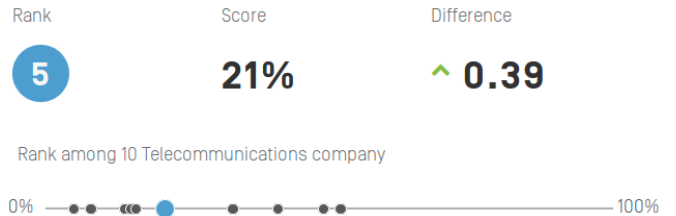


# Vodafone Group Plc

## Services evaluated

- iMessage [\[Link\]](#)
- iCloud [\[Link\]](#)
- iOS [\[Link\]](#)



## Key findings

- América Móvil failed to disclose sufficient information about its policies and practices affecting users' freedom of expression and privacy.
- The company lacked disclosure about how it responds to government requests to shut down networks.
- The company did not clearly disclose how it handles government or private requests to restrict content or hand over user information.

## Key Recommendations

- **Be transparent about policies affecting users' freedom of expression.** The company should be more transparent about how it responds to government requests to block content, restrict user accounts, and shut down networks.
- **Be transparent about external requests.** The company should disclose data about the number of government and private requests it receives to remove content and accounts and to hand over user information.
- **Disclose more about security practices.** The company should clearly communicate its handling of data breaches to users.

**América Móvil, S.A.B. de C.V.** provides telecommunications services to Mexico and 35 countries in the Americas and Europe. It offers mobile and fixed-voice and data services for retail and business customers and is one of the largest operators globally.

**Industry:** Diversified Telecommunication Services

**Market cap:** USD 63.4 billion

**Stock symbol:** AMX L

## Analysis 21%

América Móvil ranked fifth out of the 10 telecommunications companies evaluated, disclosing little about policies and practices affecting freedom of expression and privacy. The company slightly improved its disclosure of policies affecting users' freedom of expression in the 2018 Index. Although Freedom House rates Mexico's internet environment as [Partly Free](#), the country's legal environment does not prevent the company from meeting basic benchmarks for transparency in key areas. For instance, the company did not disclose its process for responding to government or private requests to block content or accounts, although no

laws in Mexico prevent companies from doing so. In addition, although companies are [required to report](#) to the telecommunications authority the number of government requests received for real-time location tracking or access to user metadata, América Móvil did not publish this data.

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## Governance 21%



América Móvil scored below most of its peers in the Governance category, but ahead of Bharti Airtel, Etisalat, Axiata, and Ooredoo. The company continued to lack clear disclosure of its commitments to human rights at the governance level, including whether it conducts human rights impact assessments (G4) or if it engages with a range of stakeholders on freedom of expression and privacy issues (G5). However, it disclosed more than most of its peers about remedy mechanisms addressing freedom of expression and privacy related complaints (G6). In Mexico [companies are legally required to provide users with a complaint mechanism](#).

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## Freedom of expression 17%



But the company failed to clarify this (F11).

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## Privacy 25%



América Móvil ranked fifth out of the 10 telecommunications companies evaluated in the Privacy category, ranking behind AT&T, Orange, and several other companies.

**Handling of user information:** Telcel disclosed less about how it handles user information than AT&T, Vodafone UK, and Telefónica Spain, but more than most other telecommunications companies evaluated (P3-P8). It disclosed little about what types of user information it collects (P3), shares (P4), and its reasons for doing so (P5). Like most of its peers, Telcel disclosed nothing about how long it retains user information (P6), although no law prohibits the company from doing so. It disclosed little about options users have to control what information is collected, including for targeted advertising (P7).

**Requests for user information:** Like most telecommunications companies, América Móvil provided almost no information about how it handles government and private requests for user information (P10), and failed to disclose whether it informs users when their information is requested (P12). The company did not publish any data about such requests (P11), despite being required by law to report the number of government requests for real-time location tracking or user metadata to the country's telecommunications authority.

**Security:** Telcel did not provide as much information about its security policies as Vodafone UK, AT&T, and Telefónica Spain, but was on par with Airtel India and Orange France (P13-P18). Telcel failed to disclose any information about how it addresses security vulnerabilities, including if it offers a bug bounty program for security researchers to submit vulnerabilities (P14). Like most companies in the Index, Telcel disclosed nothing about its policies for addressing data breaches (P15). Companies in Mexico are [legally required](#) to notify users only if the data breach "significantly affects" their rights, however the company does not disclose this information to

users.

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