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Customer and Partner Agreements



Twilio Sub-Processors

Privacy



Last Updated: September 6, 2024

Mobile Application Terms



[Third Party Sub-Processors](#)

Supplier Agreements



Twilio uses the third party companies below (each, a “**sub-processor**”) to process personal data (i) on behalf of Twilio customers; (ii) in accordance with customer instructions as communicated by Twilio; and (iii) in strict accordance with the terms of a written contract between Twilio and the sub-processor.

Intellectual Property



Resources for Law Enforcement



Twilio imposes obligations on its sub-processors to implement appropriate technical and organizational measures ensuring that the sub-processing of personal data is protected to the standards required by applicable data protection laws. Further information relating to sub-processor security measures can be found via the external links below.

Civil Requests



Code of Conduct & Ethics Hotline



Digital Promotions General Rules



Where the engagement of a sub-processor requires the cross-border transfer of personal data, Twilio has performed [Transfer Impact Assessments](#) ↗ for such data transfer.

Customer Research and User Experience



Twilio maintains an up-to-date list of the names and locations of all sub-processors below. Twilio customers may [subscribe to notifications of sub-processor changes](#) to receive updates.

Legal Notices for Twilio's Web Site



Duration of processing: For each sub-processor below, processing of personal data will be for the duration that the customer uses and continues to use the applicable service(s), and for the retention periods as set out in customer’s agreement with Twilio.

Italy ALIAS Database Code of



Conduct

Sub-Processor	Applicable Service(s)	Subject matter	Nature and purpose of processing	Location(s) of processing	External links for additional information relating to security
Adaptive Mobile	Programmable Messaging	Personal data contained in communications sent through the Twilio Services	Prevention of illegal or unwanted communications over Twilio's messaging services	USA	Data Privacy
AWS	All services	Personal data contained in communications sent through or uploaded to the services.	Infrastructure Provider providing hosting services and storage.	USA*	Compliance Program ; GDPR Centre ; Supplementary Measures Addendum

[; Blog](#)

AWS	Programmable Voice	Personal data contained in voice communications.	Text to speech functionality for customers using Amazon Polly, Amazon Comprehend, and Amazon Transcribe.	USA*	Compliance Program ; GDPR Centre ; Supplementary Measures Addendum ; Blog
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AWS	Programmable Video	Personal data contained in streamed videos.	Streaming and interactive video.	USA*	Compliance Program ; GDPR Centre ; Supplementary Measures Addendum ; Blog
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AWS	Marketing Campaigns (SendGrid)	Personal data contained in email communications.	Automation and storage services for marketing campaigns.	USA	Compliance Program ; GDPR Centre ; Supplementary Measures Addendum ; Blog
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AWS	Email (SendGrid)	Personal data contained in email communications.	Routing and transmission of emails.	USA	Compliance Program ; GDPR Centre ; Supplementary Measures Addendum ; Blog
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Personal data Infrastructure USA or EU [Compliance Program](#)

AWS CDP (Segment) contained in communications sent through the Segment Services Provider (Dublin) providing hosting services and storage. as selected by customers ; [GDPR Centre](#) ; [Supplementary Measures Addendum](#) ; [Blog](#)

Confluent Twilio Flex Personal data contained in communications sent through Twilio Flex. Infrastructure management USA ; [Trust & Security](#)

Datadog Segment System and event logs only Operational monitoring USA ; [Data Protection](#) ; [Security Policies](#) ; [Compliance Program](#)

UK

DVELP/ Sabio	Twilio Flex	Personal data contained in voice communications.	Connectivity services to customer's Google CCAI instance.	(provision of the services), Belgium, Finland, Germany, Netherlands, and Poland (data persistence/backups)	Data Privacy ; Data Security ;
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Frame.AI	Twilio Flex	Personal data contained in voice transcriptions and conversations messages	AI/ML features as enabled by the customer for the purpose of calculation of scores and data analysis	USA	Privacy Policy
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GoodData Corporation	Twilio Flex	Personal data contained in communications sent through Twilio Flex.	Data analytics functionality for customers who have enabled the feature in Twilio Flex.	USA	Data Privacy ; Data Security & Cloud Security
Google	Segment/ Twilio Engage	Personal data contained in communications sent through the Segment Services	Data storage compute and queries	USA or EU (Zurich & London) as selected by Customers	Data Privacy ; Trust & Security ; Blog
			Speech recognition functionality		Data

Google	Programmable Voice; Twilio Flex	Personal data contained in voice communications.	for customers who have enabled the feature on supported products.	USA*	Privacy ; Trust & Security ; Blog
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Google RCS	Verify	Phone numbers and message content	Message delivery for outbound/ inbound Twilio Verify services.	USA, South America: Chile, Europe: Ireland, Netherlands, Denmark, Finland, Belgium, Asia: Taiwan, Japan, Singapore	https:// safety.google/ intl/en/
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Meta	Whatsapp	Phone numbers and	Outbound/ inbound	USA	Data Privacy and
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Vendor	Channel	Type of message content	message delivery	Country	Security overview
OpenAI	Flex Agent Copilot	Personal data contained in customer defined workflows	Customer.AI features as enabled by customer for the purpose of summarization, sentiment analysis and disposition	USA	https://openai.com/security
OpenAI	Segment Generative Audiences	Personal data contained in communications Sent through Segment Services	Customer.AI features as enabled by customer for the purpose of generating audiences	USA	https://openai.com/security

OpenAI	Voice Intelligence	Personal data contained in voice communications	Customer.AI features as enabled by customer for the purpose of summarization and sentiment analysis	USA	https://openai.com/security
Snowflake	Marketing Campaigns (SendGrid)	Personal data contained in email communications.	Automation and storage services for Marketing Campaigns.	USA	Security Addendum ; DPIA Fact Sheet ;
Temporal Cloud	Twilio Flex	Personal data contained in customer defined workflows	Scheduling and execution of the customer defined	USA	Data Security

WORKFLOWS

workflows.

VoiceBase	Programmable Voice; Twilio Flex	Personal data contained in voice communications.	Transcription services for customers who have enabled transcriptions on supported products.	USA	Data Privacy ; Data Security
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* If using [Regional Twilio](#) for supported products, Customer Content is stored and processed in the region selected (Ireland or Australia). Exceptions will occur as necessary to investigate issues of fraud and abuse. At this time, all other data relating to your account and use of the Twilio Services will continue to be processed in the United States to allow Twilio to continue to provide and improve our Services to you.

[Twilio Group Sub-Processors](#)

External links for

Sub-Processor	Applicable Service(s)	Subject matter	Nature and purpose of processing	Location(s) of processing	additional information relating to security
DataBank	Sendgrid Services	Personal data contained in communications sent through or uploaded to the services.	Infrastructure Provider providing hosting services and storage.	North America	Data Privacy ; Data Security
Lumen	Sendgrid Services	Personal data contained in communications sent through or uploaded to the services.	Infrastructure Provider providing hosting services and storage.	North America	Data Privacy ; Data Security
Digital Realty	Sendgrid Services	Personal data contained in communications sent through or uploaded to the	Infrastructure Provider providing hosting services and	North America	Data Privacy ; Data Security

services.

storage.

If Twilio Inc.
is not the
Twilio party
to the
agreement,
then Twilio
Inc. is
acting as a
sub-
processor
for that
Twilio party.

Twilio Inc.

All Services

(For
example. If
you are
contracting
with Twilio
Ireland Ltd,
then Twilio
Inc. is
acting as a
sub-
processor

Provision of
the Twilio
Services

USA*

[Data](#)
[Privacy](#); [Data](#)
[Security](#)

for the
provision of
the
services.)

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