



November 1, 2019

The Honorable Edward Markey
United States Senate
255 Senate Dirksen Office Building
Washington, DC 20515

Dear Senator Markey,

I write in response to your follow-up letter dated October 10, 2019 regarding Ring.

Ring customers place their trust in us to help protect their homes and communities, and we take that responsibility seriously. Home security cameras have existed for decades, and local police have long engaged in the practice of asking residents to voluntarily provide information, including any video recordings, to help the police investigate, solve, and prevent crimes.

The Ring Neighbors Portal provides an added layer of privacy to traditional investigative assistance encounters because police are not made aware of who was asked to help with an investigation or if the person chose not to assist. Ring does not own or otherwise control users' videos, and we intentionally designed the Neighbors Portal to ensure that users get to decide whether to voluntarily provide their videos to the police. Neighbors Portal also benefits communities by allowing local police to more efficiently achieve their public safety goals.

We routinely evaluate our communications to users to ensure they understand they are in complete control of their video recordings. We recently revised our email communication to further emphasize this control. A sample of this communication is attached in the Appendix.

The answers to your specific questions are as follows:

- 1. Does Ring require law enforcement partners to meet any evidentiary standard before allowing those partners to request video footage from Ring users?**
 - a. If not, why not? If so, please justify why Ring has selected a specific evidentiary standard.**

No. The local police are simply asking Ring users if they have any relevant footage or other information they are willing to voluntarily share in order to assist the police; the police are not seeking to compel such assistance. The law does not require an evidentiary standard for local police to ask residents if they would like to voluntarily assist in an investigation. Thus, we do not require local police to make an evidentiary showing to Ring in order to inform Ring users of an investigation and ask if they have information in the context of the investigation that could be useful.

Furthermore, absent an exigent or emergency circumstance, Ring does not disclose customer information in response to government demands unless required to do so to comply with a legally valid and binding order, such as a search warrant.¹ Beyond those limited circumstances, users must expressly choose to assist police, the same way they would traditionally answer the door or respond

¹ Ring's policies in this regard are publicly disclosed on Ring's website: <https://support.ring.com/hc/en-us/articles/360001318523-Law-Enforcement-Legal-Process-Guidelines>

to a public request for tips. If a customer chooses to assist the police by providing information or user recordings, this permission expires with each instance and the customer has to again opt-in to future requests. We also designed the Neighbors Portal tool to protect user privacy. In particular, by not providing police any information on who, if anyone, was asked to help with the investigation or if the person opted to not assist, we eliminate the pressure implicit in receiving an in-person request from police.

b. Please describe what procedures and requirements, if any, prohibit law enforcement from issuing widespread requests for footage throughout a neighborhood without any evidence that access to this footage will help address a specific crime.

Local police may only seek assistance with the investigation of a specific crime, and our Neighbors Portal technology will not allow police to proceed with their request without a case number. Specifically:

- local police can only ask for video recordings for a maximum time frame of 12 hours;
- local police can only ask for videos in an area covering a minimum 0.025 square miles (to avoid targeting specific residents) and a maximum of 0.5 square miles;
- local police can only ask for video recordings up to 45 days old; and
- local police cannot send 'batch' video requests (i.e. video requests must each be created individually).

The Neighbors Portal prohibits police from asking users to voluntarily assist unless all of these requirements are satisfied. If customers choose to assist, they have the ability to decide which, or how many, videos from the relevant time frame are shared with police.

In addition to the technical safeguards above, Ring believes that state and federal procedures, regulations, and statutes serve to ensure that police departments do not open investigations or seek information for improper purposes.

2. You state that "law enforcement can only view publicly available content in the Neighbors app, unless a user explicitly and voluntarily chooses to share their own recordings with law enforcement."

a. If a Ring user declines to share her video footage with law enforcement, does Ring allow law enforcement to directly request the footage from Ring or Amazon?

The Neighbors Portal does not provide local police with any information on who, if anyone, was asked to assist with the investigation, or if the person declined to assist. Police cannot selectively target Ring's users based on a user declining a request.

Ring does not disclose customer information in response to government demands unless required to do so to comply with a legally valid and binding order, such as a search warrant; or in an exigent or emergency circumstance. Ring objects to overbroad demands as a matter of course. Ring users control their video recordings, including deciding whether to retain, store, download, or permanently delete their recordings.

- b. If so, please provide Ring's official policy for such requests, including indication of whether Ring requires probable cause or some other evidentiary standard from law enforcement before granting the request.**

See answer to question 2.a above.

- c. Has Ring received requests for video footage by law enforcement entities accompanied by offers of financial compensation? If so, please detail these offers.**

No.

- 3. Who owns the footage that Ring's connected doorbells capture – Ring, Amazon, the consumer, or some other entity?**

Ring customers own the video recordings that are captured by their devices. Ring's Terms of Service and Privacy Notice clearly disclose Ring's limited allowable uses, such as to provide Ring's services, detect technical issues, or comply with law.

- 4. How does Ring ensure that a user is able to stay anonymous if she refuses to grant a law enforcement request for footage from her device?**

There is no option in the Neighbors Portal for local police to view any information on users who declined to assist. As a safeguard to user privacy, the Neighbors Portal does not provide any information about our users unless that user expressly chooses to share their video recordings. Our users receive an email from the Ring team, which gives them the choice to review and/or share videos, decline the request by taking no action, or opt-out of all future requests. After local police ask residents to assist with an investigation using the Neighbors Portal tool, the tool only shows responses from users who expressly consent to share their video recordings.

- 5. Ring's terms of service require that a user's device be installed "at such an angle that it does not take any recordings beyond the boundary of [the user's] property (including public pavements or roads)."**

- a. How does Ring ensure compliance with this requirement?**

Ring's Terms of Service state that users are responsible for their use of our products and services, including use in accordance with any applicable privacy laws. Ring does not view users' videos to verify compliance with its Terms of Service.

To provide users with more options when installing our products, Ring offers installation accessories that allow users to further customize the set-up and location of their devices based on their particular environment (for example, corner kits, wedge kits, and solar panels). Ring's support pages also include tips and information regarding the installation and set-up of our products.² Some Ring products also offer additional privacy features such as privacy zones (black out areas to exclude from Live View or video recordings) and motion zones (defined as "the area where motion detection would trigger the device").

² See, for example, the Ring Installation Guide (<https://support.ring.com/hc/en-us/articles/360032614512-Ring-Installation-Guide>).

b. How does Ring handle law enforcement requests for user video footage that does not comply with this requirement?

As noted above, Ring users are responsible for using their devices in accordance with applicable law, and Ring does not view user's videos to verify compliance with its Terms of Service.

Absent an exigent or emergency circumstance, Ring does not disclose customer information in response to government demands unless required to do so to comply with a legally valid and binding order, such as a search warrant.

6. Your terms of services also require users to "prominently display appropriate signage advising others that audio/visual recording is taking place." How does Ring ensure compliance with this requirement?

Ring includes a door/window sticker in the box with each device that is equipped with audiovisual recording capabilities. Additional stickers and a solar-powered yard sign are offered on ring.com. Users also may download and print additional stickers through our website.

7. Your privacy policy states, "We do not knowingly collect personal information online from children under the age of 13." What processes does Ring have in place to ensure that its connected doorbells do not capture video footage of children?

Ring customers own and control their video recordings, including installation and managing storage through our subscription services. Similar to any security camera, Ring has no way to know or verify that a child has come within range of a device.

8. You state that "Ring does not currently offer facial recognition technology as part of its services." However, your privacy policy states that Ring may "obtain certain facial feature information about the visitors you ask your Ring product to recognize." Please clarify how these two official statements do not conflict.

We do not currently offer facial recognition technology in Ring products. This sentence in the Privacy Notice refers to a contemplated, but unreleased feature. We do frequently innovate based on customer demand, and facial recognition features are increasingly common in consumer security cameras today, such as: Google Nest Hello, Tend Secure Lynx, Netamo Welcome, Wisenet Smartcam, and Honeywell Smart Home Security. If our customers want these features in Ring security cameras, we will only release these features with thoughtful design including privacy, security, and user control; and we will clearly communicate with our customers as we offer new features.

9. Will Ring commit to never selling its users' biometric information? If not, why not?

Ring does not sell customer information.

10. Does Ring have any knowledge of its users' video footage being accessed without authorization or breached? If so, please describe all such incidents in detail.

Protecting the security and privacy of our users' video recordings is paramount, and Ring has comprehensive policies and practices in place to prevent unauthorized access to videos and other customer data. These include, but are not limited to, access controls, encryption, physical security, firewalls, and frequent monitoring and patching of its systems and devices.

To Ring's knowledge, these security measures have been successful to date. We are not aware of any instances in which Ring's system was breached or accessed without authorization by any outside party. We are aware our customers' accounts may, or have, become exposed due to other third-party breaches, or poor account security practices outside our control such as sharing passwords. We strive to help customers maintain strong security practices by requiring strong passwords and offering two-factor authentication.

Thank you for your follow-up letter. As always, we are available to provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Huseman". The signature is fluid and cursive, with a large initial "B" and "H".

Brian Huseman
Vice President, Public Policy

Appendix

Ring is contacting you on behalf of X Enforcement Division who is seeking videos in connection with the investigation of an incident near your home.

This is an example of the Request Video email.
The links below have been disabled in this copy, but the links are active for Ring users.



Dear Neighbor,

Ring is contacting you on behalf of **Detective C. Pham** of the **X Enforcement Division**, who is seeking videos recorded between **October 1st from 8:00 PM PDT to 1:00 AM PDT on October 2nd** in connection with the investigation of an incident (Incident #123456-10112019) near your home.

A message from Detective Pham:

On 10/01 at 11:50pm, a vehicle was stolen by three males in your area. They were seen walking through the neighborhood in blue jackets. If you have additional information to share or have questions, please contact me at example@agency.com

Sharing your videos with law enforcement is entirely optional and will not provide law enforcement with access to your Ring device(s). If you choose to share your Ring videos, the X Enforcement Division will also receive your email address and street address.

Review and Share

-- or --

Share Videos without Reviewing

If you do not wish to participate, simply ignore this request and nothing will be shared with law enforcement, including whether or not this request was sent to you. If you do not wish to receive requests like these in the future, [click here to unsubscribe](#).

If you have any questions or information about this incident, please contact **Detective Pham at the X Enforcement Division and reference Incident #123456-10112019**. For more information about video requests, including how your shared videos may be used by law enforcement, visit our [FAQ](#).

Stay safe,
Ring Team

[Click here to unsubscribe from future requests to share footage](#)



Email intended for

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