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Isedua Oribhabor
Access Now
463 LincolnPlace #241
Brooklyn, New York 11238

Madrid, 7th July 2021

Dear Isedua,

Many thanks for your letter from 18 May 2021 regarding our performance in the 2020 Ranking Digital Rights Index, in which we were ranked first in the telecommunications company category, for the second year in a row.

Communications technology often provides the very basis for the actual enjoyment of human rights, for instance, by enabling access to information or the exchange of ideas, which in turn advances knowledge, creates opportunities and fosters personal and/or economic development. Like any other business sector, however, the telecommunications industry is not shielded from potential negative impacts on human rights.

It is in this context that Telefónica fully acknowledges its responsibility to respect and promote human rights, as articulated in the UN Guiding Principles on Business and Human Rights. Our commitment is embodied in our [Business Principles](#) in general and our [Global Human Rights Policy](#) in particular. Our [human rights due diligence process](#) emanates from these commitments and aims at identifying, preventing, mitigating and remedying human rights impacts. It does not come as a surprise given our business activity that the fundamental rights of privacy and freedom of expression are one of the most salient human rights issues for our company.

The Ranking Digital Rights Index plays a vital role in informing the aforementioned human rights due diligence process and our policies/processes in relation to privacy and freedom of expression. This is why we have actively engaged with the team of Ranking Digital Rights throughout the last years and volunteered to participate in the 2019 pilot to test its revised methodology integrating indicators on targeted advertising and algorithmic decision-making systems in view of the 2020 Ranking.

As in previous years, we have been reviewing the results of the latest Ranking Digital Rights Index and already working on the implementation of its recommendations, such as the one regarding broadening the scope of our future human rights impact assessments to explicitly include targeted advertising and zero rating, even though work has already been done on these issues from a human rights/privacy perspective in the past (more information on our approach to targeted advertising can be found [here](#); zero-rating is not being offered in our core market Spain given our commercial strategy to provide unlimited data plans).

We are looking forward to continued dialogue with interested stakeholders on human rights, also and particularly with Access Now. Sincerely,

Maya Ormazabal
Director of Environment and Human Rights, Telefónica S.A.