



12 September 2018

Arkady Volozh
Chief Executive Officer
Yandex N.V.
Ulitsa Lva Tolstogo 16, Moscow,
Russia 119021

Dear Mr. Volozh:

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. Yandex's score was based on an evaluation of its disclosed policies for its Yandex Mail, Yandex Search, and Yandex Disk services.

Yandex ranked ninth out of 12 companies in its category, and saw no change in its Index score from 2017. The company did not make substantive improvements or disclose sufficient information about Yandex's policies affecting users' human rights. Although the company does not face any legal impediments for making a public commitment to respect users' human rights, the company has failed to do so.

Further, the 2018 Index results demonstrated a serious lack of transparency on issues related to users' privacy. Yandex provided very little information about users' ability to control whether their information is used for targeted advertising. The company did not disclose whether and how it tracks users across the internet nor whether users may access the information that the company holds about them. This, coupled with the fact that the company provides less information than most of its competitors about its process for handling government and private requests for user information, represents an important area for improvement for the company to fully respect the rights of its users.

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.

- Yandex should **clearly articulate its commitment to freedom of expression and privacy as human rights**. There are no legal obstacles that prevent Yandex from clearly committing to upholding these rights.



- The company should **be more transparent about external requests**. Yandex should provide more information about how it handles government requests to delete content as well as requests for access to user information. The company should also provide information on the instances where the law impedes the company's full transparency.
- Yandex should **provide more information about how it handles user information**. The company should be more transparent about how long it retains user data, and whether and how it tracks users across the internet.
- Yandex 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 depend on companies to be transparent about these issues to ensure they are making sound choices that are encouraging user growth.

We ask that 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 12, 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