



12 September 2018

Vittorio Amedeo Colao  
Chief Executive Officer  
Vodafone Group Plc  
Vodafone House  
The Connection  
Newbury  
Berkshire, RG14 2FN, England

Dear Mr. Vittorio Colao,

Access Now is a global organization fighting to defend and extend human rights in the digital age, particularly for users most at risk. We are writing to draw your attention to your company's performance in the [2018 Ranking Digital Rights Corporate Accountability Index](#) and to invite you to offer a public response.

As you may be aware, the Index evaluated 22 of the world's leading internet, mobile, and telecommunications companies, including yours, and found that all companies could make significant improvements in disclosing policies and commitments that affect their users' rights to freedom of expression and privacy. Vodafone's score was based on an evaluation of its disclosed policies for Vodafone UK's pre-paid mobile, post-paid mobile, and fixed-line broadband services.

Vodafone ranked first out of 10 companies in its category, and saw a 3.47% increase in its Index score from 2017. A significant portion of that increase can be attributed to Vodafone's strengthened commitment to protecting users' human rights by joining the Global Network Initiative (GNI) in March 2017. The company has both publicly committed to honoring freedom of expression and privacy rights as well as improved disclosure of its human rights impact assessments. Vodafone was also the only company that provided comprehensive information about how it handles data breaches.

Although Vodafone disclosed more about policies affecting freedom of expression than any other telecommunications company in the Index, disclosure gaps still remain. Vodafone should be more transparent about whether users may control the collection of their data or whether they can delete some of this information. The company should also provide more information regarding the number of user complaints it receives for freedom of expression and privacy violations and provide evidence that Vodafone is responding to these complaints. Moreover, Vodafone should be more transparent about how it handles private requests to restrict content or accounts.

We would like to draw your attention to several concrete steps that your company can take to improve disclosure of policies affecting users' rights. We recognize that in some instances, legal obligations may prevent companies from disclosing certain types of information about specific policies and practices. However, the Ranking Digital Rights team has consulted with legal experts and identified steps that your company can take in the immediate future to improve disclosure within the current legal environment.



- The company should **clarify how it handles users' data**. Vodafone should clearly communicate to users the types of information it collects and shares. Vodafone should also be more transparent about its data retention periods.
- Vodafone should **make privacy the default user setting**. Vodafone should provide users with more options to control their data and clearly commit to deactivating targeted advertising by default.
- Vodafone should be **more transparent about government requests**. The company should provide users with more information about how it handles third party requests it receives, including government requests to shutdown a network.

Transparency on these issues is not only important from a human rights perspective, but also key to ensuring user trust. Investors also depend on companies to be transparent about these issues to verify they are making sound choices that are encouraging user growth.

We encourage you and the relevant officers within your company to read through the Index findings and recommendations, and the [“report card” for your company](#) in particular, and develop a public response to the issues raised here. This is an opportunity to distinguish your company from others in the sector as a leader on these issues, and to demonstrate a commitment to your users to respect their rights. The full results and raw data can be found at: <https://rankingdigitalrights.org/index2018>. For your convenience I am also attaching PDFs of the full report as well as your company's report card.

This letter will be published this week on the website of the Business and Human Rights Resource Centre, alongside letters to each of the other companies evaluated in the Index. Company responses will be published in a timely manner on the same website upon receipt. A similar set of letters and company responses were published in 2016, visible at: <https://business-humanrights.org/en/access-now-sends-digital-rights-demands-to-tech-and-telco-firms>

We encourage you to send a response for publication by September 26, 2018, to demonstrate to your users and stakeholders that your company is serious about upholding freedom of expression and privacy. Please send your letter via email to Peter Micek <[peter@accessnow.org](mailto:peter@accessnow.org)> with Ana Zbona <[zbona@business-humanrights.org](mailto:zbona@business-humanrights.org)> in copy.

The Access Now team would be happy to speak with you about your results and provide feedback as you develop your response.

Sincerely,

Peter Micek  
General Counsel, Access Now  
[peter@accessnow.org](mailto:peter@accessnow.org)