

Telenor ASA

Operating company evaluated:

- Telenor Norway

Services evaluated:

- Telenor Norway [Prepaid mobile]
- Telenor Norway [Postpaid mobile]
- Telenor Norway [Fixed-line broadband]

Rank

4

Score

45%

Rank among 12 telecommunications companies

0% —●●●●●●●●●●●●●● 100%

Key findings

- Telenor disclosed strong corporate governance and oversight over human rights issues across its global operations, but still lacked transparency about its policies and practices affecting freedom of expression and privacy in key areas.
- Telenor lacked disclosure about how it handles government demands for user data or to block or filter content, although there are no legal barriers preventing it from being more transparent.
- The company did not reveal enough about what types of user data it collects and shares—or give clear enough options for users to control what is collected and shared about them.

Key recommendations

- **Be more transparent about government demands:** Telenor should disclose more detailed data about its compliance with government requests to restrict content or accounts, and to hand over user information.
- **Clarify handling of user data:** Telenor should clarify the types of data it collects, shares, and its policies for retaining user information. It should give users clear options to control what data the company collects and shares about them, including for the purposes of targeted advertising.
- **Improve remedy:** Telenor should be more accountable to users by strengthening its grievance and remedy mechanisms and ensuring that these procedures are accessible, predictable, and fully transparent.

Analysis

Telenor ranked fourth out of 12 telecommunications companies, scoring slightly higher than Deutsche Telekom, but lower than Telefónica, Vodafone, and AT&T.¹ The company—a newcomer to the RDR Index this year—is a member of the Global Network Initiative (GNI). However, while Telenor disclosed strong corporate governance and oversight over human rights issues and commitments across its global operations, it lacked sufficient transparency about its policies and practices affecting freedom of expression and privacy in key areas. Telenor was particularly opaque about how it handles government demands for user data, or to block content or deactivate accounts, despite there being no legal restrictions preventing the company from being more transparent in these areas.

Telenor ASA offers mobile and fixed-line broadband services in Scandinavia and Asia.

Market cap: USD 29.3 billion²

OSE: TEL

Domicile: Norway

Website: <https://www.telenor.com>

Governance 78%

Telenor received the fourth-highest score among telecommunications companies, after Telefónica, Orange, and Vodafone. It published a strong public commitment to respect freedom of expression and privacy as human rights (G1), and disclosed evidence of senior-level management over these issues within the company (G2). It disclosed that it conducts human rights impact assessments on existing products and services, but like most companies, failed to disclose whether it assesses risks associated with enforcing its terms of service,

its use of automated decision-making technologies, or its targeted advertising policies and practices (G4). Telenor could also improve its grievance and remedy mechanisms: while it provided users with an option to submit complaints, including those related to freedom of expression and privacy, it offered no information about the number of complaints it received or any evidence that it provided users with a remedy (G6).

Freedom of Expression 34%

Telenor failed to disclose adequate information about policies and practices affecting users' freedom of expression, and was less transparent than Telefónica, Vodafone, and AT&T in a number of areas. While Telenor Norway was more clear than any other telecommunications operator in the Index about what types of content and activities are prohibited on its services (F3), it disclosed nothing about what actions it took to enforce these rules (F4).³ Telenor also lacked sufficient transparency about how it handles third-party requests to block content or deactivate user accounts (F5-F7). Although telecommunications

companies generally score poorly on these indicators, there is nothing preventing Telenor from being more transparent about how it handles these types of requests.

The company also disclosed very little about its network management policies, and failed to make a commitment to net neutrality principles (F9). But it disclosed more than most of its peers about its process for responding to government demands to shut down networks (F10).

Privacy 39%

Telenor disclosed less than most of its European peers about policies affecting users' privacy, and was particularly unclear about how it handles government demands for user data. It disclosed less than most of its European peers, except Orange, about its process for responding to government and private requests for user information (P10, P11)—and, like all telecommunications companies evaluated, it failed to disclose whether it would notify users of requests it receives for their information (P12).

Telenor Norway also fell short of clearly disclosing how it handles user information (P3-P8)—although it disclosed more than many of its peers, apart from Deutsche Telekom and Telefónica Spain. It did not fully disclose the types of data it

collects (P3), or shares (P4), and disclosed almost nothing about its policies for retaining user information (P6). It also did not give users very clear options to control what data the company collects and shares about them, including for the purposes of targeted advertising (P7).

While Telenor Norway disclosed less about its security policies (P13-P18) than most of its European peers, it was one of the few telecommunications companies to provide some information about its process for responding to data breaches (P15). However, the company disclosed almost no information about how it addresses security vulnerabilities (P14).

Footnotes

[1] The research period for the 2019 Index ran from January 13, 2018 to February 8, 2019. Policies that came into effect after February 8, 2019 were not evaluated in this Index.

[2] Bloomberg Markets, Accessed April 18, 2019, www.bloomberg.com/quote/TEL:NO

[3] For most indicators in the Freedom of Expression and Privacy categories, RDR evaluates the operating company of the home market, in this case Telenor Norway.