Dear Mr. Micek,

Thank you for providing us with the opportunity to respond to your 2018 Ranking Digital Rights Corporate Accountability Index (Index).

We recognize and value the effort of Access Now, Ranking Digital Rights (RDR) and Business and Human Rights Resource Centre, and the works to promote freedom of expression and privacy by creating global standards and incentives for companies to respect and protect users’ rights.

Axiata remains committed to respecting and protecting the privacy and data of our customers with utmost respect, due care and diligence. We are continuously working on improving our disclosures in this respect, and the same will be reflected our Integrated Annual Report 2018.

Celcom Axiata Berhad (Celcom) is a member of the Axiata Group of Companies and the company evaluated in the Index. Celcom is Malaysia’s premier and most experienced mobile communications company. Serving close to 11 million customers, the company has demonstrated continuous commitment in handling and safeguarding their personal information, privacy and rights.

This commitment is translated into various activities to enhance business protocols, practices and standards, earning the Axiata group of companies various international awards and accolades related to customers’ trust, Best Practice and Corporate Governance (see Appendix 1).

While these various activities do not fall squarely within the RDR’s evaluation framework, we take guidance from the Index to reassess our organization’s practices in disclosing our policies and commitments that affect our customers’ rights to freedom of expression and privacy.

In the letter addressed to our Managing Director/President & Group Chief Executive Officer, Tan Sri Jamaludin Ibrahim, the Index proposed a few recommendations. We are pleased to review and respond to these recommendations.

- More transparency in disclosing the manner in which the company handles external request from the government.

  **Government’s request for customers’ information**

  All external requests are carefully reviewed by Celcom’s Liaison Unit. They are guided by Malaysian Personal Data Protection Act 2010 and its internal Procedure for Handling Request for Customer Information from Government Enforcement Agencies. This procedure requires a two-prong procedural and legal-basis assessment to validate the legitimacy of such request before acting upon the orders.
Any disclosure of personal data is in accordance with purposes listed in Celcom Privacy Notice or to comply with any legal obligation or court order for the purposes of preventing or detecting a crime, or for the purposes of investigation. Approved disclosure is released only through our authorized channel and is limited to the minimum fields for the purpose requested.

**Government’s orders to shut down the network**

As a licensee of the Malaysian Communications and Multimedia Act 1998, Celcom is duty-bound to comply with requirements under the law or towards the detection or prevention of crime and upholding national security and public safety.

Celcom remains mindful that the execution of this order may have negative impact on the public. As such, on the industry level, the company is working collectively with its peers and the regulator to establish clearer protocols in this area.

- Clear communication on the process for protecting customers’ information and how it responds to data breaches.

Celcom has an overarching cyber security strategy – Digital Trust 2020. It has also adopted an internationally recognised National Institute of Standards and Technology (NIST) Cyber Security Framework and issued Minimum Baseline Security Standards (MBSS) that are now widely implemented across the company. The company has deployed leading-edge technology software such as Data Loss Prevention (DLP) and Security Information and Event Management (SIEM) to better manage their information access and resources. It has also implemented 24 x 7 Security Operation Centre (SOC) and augmented it with world-class Endpoint Detection and Response (EDR) to continuously monitor and provide real-time response. This has enabled them to take swift action to resolve high severity and emerging treats before they manifest as data breaches.

Additionally, the company has implemented a set of robust policies and procedures notably Celcom Corporate Information Security Policy and Celcom Cyber Incident Handling and Response Procedure which ensures strict security controls and proper governance. Celcom has also increased investment in the implementation of the Detection and Responsibility Capabilities.

The Celcom Management Team is fully committed to cyber security and privacy. They have established a Cyber Security Steering Committee (CSSC) chaired by the Chief Executive Officer and represented by the Senior Leadership Team. The CSSC is supported by a team of dedicated resources to spearhead and implement their ambitious privacy and security agenda.

Continuous data protection and privacy awareness and training (e-learning, weekly trainings and monthly on-boarding) are conducted throughout the organization. A total of 3,600 staff have attended face-to-face privacy training. Special trainings have also been conducted to its front liners under the Genesis Programme.
• Recommendation to join the Global Network Initiative (GNI)

As Celcom embarks on their journey towards becoming a New Generation Digital Champion by 2022, they remain committed to respecting and protecting our customers’ data. Celcom recognises and acknowledges the coordinated effort of the GNI and RightsCon Summit Series as voices for freedom of expression and privacy rights. Celom will explore opportunities for involvement in tandem with their maturity journey.

Celcom has continued to build on their business protocols, practices and standards. We are pleased to draw your attention to some of their recent efforts:

• Celcom has launched its one-stop centre, called “Privacy Matters” for its customers and public to obtain information on Celcom’s process and policies in managing external request from government, private entity or third party, information on data security and data breach. Alternatively, they can call-in to Celcom Customer Service or write in to the company.

• Celcom has published a new Privacy Notice which provides greater transparency as to how the company collects, use, shares, retains and destroys personal data that is no longer required. This notice is published both in English and the national language, Bahasa Malaysia to facilitate our customers’ easy understanding. Customers’ are encouraged to call-in or write-in on their queries, concerns or complaints.

• Celcom has taken a proactive step to educate its customers on the local data protection legislation, the Personal Data Protection Act 2010. Simple infographic awareness material is available at counter-tops in their Blue Cube Customer Service Stores.

• Celcom is in the process of developing a Human Rights Statement to include our commitment in upholding freedom of expression and privacy. This will be published on their corporate website.

• Celcom in the process of developing online materials to educate their customers on cyber security risk and will publish the same on their corporate website.

Celcom is steadfast in meeting its legal and societal responsibilities in managing their customers’ personal information, privacy and rights by ensuring they have robust policies and procedures based on our core values of Uncompromising Integrity and Exceptional Performance (UI.EP).

We welcome recommendations and will continue to build upon it to strengthen our governance, data privacy and security practices. By doing so we hope to inspire our customers’ trust and confidence.

Thank you.

Asri Hassan
Group Chief Corporate Officer
In copy;

**Ana Zbona**  
Civic Freedoms & Human Rights Defenders Project Manager, Business Human Rights

**Mohamad Idham Nawawi**  
Celcom, Chief Executive Officer

**Abid Adam**  
Axiata Group, Chief Information Security Officer and Group Head of Privacy
Appendix 1: List of Awards and Accolades in 2017 (not exhaustive)

Axiata Group
- Chairman of the Year 2017 – Minority Shareholder Watchdog Group (MSWG)
- Ranked 2nd in Excellence Award for Corporate Governance Disclosure - Minority Shareholder Watchdog Group (MSWG)
- PwC Building Trust Awards 2017 Runner-up
- ACCA Malaysia Sustainability Reporting Awards (MaSRA) 2017 2nd Runner-up

Celcom Axiata Berhad
- Frost & Sullivan Malaysia Excellence Awards 2016

XL Axiata
- Corporate Social Responsibility Awards 2017

Robi Axiata
- GSMA Glomo Award 2017
- Asia Pacific ICT Alliance Award

Smart Axiata
- Frost & Sullivan Asia Pacific Best Practices Awards 2017
- IDG ASEAN Awards

Ncell Axiata
- Frost & Sullivan Asia Pacific Best Practices Awards 2017
- Telecom Asia Awards 2017

Edotco
- Frost & Sullivan Asia Pacific Best Practices Awards 2017