

7th September 2015

Vodafone Group plc – Response to the findings in the Access Report “The Rise of Mobile Tracking Headers: How telcos around the world are threatening your privacy”

Ensuring our customers’ right to privacy is respected is one of Vodafone’s highest priorities. It is also a part of Vodafone’s Code of Conduct which everyone who works for Vodafone has to follow at all times.

Header enrichment is not Vodafone’s default operation, and we do not routinely share information with the websites our customers visit. We use header enrichment for a limited number of Vodafone and trusted third-party services where it is necessary for them to work. For example, if a customer visits a site or app store that offers a “charge to bill” service and where there is a direct billing relationship between the site/app store owner and Vodafone, the customer requires an enriched header containing an anonymised customer reference to allow the goods to be charged to their phone bill. The enriched header does not allow third parties to access personal information, create profiles or track internet behaviour.

Vodafone Netherlands changed the way it uses header enrichment earlier this year. In the past, Vodafone Netherlands has attached a “dynamic anonymous customer reference” (ACR) to traffic in order to offer customers a “charge to bill” service. While the ACR did not give access to personal information and is generated randomly to prevent tracking, we updated our systems in May 2015 to curtail the use of ACRs to only those circumstances where a limited number of Vodafone and trusted third-party websites require this header for our “charge to bill” services to work.

Vodafone Spain only uses header enrichment for “charge to bill” services from Vodafone and trusted third parties. We do not attach headers to all traffic, so it’s unusual that eleven customers have been identified in the research as having headers in their traffic. We are looking into these findings.