

Dear Sir/Madam,

Thank you for providing us with the opportunity to answer to your 2018 Ranking Digital Rights Corporate Accountability Index recommendation for Orange. In the letter addressed to our CEO, you stress 3 main items related to Human Rights and Privacy protection for which you recommend Orange should improve in France.

Let me first remind that Orange was one of the first companies to sign up to the United Nations Global Compact in 2000. Respecting the fundamental principles set out in the Universal Declaration of Human Rights and by the International Labour Organization explicitly features in the Group's Code of Ethics. Orange thus asserts its commitment to respecting and promoting fundamental human rights in its activities and sphere of influence, in particular in supporting and promoting freedom of expression and respect for privacy worldwide. The Group also confirms its commitment to ensuring that these rights are respected by each of its employees and managers, both internally (employee relations) and in its relationships with its customers, suppliers and subcontractors.

In 2017, Orange published its first report on respect of human rights, prepared according to a reporting framework in line with the United Nations' guiding principles on human rights (see orange.com, heading Human Inside/Corporate Responsibility/Our commitment), as well as its first Declaration on the non-use of modern slavery (see orange.com, heading Human Inside/CSR Report).

On your first recommendation : **“Orange should improve its grievance and remedy mechanisms by providing clear procedures for users to directly submit complaints of violations to their privacy rights.”**

Orange undertakes, in the context of its activities and in accordance with the legislation in force in France and Europe, to ensure the protection, confidentiality and security of the personal data of the users of its services, and to respect their privacy.

The Orange policy on the protection of personal data is available on <https://c.orange.fr/pages-juridiques/donnees-personnelles.html#comment-exercer-vos-droits>

Orange residential customers in France can manage their personal data and especially their contact preferences (the way Orange and its partners can contact them) from their Customer Center (Espace Client).

To submit a question or a complaint related to their personal data, Orange customers for France have several possibilities:

- business customers: postal address + contact form;
- Sosh customers: web contact form available in their customer Center, as the service is fully web based;
- Other Orange customers: postal address, while waiting for the next contact form to be put online.

In the event of what they consider to be a violation of their personal data, Orange customers are aware of the contact procedure from their Customer Center, Claim section.

The amounts of any commercial gestures depend on the situation (typology of data concerned, factual elements, ...)

On your second recommendation : **“Orange should be more transparent about how it responds to government and third-party requests to block content or restrict user accounts.”**

As a policy Orange confirms, in its implementation of the GNI's updated principles, "its commitment to respect and promote fundamental human rights in its activities and sphere of influence, particularly to support and promote worldwide freedom of expression and respect for privacy. [...];The right to freedom of expression should not be restricted by governments, except in narrowly defined circumstances based on internationally recognized laws or standards. These restrictions should be consistent with international human rights laws or standards and the rule of law. They must be necessary and proportionate for the relevant purpose."

As per the Principe number 2 of the GNI, Orange respects and works to protect freedom of expression, making use of analysis of the legal framework for restrictions to freedom of expression and respect for privacy in each country where the company is active; this analysis is executed and shared within GNI.

The analysis means that the legitimacy of each request can be checked before entering into dialogue with the authority making the request.

After this analysis, Orange, in compliance with the legislation in force, allows requisitions issued by the judicial or governmental authorities, in the context in which said requests and requisitions were authorized.

On your third recommendation : **"Orange should provide more information on how the company protects user data and its procedure for responding to data breaches."**

Orange ensures that the data is processed safely and confidentially, including when certain operations are carried out by subcontractors.

Platforms are tested, supervised, and audited with the highest levels of security requirements. Security audits and intrusion tests are conducted by Orange CyberDéfense and other audit firms, which are qualified by ANSSI. These audits include both application and systems security testing on all platforms, resulting in remediation updates as needed.

For obvious reasons of confidentiality and security, Orange does not wish to communicate on its procedure for responding to data breaches, which is available to the supervisory authorities.

We hope to have proven our commitment for the respect and promotion of human rights, freedom of expression and respect of private life.

Sincerely yours,