

Twitter, Inc.

SERVICES EVALUATED

- Twitter [Social networking & blog]
- Periscope [Video & photo sharing]

Key Findings:

- Twitter disclosed less than most of its U.S. peers about policies affecting users' privacy, but disclosed more about policies affecting freedom of expression than any company in the Index.
- Twitter improved its disclosure of how it responds to government requests to remove content and restrict accounts.
- Twitter disclosed ways for users to opt out of targeted advertising, which indicates that targeted advertising is on by default. In a setback for user privacy, the company disclosed it no longer responds to "Do Not Track" signals from users asking the company not to track them across third-party websites.

Analysis

Twitter ranked fifth out of 12 internet and mobile ecosystem companies, disclosing less about its policies affecting privacy than most of its U.S. peers. The company's score improved in the 2018 Index due to improved public commitments to users' freedom of expression and greater clarity in its transparency reporting on content removal requests.¹ However, Twitter's privacy score declined due to a change in its privacy policy stating that the company no longer responds to "Do Not Track" signals, and a lack of clear examples about how it implements its process for responding to government or private requests for user information. In addition, U.S. law prevents companies from disclosing the exact number of government requests for stored and real-time user information they receive, which prevented Twitter from being fully transparent in that area.²

¹ The research period for the 2018 Index ran from January 13, 2017 to January 12, 2018. Policies that came into effect after January 12, 2018 were not evaluated in this Index. For Twitter's performance in the 2017 Index, see: <https://rankingdigitalrights.org/index2017/companies/twitter>.

² "USA FREEDOM Act of 2015," Pub. L. No. 114-23 [2015], <https://www.congress.gov/bill/114th-congress/house-bill/2048>.

³ Bloomberg Markets, Accessed February 26, 2018, <https://www.bloomberg.com/quote/TWTR:US>.

RANK

5

SCORE

54%

DIFFERENCE FROM 2017

▲ 4.60

RANK AMONG 12 INTERNET AND MOBILE ECOSYSTEM COMPANIES

0% ——— ● ● ● ● ● ● ● ● ● ● ● ● ——— 100%

Key Recommendations:

- **Institutionalize policy commitments to freedom of expression and privacy.** Twitter should demonstrate that it has institutionalized comments to respect users' digital rights by disclosing whether and how it is implementing policies such as employee training and human rights impact assessments.
- **Protect users' privacy.** The company should show a stronger commitment to protect users' privacy by not sharing users' information for targeted advertising unless they opt in. It should also commit to respect signals from users to not track them across third-party websites.
- **Disclose more comprehensive information about security policies and practices.** Twitter should improve its disclosure of its internal processes for keeping user data secure, including the company's policies for responding to data breaches.

About Twitter, Inc.

Twitter, Inc. operates a global social sharing platform with products and services that allow users to create, share, and find content on the Twitter social network and to livestream videos on Periscope. Twitter also provides advertising services and developer tools.

Market Cap: USD 24.5 billion³

NYSE: TWTR

Domicile: United States

Website: <http://twitter.com/>

Governance 46%

Twitter ranked fifth in the Governance category, scoring lower than most U.S. internet and mobile ecosystem companies evaluated, despite some notable improvements. The company strengthened its public commitment to respect users' freedom of expression and privacy (G1), improved its disclosure of senior-level oversight over these issues (G2), and disclosed a commitment to conduct human rights risk assessments when launching new products or entering into new markets (G4). While it disclosed that it regularly engages

with a range of stakeholders on freedom of expression and privacy issues (G5), Twitter is not a member of a multi-stakeholder initiative like the Global Network Initiative (GNI), whose members not only make commitments but also undergo independent assessments to verify whether they have implemented and institutionalized them. As a result, Twitter's disclosure in the Governance category suffered compared to several of its other U.S.-based peers.

Freedom of Expression 61%

Twitter disclosed more than any of its peers about policies affecting freedom of expression.

Content and account restrictions: Twitter disclosed more than any other internet and mobile ecosystem company about its process for terms of service enforcement (F3, F4, F8). It disclosed more than most other companies about why it may restrict content or accounts (F3). It was one of only four companies, including Facebook, Microsoft, and Google, to disclose any data about its terms of service enforcement, reporting the number of accounts it restricted due to terrorist content and from legal requests to remove content or restrict accounts for violating Twitter's rules (F4). However, the data did not include all of the actions the company might take to enforce its rules.

Content and account restriction requests: Twitter disclosed less than Google and Oath about how it handles government and private requests to restrict content or accounts (F5-F7). It disclosed more data about government requests to restrict content or accounts than most of its U.S. peers (F6), and it provided more data than any other company about private requests to restrict content or accounts (F7).

Identity policy: Twitter and Microsoft were the only two internet and mobile ecosystem companies that disclosed that they do not require users to verify their identity with a government-issued ID or other information tied to their offline identity (F11).⁴

Privacy 53%

Twitter disclosed less than Google, Microsoft, Apple, and Oath about policies affecting users' privacy, but more than Facebook.

Handling of user information: Twitter offered more information than all other internet and mobile ecosystem companies about how it handles user information, but still fell short of Index benchmarks (P3-P9). It clearly disclosed what types of user information it collects (P3), but was less clear about what information it shares and with whom (P4). It disclosed more than any other company about how long it retains user information (P6), but disclosed little about whether users could access the information the company holds about them (P8). The company provides users with options for controlling how their information is collected for targeted advertising, suggesting targeted advertising is on by default (P7). Twitter's revised privacy policy made its practices of tracking users across third-party websites less clear (P9).⁵ The company also disclosed it no longer respects "Do Not Track" (DNT) signals (P9).

Requests for user information: Twitter disclosed more than most of its peers, apart from Microsoft and Google, about how it handles government and private requests to hand over use data (P10-P12). Like most companies, it clearly disclosed its processes for responding to government requests for user information, but not for private requests it received (P10). It tied with Facebook for disclosing the most data on government and private requests for user information it received (P11).

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

⁴ "Guidelines for Law Enforcement," Twitter Help Center, accessed March 13, 2017, <https://help.twitter.com/articles/41949?lang=en>.

⁵ "Privacy Policy," Twitter, June 18, 2017, <https://twitter.com/content/twitter-com/legal/en/privacy.html>.