

TeliaSonera Transparency report, Finland and Sweden January to December 2013, January to June 2014

Millions of customers trust TeliaSonera to provide telecommunications services. They trust TeliaSonera to protect their communications, data and personal information. In return we hereby publish our first Transparency Report to contribute to an open and transparent world where customer privacy and freedom of expression is in the front.

Maintaining customer privacy is of utmost importance to TeliaSonera, it is one of the pillars in our Group Code of Ethics and Conduct. At the same time TeliaSonera, like all telecommunication's companies, is obliged by legislative, administrative, license or law enforcement requirements to respond to requests and demands from authorities to disclose customer information. Such obligations are specified by law and for specific reasons, such as enforcing criminal law and safeguarding national security. We also provide assistance to emergency services in response to life threatening situations and emergency calls.

TeliaSonera only discloses information to authorities to the extent required by law or with the customer's permission. This is a non-negotiable part of the way we operate.

Through this Transparency Report TeliaSonera wants to add to reports from Governments and make it transparent to our customers and stakeholders to what extent authorities require access to data. Our aim is to contribute to meaningful oversight and discussion of proper limits of government surveillance powers. We will therefore publish transparency reports on a regular basis every six months.

We encourage governments to be transparent about their use and scope of surveillance of communications. We welcome reports such as the ones in Finland and Sweden, where the respective Government regularly publicly report to Parliament their scope of surveillance. Although these publications might not always cover all kinds of requests and demands, we see these models as good starting points to discuss best practice for meaningful transparency, considering that a Government can cover all telecom operators in any respective country.

In this first TeliaSonera Transparency Report we publish statistics covering requests from police and other authorities in Finland and Sweden. Our report provides figures for the full year 2013 and the first six months 2014. We will update this report twice a year. Our aim is to add similar statistics from Denmark, Estonia, Nepal, Norway and Spain in the Transparency Report which is to be published in January 2015. We will now also further analyze the legal situation in other geographies, aiming for transparency for all our markets in the future.

In addition to the Transparency Report, we aim to report transparently on our efforts in relation to requests or demands with serious impacts on freedom of expression in telecommunications. We identify such request and demands as ‘major events’.

Stockholm, August 22nd 2014

Jonas Bengtsson

Senior Vice President and General Counsel, TeliaSonera

Transparency Report 2013 and January-June 2014

TeliaSonera Transparency Report for Finland and Sweden Jan-Dec 2013, table 1, and Jan-Jun 2014, table 2. The categories are explained briefly below the charts and more in detail under the headline Request from authorities, page 9.

Authority requests 1 Jan – 31 Dec 2013					
Country	Lawful interception	Historical Data	112 Emergency positioning	Subscription Data	Challenged/rejected requests
Finland	3 570	4 091	Jul-Dec 81 038	1 623	n/a*
Sweden	1 947	1 996	Jul-Dec 1 073 880	No figures	n/a*

Authority requests 1 Jan – 30 June 2014					
Country	Lawful interception	Historical Data	112 Emergency positioning	Subscription Data	Challenged/rejected requests
Finland	1 630	1 892	90 511	475	n/a*
Sweden	1 145	995	1 605 949	1 284	n/a*

* Reporting started July 2014

By ‘lawful interception’ we mean secret real-time wire-tapping and monitoring from police and secret police, e.g. real-time access to content of communications or traffic data (“listening in”, wire-tapping, checking who is calling who, when and for how long or access to location information).

By 'historical data' we mean historical traffic data, location data for mobile devices and cell-tower dumps. Traffic data relate to use of telecommunications services, including call data records, SMS records, and internet records. These records include information such as number of a called party, and the date, time and duration of a call. Internet session information includes the date, time and duration of internet sessions as well as email logs.

By '112 emergency positioning' we mean requests for positioning in emergencies from emergency/rescue authorities (112, Public Safety Answering Points, PSAP); The Emergency Response Center (Swedish: 'SOS alarm') and (Finnish: 'Hätäkeskuslaitos') and Border Patrol Authority (Finnish: 'Rajavartiolaitos'). This report includes all positioning requests of automated emergency positioning. Emergency centers can directly generate a request and immediately have the location of a mobile phone. In Sweden, all mobile calls to 112 are located. In Finland, in addition to positioning of mobile calls to 112, the emergency center can also locate users that have not called 112, i.e. in case of when a person is missing.

By 'subscription data' we mean secret numbers and supplementary services. Subscription data refers to details which appear on a phone bill, such as the customer's name, address and service number. It can include other information we may hold such as a customer's date of birth and previous address.

'Challenged/rejected requests' contains information on how many requests we have challenged, such as asking for clarification, correct formalities or rejections. All requests from authorities must be legally correct. TeliaSonera will reject or challenge any request that does not follow the established form and process, such as when a form has not been signed or has not been sent by the appropriate sender.

Major Events report 2013 and January-June 2014

TeliaSonera has defined requests and demands from authorities with potentially serious impacts on freedom of expression in telecommunications as 'major events'. These are requests or demands regarding for instance mass surveillance initiated by national security authorities, shutting-down of networks or the blocking or restriction of access to telecom services or networks. More described under the headline Request from authorities, page 9.

Our commitments have been published [here](#).

In line with our ambition to be transparent on governmental surveillance requests we will twice a year publish the total number of major event requests.

Our aim is to publish information on each and every ‘major event’ as soon as the specific event occurs, but it is, due to strict laws on confidentiality, most often difficult or impossible to report on specificities. This is why we will publish aggregated information on ‘major events’ in parallel with our coming January and July transparency reports.

In November 2013, we published the following on teliasonera.com: [‘Government requests in Eurasia as to major freedom of expression events’](#).

Government requests in TeliaSonera as to major freedom of expression events, January to June 2014

Based on TeliaSonera’s freedom of expression policy adopted in December 2013, we have from January to June 2014 logged some ten major requests or demands from governments across our operations that have potentially serious impacts on freedom of expression in telecommunications.

These have been related to for instance closure of networks or services, blocking of content, new laws and/or significant imposed operational changes in relation to surveillance of communications.

TeliaSonera's Group Policy on Freedom of Expression in Telecommunications focuses on requests or demands made by governments relating to the surveillance of communications. Such requests or demands often serve legitimate purposes such as the protection of certain human rights, but they may also be problematic in that they could conflict with other human rights. The policy defines TeliaSonera’s commitments in relation to requests or demands with potentially serious impacts on freedom of expression in telecommunications, such as unrestricted real-time network access, shutdown of networks and blocking of access to the Internet or specific websites.

In most cases, TeliaSonera promoted freedom of expression applying a practical point-of-challenge such as requesting the decision to be put in writing or postponing implementation inasmuch as the law allows. On those occasions when we were required to suspend services, we did not say that this was the result of technical problems.

TeliaSonera aims to strengthen transparency by reporting on the receipt of requests or demands that have a potentially serious impact on freedom of expression. However, only in a few of these cases have we been allowed to disclose the requests or demands due to local laws and regulations. In 2014 we have been able to communicate publicly on major issues related to freedom of expression in Latvia, Lithuania, Kazakhstan and Sweden.

Based on our Group Policy, we seek to influence legislation in relation to the surveillance of communications. To this end, we have held high-level meetings with decision-makers and influencers in a range of countries to present our position on the issues.

QUESTIONS AND ANSWERS

Why is TeliaSonera publishing Transparency Reports?

Like all telecommunication operators we are required by laws in the countries where we operate to assist authorities for purposes such as enforcing criminal law or assisting emergency services. We only disclose customer information in accordance with the law and we assure the process to ensure it complies with the law.

By publishing Transparency Reports we want to make sure that our customers know that government authorities through law have access to data, and that TeliaSonera protects our customers and gives data to authorities only if required to do so or with the customers' permission.

We encourage governments to be transparent about their use and scope of surveillance of communications.

What is it that you report? Is it all requests from authorities?

For Finland the statistics include figures regarding police, secret police, customs and emergency authorities. (Also figures for tax authorities are included, since in Finland police investigates economic crimes in cooperation with tax authorities.) For Sweden, the statistics include figures regarding police, secret police, tax authorities, customs and emergency authorities.

The statistics does not include requests from authorities that have no role in lawful interception or other services obligated for operators, such as requests from the competition authority and the national regulatory authority.

How often will you publish a new report?

We will publish a new Transparency Report every six month, including total numbers or requests from authorities per country as well as information on Major Events for the whole TeliaSonera Group.

In this first TeliaSonera Transparency Report we publish statistics covering requests from police and other authorities regarding Finland and Sweden. Our report provides figures for the year 2013 and the first six months Jan-Jun 2014. Our aim is to add similar statistics from Denmark, Estonia, Nepal, Norway and Spain in the Transparency Report in January 2015.

Do you ever challenge a request?

All requests from authorities must be legally correct. TeliaSonera will reject or challenge any request that does not follow the agreed form and process, such as when a form has not been signed or has not been sent by the appropriate sender. In such cases TeliaSonera asks for clarification.

As to 'Major Events' we have committed, in our Group Freedom of Expression in telecommunications Policy, on how to pursue with a point-of-challenge when the freedom of expression of our customers is at risk. This implies that we make careful assessments of all major requests and demands that may impact freedom of expression. A strict escalation procedure for internal decision making is put in place to follow the policy. Formal decisions on the extent of compliance or refusal to comply with such major problematic requests or demands are not made at local company level, unless there are exceptional reasons.

Will you publish Transparency Reports for all countries?

In this first TeliaSonera Transparency Report we publish statistics covering requests from police and other authorities in Finland and Sweden. Our aim is to add similar statistics from Denmark, Estonia, Nepal, Norway and Spain in the Transparency Report in January 2015. We will now also further analyze the legal situation in other geographies, aiming for transparency for all our markets in the future.

Why do the figures differ between countries?

There are several factors that make it difficult to compare the statistics between countries. TeliaSonera has different market-shares in different countries and this is most likely mirrored in the figures. Furthermore, TeliaSonera does not know about the authorities' working-methods and priorities in different countries, but such methods most likely differ. Also, within TeliaSonera, there are different working-methods in different countries. We aim to stream-line our operations.

It is also good to remember that the figures show the number of requests from authorities, not numbers of individuals that have been targeted. Not even we as an operator and provider of the information have this knowledge. Most likely, however, the numbers of requests are larger than the number of individuals that have been targeted.

Does TeliaSonera make money on this?

No. Local law often prescribes that the operators must finance the system set-up, and that the authority has to compensate for each single request (cost-based).

SCOPE

This Transparency Report informs about the number of requests that TeliaSonera has received from authorities in Finland and Sweden during 2013 and the first six months of 2014.

It is our view that national laws and regulations should determine the scope and mechanism for transparency reporting relating to Government requests for access to customer data. Such data is most often asked for by the police but also by other authorities such as the Customs and Tax authorities.

Requests from law enforcement authorities are in TeliaSonera handled by specially set-up units that have been trained to handle the requests according to formal processes in place.

Included in this report

For Finland the statistics include figures regarding police, secret police, customs and 112 emergency authorities. (Also figures for tax authorities are included, since in Finland police investigates economic crimes in cooperation with tax authorities.)

For Sweden, the statistics include figures regarding police (which in turn include requests from the secret police), tax agency (Swedish: 'Skatteverket'), customs service, the Enforcement Authority (Swedish: 'Kronofogdemyndigheten'), the Economic Crime Authority (Swedish: 'Ekobrottsmyndigheten') and 112 emergency authorities.

All requests from authorities must be legally correct. TeliaSonera will reject or challenge any request that does not follow the established form and process, such as when a form has not been signed or has not been sent by the appropriate sender. In such cases TeliaSonera asks for clarification.

TeliaSonera has committed to a Policy on freedom of expression in telecommunications. The Policy defines TeliaSonera's commitments in relation to requests or demands with potentially serious impacts on freedom of expression in telecommunications. You can read about our commitments [here](#). TeliaSonera has committed to inform stakeholders about such events whenever this is appropriate and legally permissible.

Not included in this our transparency reporting for Finland and Sweden

TeliaSonera's statistics does not include requests from authorities that have no role in lawful interception or other services obligated for operators, such as requests from the competition authority and the national regulatory authority.

Not included in this Major Events report

As to such as signals intelligence and real-time access, TeliaSonera has no insight into the extent of surveillance and cannot provide any statistics.

REQUEST FROM AUTHORITIES

Like all telecommunications companies around the world, TeliaSonera is required by law to assist Government authorities for defined purposes. Governments and the authorities (e.g. Police, Security authorities, Customs) conduct various types of surveillance of communications (e.g. calls, SMS, e-mail, surf) by imposing obligations on telecommunications companies in connection with criminal investigations and national security issues.

Government surveillance of communications can be classified into four main general categories;

1. Requests from law enforcement authorities:
 - Real-time access to the content of communications (e.g. listening in to voice-calls) and access to historical content (e.g. checking what was written in an e-mail message)
 - Real-time access to traffic data (e.g. checking who is calling who, when and for how long)
 - Access to historical traffic data which the provider has stored or retained (e.g. checking who has called who, when and for how long)
 - Access to subscription data which the provider has stored or retained (e.g. checking who is the subscriber of a certain telephone-number)
 - Access to location information, i.e. access to information on the location of mobile terminals/phones (e.g. from which block in the city is a call made)
2. Signals intelligence, i.e. intelligence-gathering through analysis and processing of communication signals (example: the Swedish National Defence Radio Establishment (Swedish: Försvarets Radioanstalt))
3. Real-time access without requests, technical systems for more extensive monitoring of telecommunications (example: mass surveillance by national security authorities)
4. Shut-down, blocking or restriction of access (example: Shut-down of SMS-communication, blocking of the full Internet or of certain web sites)

Category 1:	TeliaSonera Transparency Reporting.
Categories 2 and 3:	TeliaSonera has no insight into the extent of surveillance and cannot provide any statistics. Proposals for new laws or significant imposed operational changes in the area of these two categories are potentially 'major events' within Category 4.
Category 4:	TeliaSonera reporting on 'major events'.

THE INTERNATIONAL FRAMEWORK

The international framework that exists within the area of human rights, which TeliaSonera is obliged to follow, is multifaceted. Freedom of expression and protecting the privacy of a telecoms operator's customers are essential rights that have a particular bearing on a telecoms operator's business.

It is becoming increasingly important for TeliaSonera and other operators to be able to respect these rights as national authorities impose greater demands on the ability to monitor telecommunications and Internet traffic in order to safeguard national security and combat crime.

It is vital for TeliaSonera to have a good understanding of the limits of our responsibilities and how we can best address these issues. This is a challenge for the entire global telecommunications industry. For further information on the international framework on freedom of expression and privacy, [see here](#).

TeliaSonera is an active participant in the 'Telecommunications Industry Dialogue on Freedom of Expression and Privacy'. The initiative is presented [here](#)