



12 September 2018

Boris Dobrodeev
Chief Executive Officer
Mail.Ru Group Ltd.
125167, Leningradsky prospekt 39, bld. 79
Moscow, Russia 125167

Dear Mr. Dobrodeev:

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. Mail.Ru's score was based on an evaluation of its disclosed policies for its Mail.Ru email, Mail.Ru Agent, and Vkontakte services.

Mail.Ru ranked 11th out of 12 companies in its category, and saw no improvements from its 2017 Index score. The company's poor score can be attributed to its lack of transparency around its policies affecting users' privacy and freedom of expression. Although Russian laws impose many requirements on internet companies, your company does not face any legal obstacles for publicly committing to respect users' human rights. Mail.Ru could disclose more information about key policies and practices affecting freedom of expression and privacy rights.

Mail.Ru was one of three internet and mobile companies that did not disclose any information about their process for handling government and private requests for user information. Your company could also provide more information about its processes for handling government and private demands to restrict content. Further, Mail.Ru's social networking service requires users to supply a mobile phone number in order to confirm users' real identity, despite no clear indication that the Russian regulation requires social network platforms to implement an identity verification process.

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.

- Mail.Ru should clearly articulate its **commitment to respect freedom of expression and privacy as human rights**. The company should publicly pledge to uphold these rights particularly given that there are no legal obstacles that prevent Mail.Ru from doing this.



- The company should provide **more information about how it handles government demands to remove content as well as its protocol for processing government requests for user information.** Mail.Ru should also indicate where the law does not permit full transparency.
- Mail.Ru should be **more transparent about the company's process for handling user data**, including providing information on the manner in which the company communicates to users what steps they are taking in order to secure user information.
- Mail.Ru 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 multi-stakeholder forums including the RightsCon Summit Series.

Transparency on these issues not only supports human rights, but also helps ensure 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 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
peter@accessnow.org