



**January 26, 2021**

**Mr. Evan Spiegel**

CEO, Snap. Inc

cc Michael O'Sullivan, General Counsel, Snap Inc.

Dear Mr. Spiegel,

We write to express our alarm and seek clarification regarding the [recent announcement](#) that Snap will be an anchor tenant for a new Google Cloud region in the Kingdom of Saudi Arabia (KSA).

We have urgent questions about the human rights impacts of Snap's decision to do so, in view of Saudi Arabia's poor human rights record and the popularity of Snapchat--your company's flagship service--in the country.

We want to understand what, if any, human rights due diligence or impact assessments you conducted prior to contracting for cloud services with Google in Saudi Arabia, and what measures you will take to protect the digital rights of users in the region now that you are operating infrastructure 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 Snap can be a tenant at a data center in that country while respecting the human rights of its users. Companies have a duty under the UN Guiding Principles on Business and Human Rights to avoid causing or contributing to adverse impacts on human rights. By establishing an operational presence in Saudi Arabia, Snap runs the risk of facilitating and whitewashing foreseeable human rights abuses.

We are particularly concerned that storing content data or metadata relating to Snapchat's users places these within reach of government demands under local law, with little ability for you to resist. The Saudi authorities could also leverage this access to further restrict dissenting voices. The user community deserves to hear why Snap believes it is not placing its users' rights at risk with its data center tenancy in Saudi Arabia.



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Therefore we ask:

- **What due diligence did you carry out, including on potential human rights impacts, with respect to your deal with Google in Saudi Arabia? What teams were involved, and who made the decision to move forward with this deal?**
- **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 Snap consider necessary for secure and sustainable operations, and how does Saudi Arabia meet those indicators?**
- **What understanding exists between the Saudi government and Snap, if any, regarding government access to data?**

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

Sincerely,

Access Now and 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.