

TELIA COMPANY LAW ENFORCEMENT DISCLOSURE REPORT 2019



Executive summary

This our Law Enforcement Disclosure Reporting aims to offer detailed and up-dated insights into the context and extent of surveillance and collection of, customer data in Telia Company's main markets. It includes statistics on conventional requests as well as information on legislation regarding 'direct access' as well as on mandatory data retention for law enforcement purposes and also on unconventional requests.

A summarized version of this report is published in the Telia Company 2019 Annual and Sustainability Report available at annualreports.teliacompany.com. This here full report includes more context, including such as information on main goals of this reporting, definitions, challenges as well as omissions related to our reporting.

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LETTER FROM THE GENERAL COUNSEL

Millions of customers trust Telia Company to provide telecommunications services and to protect their communications, data and personal information. We publish Law Enforcement Disclosure Reports to contribute to an open and transparent world where freedom of expression and surveillance privacy are at the forefront.

Maintaining customer privacy is of utmost importance at Telia Company: It is one of the pillars of our Code of Responsible Business Conduct. At the same time, Telia Company and its local subsidiaries – like all telecommunications companies – are 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 regulations and are based on specific reasons, e.g. enforcing criminal law and safeguarding national security.

According to our policies and procedures, Telia Company discloses information to authorities only to the extent required by law. This is a non-negotiable part of the way we are to operate. While our process is intended to identify and mitigate potential violations to individuals' freedom of expression and surveillance privacy, the actual outcome heavily depends on local laws. It should specifically be noted that, within this context, governments also have direct access, real-time network access without requests, i.e. signals intelligence (intelligence gathering through analysis and processing of communication signals) and technical systems for more extensive monitoring of telecommunications. Regarding such direct access, Telia Company has no insight into the extent of surveillance (when, who and what) and cannot provide statistics. What we can do, as in this report, is to publish links to such relevant laws in our respective markets. We also provide links to laws on mandatory data retention for law enforcement purposes. We will also provide statistics on the number of blocking requests we receive from authorities.

The issues can be complex. Different stakeholders have different views, and there are societal needs both for surveillance, security and privacy. Nevertheless, fundamentally we respect and support individual's rights to freedom of expression and surveillance privacy, even as we accept that sometimes there need to be limitations on those rights, to the extent allowed by applicable legislation. Limitations must be necessary and proportionate and clearly delineated within a strong legal framework with the right checks and balances. When there is an opportunity, we argue for legislation which supports and promotes freedom of expression and surveillance privacy.

We encourage governments to be transparent themselves about their use and scope of surveillance of communications. We welcome reports – such as the ones in Denmark, Finland, Lithuania, Norway and Sweden – where each respective government regularly and pub-

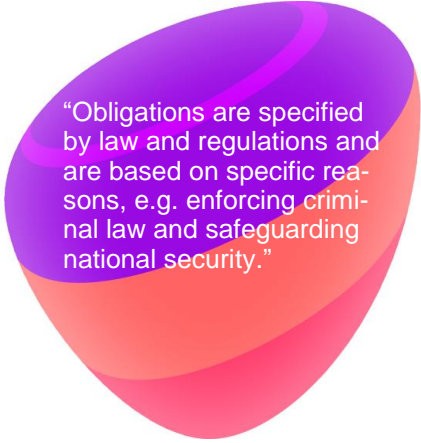
licly reports about the scope of their surveillance. Although these publications might not always cover all kinds of requests and demands, we see publicly shared government reports as the preferred starting point for discussing best practice for meaningful transparency, based on the fact that a government can cover not only Telia Company but all telecom operators in any respective country and also respond to any questions as to necessity and proportionality of surveillance.

To supplement government reporting, our aim is to contribute to a meaningful oversight and discussion of the proper limits of government surveillance powers. We publish a full Law Enforcement Disclosure Report together with our Annual and Sustainability Report, every year in March, and an update of the statistics every October.

In this report, we continue publishing our own statistics covering requests from the police and other authorities in Denmark, Estonia, Finland, Moldova, Norway and Sweden. We have also added figures provided by authorities in Lithuania. The tables show the number of authority requests in each country based on a court order or other legal demand by the police or other authority.

Stockholm March 12, 2020

Jonas Bengtsson
*Executive Vice President, Group General Counsel
Telia Company*



“Obligations are specified by law and regulations and are based on specific reasons, e.g. enforcing criminal law and safeguarding national security.”

ABOUT THIS REPORT

What we report

This report covers mainly;

- Statistics on the number of *conventional* ('day-to-day') law enforcement requests reported in four different categories; 'Lawful interception', 'Historical Data', 'Subscription Data' and 'Challenged/rejected requests';
- Information about *unconventional* ('major') government requests and legislative initiatives; and
- Links to laws providing governments with direct access as well as to laws on mandatory data retention for surveillance.

We publish our own statistics covering requests from the police and other authorities in Denmark, Estonia, Finland, Moldova, Norway and Sweden. We publish this full Law Enforcement Disclosure Report together with our Annual and Sustainability Report, every year in March, and an update of the statistics every October.

According to our policies and procedures, Telia Company discloses information to authorities only to the extent required by law. This is a non-negotiable part of the way we are to operate. It should be noted that, within this context, governments also have direct access, i.e. signals intelligence and technical systems for more extensive monitoring of telecommunications without having to send requests to the operators. Regarding such direct access, Telia Company has no insight into the extent of surveillance and cannot provide statistics. What we can do is to publish in this reporting a chart with links to legislation providing the authorities with such direct access.

Our next full Law Enforcement Disclosure report is planned to be published in March 2021.

Main goals

Our report aims to provide insights into the extent of authorities' collection of customer data for law enforcement purposes. This is a part of Telia Company's commitment to respect freedom of expression and surveillance privacy. Operators must adhere to law enforcement requirements which may impact an individual's freedom of expression and surveillance privacy. What Telia Company can do is to inform its customers and stakeholders of the extent of use of such surveillance, including within which legal context. Our Law Enforcement Disclosure Reporting, our transparency reporting in the context of surveillance, is to build user trust and gain the confidence of investors that Telia Company manages its human rights risks related to freedom of expression and surveillance privacy. Our aim is also to contribute to meaningful oversight and discussions regarding the

proper limits of government surveillance powers. By publishing law enforcement disclosure statistics, as well as thorough context, Telia Company wants to make it transparent to our customers and stakeholders to what extent laws and regulations provide for surveillance and how authorities are authorized to require access to data and systems. We therefore;

- Report statistics also in markets where Governments themselves report;
- Seek to move beyond numbers, complementing quantitative transparency with context for the requests;
- Seek to disclose information in a format that is intended for all stakeholders to be able to understand, not just telecommunications regulators and policy specialists;
- Seek to provide evidence that we are embedding our freedom of expression and surveillance privacy commitments; and
- Advocate for laws and regulations that protect the freedom of expression and surveillance privacy of our customers and users.

We have also taken further steps to establish effective grievance mechanisms by including reporting on human rights violations into Telia Company's speak-up line, a whistle-blowing tool that enables employees and external parties to anonymously report violations at speakupline.ethicspoint.com.

The tables below show the number of authority requests in each country based on a court order or other legal demand by the police or other authority.

The categories of data reported are explained briefly below the charts and in more detail under the chapter 'Definitions'.

It should be noted that several factors make it difficult to compare the statistics between countries. Telia Company has different market shares in different countries, which is probably reflected in the figures. Furthermore, Telia Company is not privy to each authorities' working methods and priorities in different countries, and these methods are likely to differ as well. Also, within Telia Company, there are different working methods in different countries which causes issues related to completeness and comparability of reported data. See further the Questions and Answers (Q&A) section in this report titled "Why do the figures differ between countries".

It should, furthermore, be noted that the figures show the number of requests from authorities, not the number of individuals that have been targeted. Not even Telia Company as the operator and provider of the information has that knowledge. Within the category of lawful interception, the number of requests is most

likely larger than the number of individuals that have been targeted.

The statistics include figures from companies in our group where Telia Company owns the networks and process for law enforcement disclosure. This means that our figures (except for the category 'Lawful interception') do not cover all requests directed to external service operations because these might be directly responsible for such as subscriber information requests.

Telia Company has committed itself to a Policy on Freedom of Expression & Surveillance Privacy. The Policy defines Telia Company's commitments in relation to *unconventional* requests or demands with potentially serious impacts on the freedom of expression and surveillance privacy. You can read about our commitments [here](#) Telia Company has committed itself to informing stakeholders of such events whenever and to the extent legally permissible and doable. Our aim is to publish information on each and every unconventional request or demand as soon as possible after having been notified. However, due to strict laws on confidentiality, or other circumstances such as the liberty and safety of personnel, it is often difficult or impossible to report on, or to fully report on, a specific event. This is why we publish, here below, short aggregated information on unconventional requests and demands, not always mentioning the country in question.

Inevitably, Telia Company makes own judgments on these issues. We listen and participate in stakeholder dialogues.

We welcome views on how we can improve.

Included in this report

Normally, a request is counted into our statistics as soon as a government request has been registered in our respective case management system.

Denmark: The statistics include figures regarding the police and the police based Security and Intelligence Service.

Estonia: The statistics include figures regarding the police, secret police, Tax and Customs Board, Ministry of Justice and Estonian Foreign Intelligence Service.

Finland: The statistics include the police, secret police, and customs. In addition, figures regarding tax authorities are included, since in Finland the police investigate economic crimes in cooperation with the tax authorities.

Lithuania: The statistics – provided by the authorities and reported by the Telia Company affiliate in Lithuania - include figures regarding the State Security Department of Lithuania.

Moldova: The statistics include figures regarding the following authorities: Ministry of Internal Affairs, Ministry of Defense, National Anti-Corruption Centre, Criminal As-

sets Recovery Agency, State Protection and Guard Service, Security and Intelligence Service, Customs Service, Penitentiary Department of the Ministry of Justice, Prosecutor's Office, Courts.

Norway: The statistics include figures regarding the Police ('Politiet'), Criminal Investigation Service ('Politiets sikkerhetstjeneste'), National Criminal Investigation Service ('KRIPOS'), the Police Security service ('PST') and Rescue/Emergency Services ('HRS').

Sweden: The statistics include figures regarding the Police (which in turn include requests from the Secret police), Tax agency (Swedish: 'Skatteverket'), Customs, the Enforcement Authority (Swedish: 'Kronofogdemyndigheten'), and the Economic Crime Authority (Swedish: 'Ekobrottsmyndigheten').

Challenges and omissions

Telia Company wants to be transparent on the main challenges and omissions regarding completeness of this report in order to give the readers the possibility to understand the problems and make their own judgments.

Main challenges

- Governments have direct access, real-time network access without requests, i.e. signals intelligence (intelligence gathering through analysis and processing of communication signals) and technical systems for more extensive monitoring of telecommunications. As to such direct access, Telia Company has no insight into the extent of surveillance and cannot provide statistics. What we can do is to publish links to relevant such legislation in our respective markets, in the way we do in this report.
- Telia Company's internal systems for interaction with the authorities have been set up to handle each single interaction. This means that a request to extend or to discontinue on-going interception is counted as a request in the statistics.
- With regard to the category of lawful interception, the number of requests is most likely larger than the number of individuals that have been targeted.

Pertaining to requests for cell tower dumps (i.e. requests that oblige Telia Company to disclose data about the identity, activity and location of any device that connects to targeted cell towers over a set span of time), however, the number of affected individuals will naturally become significantly larger than the number of requests. Depending on the scope of such a request, Telia Company is required to hand out varying amounts of customer data. This depends on the timeframe of the request as well as where the cells within the scope of the request are situated. In urban areas the amount of disclosed data is naturally higher. Cell tower dump requests are part of the statistics provided in this report. In countries where these requests are part of the law enforcement measures, it is reported under the historical data category. We are not

reporting these separately, but in the Nordics we usually receive roughly around 150 - 190 cell tower dump requests a month and per country. An answer to a cell tower dump request can include information from some few devices to even tens of thousands of devices.

Omissions

The following has not been included in this report:

Other than surveillance

Telia Company's statistics do not include requests from authorities that have no role in lawful interception or other services obligated for operators, such as requests from competition authorities and national regulatory authorities or requests based on the copyright IPR Enforcement Directive. Also, the report does not cover information on Telia Company's voluntary commitment to block child sexual abuse material based on a list from Interpol and/or local law enforcement.

Information on emergency positioning

Emergency positioning requests are outside the scope of surveillance. They are normally automatically initiated after a dial to the local emergency number (i.e. 112). We have, since July 2015, discontinued to include such automated positioning to this reporting. We have however placed manual positioning requests, which are mostly done also for rescuing people, in the Historical data category.

Privacy and data protection

This report covers Telia Company's commitments as to freedom of expression and surveillance privacy and interaction with law enforcement authorities. Our commitments as to customer privacy, not covered in this report, are defined in our Policy Privacy and Data Protection, available [here](#). Our work as to customer privacy is published in our Annual and Sustainability report.

Telia Carrier operations

Telia Company owns and operates one of the largest fiber-optic networks in the world, providing network infrastructure and services to more than 1,900 wholesale customers in 115 different countries worldwide. Telia Carrier markets outside the Nordics and Baltics are not included in the law enforcement disclosure statistics in this report, nor to the blocking statistics. As to markets in the Nordics and Baltics, any requests to Telia Carrier are forwarded to the local Telia company operations.

Requests or demands from private entities

Telia Company local companies are not to act upon requests or demands from private entities to remove, filter or restrict access to content. Telia Company, however, actively participates in combating spam, viruses and distributed denial of service (DDoS) -attacks to protect our customers and networks.

LAW ENFORCEMENT DISCLOSURE REPORT SUMMARY (ASSURED)

The Annual and Sustainability Report 2019 has been subject to limited assurance. This summary is an extract from that report.

(Below from page 52)

Law enforcement disclosure reporting

We believe that transparency on governments' surveillance and limiting of the free flow of information contributes to stronger enforcement of freedom of expression and surveillance privacy. For this reason, we publish Law Enforcement Disclosure Reports (LEDR). The report released alongside this Annual and Sustainability Report includes our statistics on conventional ("day-to-day") requests. Statistics regarding authorities' conventional requests as well as unconventional requests are included in the limited assurance of this Annual and Sustainability Report. See Note S8 to the Sustainability Notes for the statistics as well as information on the scope and limitations. The LEDR also includes links to national laws that provide governments with direct access to information about our customers and their communication, without having to request information from Telia Company. Regarding such governments' real-time network access without requests, i.e. signals intelligence (intelligence gathering through analysis and processing of communication signals) and technical systems for more extensive monitoring of telecommunications, Telia Company has no insight or control into the extent (when, who and what) of such surveillance and cannot provide any statistics. As a step towards broadening our scope of transparency, the number of blocking requests were added, starting with the March 2019 LEDR. Our reporting on countries' local laws on freedom of expression and surveillance privacy in telecommunications is carried out through contributions to the GNI database on country legal frameworks.

Unconventional requests

In addition to reporting statistics on conventional requests, we aim to publish information on unconventional requests or demands from governments. During 2019, we closed around ten such requests or demands across our operations. Requests included areas like new legislation, blocking, shut-down of networks and targeted surveillance. To ensure consistency, group-level experts facilitated local assessments and escalations. In around two thirds of the cases, Telia Company promoted freedom of expression and surveillance privacy in some way. Such measures were defined jointly by local companies and

representatives of Group Executive Management. There are several challenges related to transparency on unconventional requests. Local laws that sometimes lack full clarity determine what can be published. There may be confidentiality provisions and/or constraints based on our duty to protect the safety of our employees. Issues regarding direct access are closely related to national security and are therefore complex and challenging to communicate. Also, counting the number of unconventional requests can be difficult and subjective as they range from demands to block one or several websites or shutting down a network locally, to requests regarding direct access.

(Below from page 218)

Law enforcement disclosure reporting

Several factors make it difficult to compare the statistics between countries. To facilitate comparison over time, previous year's figures have been included. Telia Company has different market shares in different countries, which is probably reflected in the figures. Furthermore, Telia Company does not have knowledge of the authorities' working methods and priorities in different countries, but the methods are likely to differ. Also, within the group, there are different internal methods of collecting data in different countries, causing issues related to completeness and accuracy of reported data. Also note that the figures show the number of requests from authorities, not the number of individuals that have been targeted. Not even we as the operator and provider of the statistics have this knowledge. Most likely, in the category of lawful interception, the number of requests is larger than the number of individuals that have been targeted. Pertaining to requests for cell tower dumps (i.e. requests that oblige the local operator to disclose data about the identity, activity and location of any device that connects to targeted cell towers over a set span of time) however, the number of affected individuals will naturally become larger than the number of requests. Depending on the scope of such a request, Telia Company is required to hand out varying amounts of customer data. This depends on the timeframe of the request as well as where the cells within the scope of the request are situated. In urban areas, the amount of disclosed data is naturally higher.

Telia Company Law Enforcement Disclosure Report
2019

Authority requests 2019

Country	Lawful interception	Historical data	Subscription data	Challenged or rejected requests
Denmark	8,457 (7,071)	2,229 (2,096)	12,895 (13,940)	0 (0)
Estonia	Direct access – no statistics (6,209) ¹	16,827 (1,568)	851,301 (582,487) ²	19 (126,545) ³
Finland	4,767 (4,626)	2,951 (2,787)	10,950 (8,432)	71 (11) ⁴
Lithuania ⁵	No permission to publish	No permission to publish	No permission to publish	No permission to publish
Moldova	Direct access – no statistics	7,395 (7,453)	2,383 (3,158)	126 (135)
Norway ⁶	1,239 (1,198)	5,051 (5,879)	10,426 (9,182)	37 (82) ⁷
Sweden	3,658 (3,659)	5,308 (4,235)	1,736 (1,651)	361 (355)

1) In Estonia a direct access system is used. Until 2018 Telia Estonia had full visibility into the number of requests.

Since 2019, due to a technology change, Telia Estonia has no visibility to the data regarding Lawful interception.

2) Includes all requests for Subscription data. For other countries the corresponding figure covers only requests that are handled by authorized personnel, and automated requests that refer to a criminal case.

3) In 2019, the reporting changed in the way that requests regarding subscribers belonging to other operators are no longer included in this figure.

4) Telia Company has informed the Finnish police about the significant increase in this number, largely caused by Telia Finland requesting forms to be filled in correctly. Note that Challenged/rejected cases are in most cases related to erroneous target information from the police.

5) Telia Company and Telia Lithuania have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. See the full Law Enforcement Disclosure Report published March 2020, page 22, for further information.

6) Telia Norway acquired the operator Get in 2018. Work to integrate Get into the statistics is not yet completed.

7) Invalid requests due to administrative form errors.

Requests made to Telia Carrier in an above market, if any, are forwarded to the local Telia Company operator and therefore handled by the local Telia Company operator and included in the statistics.

STATISTICS

The information below is provided as it was reported in each respective earlier law enforcement disclosure report, adding chapters for each market July to December 2019. Statistics covering periods further back in time can be found [here](#) . We started reporting in 2013.

It should be noted, as explained below, that direct access is not included in the statistics.

It should also be noted that the figures show the number of requests from authorities, not the number of individuals that have been targeted. It should also be noted that differences as to market share as well as the working methods of both authorities and within Telia Company make it difficult to compare statistics between countries.

Authority requests July – December 2019

Denmark

Lawful interception	Historical data	Subscription data	Challenged/rejected requests
3,723	925	6,077	0

Estonia

Lawful interception	Historical data	Subscription data	Challenged/rejected requests
No stat's available	9,051	447,699	5

As to the category 'Lawful interception', in Estonia a direct access system is used. Until 2018 Telia Estonia had full visibility into the number of such requests. Since 2019, due to a technology change, Telia Estonia has no visibility to the data regarding Lawful interception.

The category 'Subscription data' includes all requests for Subscription data. For other countries the corresponding figure covers only requests that are handled by authorized personnel, and automated requests that refer to criminal cases.

As to the category 'Challenged/rejected requests', in 2019, the reporting changed in the way that requests regarding subscribers belonging to other operators are no longer included in this figure.

Finland

Lawful interception	Historical data	Subscription data	Challenged/rejected requests
2,177	1,623	4,627	43

As to the category 'Challenged/rejected requests' Telia Company has informed the Finnish police about the significant increase in this number, largely caused by Telia Finland requesting forms to be filled in correctly. It is also noted that Challenged/rejected cases are in most cases related to erroneous target information from the Police.

Telia Company Law Enforcement Disclosure Report 2019

Lithuania

Telia Company and Telia Lietuva have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. See page 22 below for further information.

Moldova

Lawful interception	Historical data	Subscription data	Challenged/rejected requests
No stat's available	3,868	1,181	67

Norway

Lawful interception	Historical data	Subscription data	Challenged/rejected requests
1,239	5,051	10,426	37

Telia Norway acquired the operator Get in 2018. Work to integrate Get to the statistics is not yet completed.

As to the category 'Challenged/rejected requests', these are invalid requests due to administrative form errors.

Sweden

Lawful interception	Historical data	Subscription data	Challenged/rejected requests
1,738	2,679	900	185

Telia Company Law Enforcement Disclosure Report 2019

Authority requests* January–June 2019

Country	Lawful interception	Historical data	Subscription data	Challenged/rejected requests
Denmark	4,734	1,304	6,818	0
Estonia	No stat's available *1	7,776	403,602 *2	14 *3
Finland	2,590	1,328	6,323	28 *4
Moldova	No statistics available	3,527	1,202	59
Norway	572	2,444	5,066	20
Sweden	1,920	2,629	836	176

* As explained below, direct access is not included in the statistics.

* 1 Due to technology change, Telia Estonia has no visibility to data regarding Lawful interception.

* 2 Includes all requests for Subscription data. For other countries the corresponding figure covers only requests that are handled by authorized personnel, and automated requests that refer to criminal cases.

* 3 The reporting now changed in the way that requests regarding subscribers belonging to other operators are no longer included in this figure.

* 4 Telia Company has informed the Finnish police about the significant increase in this number, largely depending on Telia requesting forms to be filled in correctly. It is also noted that Challenged/rejected cases are in most cases related to erroneous target information from the Police.

Telia Company and Telia Lietuva have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. See the full Law Enforcement Disclosure Report published March 2019, page 22, for further information.

Authority requests July – December 2018

Country	Lawful interception	Historical data*	Subscription data	Challenged/rejected requests
Denmark	3,296	989	8,833	0
Estonia	2,864 *1	820	323,364 *2	66,540 *3
Finland	2,417	1,481	4,509	6
Lithuania	No permission to publish	No permission to publish	No permission to publish	No permission to publish
Moldova	Direct access – no statistics	3,556	1,395	62
Norway	506	2,934	4,361	32 *4
Sweden	1,760	2,202	848	198

1) In Estonia, a direct access system is used. Telia in Estonia has full visibility into the number of requests.

2) Includes all requests for Subscription data. For other countries the corresponding figure covers only requests that are handled by authorized personnel, and automated requests that refer to a criminal case.

3) Includes all requests to which we were not able to answer, most often because the requested information was about a customer of another operator.

4) Invalid requests due to administrative form errors.

Authority requests* January – June 2018

Country	Lawful interception	Historical data*	Subscription data	Challenged/rejected requests
Denmark	3,775 *4	1,107	5,107	0
Estonia	3,345 *1	748	259,123 *2	60,005 *3
Finland	2,209	1,306	3,923	5
Moldova	No statistics available	3,897	1,763	73
Norway	692	2,945	4,821	50
Sweden	1,899	2,033	803	157

* As explained below, direct access is not included in the statistics.

* 1 In Estonia, a direct access system is used. This figure has been provided by the Estonian authorities.

* 2 Includes all requests for Subscription data. For other countries the corresponding figure covers only requests that are handled by authorized personnel, and automated requests that refer to criminal cases.

* 3 Includes all requests to which we were not able to answer, most often because the requested information was about a customer of another operator.

* 4 This figure has been corrected. Due to an editing mistake, in October 2018 we had previously reported 3755.

Telia Company and Telia Lietuva have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. See the full Law Enforcement Disclosure Report published March 2018, page 22, for further information.

Telia Company Law Enforcement Disclosure Report 2019

Authority requests* July – December 2017

Country	Lawful interception	Historical data*	Subscription data	Challenged/rejected requests
Denmark	4,124	1,031	6,950	0
Estonia	2,503 ¹	662	260,867 ²	53,518 ³
Finland	1,865	1,391	3,710	12
Georgia	Direct access – no statistics	396	15	29
Lithuania	1,366 ⁴	No permission to publish	No permission to publish	No permission to publish
Moldova	Direct access – no statistics	4,502	2,356	93
Norway	675	3,089	4,077	36 ⁵
Sweden	1,808	1,769	654	146

* As explained below, direct access is not included in the statistics.

*1 In Estonia, a direct access system is used. Telia in Estonia has full visibility into the number of requests.

*2 This figure includes all requests for Subscription data. For other countries, the corresponding figure only covers requests that are handled by authorized personnel, and automated requests that refer to a criminal case. This number has increased due to the implementation of a new system for automated queries. To get all information for an individual subscriber, a higher number of requests are needed.

*3 This figure includes all requests to which we were not able to answer, most often because the requested information was about a customer of another operator. This number has increased due to the implementation of a new system for automated queries. To get all information for an individual subscriber, a higher number of requests is needed.

*4 Telia in Lithuania have been granted permission to publish Lithuanian authority statistics for Lawful interception requests. Telia in Lithuania has added a few requests. According to the authority and Telia in Lithuania statistics, there were 2,733 requests during the year.

*5 Invalid requests due to administrative form errors.

Telia Company has not been able to establish reporting of statistics on conventional requests in our operations in Azerbaijan, Kazakhstan and Uzbekistan.

Authority requests* January – June 2017

Country	Lawful interception	Historical data*	Subscription data	Challenged/rejected requests
Denmark	4,006	1,026	5,275	0
Estonia	2,093 ¹	665	125,739 ²	650 ³
Finland	1,775	1,083	3,726	8
Georgia	No statistics available	451	34	1
Moldova	No statistics available	4,962	2,646	82
Norway	894	3,226	5,124	32
Sweden	2,014	1,486	867	54

* As explained below, direct access is not included in the statistics.

*1 In Estonia, a direct access system is used. Telia in Estonia has full visibility into the number of requests.

*2 This figure includes all requests for Subscription data. For other countries, the corresponding figure only covers requests that are handled by authorized personnel, and automated requests that refer to a criminal case.

*3 This figure includes all requests to which we were not able to answer, most often because the requested information was about a customer not of our operations but of another operator.

Telia Company and Telia in Lithuania have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. For further information, see the full Law Enforcement Disclosure Report.

Telia Company Law Enforcement Disclosure Report 2019

Authority requests* July – December 2016

Country	Lawful interception	Historical data*	Subscription data	Challenged/rejected requests
Denmark	3,104	1,041	4,949	3
Estonia	1,965 ¹	1,054	137,494 ²	655 ³
Finland	1,593	1,109	3,808	9
Georgia	No statistics available	230	147	277
Moldova	No statistics available	5,483	2,851	65
Norway	1,158	2,868	5,113	75
Sweden	1,643	1,278	737	68

* As explained below, direct access is not included in the statistics.

*1 In Estonia, a direct access system is used. Telia in Estonia has full visibility into the number of requests.

*2 This figure includes all requests for Subscription data. For other countries, the corresponding figure only covers requests that are handled by authorized personnel, and automated requests that refer to a criminal case.

*3 This figure includes all requests to which we were not able to answer, most often because the requested information was about a customer not of our operations but of another operator.

Telia Company and Telia in Lithuania have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. For further information, see the full Law Enforcement Disclosure Report.

Authority requests* January – June 2016

Country	Lawful interception	Historical data*	Subscription data	Challenged/rejected requests
Denmark	2,836	1,048	4,700	0
Estonia	1,438 ¹ and ⁴	816	137,937 ²	928 ³
Finland	1,920	961	3,493	10
Georgia	No statistics available	328	129	126
Moldova	No statistics available	4,813	2,611	114
Norway	1,115	3,514	4,668	54
Spain	9,464	12,825	17,265	312
Sweden	1,782 ⁵	1,147	1,148	97

* As explained below, direct access is not included in the statistics.

1 In Estonia, a direct access system is used. This figure has been provided by the Estonian authorities.

2 This figure, for Estonia, includes all requests for Subscription data. For other countries, the corresponding figure only covers requests that are handled by authorized personnel, and automated requests that refer to a criminal case.

3 This figure, for Estonia, includes all requests to which we were not able to answer, most often because the requested information was about a customer not of our operations but of another operator.

4 This figure has been corrected. Due to an editing mistake, the October 2016 report wrongly read 1483.

5 This figure has been corrected. Due to an editing mistake, the October 2016 report wrongly read 1728.

Telia Company and Telia in Lithuania have not been granted permission to publish statistics regarding how many requests we have received in Lithuania. See the full Law Enforcement Disclosure Report, page 20, for further information.

DEFINITIONS

Authority requests – categories in the above tables

By '*Lawful interception*' we mean secret real-time wire-tapping and monitoring by the police and secret police, e.g. real-time access to the 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 or internet traffic). In some countries, lawful interception requests may include requests for historical data. In order to avoid duplicate reporting, these are not reported separately below in 'historical data'.

By '*Historical data*' we mean historical traffic data, location data on mobile devices and cell-tower dumps. Traffic data relates to the use of telecommunications services, including call data records, SMS records, and Internet records. These records include information such as the 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. This figure also includes manual emergency positioning requests by the emergency centers and police. Emergency positioning is normally automatically initiated after a dial to the local emergency number, i.e. 112.

By '*Subscription data*' we mean secret numbers and information about supplementary services. Subscription data refers to details which appear on a bill, such as the customer's name, address and service number. It can also include other information we may hold, such as a customer's date of birth and previous address as well as the identity of the communication equipment (including IMSI and IMEI). This figure consists of requests that are either handled by authorized personnel or by an automated interface with reference to a criminal case identification number.

'*Challenged/rejected requests*' contains information on how many requests we have challenged, for example by asking for clarification, the correction of formalities or rejecting the request. All requests from authorities must be legally correct. Telia Company will challenge or reject any request that does not conform to the established form and process, for example, when a form has not been signed or has not been sent by an appropriate sender.

Different types of requests from authorities

Like all telecommunications companies around the world, Telia Company is required by law to assist government authorities for defined purposes. Governments and authorities (e.g. the police, security authorities, and 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.

The government's surveillance of communications can be divided into four main categories:

Surveillance Category 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 or internet traffic)
- 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 mobile cell a call is made)

Surveillance Category 2. Signals intelligence

Signals intelligence i.e. intelligence-gathering through analysis and processing of communication signals (example: the Swedish National Defense Radio Establishment; 'Försvarets Radioanstalt' in Swedish).

Surveillance Category 3. Direct access without requests

Real-time network access without requests, i.e. signals intelligence (intelligence gathering through analysis and processing of communication signals) and technical systems for more extensive monitoring of telecommunications.

Surveillance Category 4. Shut-down, blocking, restriction of access, etc. ('unconventional requests and demands')

Examples: Shut-down of communications, shut-down of internet access, blocking of web sites or requests and demands to install or up-grade systems for direct access.

This is how we publish information as to these four categories:

Reporting on Category 1:

Telia Company Law Enforcement Disclosure Reporting on statistics. See this report, Chapter 'Statistics'.

Reporting on Categories 2 and 3:

Telia Company has no insight into the extent of surveillance and cannot provide any statistics. Telia Company has, however, added a list of national legislation within these two categories to this Report, see below.

Proposals for new laws or significant imposed operational changes in the area of these two categories may be defined as un-conventional requests ('major events') within Category 4.

Reporting on Category 4:

Telia Company reporting on unconventional requests and demands ('major events'). See this report, chapter 'Unconventional requests and demands'. Starting March 2019, we also started collect and report on the number of authority requests to block certain content.

UNCONVENTIONAL REQUESTS AND DEMANDS

Telia Company regards unconventional requests and demands from authorities which might potentially have serious impacts on the freedom of expression and surveillance privacy as 'major events'.

Governments' requests and 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. Our policy on freedom of expression and surveillance privacy defines Telia Company's commitments in relation to such unconventional requests or demands with potentially serious impacts on freedom of expression and surveillance privacy, such as direct network access, shutdown of networks and blocking of access to the Internet or specific websites. This is described in greater detail in the above chapter 'Definitions' under the head-line 'Different types of requests from authorities'. We also include and address initiatives for new law-making, or significant imposed or proposed operational changes, which might potentially have serious impacts on freedom of expression and surveillance privacy as 'major events', as we do with requests and demands to install or up-grade systems for direct access. Our commitments are available [here](#).

Our aim is to publish information on each and every such unconventional request or demand as soon as possible after having been notified. However, due to strict laws on confidentiality, or other circumstances such as the liberty and safety of personnel, it can be difficult or impossible to report on a specific event. This is why we publish, here below, short aggregated information on unconventional requests and demands.

It must be noted that the below indication of the number of unconventional requests during a specific period, is quite arbitrary. If in one country a large number of websites have been blocked, and in another country only one, then each of these two count as one (1) major event in the figures below. A shut-down of the network or a service in *part* of a country is counted as a major event equally as a shut-down of the network or service in *all* of a country. A minor update of a system for government direct access to Telia Company's networks and services is counted equally as a much more substantial upgrade of such a system. Etcetera.

Unconventional government requests are assessed by the local company and escalated within Telia Company for informed decision-making, including considerations from outside of the local context, on how to perform a point of challenge. This means adhering to the local law while at the same time seeking and performing measures to respect and support the rights of our users. We can request and remind that a decision be put in writing and/or seek to publicly share information about the request.

While the process is intended to identify and mitigate potential violations to individuals' freedom of expression and surveillance privacy, the actual outcome heavily depends on local laws, as well as the security and capability of local employees.

A. Unconventional requests and demands from 2013 to 2015

Please see our earlier Law Enforcement Disclosure Reports, available [here](#).

B. Unconventional requests and demands January to June 2016

Using the same set-up as introduced March 2016 in chapter C, during the first half of 2016 we closed some 20 unconventional requests or demands from governments across our operations. Most of these were either about prolonging or enhancing direct access based on local law, or new legislative proposals for surveillance. To support the decision-making process and ensure a consistent view on freedom of expression throughout the group, we facilitated local company risk assessments and escalations. Points of challenge, where possible, were defined jointly by local, regional and group management. In about half of these some 20 closed cases, Telia Company promoted freedom of expression, e.g. mainly by publishing information about them on teliacompany.com/news (see case studies in the Chapter "Transparency as to specific unconventional requests" here below), Were possible and relevant, we also pushed our views in specific and direct meetings with decision-makers. Additionally, in one case, the implementation was notably delayed.

As to direct access, e.g. SORM and similar systems, we are pursuing our point of view based on our Freedom of Expression Policy. The main difference between direct access and other systems is the legal framework through which law enforcement agencies can monitor citizens. Telia Company has, as has been reported in earlier versions of this report, challenges to push back

and promote freedom of expression in the context of Government direct access. Several requests regarding SORM were closed at the beginning of 2016. Such requests are most often strictly confidential.

In one of our geographies, it is still difficult for the local company to receive the unconventional requests other than by e-mail despite the law requiring such requests to be in writing.

C. Unconventional requests and demands July to December 2016

Just as during the first half of 2016, during the second half of 2016 we closed some 20 unconventional requests or demands from governments across our operations. More than half of these requests were about blocking of lists of sites and/or of lists of open VPNs. Requests to block VPNs is a new type of request received. During this second half of 2016, we only succeeded in promoting freedom of expression in about one third of the events. More than half of the cases in which we could not promote freedom of expression were requests in a specific country. In one country, it is still difficult to receive, even in retrospect, specific requests other than by e-mail, despite the law requiring such requests to be in formal writing. There are challenges when seeking to be transparent. Local laws sometimes lack full clarity in determining what can be published. There may also be confidentiality provisions, and/or constraints based on our duty to protect the safety of our employees.

D. Unconventional requests and demands January to December 2017

During 2017 we closed some 30 unconventional requests or demands from governments across our operations. Roughly, one fourth was about blocking or restricting access to specific services, Internet websites or content. The remaining unconventional requests were more or less equally divided between; new surveillance legislation; data retention obligations; requests relating to existing legislation regarding unrestricted real-time network access; and 'other'. Telia Company has been able to perform some kind of point of challenge in more than

half of these requests and demands, either by being transparent (in some 50 percent of these cases), or by some other measure.

F. Unconventional requests and demands January to December 2018

During 2018, we closed around ten such requests or demands across our operations, including region Eurasia. Requests included, for example, the application of laws on direct access and nation-wide blocking of websites. To ensure consistency, group-level experts facilitated local assessments and escalations. Points of challenge were established in more than half of the cases, most often by being transparent and publishing information on Telia Company's newsroom or requesting clarification from the requesting authority. The points of challenge were defined jointly by local companies and representatives of Group Executive Management.

There are several challenges related to transparency on unconventional requests. Local laws that sometimes lack full clarity determine what can be published. There may be confidentiality provisions and/or constraints based on our duty to protect the safety of our employees. Issues regarding direct access are closely related to national security and are therefore complex and challenging to communicate. Counting the number of unconventional requests can be difficult and subjective as they range from demands to block one or several websites or shutting down a network locally, to requests regarding direct access.

G. Unconventional requests and demands January to December 2019

During 2019, we closed around ten such requests or demands across our operations. Requests included areas like new legislation, blocking, shut-down of networks and targeted surveillance. To ensure consistency, group-level experts facilitated local assessments and escalations. In around two thirds of the cases, Telia Company promoted freedom of expression and surveillance privacy in some way. Such measures were defined jointly by local companies and representatives of Group Executive Management.

TRANSPARENCY AS TO SPECIFIC UNCONVENTIONAL REQUESTS DURING 2019

Telia Company aims to publish information on each and every unconventional request or demand as soon as possible after having been notified. However, due to strict laws on confidentiality or other circumstances such as the liberty and safety of personnel, it can be difficult or impossible to report in detail, or even to be transparent at all, revealing the specific country. This is why we publish, above in this Law Enforcement Disclosure Report, aggregated information on all closed unconventional requests and demands during each respective year.

When it *is* possible to be transparent on some or all relevant information as to a specific unconventional request, Telia Company does so by also publishing articles on www.teliacompany.com. Here examples of such articles during 2019;

Blocking of sites in Lithuania

<https://www.teliacompany.com/en/news/news-articles/2019/blocking-of-sites---telia-companys-comment-on-new-legislation-in-lithuania/>

Surveillance legislation in Finland

<https://www.teliacompany.com/en/news/news-articles/2018/respecting-freedom-of-expression---telia-companys-view-on-new-surveillance-regulation-direct-access-in-finland/>

Service limitations in Norway

<https://www.teliacompany.com/en/news/news-articles/2019/respecting-freedom-of-expression-recent-event-as-to-service-limitations-in-norway-february-2019/>

Security legislation in Russia

<https://www.teliacompany.com/en/news/news-articles/respecting-freedom-of-expression-and-surveillance-privacy--telia-companys-view-on-new-security-legislation-in-russia/>

LAWS PROVIDING GOVERNMENTS DIRECT ACCESS

When it comes to governments' direct access, real-time network access without requests, i.e. signals intelligence (intelligence gathering through analysis and processing of communication signals) and technical systems for more extensive monitoring of telecommunications, Telia Company has no insight into the extent of such surveillance and cannot provide any statistics.

What we can do is publish a list with links to such legislation in all of our respective markets. The list shows that in most of our geographies the state has implemented such a power.

First and foremost, it is important to note that detailed legal and administrative frameworks for surveillance often remain classified, and little is public about the ways in which capturing of data are operationalized. The systems and regulations vary from country to country. They apply to all operators in each respective country.

It is our view that, while there may be legitimate public-interest reasons for maintaining the secrecy of technical and operational specifications, generic information about the nature and extent of surveillance should be made available to the public. Without such information, it is impossible for rights holders to assess the legality, necessity, and proportionality of these measures. States should therefore be transparent and clear about the use and scope of communications surveillance.

In accordance with our policy on freedom of expression and surveillance privacy, Telia Company advocates that governments should not have direct access to a company's networks and systems. Telia Company should retain operational and technical control. Telia Company also advocates clear and transparent legal provisions on proportionality and necessity for all government surveillance of communications. Vague, non-transparent, and broadly conceived legal provisions are not appropriate when freedom of expression and surveillance privacy is at stake. Telia Company's views are reflected in the [blog](#)

['Direct Access systems and the right to privacy', published by the Freedom Online Coalition.](#)

The United Nations, in its Resolution on the 'Promotion, protection and enjoyment of human rights on the Internet' from June 2016: (1)

"8. Calls upon all States to address security concerns on the Internet in accordance with their international human rights obligations to ensure protection of freedom of expression, freedom of association, privacy and other human rights online, including through national democratic, transparent institutions, based on the rule of law, in a way that ensures freedom and security on the Internet so that it can continue to be a vibrant force that generates economic, social and cultural development."

Surveillance includes both real-time interception and historical data. While systems for direct access normally provide real-time access to communications, such systems normally do not provide access to historical data. Governments, also those with direct access to a company's networks and systems, thus normally turn to operators with requests for historical data.

Telia Company has below listed the most relevant laws in our present local markets (March 2020) on;

- Signals intelligence, i.e. intelligence-gathering through analysis and processing of communication signals; and/or
- Real-time access without requests, i.e. technical systems for more extensive possibilities to monitor telecommunications.

(1) http://www.un.org/ga/search/view_doc.asp?symbol=A/HRC/32/L.20

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Denmark	No signal intelligence and/or real-time access without requests in the legislation with the exception that the Centre For Cyber Security may initiate lawful interception without a court order, but only if companies or governmental authorities have voluntarily signed up for or requested this ad hoc. Telia Denmark is not a party to this arrangement and does not allow lawful interception without a court order.
Estonia	Electronical Communication Act ('Elektronilise side seadus') https://www.riigiteataja.ee/en/eli/ee/521082017008/consolide/current The relevant section is § 113 in Chapter 10
Finland	Act on military intelligence: http://finlex.fi/fi/laki/ajantasa/2019/20190590 Act on civil intelligence: http://finlex.fi/fi/laki/ajantasa/2019/20190582 Police Act (section 5 a): https://www.finlex.fi/fi/laki/ajantasa/2011/20110872
Latvia	The Electronic Communication Law (http://likumi.lv/doc.php?id=96611), Section 69 "Connection to Electronic Communications Networks" Cabinet of Ministers regulations No Nr.591 "Procedure for equipping electronic communication network for obtaining investigatory information from technical equipment and investigatory wiretapping of conversations in the cases specified by law" (unofficial translation). Original language document: http://likumi.lv/doc.php?id=114208
Lithuania	Criminal Code of the Republic of Lithuania: https://www.e-tar.lt/portal/lt/legalAct/TAR.2B866DFF7D43/ZpNMZQSaRN Code of Criminal Procedure of the Republic of Lithuania: https://www.e-tar.lt/portal/lt/legalActEditions/TAR_EC588C321777 Law on Criminal Intelligence of the Republic of Lithuania: https://www.e-tar.lt/portal/lt/legalAct/TAR.3B8E4F16C815/hxVVzGWbGr Law on Intelligence of the Republic of Lithuania: https://www.e-tar.lt/portal/lt/legalAct/TAR.1881C195D0E2/XYOnFcTdlT
Moldova	Art. 20 of the Law on electronic communications: http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=327198 Art. 132 Criminal Procedure Code: http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=350171 Art. 7 of the Law on Intelligence Security Service: http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=311721 Art. 18 of the Law on special investigation activity: http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=343452
Norway	According to the Criminal Procedure Act: https://lovdata.no/dokument/NL/lov/1981-05-22-25 According to the section 6-2a Electronic Communication Act, the police may use frequencies allocated to others through the use of "mobile restricted zones". This cannot be done without a court decision. The police should also notify the National Communication Authority (NCA) without undue delay after the measure has been established. https://lovdata.no/dokument/NL/lov/2003-07-04-83
Sweden	Law on Defence Intelligence http://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-2008717-om-signalspaning-i-sfs-2008-717 Additional information: www.fra.se / Om FRA / Lagstiftning

Telia Company owns and operates one of the largest fiber-optic networks in the world, 'Telia Carrier', providing network infrastructure and services to more than 1,000 customers in 80 different countries worldwide. These markets have not been included in the above list of laws regarding signals intelligence and other direct access. It is worth noting that there are markets in scope of Telia Carrier which have that type of direct access legislation, such as Germany and Hungary.

In addition, Telia Company has a minority ownership in Turkcell (Turkey). Here added, therefore, a list of the most relevant laws regarding what we interpret as direct access signals intelligence and real-time access without requests in Turkey;

Turkey	Law No: 5271 on Criminal Procedure Code Law No: 5809 on Electronic Communications Law No: 2559 on Duties and Powers of the Police Law No: 2803 on the Organization, Duties and Powers of the Gendarmerie Law No: 2937 on State Intelligence Services and National Intelligence Organization Law No: 5651 on Regulating Online Content and Tackling Crimes Committed via Online Content Law No: 7091 on State of Emergency Safeguards (All of the above laws available via www.mevzuat.gov.tr)
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LAWS ON MANDATORY DATA RETENTION FOR LAW ENFORCEMENT

The European Court of Justice (ECJ) in December 2016 (Joint Cases C-203/15 and C-698/15) concluded that EU law constitutes a barrier to national legislation which, for law enforcement, provides for general and undifferentiated storage of all traffic data and location data for all subscribers and registered users and all electronic

means of communication. Legislation on mandatory data retention by companies for law enforcement is in scope of this report on law enforcement disclosure. Telia Company therefore here provides a list of applicable laws in our markets.

Denmark	BEK nr. 988 28/9-2006 with amendments: "Executive Order on Data Retention" https://www.retsinformation.dk/Forms/R0710.aspx?id=2445
Estonia	Electronic Communication Act ('Elektronilise side seadus') https://www.riigiteataja.ee/en/eli/ee/521082017008/consolide/current The relevant section is §111 ¹ in Chapter 10
Finland	Act on Electronic Communications Services (917/2014), section 157 (formerly Information Society Code) https://www.finlex.fi/en/laki/kaannokset/2014/en20140917.pdf
Latvia	The Electronic Communications Law (https://likumi.lv/ta/id/96611), Section 71.1 "Utilization and Processing of Data to be Retained" Cabinet of Ministers Regulation No 820 "Procedures by which Pre-trial Investigative Institutions, Bodies Performing Investigatory Operations, State Security Institutions, Office of the Prosecutor and Court Request and a Merchant of Electronic Communications Transfers Data to be Retained, and Procedures by which Statistical Information regarding Requests of Data to be Retained and Issuing thereof is Compiled" (https://likumi.lv/ta/id/167539)
Lithuania	Law on electronic communications of the Republic of Lithuania https://www.e-tar.lt/portal/lt/legalAct/TAR.82D8168D3049/NgcqulkcSk
Moldova	Law on electronic communications of Republic of Moldova, art. 20 p. 3): http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=372518 ; Law on prevention of cybercrimes, art. 7 p. b) about data preservation: http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=333508
Norway	None (The Ministry of Justice and Public Security is working on a proposal on mandatory retention of IP addresses and port numbers.)
Sweden	Electronic Communications Act, Chapter 6, §§ 16a-f https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-2003389-om-elektronisk-kommunikation_sfs-2003-389 Electronic Communications Decree §§ 37-46 https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2003396-om-elektronisk_sfs-2003-396
Turkey	Data retention rules are disseminated in each of the below mentioned laws; Law No: 5271 on Criminal Procedure Code Law No: 5809 on Electronic Communications Law No: 2559 on Duties and Powers of the Police Law No: 2803 on the Organization, Duties and Powers of the Gendarmerie Law No: 2937 on State Intelligence Services and National Intelligence Organization Law No: 5651 on Regulating Online Content and Tackling Crimes Committed via Online Content Law No: 7091 on State of Emergency Safeguards Law No: 6698 on Personal Data Protection Law, By-law on Erasure, Destruction or Anonymization of Personal Data (All of the above laws available via www.mevzuat.gov.tr)

GOVERNMENTS' LAW ENFORCEMENT DISCLOSURE REPORTS

We encourage governments to be transparent about their use and scope of surveillance of communications. We welcome reports where the respective government regularly and publicly report to their Parliament about the scope of surveillance. Although these publications might not always cover all kinds of requests and demands, we see government reports as the preferred starting point for discussing best practices for meaningful transparency. The same governments that impose surveillance laws should also make all reasonable efforts to ensure concerned citizens that these powers are used by the state with due care. Also, each government can cover all telecom operators in any respective country and can also best respond to any questions regarding proportionality of surveillance.

Law Enforcement Disclosure Reports from Governments;

Denmark:

<https://anklagemyndigheden.dk/sites/default/files/inline-files/Statistik%20over%20indgreb%20i%20meddelelser-hemmeligheden%202018.pdf>

and additional reporting

<https://anklagemyndigheden.dk/da/statistik>

Finland:

<http://intermin.fi/kertomukset-ja-selvitykset>

Lithuania:

Telia Company and Telia in Lithuania have not been granted permission to publish our own statistics regarding how many requests we have received in Lithuania.

We welcome, however, that Lithuania like many of the other countries publishes its own statistics in reports from the State Security Department of Lithuania (SSD). The data is grouped together with other activities, such as access to homes. The latest report for 2018 (page 2) states: "In 2018 SSD has performed actions sanctioned by the district courts against 1822 individuals. The court sanctioned actions were carried out in respect of 886 citizens of the Republic of Lithuania, 912 in relation to foreign citizens and 24 in relation to legal persons."

<https://www.vsd.lt/wp-content/uploads/2019/06/VSD-2018-ataskaita.pdf>

Norway:

<https://www.kk-utvalget.no/rapporter.473489.no.html>

and additional reporting

https://eos-utvalget.no/norsk/content/text_ed78f726-e398-40b4-8926-5e169ba74a64/1523359815630/2017_eos_a_rsmelding_net.pdf

Sweden:

<https://data.riksdagen.se/fil/754B3405-C402-4DA7-B20E-8F8A57F1DC4A>

and additional reporting

<https://www.aklagare.se/globalassets/dokument/rapporter/ovriga-rapporter/redovisning-av-anvandningen-av-vissa-hemliga-tvangsmedel-under-2018.pdf>

ADDITIONAL TRANSPARENCY

The Global Network Initiative (GNI) Country Legal Frameworks Resource

Publishing, as above in this report, links to laws on signals intelligence and real-time access without requests only does part of the job. In Telia Company's view, customers should have easily accessible and user-friendly information on all surveillance legislation. In the same way as regards statistics on the extent of surveillance, it is of course at first Governments who are to provide citizens with information about surveillance legislation. Telia Company and other players can, however, undertake to help make this information more accessible. This is why the Telecommunications Industry Dialogue elaborated a database covering, to date, 54 countries describing some of the most important surveillance powers available to government agencies and authorities seeking access to customer communications. Most of the information in the database was provided by Vodafone and Telenor. The work, now continued within the Global Network Initiative (GNI), of which Telia Company is an active member, includes reports on Denmark, Norway, Sweden and Turkey. We hope the database is useful to civil society organizations, academics, investors, and others who study the norms regulating government access to communications and their capacity to restrict content. Telia Company's aim is to continue to help building on this joint resource.

The database with information on surveillance legislation in, presently, 54 countries is available here; <https://globalnetworkinitiative.org/policy-issues/legal-frameworks/>

Publicly sharing Telia Company's tool for assessing and escalating unconventional authority requests

Telia Company regards unconventional requests and demands from authorities which might potentially have serious impacts on the 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, the blocking or restricting of access to telecom services or networks, or initiatives for new law-making which might potentially have serious impacts on freedom of expression and surveillance privacy.

Within Telia Company, such unconventional requests and demands are intended to be assessed and escalated in a way so that locally and group-wide, Telia Company can seek ways to respect freedom of expression and surveillance privacy. An internal tool for assessing and escalating has been elaborated and updated, based

on learnings from actual major events, since the adoption by Telia Company of the freedom of expression policy. We seek, in this way, to contribute to industry best practice of shared learning.

The purpose of sharing the tool is to globally support implementation and further development of industry best practices, to promote and respect freedom of expression within the ICT industry, and to aim for practical measures on the ground with regard to the freedom of expression of customers and users.

We also want to open up our tool for rights holder representatives and other stakeholders to comment upon our approach to help build the best possible process together.

The latest version of Telia Company's Form is available [here](#); The Form has also been made available by the industry organization GSMA in its policy handbook for handling of service restriction orders, [here](#).

Authority requests to block content

Starting March 2019, Telia Company here includes also the number of authority requests to block content in our Law Enforcement Disclosure Reporting.

Starting with the second half of 2018 we collect statistics using the following blocking categories;

Requests from Government, Authority, Court to block DNS / IP-number / URL / VPN. For each of these categories we collect statistics on the number of requests, and the total number of DNS, IP-number, URL or VPN.

For 2019 we logged a total of 13 requests to block a summary of 518 DNS's;

- Nine (9) requests to block 82 DNS in Denmark²;
- Two (2) requests to block 69 DNS in Estonia;
- Zero (0) requests to block in Finland;
- Requests to block 210 DNS in Lithuania;
- Zero (0) requests to block in Moldova; and
- Two (2) requests to block 157 DNS in Sweden.

In Norway, Telia acquired the operator GET in 2018. Work to integrate GET in the statistics is not yet completed.

² In Denmark blockings are made according to an industry code of conduct when a court has made a decision on blocking. For

transparency, the industry publishes all blockings on the following web-page: <http://www.teleindu.dk/brancheholdninger/blokeringer-pa-nettet/>

QUESTIONS AND ANSWERS

Why is Telia Company publishing these reports?

Like all telecommunication operators, we are required by laws in the countries within which we operate to assist authorities for purposes such as enforcing criminal law. We are only to disclose customer information in accordance with the law and we insure the process to ensure it complies with the law.

By publishing these Law Enforcement Disclosure Reports we want to make sure that our customers have access to information about that, and to what extent, government authorities have the power to access data based on law and that Telia Company, according to our policies and procedures, protects customers. Our instruction includes to provide data to authorities only if and to the extent required to do so. Our report also points out and links to legislation which render the governments in most of our markets direct access to our systems and networks. The report also provides links to national laws on mandatory data retention for law enforcement purposes.

We encourage governments to be transparent about their use and scope of surveillance of communications. Telia Company's advocacy is based on our Group Policy on Freedom of Expression Policy & Surveillance Privacy, available [here](#).

Do you ever challenge a request?

At Telia Company, requests from law enforcement authorities are handled by specially set-up units that have been trained to handle these requests according to processes in place. All requests from authorities must be legally correct. Telia Company is to reject or challenge any request that does not conform to the established form and process, for example when a form has not been signed or has not been sent by an authorized sender. In such cases, the process is for Telia Company to ask for clarification.

As to unconventional government requests, according to our Group Policy on Freedom of Expression & Surveillance Privacy, we have committed to and determined how to pursue a point-of-challenge when our customers' freedom of expression and surveillance privacy is at risk. This implies that we are to make careful assessments of all unconventional requests and demands that may have serious impacts on freedom of expression or surveillance privacy. A strict escalation procedure for internal decision-making has been put in place for adherence to the policy. Formal decisions on the extent of compliance or push-back following problematic requests or demands are not to be made at local company level alone, unless there are exceptional reasons.

Why do the figures differ between countries?

Several factors make it difficult to compare law enforcement disclosure statistics between countries. Telia Company has different market-shares in different countries, which is probably reflected in the figures. Furthermore, Telia Company is privy to each local authorities' working-methods and priorities in different countries, and these methods are likely to differ. Different

demands from authorities result in different working-methods in different countries.

It is also important to note that the figures show the number of requests from authorities, not the number of individuals that have been targeted. Not even Telia Company as the operator and provider of the information has this knowledge. The number of requests is most likely larger than the number of individuals that have been targeted. Also, in some countries, one request may include several targets.

Does Telia Company make money on this?

No. Local legislation often prescribes that the operators must finance the system setup and that the authority has to compensate for every single request (cost-based).

How might these reports be used?

Telia Company's aim is to make it transparent to users and stakeholders to what extent governments' access customer data. Our Law Enforcement Disclosure Reports might help getting a clearer picture of the norms governing surveillance. The reports might therefore be useful in research and advocacy. We also encourage governments to be transparent about their use and scope of surveillance of communications.

How does Telia Company enforce its Policy and internal instruction and processes in this context?

Our commitment to freedom of expression & surveillance privacy is included in relevant employee training, and also in our whistle-blowing mechanism (the Telia Company 'Speak-Up Line'). The Policy implementation is based on our internal oversight and accountability model. Telia Company has also conducted Human Rights Impact Assessments, followed by local action plans and prioritizations.

Does Telia Company have grievance mechanism in place, open for grievances regarding freedom of expression and surveillance privacy?

Yes. Telia Company's grievance mechanism, our 'Speak-Up Line', is applicable and available [here](#).

Does Telia Company inform its users when their data has been revealed to authorities?

No. It is generally defined by legislation if and when the requesting authority shall inform the user about the surveillance conducted by the authority.

What are the main challenges associated with Law Enforcement Disclosure Reporting?

It should be noted, within the context of this report, that governments also have direct access, i.e. signals intelligence and real-time access without sending requests to the operators. Regarding such direct access, Telia Company has no insight into the extent of surveillance and cannot provide statistics. What we can do is to publish links to relevant such legislation in our respective markets, in the way we do in this report.



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