



6th May 2016

## **Vodafone Group plc – Response to Access letter on Ranking Digital Rights**

Ensuring our customers' right to privacy is respected is one of Vodafone's highest priorities. It is also a part of Vodafone's Code of Conduct which everyone who works for Vodafone has to follow at all times.

We welcome the contribution that the Ranking Digital Rights project has made to the debate on respecting privacy and freedom of expression in the sector. We participated actively in the project and were pleased to be ranked first amongst the telecommunications operators included in the ranking.

In 2014, Vodafone became one of the first telecommunications companies to produce a comprehensive Law Enforcement Disclosure report which provides detailed insight into the legal frameworks, governance principles and operating procedures associated with demands for assistance from law enforcement and intelligence agencies across 28 countries.

Within the report we set out our views and approach to the disclosure of aggregate statistics relating to requests from law enforcement agencies and authorities. We believe that it is governments - not communications operators - who hold the primary duty to provide greater transparency on the number of agency and authority demands issued to operators and therefore within the report we provide links to all aggregate statistics currently published by governments in place of our own locally held information. Where the authorities currently do not publish aggregate statistical information but where we believe we can lawfully publish in our own right, we disclosed this information. However, legislation often includes stringent restrictions preventing operators from disclosing any information relating to agency and authority demands received, including disclosure of aggregate statistics. Where these restrictions exist, we do not publish. More details on our views, as well as our country-by-country disclosures, can be found within the Report.

In relation to content blocking, Vodafone UK operates a content filtering service on its mobile and broadband services. This allows customers to restrict access to sites which are considered unsuitable for children (Vodafone UK relies on the British Board of Film Classification's framework for classifying content). Vodafone UK also subscribes to the Internet Watch Foundation's child abuse image content (CAIC) list, and does not permit traffic to these images. This list is updated frequently and automatically and a customer cannot choose to have this filter removed. Any private requests to block a website would require a court order compelling Vodafone UK to do so.

In relation to requests by private parties for user data, where a customer asks for data held by Vodafone UK relating to their own account (e.g. for a copy of account notes, or copies of records of a bill), we will happily provide this, subject to passing an appropriate identification check. Where Vodafone UK is unable to verify the customer (for example, because the account in

question relates to an unregistered pre-paid number), Vodafone UK requires a court order. Where someone wants access to information about another Vodafone customer, Vodafone UK's general position is to require a court order. However, in very limited circumstances (e.g. the provision of outstanding debt information to the executor of a deceased customer's estate), Vodafone UK may provide access.

Vodafone UK's [privacy policy](#) provides detail on what personal data we capture and how it is used. The retention period for personal data will vary depending on the category of the personal data and the purpose for which it is being retained. For example, personal data contained in a contract will be retained longer (as it is needed to evidence the customer relationship) than a call record.

In February 2016, Vodafone Group became an observer of the [Global Network Initiative](#). The GNI is an international, multi-stakeholder group of companies, civil society organizations, investors, and academics who have created a collaborative approach to protect and advance freedom of expression and privacy in the ICT sector. The GNI's accountability process uses independent assessments to ensure that participating companies are implementing the GNI Principles. Over the next year, as an observer, we will participate in GNI committees and policy work and the sharing of best practices with the aim of becoming full members at the completion of the observer year.

We value the inputs that we receive from stakeholders – including the Ranking Digital Rights project - on how we can improve our transparency on these critical issues and aim to continue to extend our disclosures in the future.