



January 26, 2021

Sundar Pichai

CEO, Google

cc Thomas Kurian, CEO, Google Cloud

cc Halimah DeLaine Prado, General Counsel, Google

Dear Mr. Pichai,

We write to express our alarm and seek clarification regarding Google's [recent announcement](#) that it is establishing a new Google Cloud region in the Kingdom of Saudi Arabia (KSA).

We have urgent questions about the human rights impacts of Google's decision to do so, in view of Saudi Arabia's poor human rights record. Our concerns are heightened by the statement in your recent announcement that Snap, Inc.—the parent company of Snapchat, one of the most popular apps in Saudi Arabia—will be among the anchor tenants for your new Saudi-based cloud services.

We want to understand what, if any, human rights due diligence or impact assessments Google conducted prior to this expansion into Saudi Arabia, and what measures Google will take to protect the digital rights of users in the region now that you are operating there.

Saudi Arabia has long been criticized for its [dismal human rights record](#). From the extrajudicial [killing](#) of *Washington Post* journalist Jamal Khashoggi, to the [detention and torture of women's rights activists](#) peacefully campaigning for human rights protections, to the use of spyware to conduct unlawful surveillance on [dissidents and critics](#) at home and abroad, the government of Saudi Arabia has silenced the voices of activists and human rights defenders, and violated the basic rights of its citizens. Indeed, the Saudi authorities went so far as to [recruit](#) internal Twitter employees in the US to extract personal information and spy on private communications of exiled Saudi activists.

Given this troubling human rights record, it is difficult for us to understand how Google can operate a cloud region in Saudi Arabia in a rights-respecting manner. The UN Guiding Principles on Business and Human Rights, which Google has [committed to uphold](#), require that companies avoid causing or contributing to adverse impacts on human rights. By establishing a cloud region in Saudi Arabia, Google runs the risk of facilitating and whitewashing foreseeable human rights abuses.

We are particularly concerned that storing content data or metadata relating to Snap and its users places these within reach of government demands under local law, with little ability for Google or Snap to resist. The Saudi authorities could also leverage this access to further restrict dissenting voices. As you know, the Global Network Initiative (GNI) formed after the adverse human rights impacts of locating sensitive user data in an authoritarian regime [became clear](#). The user community



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deserves to hear from Google, a founding member of GNI, about whether the company can meet its GNI commitments while operating in KSA.

Therefore we ask:

- **What due diligence did you carry out, including on potential human rights impacts, with respect to establishing a cloud region in Saudi Arabia generally, and the deal with Snap particularly? What teams were involved, and who made the decision to move forward with a deal with Saudi Arabia?**
- **What apps or other clients hold—or might hold—their data in this center?**
- **What user data is being held or processed there, and from which countries?**
- **What security measures are in place to protect the data?**
- **What legal standards does Google Cloud consider necessary for secure and sustainable operations, and how does Saudi Arabia meet those indicators?**
- **What understanding exists between the Saudi government, Google, and tenants on government access to data?**

We would greatly appreciate a public response by **Tuesday, February 2.**

Sincerely,

Access Now & CIPPIC

Access Now (<https://www.accessnow.org>) defends and extends the digital rights of users at risk around the world. By combining direct technical support, comprehensive policy engagement, global advocacy, grassroots grantmaking, legal interventions, and convenings such as RightsCon, we fight for human rights in the digital age.

CIPPIC (<https://cippic.ca/>) is a public interest technology law clinic based at the University of Ottawa's Faculty of Law. CIPPIC's team of legal experts and law students works together to advance the public interest on critical law and technology issues including privacy, free expression, intellectual property, telecommunications policy, and data and algorithmic governance.