

Summary of the Global Rule on Requests made by Competent Authorities

User's freedom of expression and privacy rights are becoming increasingly important to our industry. Telecommunications operators play a fundamental role in the exchange of ideas and the expression of opinions, facilitating the development and expansion of human rights and democracy at the international level. Having said that, we cannot ignore that, at the same time, there are societal needs, such as those linked to national security, which can affect the secrecy of communications and privacy if the right balance is not struck.

It is a question of reconciling the due protection of the personal information to which we have access with the obligation to attend requests made by competent authorities when in accordance with what is established in the laws; such requests may be directly or indirectly related to information regarding the communications of our clients or users, with the implementation of the necessary technical measures so that the authorities may access communications in aid of judicial activity, or even with limitations on access to the network, blocking of access to certain sites and contents, or even complete shutdown of networks or services.

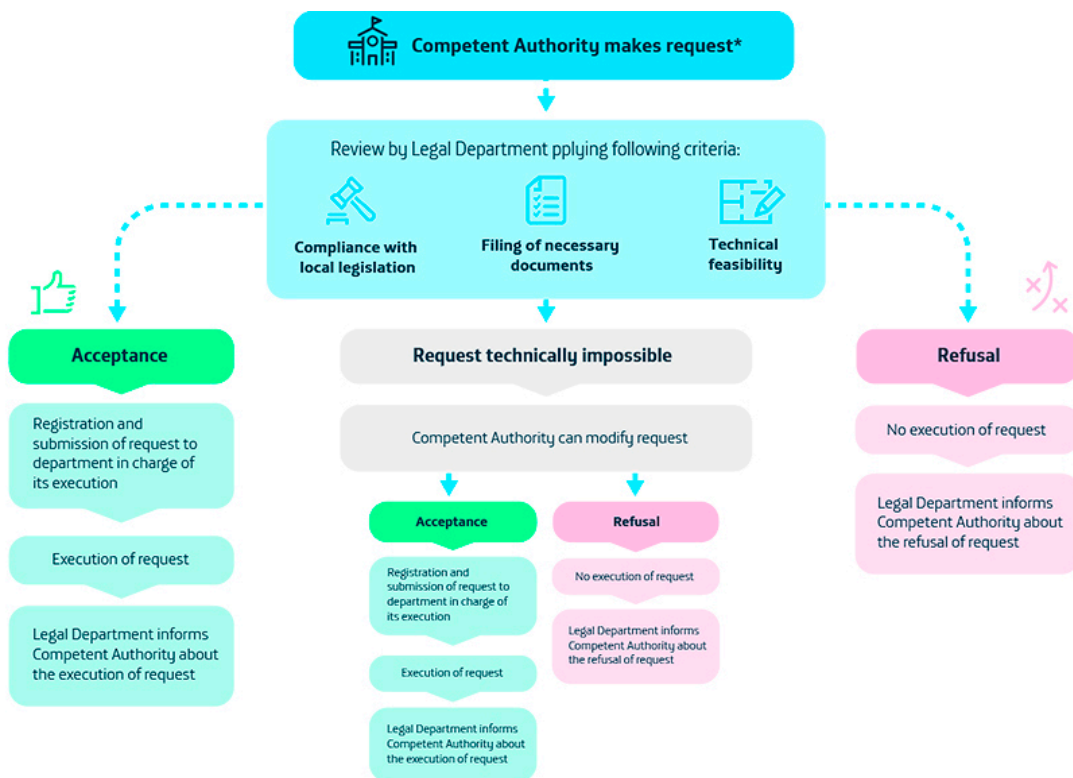
The aim of this procedure is to ensure a balance between legal compliance and respect for the fundamental rights of people in the countries where we operate.

The requests we receive are dealt with in accordance with the applicable national legislation in each country, and in accordance with the following principles:

- Confidentiality: we treat the request and the written response with a guarantee of strict confidentiality, in accordance with the levels set out in our corporate standard for the classification and processing of information.
- Completeness: we analyse the request in detail and in its entirety to determine whether or not it complies with national legislation.
- Justification: we analyse whether the request meets all the requirements, both from a procedural and substantive point of view, in order to be processed in accordance with national legislation.
- Proportionality: we interpret the request in such a way as to minimise negative impacts on the rights and freedoms of individuals, and in particular, with regard to the secrecy of communications, personal and family honour and intimacy, privacy and freedom of expression.
- Political Neutrality: in accordance with our Business Principles, we remain neutral at the political level and at no time take a position, directly or indirectly, for or against any political party.
- Diligent response: we treat each request with diligence, attending to its urgency and, in any case, observing the deadlines established in accordance with each applicable law.
- Security: we organize the process of reception, storage and communication under strict security measures.

Any action aimed at preventing a petition from being processed, without prejudice to the legal consequences that may result, entails the application of the sanctioning regime provided for in the applicable labour regulations.

And, most importantly, we have a detailed procedure that guarantees a global homogeneity in the treatment of the requests made by the competent authorities, ensuring the participation in the process of the areas with legal competences, and having fixed interlocutors as a single point of contact in our relationship with these authorities. All this in accordance with a process of reception, processing, response and registration, which allows us to monitor and control each request we receive.



*Competent authorities are governments, non-judicial government authorities and courts, empowered by the law to approve or authorize the adoption and order the technical execution of a measure for legal interception, a request for metadata, the blocking of contents or the suspension of the service

The requests which, due to their characteristics and exceptional nature so require, are analysed by the heads of the respective Responsible Unit by means of an appropriate weighting of all potentially compromised interests, including human rights, fundamental freedoms or other interests which may be applicable and, if circumstances arise, by the bodies within each Company whose functions include the evaluation and management of these types of exceptional situations.