



June 1, 2016

Twitter

1355 Market Street, Suite 900  
San Francisco, CA 94103

Dear Omid Kordenstani and Jack Dorsey,

We are writing to you in your roles as Executive Chairman and CEO to seek further engagement with Twitter about the results of the [Ranking Digital Rights Corporate Accountability Index](#). The Index ranked 16 of the world's leading internet and telecommunications companies on their disclosed policies and practices with respect to privacy and freedom of expression online. As you are likely aware, the sector-wide results were disappointing. Several companies performed poorly on objective indicators that measure adherence to best practices for reporting and transparency.

Twitter performed measurably better than most. Yet we are writing publicly to all companies ranked in order to further motivate sector-wide improvement. Drawing upon the Index results, we have prioritized recommendations to each company to pick off the "low-hanging fruit" that could improve your ranking in future releases of the Index.

We do not need to tell you the importance of respecting digital rights. You know that addressing human rights challenges in an accountable and transparent manner is good for business, and that your company's health and wealth depend on the trust of your customers.

Investors, too, require accurate and meaningful data on your firm's performance -- financial and otherwise -- to show why they should continue to commit to your growth. Policymakers seeking to protect their constituents' interests look to you for clear statements and policies to verify that you are complying with laws and norms. Despite laudable efforts by companies that ranked near the top of the Index, users remain in the dark about many company practices impacting their human rights, which is a key reason we are pushing even companies that performed relatively well in the Index to make further improvements.

Twitter performs better than any company when it comes to transparency on third party requests for user data. You also lead on explaining content and activity rules and your process for enforcing those rules, and on disclosing how long you retain user information. Since the Index release, Twitter has taken the helpful step of publishing its public policies in one central place.

To extend its leadership, Twitter should broadly continue to:

- Strengthen commitments to freedom of expression and privacy at the corporate level, particularly through the establishment of stronger grievance and remedy mechanisms for freedom of expression and privacy harms.

In addition, we recommend that Twitter take these specific steps:

- Institute board-level oversight on matters related to freedom of expression and privacy.
- Enable accessible end-to-end encryption for direct messages in Twitter and Vine.
- Execute human rights impact assessments and disclose their existence, to mitigate potential human rights risks to users.
- Bring policies and disclosures for Vine in line with Twitter's main service. For example, you could offer Vine users the ability access their own information, and clearly explain how to exercise that ability.
- Include information about how you enforce your own terms of service in the transparency report.

Your company can raise your score in the Index by taking the steps outlined above, implementing other recommendations identified in the Index, and by addressing sector-wide challenges by joining organizations like the Global Network Initiative. By doing so, you would distinguish your company as a sector leader, and earn a reputation among your customers as a defender of their human rights.

We commend your corporate officers for engaging with our staff, members of the Ranking Digital Rights research team, and other advocacy groups in private conversations about ways in which your company might improve its policies and disclosures around freedom of expression and privacy. However we also believe that it is important to communicate with the broader community of users and global stakeholders. As a first step, we urge you to respond in writing to this letter and the recommendations we highlight from the Corporate Accountability Index.

We are happy to speak with you about your results and work with you in developing a response.

Sincerely,



Peter Micek  
Global Policy & Legal Counsel  
Access Now  
[peter@accessnow.org](mailto:peter@accessnow.org)