



12 September 2018

Sheikh Saud Bin Nasser Al Thani
Group Chief Executive Officer
Ooredoo
Ooredoo Tower
West Bay Area
Doha, Qatar

Dear Nasser Al Thani,

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

Ooredoo received the lowest score of the 10 telecommunications companies surveyed and saw no increase in its Index score from 2017. Ooredoo's results in the 2018 Index demonstrated a serious lack of transparency on issues related to freedom of expression and privacy rights. Ooredoo was the poorest performing telecommunications company in the governance category. The company failed to make a public commitment to respect freedom of expression and privacy as human rights. Further, the company also received the lowest privacy score because it did not publish a privacy policy for pre- or post - paid mobile, or fixed-line broadband services. Additionally, Ooredoo has not provided information about the company's policies to secure users' data.

Ooredoo also lagged behind its competitors because the company did not publish the types of user information it collects, shares, retains, and its purposes for doing so. The company's poor Index ranking is also attributed to the fact that Ooredoo did not supply information about how it handles external requests to block content or restrict users' accounts. Additionally, Ooredoo failed to provide data about these types of external requests, despite facing no legal obstacles for disclosing this information.

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.



- Ooredoo should **publish privacy policies**. The company should clearly articulate its privacy policies and ensure that these documents are easily accessible and written in plain language.
- The company should be **more transparent about its process for handling government and private requests to block content or restrict user accounts**, as well as Ooredoo's approach for handling network shutdown requests.
- Ooredoo should **disclose the process by which it receives complaints related to freedom of expression and privacy rights**, and its process for responding to these complaints.
- Ooredoo 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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