



Vodafone Procurement Company S.à r.l.

Supplier Policy - A5

Supplier Assistance with Law Enforcement

Scope

All Vodafone Procurement Company procurement agreements with Suppliers.

Policy

1. Introduction

The phrase “Supplier” in this Supplier Policy shall, where relevant, also include all officers, employees, contractors, subcontractors and agents of Supplier. All references to “Vodafone” include the relevant contracting entity and all other Vodafone Group Companies that benefit from the goods and services being provided.

As communication network and service providers, Vodafone local markets may be subject to local statutory and regulatory obligations to provide assistance to local governments, law enforcement and national security agencies. These obligations fall into the following categories:

- 1.1 Lawful interception of communications in real time;
- 1.2 Retention of specific categories of communication data; and
- 1.3 Disclosure of communication data on receipt of a lawful request.

2. Providing assistance

Where Supplier provides a service or services to a Vodafone local market that involve(s) or relate(s) to the provision of communication network or services, the following will apply:

- 2.1 The relevant Vodafone local markets will notify Supplier of any regulatory or statutory obligations that apply and will provide details of what those obligations require of Supplier (“**notified assistance**”).
- 2.2 Such notified assistance may include but not be limited to:
 - 2.2.1 implementing and maintaining interception capability;

- 2.2.2 retaining the required communication and network data on the use of the services by customers;
 - 2.2.3 implementing and maintaining customer identification procedures; and
 - 2.2.4 providing such other assistance as is necessary to deliver compliance with the notified statutory or regulatory obligations.
- 2.3 When providing the notified assistance, Supplier will enter into a data processing agreement with Vodafone to address any legal, regulatory and/or data protection obligations that are imposed on the Vodafone local market.
- 2.4 When providing the notified assistance, Supplier will make appropriate technical and organisational security arrangements to ensure that any data generated are protected against compromise.
- 2.5 Those security measures will be commensurate with the privacy sensitive and confidential nature of the required notified assistance.
- 2.6 Those security measures will include but not be limited to:
- 2.6.1 Ensuring the integrity of employees who are to deliver the services by:
 - (a) appointing nominated individuals who are permanent employees of Supplier and who are notified and agreed in advance with Vodafone;
 - (b) providing appropriate training and awareness to ensure that those nominated individuals are aware of the privacy sensitive and confidential nature of the services that are being provided, and the information being generated and stored;
 - (c) requiring those nominated individuals to sign and be legally bound by, and notified of, confidentiality and secrecy obligations in respect of all information concerning law enforcement assistance, including surveillance targets, frequency of requests or the details of any information provided.
 - 2.6.2 Complying with legal minimum security requirements that form part of the data processing agreement.
- 2.7 In respect of any data generated and/or retained as a result of providing the required and notified assistance, Supplier shall treat that data as the confidential and proprietary information of Vodafone and shall ensure that that data are only processed in accordance with the instructions of Vodafone and the contractual obligations set out in the data processing agreement.
- 2.8 Where Supplier receives a direct request for assistance from a government, law enforcement or national security agency, Supplier shall immediately inform the relevant Vodafone operating company, unless prohibited by law from doing so.