

18 May 2021



Nick Read

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

Dear Mr. Read,

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 [2020 Ranking Digital Rights Corporate Accountability Index](#). As you may be aware, the Index evaluated 26 of the world's leading digital platforms and telecommunications companies, including yours. Ranking Digital Rights (RDR) found that all companies could make significant improvements in disclosing policies and commitments that affect their users' rights to freedom of expression and privacy.


Transparency on these issues not only supports human rights, but also helps ensure user trust. Investors also depend on disclosures to verify that companies are upholding their duty to respect human rights. Therefore, we invite you to offer a public response to the 2020 Index results.

Vodafone ranked second out of the 12 companies in its category, and saw a 0.74% increase in its RDR Index score from 2019, when measured on comparable indicators. These scores were derived from RDR's evaluation of disclosed policies for the fixed-line broadband and pre- and post-paid mobile services of Vodafone's UK operating company, Vodafone UK. Vodafone made some key improvements, notably improving the information it published on its third-party security audits. We also commend Vodafone for responding to our previous letter and making its perspectives public.

However, there is still room for improvement. We encourage you and the relevant officers within your company to read through the full RDR Index findings and recommendations, and the "report card" for your company in particular, and develop a public response to the issues raised here. But we have narrowed our recommendation to one, timely, and achievable, objective based on our insights into the most acute issues facing at-risk users.

Recommendation:

Vodafone should be more transparent about its reasons for collecting, sharing, and inferring user information and clarify options users have to control what data is collected, shared, and inferred about them.



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/index2020>.

The 2020 report card for Vodafone can be found here:
<https://rankingdigitalrights.org/index2020/companies/Vodafone>.

We encourage you to send a response for publication by **June 1, 2021**, to demonstrate to your users and stakeholders that your company is serious about upholding freedom of expression and privacy. **We also invite you to join us at [RightsCon](#)**, the world's leading summit on human rights in the digital age, from June 7-11, 2021. At RightsCon, you will have the opportunity to engage with a wide range of stakeholders from around the world.

We look forward to hearing from you and would be happy to speak with you about your results and provide feedback as you develop your response.

Sincerely,

Isedua Oribhabor
US Policy Analyst, Access Now
isedua@accessnow.org