

# Telenor Annual Authority Request Disclosure Report

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## 2022



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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 September 2022, Telenor launched a new strategy and organisational setup for the company. Telenor is going from an integrated, global company to operations through four business areas with clear ambitions and strategic flexibility. Our longstanding commitment to continuously raise standards through a common approach to responsible business remains strong in the new strategic direction and subsequent organisational set-up. The changes will be reflected in the Authority Request Disclosure Report for 2023, to be published in 2024.

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 eight annual report<sup>1</sup>. 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.<sup>2</sup>

Whilst adopting transparency as a default position, we continue to advocate that this transparency report should not reduce the respective governments' responsibility

<sup>1</sup> 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/>

<sup>2</sup> <https://globalnetworkinitiative.org/policy-issues/legal-frameworks/>

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 inform 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.

The general increase across Telenor's business units (BUs) of requests for the distribution of authority information and for historical data since the beginning of the global pandemic was reported in the 2020 report. In 2021 and 2022 there was no further increase in trends in any of our markets due to the 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.

## Myanmar

Telenor sold its entire share in Telenor Myanmar to new owners on 24th March 2022. In the short period from 1st January 2022 to 24th March 2022, the situation did not change regarding authority requests, i.e., no intercept took place as the system for lawful intercept was not activated by the company. Telenor's challenges with regards to authority requests in Myanmar after the military takeover on February 1, 2021, are explained further in the report for 2021. For more information on Myanmar, see dedicated page on Telenor.com.<sup>3</sup>

## Malaysia

In 2022, Telenor's company Digi merged with Axiata's operator Celcom and the new merged company Celcom Digi started operations on 1st December 2022. The report contains information from 1st January 2022 to 30st November 2022 for Digi.

## Thailand

On 1st March 2023 the amalgamation of the two telecommunications operations of True and dtac was completed and the new company, True Corporation, started operations. This report includes information for dtac for the full year of 2022.

<sup>3</sup> <https://www.telenor.com/sustainability/responsible-business/human-rights/human-rights-in-myanmar/myanmar/>



## 2. WHY DO WE REPORT

During the reporting period, Telenor Group had mobile operations in eight countries across Europe and Asia (excluding Myanmar). 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. Telenor has completed 2 rounds of independent assessments by an external assessor, in 2019 and in 2022. In both instances and 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 GNI Public Report on the Fourth Cycle will be launched in 2023.

The Public Report on the Third Cycle of Independent Assessments of GNI Company members 2018/2019 is available here: <https://globalnetworkinitiative.org/wp-content/uploads/2020/04/2018-2019-PAR.pdf>

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. Prior to Telenor's organisational changes in the latter part of 2022, ownership of the Group Sustainability policies were with the Group Executive Vice President for People and Sustainability, Group Privacy policy was owned by Group Executive Vice President for External Relations and Strategy and the Group Authority Request Manual was owned by Group Executive Vice President and Head of Legal. The new structure will be reflected in the Authority Request Disclosure Report for 2023, to be published in 2024. For further information about the changes in executive management, see the announcement from August 2022 here: <https://www.telenor.com/media/newsroom/press-releases/changes-in-telenor-groups-executive-management/>

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 majority owned 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 operator's 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**
- **Information – including regular updates to company CEO**

- **Transparency – including a general requirement of transparency to the extent possible**
- **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<sup>4</sup>.

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<sup>5</sup>.

<sup>4</sup> <https://www.telenor.com/privacy-policy/>

<sup>5</sup> <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

<p><b>LAWFUL INTERCEPT</b></p> <p>Covers real-time interception (i.e. wire-tapping, positioning for emergency situations, etc.), in particular:</p> <ul style="list-style-type: none"> <li>• Request for real-time access to the content of communications</li> <li>• Request for real-time access to traffic data</li> <li>• Request for access to real-time location information, i.e. access to information on the location of mobile terminals/phones</li> </ul> <p>One single request can include several MSISDN, IMEI, USER-ID etc.</p>	<p><b>HISTORICAL DATA</b></p> <p>Covers all requests for the provision of historical data:</p> <ul style="list-style-type: none"> <li>• Request for access to any historical traffic or communications data</li> <li>• Request for access to any subscription data</li> <li>• Request for access to historical location information</li> <li>• Request for any other personal information stored by operator – e.g. regarding employees, visitors and surveillance videos.</li> <li>• Request for other types of customer data such as name, physical address, services subscribed and historical location data.</li> </ul> <p>One single request can include several MSISDN, IMEI, USER-ID etc.</p>
<p><b>FREEZE OF HISTORICAL DATA</b></p> <p>Covers all requests for freeze of data. Requests to provide authorities with access to frozen data are not covered by the concept.</p>	<p><b>BLOCKING</b></p> <p>Covers all requests for blocking including blocking of specific IP-addresses, ports, URLs or of specific OTT services.</p> <p>Shutdown of a full network or of for instance 3G is not counted as blocking, see Network shutdown.</p>
<p><b>ELEMENTS BLOCKED</b></p> <p>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.</p>	<p><b>NETWORK SHUTDOWN</b></p> <p>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.</p> <p>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.</p>
<p><b>DISTRIBUTION OF AUTHORITY INFORMATION</b></p> <p>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.</p> <p>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.</p>	<p><b>ACCOUNT RESTRICTION</b></p> <p>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.</p> <p>Requests to restrict all accounts, or all accounts with few exceptions, are not counted. See blocking and network shutdown.</p>
<p><b>NUMBER OF ACCOUNTS AFFECTED</b></p> <p>The total number of accounts affected by requests. If a single account is affected by two different requests, the account is counted twice.</p> <p>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.</p>	<p><b>COMPLAINTS RECEIVED</b></p> <p>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.</p>
<p><b>POPULATION</b></p> <p>As reported by UNFPA, numbers for 2022.</p>	<p><b>MOBILE SUBSCRIBERS</b></p> <p>As reported by Telenor in 2022 Q4 Report.</p>
<p><b>GDP PER CAPITA (PPP CURRENT \$)</b></p> <p>As reported by World Bank International Comparison Program, numbers for 2021.</p>	<p><b>UNDP HUMAN DEVELOPMENT INDEX, GLOBAL RANK</b></p> <p>As reported by UNDP in Human Development Index 2021 report.</p>
<p><b>WJP FUNDAMENTAL RIGHTS, GLOBAL RANK</b></p> <p>As reported by World Justice Project in Rule of Law Index 2022.</p>	<p><b>FREEDOM HOUSE, INTERNET FREEDOM SCORE</b></p> <p>As reported by Freedom House, 2022 (only available for Asian units)</p>



## 7. Country Overview





## BANGLADESH

Basic facts	
Population	167.9 mill. <sup>6</sup>
Mobile subscribers	79 mill. <sup>7</sup>
GDP per capita (PPP current international \$)	\$ 6,493 <sup>8</sup>
UNDP Human Development Index, global rank	#129/191 <sup>9</sup>
WJP Fundamental Rights, global rank	#135/140 <sup>10</sup>
Freedom House: Internet Freedom Score	43/100 <sup>11</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	-	-	No information on requests available for reporting.
Historical Data	1312803	1312796	
Freeze of historical data	-	-	No information on requests available for reporting.
Blocking	11	100%	377 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	10	90%	
Distribution of authority information	167	100%	
Account Restriction	-	-	No information on requests available for reporting.

**Complaints received:** The company received no complaints.

<sup>6</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>7</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>8</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>9</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>10</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2022/>

<sup>11</sup> <https://freedomhouse.org/countries/freedom-net/scores>



## DENMARK

Basic facts	
Population	5.8 mill. <sup>12</sup>
Mobile subscribers	1.6 mill. <sup>13</sup>
GDP per capita (PPP current \$)	\$ 64,672 <sup>14</sup>
UNDP Human Development Index, global rank	# 6/191 <sup>15</sup>
WJP Fundamental Rights, global rank	#1/140 <sup>16</sup>
Freedom House: Internet Freedom Score	/100 <sup>17</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	1529	98%	
Historical Data	1586	96%	
Freeze of historical data	982	98%	
Blocking	16	100%	1607 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	3	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>

<sup>12</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>13</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>14</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>15</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>16</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2022/>

<sup>17</sup> <https://freedomhouse.org/countries/freedom-net/scores>



## FINLAND

Basic facts	
Population	5.6 mill. <sup>18</sup>
Mobile subscribers	2.7 mill. <sup>19</sup>
GDP per capita (PPP current international \$)	\$ 55,203 <sup>20</sup>
UNDP Human Development Index, global rank	11/191 <sup>21</sup>
WJP Fundamental Rights, global rank	3/140 <sup>22</sup>
Freedom House: Internet Freedom Score	-/100 <sup>23</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	2107	100%	
Historical Data	8871	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

<sup>18</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>19</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>20</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>21</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>22</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2021/>

<sup>23</sup> <https://freedomhouse.org/countries/freedom-net/scores>



## MALAYSIA

### Basic facts

Population	33.2 mill. <sup>24</sup>
Mobile subscribers	10.7 mill. <sup>25</sup>
GDP per capita (PPP current international \$)	\$ 28,929 <sup>26</sup>
UNDP Human Development Index, global rank	#62/191 <sup>27</sup>
WJP Fundamental Rights, global rank	#90/140 <sup>28</sup>
Freedom House: Internet Freedom Score	59/100 <sup>29</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	-	-	
Historical Data	18190	99%	
Freeze of historical data	0	0	
Blocking	203	100%	4497 elements were blocked at the end of November.
Network Shutdown	0	0	
Distribution of authority information	56	100%	
Account Restriction	7	100%	

**Complaints received:** The company received no complaints.

<sup>24</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>25</sup> Telenor third quarter Analytical Tool. Digi was not included in the fourth quarter or full year reporting for 2022 due to the merger of Celcom and Digi announced 30 November 2022.

<sup>26</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>27</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>28</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2021/>

<sup>29</sup> <https://freedomhouse.org/countries/freedom-net/scores>



## NORWAY

Basic facts	
Population	5.5 mill. <sup>30</sup>
Mobile subscribers	2.6 mill. <sup>31</sup>
GDP per capita (PPP current international \$)	\$ 80,534 <sup>32</sup>
UNDP Human Development Index, global rank	#2/191 <sup>33</sup>
WJP Fundamental Rights, global rank	#2/140 <sup>34</sup>
Freedom House: Internet Freedom Score	-/100 <sup>35</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	907	100%	
Historical Data	5966	100%	
Freeze of historical data	84	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.

<sup>30</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>31</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>32</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>33</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>34</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2021/>

<sup>35</sup> <https://freedomhouse.org/countries/freedom-net/scores>





# PAKISTAN

Basic facts	
Population	229.5 mill. <sup>36</sup>
Mobile subscribers	47.9 mill. <sup>37</sup>
GDP per capita (PPP current international \$)	\$ 5,748 <sup>38</sup>
UNDP Human Development Index, global rank	#161/191 <sup>39</sup>
WJP Fundamental Rights, global rank	#123/140 <sup>40</sup>
Freedom House: Internet Freedom Score	26/100 <sup>41</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	-	-	No information on requests available for reporting.
Historical Data	14	14	
Freeze of historical data	51	51	
Blocking	-	-	
Network Shutdown	41	40	
Distribution of authority information	47	47	
Account Restriction	0	0	
Others	14	14	Company received and implemented IVRs and ring back tones for dissemination of health information.

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

<sup>36</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>37</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>38</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>39</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>40</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2021/>

<sup>41</sup> <https://freedomhouse.org/countries/freedom-net/scores>



## SWEDEN

Basic facts	
Population	10.2 mill. <sup>42</sup>
Mobile subscribers	2.9 mill. <sup>43</sup>
GDP per capita (PPP current international \$)	\$ 59,222 <sup>44</sup>
UNDP Human Development Index, global rank	#7/191 <sup>45</sup>
WJP Fundamental Rights, global rank	#4/140 <sup>46</sup>
Freedom House: Internet Freedom Score	-/100 <sup>47</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	2859	98%	
Historical Data	15266	95%	
Freeze of historical data	113	97%	
Blocking	1	100%	
Network Shutdown	0	0	
Distribution of authority information	75	100%	
Account Restriction	1	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/>

<sup>42</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>43</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>44</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>45</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>46</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2021/>

<sup>47</sup> <https://freedomhouse.org/countries/freedom-net/scores>



## THAILAND

Basic facts	
Population	70.1 mill. <sup>48</sup>
Mobile subscribers	21.1 mill. <sup>49</sup>
GDP per capita (PPP current international \$)	\$ 18,760 <sup>50</sup>
UNDP Human Development Index, global rank	#66/191 <sup>51</sup>
WJP Fundamental Rights, global rank	#98/140 <sup>52</sup>
Freedom House: Internet Freedom Score	39/100 <sup>53</sup>

AR Category	Requests Received	Requests Met	Comment
Lawful Interception	0	0	
Historical Data	15239	100%	
Freeze of historical data	0	0	
Blocking	260	100%	
Network Shutdown	0	0	
Distribution of authority information	1	100%	
Account Restriction	0	0	

**Complaints received:** The company received no complaints.

<sup>48</sup> <https://www.unfpa.org/data/world-population-dashboard>

<sup>49</sup> Telenor 2022 fourth quarter and full year Analytical Tool

<sup>50</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD>

<sup>51</sup> <https://hdr.undp.org/en/content/latest-human-development-index-ranking>

<sup>52</sup> <https://worldjusticeproject.org/rule-of-law-index/country/2021/>

<sup>53</sup> <https://freedomhouse.org/countries/freedom-net/scores>