Telenor Annual Authority Request Disclosure Report

2021

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1. INTRODUCTION

Respect for privacy and freedom of expression is important for how we at Telenor Group run our business. Our commitment to human rights is long standing and embedded in our top governing document – the Code of Conduct – as well as our Supplier Conduct Principles.

Specific operational requirements are included in various policies, including Group-wide requirements for handling authority requests for access to our networks and customer data.

In all our markets there are laws that, in certain circumstances, require operators like Telenor to disclose information about customers to the authorities or to restrict communication. Our efforts to minimise potentially negative impacts such requests may have on privacy and freedom of expression (e.g. possible misuse) extend to systematic monitoring of incoming requests, initiating dialogue with relevant authorities, the industry and other stakeholders on authority requests, and seeking to be transparent by reporting in this area. This is our seventh annual report[1]. In our 'Legal overview' reports, most of which were developed in 2017 in cooperation with the Global Network Initiative, you can find relevant information about laws applicable within our markets. These reports contributed to the foundation for the GNI Country Legal Framework Resource, which was most recently updated in 2019 and provides dedicated comparison, download and search features[2].

Whilst adopting transparency as a default position, we continue to advocate that this report should not reduce the governments' responsibility to inform the public of the extent of such requests. There are several reasons for this, but most centrally, the same governments that restrict privacy and freedom of expression should also make all reasonable efforts to ensure concerned citizens that these powers are used with due care. It is also important to note that in a few markets, the relevant authorities have direct access to operators' networks and/or communication data, which means that the operator would not have full visibility on how authorities intercept communication.

Some governments publish reports regarding their use of legal powers to access communication information on a regular basis. We encourage all governments to adopt this practice. In the meantime, we view this document as one of our contributions to increased transparency.

The COVID-19 pandemic, the decline of democracy and trend towards political polarisation in some of Telenor's markets, have increased the legal, operational, and reputational challenges of the company. Human rights and digital access rights challenges have shown that Telenor has a role in helping solve societal challenges and ensuring responsible data governance and network security globally. Telenor cannot meet those challenges alone. The company works with partners – both public and private – to create solutions together, drive outperformance, and take fuller advantage of the opportunities afforded by sustainability.

In 2020, a general increase of requests for the distribution of authority information and for historical data since the beginning of the global pandemic was reported across Telenor's business units (BUs). In 2021 there was no further increase in trends in any of our markets due to the on-going pandemic. Telenor had engaged in mobility data exchange arrangements with health authorities in several markets in 2020, including in our Nordic operations, to help estimate the current and future trajectory of the epidemic. The data analytics provided was fully anonymised. The pandemic continued to have some impact on Telenor's work on the handling of authority requests by restricting travel, thus preventing important in-person dialogue and engagement with relevant stakeholders and forums.

[1] For our first report published in May 2015. Please see our website for more information and previous years' reports:
https://www.telenor.com/sustainability/responsible-business/handling-access-requests-from-authorities/
https://www.telenor.com/sustainability/responsible-business/privacy-and-data-protection/handling-access-requests-from-authorities/lenor Annual Authority Request Disclosure report 2021

[2] https://globalnetworkinitiative.org/policy-issues/legal-frameworks/

Update on Myanmar after the February 2021 military takeover

Telenor's disclosure and handling of authority requests faced unprecedented challenges in Myanmar after the military takeover on February 1, 2021.

Telenor entered Myanmar in 2013 with a clear ambition to support the country in its progress towards democracy and economic development. Access to telecom services has always been essential for people to exercise their basic right to freedom of opinion and expression, and to gain information. Following orders from authorities after the takeover has negative impact on human rights in Myanmar. Telenor continuously worked to minimise this impact, and repeatedly expressed to the authorities its opposition to the lacking respect for human rights and rule of law in Myanmar, and that access to telecom services should be maintained at all times.

Telenor has followed its established global process for handling authority directives both before and after 1st February '21. Each directive was assessed for legal basis, human rights impact, people security, necessity and proportionality and our ability to be transparent. As a local employer, Telenor Myanmar had to handle a difficult situation and ensure the safety and security of employees on the ground during this state of emergency. Unfortunately, these considerations made it impossible for us to be as transparent as we wanted. Telenor's ability to disclose directives received after 14 February 2021 was restricted, as it could have put the safety of Telenor Myanmar employees at risk.

Telenor sold its entire shares in Telenor Myanmar to new owners on 24th March 2022, this report contains collated data for authority directives received by Telenor Myanmar from 1st Jan'21 till 31st Dec'21.

2. WHY DO WE REPORT

During the reporting period, Telenor Group had mobile operations in nine countries across Europe and Asia. In each of these countries, there are laws that require telecom operators to disclose information about their customers to government authorities in certain circumstances.

Over the last few years, there has been an important global public debate about the scope, necessity and legitimacy of the legal powers that government authorities use to access the communications of private individuals or to restrict communication. Questions have also arisen as to the role that telecommunications network and service providers play in relation to such actions.

Although the authorities have a legitimate need to protect national security and public safety, and to prevent or investigate criminal activities, we recognise that the application of these legal powers in some situations may challenge the privacy and freedom of expression of affected individuals. Considering this, since 2015, Telenor has contributed to transparency in this area through this annual reporting.

3. GOVERNANCE

As a member of the Global Network Initiative (GNI), Telenor is fully committed to the GNI Principles. This includes a commitment to comply with all applicable laws and respect internationally recognised human rights, wherever we operate. Where national laws, regulations and policies do not conform to international standards, Telenor will seek to avoid, minimise, or otherwise address the adverse impact of government demands, laws, or regulations, and seek ways to honour the principles of internationally recognised human rights to the greatest extent possible, without violating national laws.

Telenor's Board of Directors has approved the company's human rights policies and exercises oversight with the support of its Sustainability and Compliance Committee. The Board of Directors also exercises oversight through its Risk and Audit Committee who has direct reporting from the Head of Group Internal Audit. Telenor's commitment to the GNI Principles is also overseen by the GNI Board of Directors through independent assessments. In 2019, Telenor underwent its first GNI Independent Assessment by an external assessor. Following a detailed review of the assessment by the multi-stakeholder GNI Board representing industry, civil society organisations, investors and academics, it was determined that Telenor is making good faith efforts to implement the GNI Principles with improvement over time. The full report can be accessed here. The next independent assessment will be conducted in 2022.

At Telenor Group we find that implementation is the key to ensuring that we properly handle requests from authorities. This requires continuous improvement. We achieve this through a system of clear top management ownership, dedicated personnel both at Group and company levels, and systems for checking compliance. Ownership of the Group Sustainability policies are with the Group Executive Vice President for People and Sustainability, Group Privacy policy is owned by Group Executive Vice President for External Relations and Strategy and the Group Authority Request Manual is owned by Group Executive Vice President and Head of Legal.

Telenor Group's compliance management system for handling authority requests is built on international standards. Risk assessments identify challenges and is the starting point for definition of group-wide requirements, controls, training ambitions and compliance follow-up. The specialised compliance management system for authority request is complemented by Telenor Group's general management system for human rights which covers activities ranging from overall human rights due diligence to project- or issue-specific risk assessments.

4. POLICY

In order to address requests from authorities for customer data or access to our networks professionally and systematically we have applied Group-wide requirements to all the mobile operators. These mandatory requirements are part of our governance framework and are included in our Sustainability and Privacy policies and underlying manuals.

The authority request manual is managed by the Group Legal team and locally by the Business Unit Data Protection Officers.

The purpose of our manual on handling authority requests is to ensure proper handling of authority requests in order to limit the risk that our companies' networks / services leading to negative impact on human rights restrictions to privacy or freedom of expression. It covers lawful intercept and access to historical data, blocking, network shutdown, distribution of authority information and other authority requests with a human rights impact. The manual includes requirements relating to:

- Organisation – including dedicated function(s), reporting to top management, staffed with qualified personnel

- Handling – including checking legal basis and risk of serious human rights impact, challenge and escalation criteria

- Consultation with Group – including process for notification in cases posing significant risk

- Transparency – including a general requirement of transparency to the extent possible

- Information – including regular updates to company CEO

- Record keeping – including legal basis and process steps taken

- Access to remedy – including a requirement to establish a process to receive complaints from users

- Risk assessment & mitigation – including regular reviews of legal frameworks, update of processes, and long-term strategies to minimise negative impact

- Improvement over time – including guidelines issued under the principle of comply or explain

To the extent legally possible and information available (where authorities do not have direct access to the networks), companies also report on an aggregated level the number of requests received annually in the Group ESG reporting system, which forms the basis for our public reporting.

The Privacy policy covers general data protection. In the context of authority request, it informs the principles applied when assessing requests for lawful interception and access to historical data. You can read more about the policy on our webpage[3].

The Sustainability policy is managed by the Group Head of HSE and Sustainability and by local heads of Sustainability. It covers among other requirements, principles of conducting human rights due diligence. You can read more about the policy on our webpage[4].

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[3] https://www.telenor.com/privacy-policy/
[4] https://www.telenor.com/sustainability/responsible-business/human-rights/managing-human-rights/

5. OUR PROCEDURES

Our local teams across our markets implement procedures for checking that authority requests meet procedural and material requirements for a valid legal basis under local law. When requests lack a clear legal basis or pose a significant risk of serious human rights impact, the local teams shall inform the authority accordingly and refrain from executing the request, to the extent reasonably possible without risking disproportionate reprisals. The local units are also required to interpret requests and legal basis as narrowly as possible.

At the local unit level, experts from privacy, legal, sustainability, security, communications, and public and regulatory affairs will assess challenging cases and escalate if needed to the local CEO. A point of contact at the Group level engages with the local units on these issues, receives the escalations, and summons a Group level team representing the same functions as the local escalation team as required. For any cases that are particularly challenging or of high risk, this team will escalate the request to a high-level steering committee to make a decision, in collaboration with the business unit CEO. If the request cannot be resolved at this level, Group CEO will decide on necessary actions.

Local units are further required to identify risks to customers by monitoring trends in authority requests and legislative initiatives. On that basis, our mobile operators are required to take appropriate action such as promoting incorporation of human rights safeguards into national law or following up historical requests to mitigate human rights impact.

6. HOW WE REPORT

The purpose of this section is to help our readers better understand how we approach authority requests. Through provision of relevant limitations of the report alongside the definitions we apply, we hope that our readers will be equipped with context and background for reading this transparency reporting.

6.1 LIMITATIONS

When reading this report, it is important to understand that there are inherent limitations to the report.

a. Limitation based on knowledge and permission

The disclosure in this report is based on what we are permitted to report and what we know:

- In some of the countries we operate, there are laws that prohibit us from disclosing statistics on authority requests, or information that authority requests have been made at all.

- In some countries the relevant authorities have instructed us not to publish information on authority requests. We have reason to believe that ignoring these instructions could lead to serious sanctions, and in some instances could even pose a threat to our employees.

- In some countries, the law is unclear on whether we are allowed to publish and at the same time, we have reason to believe that publishing could lead to serious sanctions, and in some instances could even pose a threat to our employees.

- In some countries we are legally obliged to allow permanent direct access to our network with no control or visibility over the interception activities that authorities carry out.

For countries where we are unable to report due to any of the reasons above, we have indicated this by inserting a dash (-) in the relevant box in the reporting form.

b. Limitation on impact demonstration

Although the number of requests that we have received and met provide a sense of scale, there are several reasons why these do not provide an accurate picture of the requests' actual privacy and freedom of expression impact. One reason for this is that a single request, depending on the legal framework in each country may cover an unspecified number of individuals, or communications services or devices used by these individuals. On the other side, one individual can in many circumstances be subject to several simultaneous or consecutive requests related to the same investigation.

As the above mentioned indicates, there are many variables to consider in order to give a picture that is as accurate as possible of the request's actual privacy and freedom of expression impact. To a large extent, these variables will also be incommensurable from one country to another.

For this reason, we have tried to complement the basic data about number of requests with other information where we have it available, such as the number of accounts that have had restrictions imposed, the number of sites that are blocked, the subject with which requests are concerned, etc.

6.2 DEFINITIONS

LAWFUL INTERCEPT

Covers real-time interception (i.e. wire-tapping, positioning for emergency situations, etc.), in particular:

· Request for real-time access to the content of communications

· Request for real-time access to traffic data

· Request for access to real-time location information, i.e. access to information on the location of mobile terminals/phones

One single request can include several MSISDN, IMEI, USER-ID etc.

HISTORICAL DATA

Covers all requests for the provision of historical data:

· Request for access to any historical traffic or communications data

· Request for access to any subscription data

· Request for access to historical location information

· Request for any other personal information stored by operator e.g. regarding employees, visitors and surveillance videos.

· Request for other types of customer data such as name, physical address, services subscribed and historical location data.

One single request can include several MSISDN, IMEI, USER-ID etc.

FREEZE OF HISTORICAL DATA

Covers all requests for freeze of data. Requests to provide authorities with access to frozen data are not covered by the concept.

BLOCKING

Covers all requests for blocking including blocking of specific IP-addresses, ports, URLs or of specific OTT services.

Shutdown of a full network or of for instance 3G is not counted as blocking, see Network shutdown.

ELEMENTS BLOCKED

This is the total number of blocked elements including URLs, IP addresses, ports, and specific OTT services at the end of the year. Blocking implemented in previous reporting periods which continue to be in place are also included in the numbers we report.

NETWORK SHUTDOWN

Covers shut down of the mobile or fixed network or parts of it. Requests to close down 2G, 3G, 4G, 5G and/or data are also counted.

A single request to shut down a network over several time periods are counted as a single request. Similarly, a single request to shut down a network in several different areas are counted as a single request.

DISTRIBUTION OF AUTHORITY INFORMATION

Covers all requests for sending out information from an authority to all or part of our customer base irrespective of means. The means is typically SMS.

This category does not include requests for distribution of information on commercial basis by means of services that are already effectively offered to all political actors.

ACCOUNT RESTRICTION

This counts the number of requests for restriction(s) of specific accounts. Restrictions may take any form such as denial of access to a specific IP addresses or complete closure of an account.

Requests to restrict all accounts, or all accounts with few exceptions, are not counted. See blocking and network shutdown.

NUMBER OF ACCOUNTS AFFECTED

The total number of accounts affected by requests. If a single account is affected by two different requests, the account is counted twice.

Where the number of accounts affected is not known, the number of MSISDNs may be provided instead. An MSISDN is a unique connection between a phone number and a SIM in a device. The number is in practice the number of SIM cards. Where the number concerns MSISDNs affected, it is explicitly stated.

COMPLAINTS RECEIVED

This includes all complaints received from users due to authority requests. If Telenor receives a complaint from a credible representative of the people impacted by an authority request or from a non- governmental organisation, the complaint is also counted.

POPULATION

As reported by UNFPA, numbers for 2021.

MOBILE SUBSCRIBERS

As reported by Telenor in 2021 Q4 Report.

GDP PER CAPITA (PPP CURRENT $)

As reported by World Bank International Comparison Program, numbers for 2020.

UNDP HUMAN DEVELOPMENT INDEX, GLOBAL RANK

As reported by UNDP in Human Development Index 2020 report.
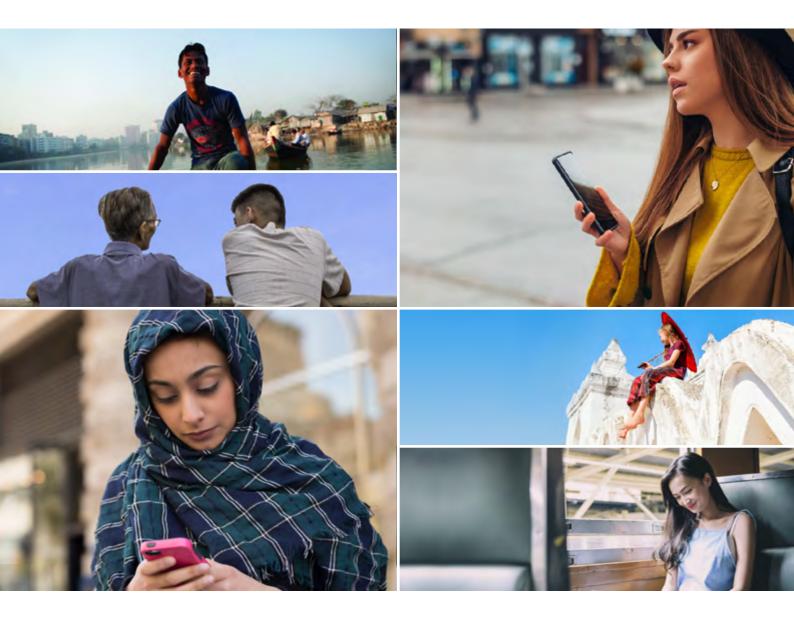
WJP FUNDAMENTAL RIGHTS, GLOBAL RANK

As reported by World Justice Project in Rule of Law Index 2021.

FREEDOM HOUSE, INTERNET FREEDOM SCORE

As reported by Freedom House, 2021 (only available for Asian units)

7. COUNTRY OVERVIEW

BANGLADESH

Basic facts	
Population	166.3 mill.[5]
Mobile subscribers	83 mill.[6]
GDP per capita (PPP current $)	$ 5,140[7]
UNDP Human Development Index, global rank	#133/189[8]
WJP Fundamental Rights, global rank	# 134/139[9]
Freedom House: Internet Freedom Score	40/100[10]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	–	–	No information on requests available for reporting.
Historical Data	907620	907620	
Freeze of historical data	–	–	No information on requests available for reporting
Blocking	1	100%	3 elements were blocked at the end of the year. For all elements, users will be notified of the blocking when trying to access the elements concerned.
Network Shutdown	3	100%	
Distribution of authority information	171	100%	
Account Restriction	–	–	No information on requests available for reporting

Complaints received: The company received no complaints.

Industry disclosure: The company further contributes to public disclosure through the Association of Mobile Telecom Operators of Bangladesh: https://www.amtob.org.bd/

[5] https://www.unfpa.org/data/world-population-dashboard
[6] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[7] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[8] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[9] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[10] https://freedomhouse.org/countries/freedom-net/scoresworks/

DENMARK

Basic facts	
Population	5.8 mill.[11]
Mobile subscribers	1.6 mill.[12]
GDP per capita (PPP current $)	$ 60,230[13]
UNDP Human Development Index, global rank	#10/189[14]
WJP Fundamental Rights, global rank	#1/139[15]
Freedom House: Internet Freedom Score	N/A[16]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	353	93%	
Historical Data	1911	97%	
Freeze of historical data	746	98%	
Blocking	46	98%	989 elements were blocked at the end of the year. For all elements, users will be notified of the blocking when trying to access the elements concerned.
Network Shutdown	0	0	
Distribution of authority information	9	100%	
Account Restriction	0	0	

Complaints received: The company received no complaints.

Industry disclosure: The company further contributes to public disclosure through Danish Telecom Industry Association. See in particular the list of blocked sites: http://www.teleindu.dk/brancheholdninger/ blokeringer-pa-nettet

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[11] https://www.unfpa.org/data/world-population-dashboard
[12] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[13] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[14] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[15] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[16] Denmark not included in Freedom House Internet Freedom Score for 2021

MALAYSIA

Basic facts	
Population	32.8 mill.[17]
Mobile subscribers	10.3 mill.[18]
GDP per capita (PPP current $)	$ 27,924[19]
UNDP Human Development Index, global rank	#62/189[20]
WJP Fundamental Rights, global rank	#84/139[21]
Freedom House: Internet Freedom Score	58/100[22]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	–	–	
Historical Data	25150	99%	
Freeze of historical data	0	0	
Blocking	323	100%	6469 elements were blocked at the end of the year.
Network Shutdown	0	0	
Distribution of authority information	98	100%	
Account Restriction	7	99%	

Complaints received: The company received no complaints.

Industry disclosure: The company further contributes to public disclosure through Danish Telecom Industry Association. See in particular the list of blocked sites: http://www.teleindu.dk/brancheholdninger/ blokeringer-pa-nettet

[17] https://www.unfpa.org/data/world-population-dashboard
[18] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[19] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[20] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[21] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[22] https://freedomhouse.org/countries/freedom-net/scores

FINLAND

Basic facts	
Population	5.5 mill.[23]
Mobile subscribers	2.7 mill.[24]
GDP per capita (PPP current $)	$ 50,506[25]
UNDP Human Development Index, global rank	11/189[26]
WJP Fundamental Rights, global rank	3/139[27]
Freedom House: Internet Freedom Score	-/100[28]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	1809	100%	
Historical Data	8186	100%	
Freeze of historical data	0	0	
Blocking	0	0	
Network Shutdown	0	0	
Distribution of authority information	0	0	
Account Restriction	0	0	

Complaints received: The company received no complaints.

[23] https://www.unfpa.org/data/world-population-dashboard
[24] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[25] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[26] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[27] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[28] Finland not included in Freedom House Internet Freedom Score for 2021.

MYANMAR

Basic facts	
Population	54.8 mill. [29]
Mobile subscribers	18.2 mill. [30]
GDP per capita (PPP current $)	$ 5,123 [31]
UNDP Human Development Index, global rank	#147/189 [32]
WJP Fundamental Rights, global rank	#137/139 [33]
Freedom House: Internet Freedom Score	#17/100 [34]

Telenor's disclosure and handling of authority requests faced unprecedented challenges in Myanmar after the military takeover on February 1, 2021. Telenor has followed its established global process for handling authority directives both before and after February 1. Each directive was assessed for legal basis, human rights impact, people security, necessity and proportionality and our ability to be transparent. As a local employer, Telenor Myanmar had to handle a difficult situation and ensure the safety and security of employees on the ground during this state of emergency. Unfortunately, these considerations made it impossible for us to be as transparent as we wanted. It was not possible to disclose directives after 14 February, because it could put the safety of Telenor Myanmar employees at risk. For more information related to Telenor in Myanmar and the handling of authority directives, see our dedicated Myanmar page on Telenor.com.

[29] https://www.unfpa.org/data/world-population-dashboard
[30] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q1-2021-Analytical-Tool-fa5e16576e17dd0e45d973617d1b619b.xlsx
[31] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[32] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[33] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[34] https://freedomhouse.org/countries/freedom-net/scores

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	0	0	Requests received in this report refers to specific tracking requests. The lawful intercept equipment in Myanmar was not activated through the reporting period, which is why the number of requests is set to 0. It should be noted that Telenor Myanmar was exposed to significant pressure from the Myanmar authorities to activate the system during the reporting period but did not do so.
Historical Data	153	96%	
Freeze of historical data	0	0	
Blocking	115	98%	42258 elements were blocked at the end of the year
Network Shutdown	73	100%	
Distribution of authority information	21	14%	
Account Restriction	12	12	Number of accounts affected: 40 MSISDN

Complaints received: A complaint was filed to the Norwegian National Contact Point (NCP) for the Organisation for Economic Co-operation and Development (OECD) on 28 July 2021, alleging that Telenor Group had failed to comply with the OECD Guidelines in the sale of its subsidiary Telenor Myanmar. Telenor has from the onset of this case, expressed openness for dialogue with the complainant and the NCP. At the time of this report's publication, the handling of the complaint is still in process.

NORWAY

Basic facts	
Population	5.5 mill. [35]
Mobile subscribers	2.7 mill. [36]
GDP per capita (PPP current $)	$ 62,645 [37]
UNDP Human Development Index, global rank	#1/189 [38]
WJP Fundamental Rights, global rank	#2/139 [39]
Freedom House: Internet Freedom Score	N/A [40]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	889	100%	
Historical Data	5432	100%	
Freeze of historical data	71	100%	
Blocking	0	0	
Network Shutdown	0	0	
Distribution of authority information	0	0	
Account Restriction	0	0	

Complaints received: The company received no complaints.

[35] https://www.unfpa.org/data AR /world-population-dashboard
[36] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[37]https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[38] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[39] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[40] Norway not included in Freedom House Internet Freedom Score for 2021

PAKISTAN

Basic facts	
Population	225.2 mill. [41]
Mobile subscribers	49.1 mill. [42]
GDP per capita (PPP current $)	$ 4,813 [43]
UNDP Human Development Index, global rank	#154/189 [44]
WJP Fundamental Rights, global rank	#126/139 [45]
Freedom House: Internet Freedom Score	25/100 [46]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	_	_	No information on requests available for reporting
Historical Data	24	24	Data pertains to the access to data for the purpose of enabling the authorities to offer financial relief and health card services to certain citizens, both related to Covid-19.
Freeze of historical data	52	52	
Blocking	_	_	
Network Shutdown	42	35	
Distribution of authority information	38	38	
Account Restriction	0	0	
Others	10	10	Company received and implemented IVRs and ring back tones for dissemination of health information through IVR

Complaints received: The company received five complaints from customers related to data sharing with law enforcement agencies. All complaints were shared with the telecom regulator and customers were informed.

[41] https://www.unfpa.org/data/world-population-dashboard
[42] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[43] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[44] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[45] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[46] https://freedomhouse.org/countries/freedom-net/scores

SWEDEN

Basic facts	
Population	10.2 mill. [47]
Mobile subscribers	2.8 mill. [48]
GDP per capita (PPP current $)	$ 55,038 [49]
UNDP Human Development Index, global rank	#7/189 [50]
WJP Fundamental Rights, global rank	#4/139 [51]
Freedom House: Internet Freedom Score	N/A

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	2612	98%	
Historical Data	14364	93%	
Freeze of historical data	2	100%	
Blocking	0	0	
Network Shutdown	0	0	
Distribution of authority information	71	100%	
Account Restriction	0	0	

Complaints received: The company received no complaints.

Disclosure by public institutions: Further information can be obtained from relevant public institutions. See in particular: The Swedish Commission on Security and Integrity Protection: https://www.sakint.se/

The Swedish Prosecution Authority: https://www.aklagare.se/

[47] https://www.unfpa.org/data/world-population-dashboard
[48] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[49] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[50] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[51] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[52] Sweden not included in Freedom House Internet Freedom Score for 2021

THAILAND

Basic facts

Basic facts	
Population	70.0 mill. [53]
Mobile subscribers	19.6 mill. [54]
GDP per capita (PPP current $)	$ 18,233 [55]
UNDP Human Development Index, global rank	#79/189 [56]
WJP Fundamental Rights, global rank	#99/139 [57]
Freedom House: Internet Freedom Score	36/100 [58]

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	0	0	
Historical Data	3648	100%	
Freeze of historical data	0	0	
Blocking	51	100%	
Network Shutdown	0	0	
Distribution of authority information	2	100%	
Account Restriction	0	0	

Complaints received: The company received no complaints.

[53] https://www.unfpa.org/data/world-population-dashboard
[54] https://www.telenor.com/binaries/investors/reports-and-information/quarterly/2021/Telenor-Group-Q4-2021-analytical-tool-d08dea229d1b3a6bfa99dbbb563acbcf.xlsx
[55] https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD
[56] https://hdr.undp.org/en/content/latest-human-development-index-ranking
[57] https://worldjusticeproject.org/rule-of-law-index/country/2021/
[58] https://freedomhouse.org/countries/freedom-net/scores