



12 September 2018

Wail Salman
Acting Chief Executive Officer
Etisalat Limited
Rotunda Towers
No.109, Galle Road
Colombo, Sri Lanka, 03

Dear Mr. Salam,

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

Etisalat ranked ninth out of 10 companies in its category, and saw a 0.52% increase in its Index score from 2017. The slight increase in the 2018 Index can be attributed to Etisalat's improved transparency around security - by clarifying that it has a security team actively monitoring privacy and security threats. Etisalat disclosed minimal information about how it handles user information.

The 2018 Index shows that Etisalat did not disclose sufficient information about its governance processes to ensure that it is effectively upholding the human rights to freedom of expression and privacy. The company has fallen behind its peers who engage independent assessment processes to bolster their accountability. Additionally, the company failed to disclose to users the options they have to control the collection and use of their information, including for purposes of targeted advertising. Further, Etisalat did not provide sufficient information on policies affecting user privacy. These factors, coupled with the fact that Etisalat provided no information on how it handles third party requests for user information, all led to Etisalat being one of the lowest-scoring telecommunications companies on the 2018 Index.

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.

- Etisalat should be **more transparent with the company's privacy policy disclosure.** The company should clearly articulate which privacy policies apply to different services, and provide more information on how Etisalat handles users' information.



- The company should provide **more information on its processes for responding to private requests** to block content or accounts and to hand over user data. Etisalat should regularly disclose data on these types of requests.
- Etisalat **should disclose information about network shutdowns** and about how it handles such requests. The company should also make a clear commitment to uphold human rights and push back against government shutdowns.
- Etisalat should **improve the company's grievance mechanism by providing information on the processes for receiving complaints** related to freedom of expression and privacy rights. The company should also provide clear remedies for these categories of complaints.
- Etisalat 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, and participate in 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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