

## Telia Company position on use of data to help fight Covid-19

### Background

The current Covid-19 crisis gripping the world has underscored how important connectivity and digitalization is in our everyday life. It has also highlighted the importance of being able to use data for good without compromising privacy of all those who use the networks – everyone.

Telia Company is the largest operator in the Nordic and Baltic region, in the current situation we have a responsibility to do all we can to help meet the challenge Covid-19 puts on society. At the same time our customers privacy remains our top priority<sup>1</sup>. There are misconceptions about the use of location data which can stand in the way of using it for good.

For this reason transparency is important, which is why Telia Company has formulated the position<sup>2</sup> outlined below. Telia Company's aim is to use the tools at its disposal to help governments, and the public at large, to manage through this period, while respecting the rights of users and remaining compliant with legislation such as GDPR, e-Privacy and being as transparent as legally possible.

### Telia Company position on the use of data to help fight a pandemic

- Insights from Telia Company's network data can be used for planning, e.g. assess how containment is working, thereby enabling decision making to reduce the spread of disease. Wherever technically possible, and legally permissible, Telia will be willing to assist in developing insights based on anonymized and aggregated data sets.
- Telia will primarily make its existing commercial offering available to health and government authorities during the crisis period. When anonymous and aggregated data is provided to the authorities, it is not possible to identify an individual and use the data provided by Telia Company to track individual citizens.
- Solutions based on anonymized and aggregated data should be prioritized. When Telia Company may be required to share individual location data, Telia Company only does that in accordance with the laws such as GDPR and e-Privacy, including only with individual's consent or if explicitly required to do so under the local law. In addition, Telia Company will always consider how to best respect the rights of the users.
- Telia Company remains committed to be transparent to its customers and explain how personal data is being used.
- Should governments want to use location tracking technology based on mobile apps, it is Telia Company's view that the following conditions must be upheld:
  - They must be independent of operators and other private companies;
  - They must be developed and controlled by national health authorities;
  - They must be in full compliance with existing laws and regulations and it must be for the state institutions to justify why they are necessary and proportionate to use; and
  - They must be limited in time, used in relation to the pandemic only.

---

<sup>1</sup> Telia Company Privacy Policy: <https://www.teliacompany.com/en/about-the-company/privacy/>

<sup>2</sup> Telia Company also stands behind the [GSMA COVID-19 Privacy Guidelines](#) published in April 2020.

- Should governments want to collect user-data directly from citizens and use mass-SMS's to citizens via Telia Company to promote such means, it is Telia Company's view that the following conditions must be upheld:
  - It must be clear that the sender of such SMS's is the authority/authorities;
  - The collection of data must be approved and supervised by the national Data Protection Authority.

## Telia Company definitions of key terms

### Shorter version

**Aggregated (our 'grouped') data** = Grouping of underlying data to significantly reduce the risk of re-identification of individuals when combining with other data sources.

**Anonymized data** = Data where characteristics that can be used to identify individuals have been removed. Anonymized data contains no personal information.

**Telia Crowd Insights** = Telia's commercially available product for anonymous and aggregated mobility insights. Telia Crowd Insights is typically used by municipalities and transport planners for urban development and optimization of public transportation.