES EVALUATED

- **Twitter** [Social network]
- **Vine** [Video sharing]
- **Periscope** [Live video streaming]

ANALYSIS

Twitter ranked sixth out of 12 internet and mobile companies and sixth in the Index overall.¹ This year's evaluation included Vine, since the service was included in the 2015 Index and was active during the Index research period, although Vine was discontinued in January 2017. The video streaming mobile app, Periscope, was included for the first time in the 2017 Index. As was the case in 2015, Twitter lacked clear public commitments or disclosed policies for implementing their commitments to respect freedom of expression across its global operations. It was also unclear in many instances if various policies that applied to Twitter's flagship social media service also extended to the Vine and Periscope services. Twitter's overall score in the Index would be substantially higher if the company had disclosed more detailed information on whether or not policies that apply to the flagship Twitter platform also apply to other services.

About Twitter, Inc.

Twitter, Inc. operates as a global social sharing platform. Its products and services allow users to create, share, and find content and short looping and livestreamed videos. Alongside these social services, Twitter provides advertising services and developer tools.

Market Cap: USD 11,052 million²

NYSE: TWTR

Domicile: United States

Website: www.twitter.com

¹ For Twitter's performance in the 2015 Index, see: <https://rankingdigitalrights.org/index2015/companies/twitter>.

² S&P Capital IQ, Accessed February 13, 2017.

³ "Twitter for Good | About," <https://about.twitter.com/company/twitter-for-good>; "The Twitter Rules," <https://help.twitter.com/articles/18311?lang=en>; "The Tweets Must Flow," <https://blog.twitter.com/2011/the-tweets-must-flow>.



GOVERNANCE 30%

Twitter received the 10th highest score out of the 22 companies in the Index in the Governance category, scoring lower than most U.S. companies. While company blog posts and support pages referenced the company's positions on users' rights to freedom of expression and privacy,³ these fell short of the type of explicit policy commitment made by many of its peers (G1). Also unlike many of its peers, Twitter offers no publicly accessible evidence of how its policy positions and commitments related to freedom of expression and privacy have been institutionalized through governance and accountability mechanisms across the company. For

example, there was no indication of whether Twitter conducts human rights due diligence to identify how aspects of its business may affect freedom of expression and privacy (G4). While Twitter disclosed that it regularly engages with a range of stakeholders on freedom of expression and privacy issues (G5), it is not a member of a multi-stakeholder initiative such as the Global Network Initiative (GNI) whose members not only make commitments but also undergo independent assessment to verify whether they have implemented and institutionalized these principles.



FREEDOM OF EXPRESSION 49%

Twitter ranked fourth out of the 12 internet and mobile companies in the Freedom of Expression category, behind Google, Kakao, and Microsoft.

Content and account restrictions: Twitter provided some disclosure on its process for terms of service enforcement, though it did not indicate if government or private entities receive priority consideration when flagging content for potentially violating the company's rules (F3). Twitter was one of only three companies, including Microsoft and Google, to disclose any data about its terms of service enforcement, reporting the number of accounts it restricted due to terrorist content (F4).⁴ But it did not report on other types of content that it removed for violating the company's rules.

Content and account restriction requests: Twitter disclosed less than Google, Yahoo, Kakao, Facebook, and Microsoft

about how it handles government and private requests to restrict content or accounts (F5-F7). Its processes for responding to such requests were not clear or consistent across the services evaluated (F5). Twitter provided detailed data about requests it received and complied with, though it did not specify if Periscope and Vine were also included (F6).⁵ Twitter's data on requests from private third parties were limited to copyright and trademark violations, though they included Twitter, Vine, and Periscope; Twitter received the second-highest score on this indicator (F7).

Identity policy: Twitter and Microsoft were the only two internet and mobile companies to receive full credit for disclosing that they do not require users to verify their identity with a government-issued ID or other information tied to their offline identity (F11).



PRIVACY 53%

Twitter tied with Kakao for fourth place among internet and mobile companies in the Privacy category, behind Google, Microsoft, and Yahoo.

Handling of user information: Twitter received the highest score of all companies evaluated for this set of indicators (P3-P9). The company clearly disclosed what types of user information it collects (P3) but offered less comprehensive disclosure about what types of user information it shares and with whom (P4). It disclosed more than any other company about how long it retains user information (P6).

Requests for user information: Twitter received the second-highest score on this set of indicators, tying with Google

and behind Microsoft (P10-P11). Twitter clearly disclosed its process for responding to government requests for user information but not for private requests (P10). It topped all internet and mobile companies for its transparency reporting on government and private requests it receives to hand over user information (P11).

Security: Twitter provided little information about its security policies, scoring higher only than Baidu and Tencent on these indicators (P13-P18). Like most companies, it failed to disclose any information about how it responds to data breaches (P15). It had one of the lowest scores for its lack of clear disclosure about whether it encrypts user communications and private content (P16).

⁴"Combating Violent Extremism," <https://blog.twitter.com/2016/combating-violent-extremism>.; "An Update on Our Efforts to Combat Violent Extremism," <https://blog.twitter.com/2016/an-update-on-our-efforts-to-combat-violent-extremism>.

⁵"Removal Requests," Twitter Transparency Report, <https://transparency.twitter.com/en/removal-requests.html>.