



# Government assistance

Vodafone's global business is made up of separate subsidiary companies, each of which operates under a local licence (or other authorisation) issued by the government of the country where it is located. Each subsidiary company is therefore subject to the domestic laws of that country.

In this section, we disclose the volume of each country's agency and authority demands, wherever that information is available and publication is not prohibited. Where appropriate we continue to enter into dialogues with Governments to discuss when and how data can be publicly shared.

# How we prepare this information

2

Each local market where we operate has a nominated and security-cleared point of contact responsible for managing and administering law enforcement assistance.

The information collated and published in this report (wherever available and wherever publication has not been prohibited) has been overseen by the relevant Disclosure Officer, although they will not typically be made aware of the context of any lawful demand issued by agencies and authorities.

We have robust processes in place to manage and track each demand for the two categories of agency and authority demand – [lawful interception and communications data](#).



# How this report is prepared

**Although the details of individual demands remain highly confidential and cannot be communicated, Vodafone's security and audit teams conduct reviews of the overarching processes and policies that are in place to ensure the integrity of our law enforcement disclosure systems.**

It should be noted that while the statistics for communications data demands are overwhelmingly related to communications metadata, the statistics we report might also include demands for other types of customer data such as names, physical addresses and services subscribed. Our reporting systems do not necessarily distinguish between the types of data contained in a demand and, in some countries, a single demand can cover several different types of data. In some countries, there is a lack of legal clarity regarding whether we can lawfully disclose the aggregate number of law enforcement demands received.



# How this report is prepared

There are further circumstances under which we have not published specific country information, as set out below.

01

## Disclosure is unlawful

The law prohibits disclosure of the aggregate demand information held by Vodafone, as well as any disclosure related to the mechanisms used to enable agency and authority access. This is particularly the case in matters related to national security.

04

## Cannot disclose

In some cases, although local laws do not expressly prohibit disclosure, the authorities have told us directly that we cannot disclose this information. In other cases, we are unable to supply the required data due to local and/or technical restrictions.

02

## Capability not enabled

Despite the technical requirements necessary to enable lawful interception being in place, some countries have not yet enabled those capabilities.

05

## Government/other public body publishes

In a number of countries, the government or a credible independent public body, such as a regulator, already publishes statistical information for certain types of demands issued to all operators in that country. Wherever this is the case, we highlight relevant sources.

03

## Unable to obtain guidance

The law on disclosure is unclear and we have been unable to engage with the government or a relevant agency or authority to discuss options for publication. This could be during a period of political tension or where disclosure could expose our employees to consequent risk.



# Government/other public body publishes

5

|                       | Lawful interception                                                                                        | Communications data |
|-----------------------|------------------------------------------------------------------------------------------------------------|---------------------|
| <b>Albania</b>        |                                                                                                            |                     |
| 2021                  | Disclosure is unlawful                                                                                     | 4,046               |
| 2022                  | Disclosure is unlawful                                                                                     | 3,821               |
| Key Note              | It is unlawful to disclose any aspect of how lawful interception is conducted.                             |                     |
| <b>Czech Republic</b> |                                                                                                            |                     |
| 2021                  | 5,365                                                                                                      | 397,686             |
| 2022                  | 6,199                                                                                                      | 306,742             |
| Key Note 1            | Communication data requests includes all requests received including those that we are not able to fulfil. |                     |
| Key Note 2            | In the case of lawful interception a valid request lasts for a maximum of 6 months.                        |                     |
| <b>DRC</b>            |                                                                                                            |                     |
| 2021                  | 0                                                                                                          | 1,088               |
| 2022                  | 0                                                                                                          | 1,412               |
| Key Note 1            | Vodacom DRC did not receive any lawful interception requests during the period.                            |                     |



| Lawful interception | Communications data |
|---------------------|---------------------|
|---------------------|---------------------|

## Egypt

|      |                        |                        |
|------|------------------------|------------------------|
| 2021 | Disclosure is unlawful | Disclosure is unlawful |
| 2022 | Disclosure is unlawful | Disclosure is unlawful |

**Key Note** It is unlawful to disclose any aspect of how lawful interception or access to communications data is conducted.

## Germany

|      |                                        |                                        |
|------|----------------------------------------|----------------------------------------|
| 2021 | Government/other public body publishes | Government/other public body publishes |
| 2022 | Government/other public body publishes | Government/other public body publishes |

**Key Note** The German Federal Office of Justice (Bundesamt für Justiz) publishes annual statistics related to agency and authority lawful interception demands, as well as annual statistics related to agency and authority demands for access to communications data

In its annual report, the Federal Network Agency (Bundesnetzagentur or BNetzA) publishes statistics (in German and English) related to access by the regulatory authority to customer details stored in accordance with Article 173 of the German Telecommunications Act (TKG).

## Greece

|      |                                          |                                          |
|------|------------------------------------------|------------------------------------------|
| 2021 | Government / other public body publishes | Government / other public body publishes |
| 2022 | Government / other public body publishes | Government / other public body publishes |

**Key Note** The Hellenic Authority for Communication Security and Privacy (ADAE) publishes statistical information related to lawful interception and communications data demands issued by agencies and authorities.



|          | Lawful interception                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Communications data |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Ireland  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |
| 2021     | Cannot disclose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2,735               |
| 2022     | Cannot disclose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2,043               |
| Key Note | Prior to publication of the 2014 report, we approached the authorities to seek clarity on the disclosure of aggregate statistics related to lawful interception demands. In response, the authorities instructed us not to disclose this information. We have regularly engaged with the Government to discuss whether such information could be published by the authorities themselves or – if not – by Vodafone and other operators. The Government has not changed its position since that time and has informed us that we cannot disclose this information. |                     |
| Italy    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |
| 2021     | 32,669                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 114,359             |
| 2022     | 36,544                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 111,466             |
| Key Note | Government/other public body publishes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                     |
| Lesotho  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |
| 2021     | Capability not enabled                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1,142               |
| 2022     | Capability not enabled                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1,054               |
| Key Note | We have not implemented the technical requirements necessary to enable lawful interception as there is no law requiring us to do so, and therefore we have not received any agency or authority demands for lawful interception assistance.                                                                                                                                                                                                                                                                                                                       |                     |



| Lawful interception | Communications data |
|---------------------|---------------------|
|---------------------|---------------------|

## Mozambique

|                   |                                                                                                                                                                                        |                           |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| 2021              | Capability not enabled                                                                                                                                                                 | Unable to obtain guidance |
| 2022              | Capability not enabled                                                                                                                                                                 | Unable to obtain guidance |
| <b>Key Note 1</b> | <b>The technical requirements necessary to enable lawful interception within Vodacom Mozambique's control are now in place but those capabilities have not yet been enabled.</b>       |                           |
| <b>Key Note 2</b> | <b>The legal position remains unclear regarding whether or not it would be lawful for Vodafone to disclose statistics related to agency and authority communications data demands.</b> |                           |

## Portugal

|                 |                                                                                                                                                              |        |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 2021            | Government/other public body publishes                                                                                                                       | 30,238 |
| 2022            | Government/other public body publishes                                                                                                                       | 44,120 |
| <b>Key Note</b> | <b>The Portuguese government publishes statistical information related to lawful interception demands issued by <a href="#">agencies and authorities</a></b> |        |

## Romania

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                        |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| 2021            | Disclosure is unlawful                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Disclosure is unlawful |
| 2022            | Disclosure is unlawful                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Disclosure is unlawful |
| <b>Key Note</b> | <b>It is unlawful to disclose any aspect of how lawful interception is conducted.</b><br>Article 142(3) and Article 152(3) of the Criminal Procedure Code (Law 135/2010) state that communications service providers are required to cooperate with criminal prosecution authorities with regards to lawful interception, and the supplier of retained communications data must keep the relevant operation a secret. Publishing aggregate statistics could potentially violate this obligation. |                        |



| Lawful interception | Communications data |
|---------------------|---------------------|
|---------------------|---------------------|

### South Africa

|      |       |        |
|------|-------|--------|
| 2021 | 1,433 | 31,960 |
| 2022 | 390   | 32,597 |

#### Key Note

In accordance with local regulations and aligned with our ambition for greater transparency in relation to government disclosures we have published this information but can provide no further detail

### Spain

|      |        |         |
|------|--------|---------|
| 2021 | 12,020 | 70,518  |
| 2022 | 10,041 | 108,412 |

### Tanzania

|      |                        |        |
|------|------------------------|--------|
| 2021 | Disclosure is unlawful | 10,055 |
| 2022 | Disclosure is unlawful | 13,836 |

### Turkey

|      |                        |                        |
|------|------------------------|------------------------|
| 2021 | Disclosure is unlawful | Disclosure is unlawful |
| 2022 | Disclosure is unlawful | Disclosure is unlawful |

### United Kingdom

|      |                                        |                                        |
|------|----------------------------------------|----------------------------------------|
| 2021 | Government/other public body publishes | Government/other public body publishes |
| 2022 | Government/other public body publishes | Government/other public body publishes |

#### Key Note

There were no substantial changes to the legal frameworks since the updates provided in our last Disclosure reports.



## Explanation of the information presented

In each country, and for each of the categories of law enforcement demands issued – lawful interception and communications data – there are a number of different possible outcomes that can arise from our decision to publish the information collated.

Where there are no restrictions preventing publication, and there are no alternative appropriate sources of information indicating total demand volumes across all operators in a specific country, we have published the data available from our own local operating business.

Our view of the shortcomings of this approach is set out in the accompanying [Statement](#).

## Read more about our explanation of the information presented

It remains our view that in countries where the government publishes certain statistical information on the law enforcement demands they issue and individual operators also publish some of the data they hold for their own operations, the net effect is confusion. In statistical terms, the datasets are irreconcilable and contradictory. We continue to advocate that it would be much more effective if governments provided consistent and comprehensive metrics spanning the industry as a whole. This would provide the public with a better understanding of the law enforcement activity being undertaken in their country.

It is important to emphasise that attempts to compare one country's metrics with those of another are essentially meaningless given the very wide variations between legal frameworks, record keeping and reporting regimes, as there are no consistent points of common reference that could be used to underpin such analysis. Similarly, it is difficult in many cases to draw accurate conclusions from year-on-year changes in reported metrics within a country, as these can be influenced by a range of factors.

These could include amendments to legislation or new laws, developments in agency or authority or accepted industry practices, or changes to the approaches used to log, aggregate, and disclose lawful demands. Any of these may apply, and therefore year-on-year changes cannot provide a reliable indication of actual trends in law enforcement activity.



