



12 September 2018

Gopal Vittal
Chief Executive Officer of India and South Asia
Bharti Airtel Limited
Bharti Crescent
1 Nelson Mandela Road
Vasant Kunj, Phase - II
New Delhi, India, 110070

Dear Mr. Vittal,

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. Bharti Airtel's score was based on an evaluation of its disclosed policies for Airtel India's pre-paid mobile, post-paid mobile, and fixed-line broadband services in India.

Airtel ranked seventh out of 10 companies in its category, and saw a 0.46% increase in its Index score from 2017. The slight increase can be attributed to the company's disclosure of employee training on security practices as well as its monitoring of employees' access to user information. However, Airtel's 2018 ranking showcases your lack of transparency regarding practices and policies that affect freedom of expression and privacy rights.

Airtel disclosed only limited information on the types of user information it collects, shares, and for what purpose, and fell short of providing information on its data retention periods. Airtel also failed to disclose whether users may control what information is collected about them and shared, or whether users can obtain information about the data the company holds on them. The 2018 Index also demonstrated a serious lack of transparency on issues related to Airtel's processes for handling third party request relating to network, content or account restrictions. Despite the immense increase in the number of network shutdown orders it receives from government officials, Airtel India did not disclose the number of requests or how it evaluates or responds to such orders.

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.



- Airtel should **disclose more information regarding network shutdowns**. The company should be more transparent about its policies and practices for handling government requests to shut down networks and commit to publicize and pushback on these types of requests.
- The company should **provide greater information about private requests**. Airtel should be more transparent about the company's process for responding to government and private requests to block content or restrict accounts. Airtel should also provide information on how the company evaluates and responds to external requests for user information.
- Airtel should **improve its disclosure of its internal processes for keeping user data secure**, including the company's policies for responding to data breaches.
- Airtel should **join the Global Network Initiative (GNI)**, whose members not only make human rights commitments but also undergo independent assessments to verify whether they have implemented and institutionalized them. Airtel should also participate in multi-stakeholder forums including the [RightsCon](#) Summit Series.

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> with Ana Zbona <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
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