



770 Broadway
5th Floor
New York, NY 10003

September 26, 2018

To:
Mr. Peter Micek
Access Now
P.O. Box 20429
Greeley Square Station
4 East 27th Street
New York, NY 10001-9998


Dear Mr. Micek:

This letter is to confirm receipt of your September 12, 2018 letter to Oath, Inc. regarding the results of the 2018 Ranking Digital Rights Corporate Accountability Index. We have engaged with the Ranking Digital Rights team since the inception of the Index. We appreciate the Index's attention to important issues at the intersection of human rights and technology and your acknowledgement of Oath's efforts in this area, including the work of the [Business & Human Rights Program](#) (BHRP).

Oath is a values-based company, and our name reflects the commitment we have made to put our consumers first. We work hard to deliver on that commitment every day. After our company was formed in 2017, we adopted and expanded Yahoo's industry-leading BHRP across Oath. The BHRP helps to integrate attention to the internationally recognized principles of privacy and freedom of expression in the decision-making processes that support our business operations. The BHRP leads Oath's efforts to make responsible business decisions to protect and promote the principles of free expression and privacy and to actively engage on these important issues not just when it's easy, but every single day.

Important to this effort is our membership in the [Global Network Initiative](#) (GNI), a multi-stakeholder organization that works to protect and advance freedom of expression and privacy in the ICT sector. We have worked within GNI to develop a system to assess whether we are living up to our commitment to follow the GNI Principles on Freedom of Expression and Privacy and their Implementation Guidelines, and to examine the operational steps we are putting in place related to the human rights issues that we impact most directly through our products, platforms and services. As part of this system, we undergo an assessment conducted by an independent third-party assessor every other year.

As you point out, Oath recognizes that transparency is fundamental to putting our consumers first. This is why shortly after its formation, Oath began publishing a [transparency report](#) with information on the government requests we receive for consumer data, including national security requests, to the extent allowed by U.S. law. We also report on all requests to remove content that we are able to identify as coming from a government agency, whether pursuant to law or pursuant to our terms of service and community guidelines and provide illustrative examples of these requests. In addition to providing this information, we [share](#) information about how we put our commitments into action.



We actively study, analyze and consider the results and findings of RDR with respect to company transparency and we appreciate the potential the Index has to drive dialogue on how companies can communicate about their attention to these important issues. We look forward to the opportunity for continued dialogue and partnership with interested stakeholders including Access Now.

Sincerely,



Nicole Karlebach
Global Head, Business & Human Rights