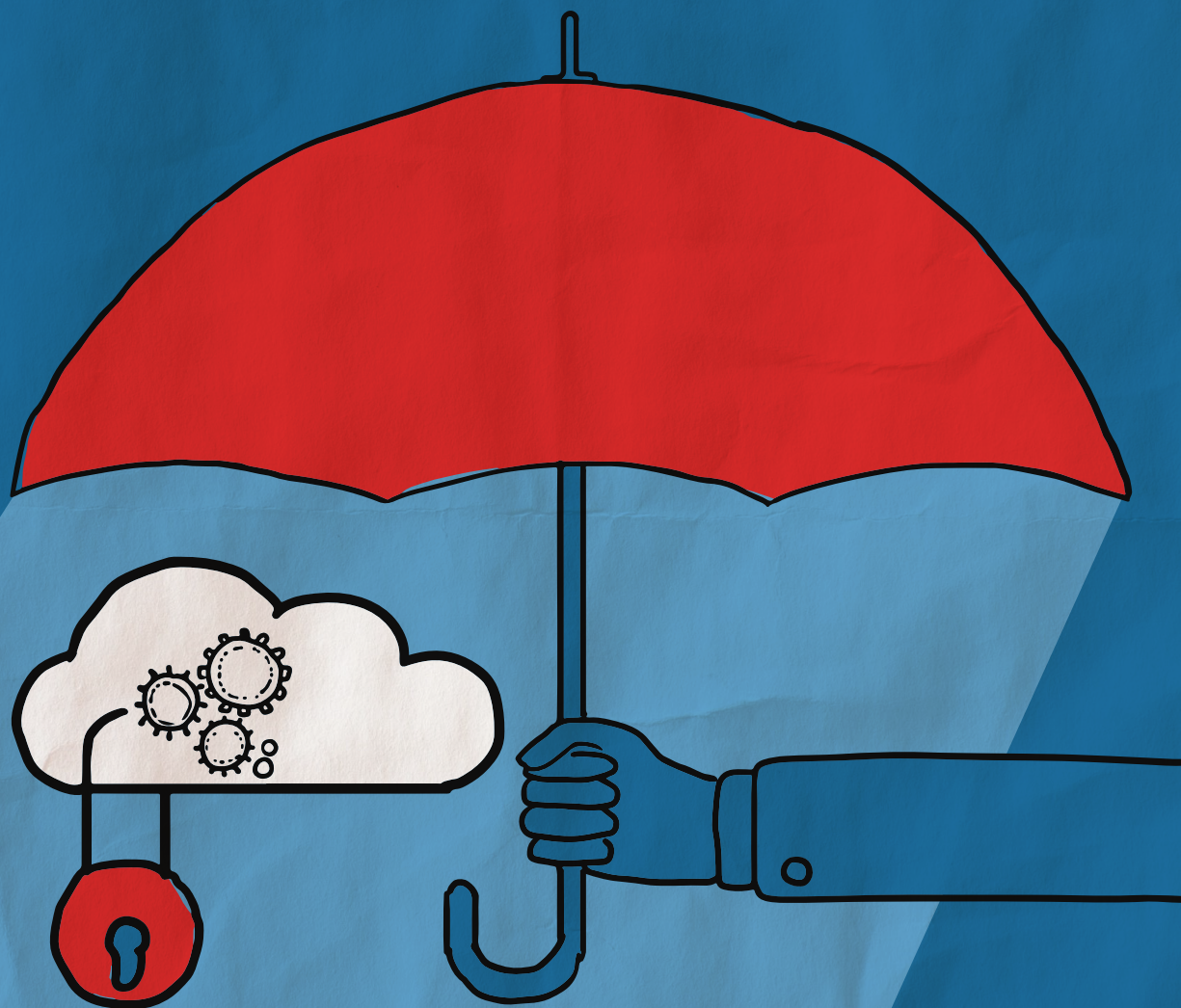


PROTECTING THE DIGITAL DATA

An overview of corporate data protection policies



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FOREWORD

Exactly a year ago today, a couple of my colleagues conducted an interesting experiment. They called a number of fast food chains, they knew I frequently ordered from, and told them they were actually me – calling from another number. All they had to do was to say, can you pull up my information from my own phone number, the battery is dead so I am calling from a friends mobile. Each and every chain's representative immediately pulled up my file and proceeded to give them information about my home and office addresses (and in one instance even my previous addresses). They were able to tell them what I had ordered the last (or last two or three times) and allowed them to place an order under my name (Watch here - <https://bit.ly/2QPBHUP>).

We found it slightly funny to see multiple orders arriving and being told that I had infact not placed the order.

But, the implications of this experiment were far from amusing. What this little experiment demonstrated was the total lack of consumer protection that is available when it comes to data protection. As the government works on Personal Data Protection Bill 2018, here we take a look at the data protection and privacy policies by different corporate entities in Pakistan and try to determine how transparent and responsive they are in terms of data protection. We hope that this research will help the consumers understand their data processing better, help the corporates identify the gaps and improve and helps the government formulate better regulatory policies to protect the consumers.



Sadaf Khan

Co Founder, Director
Media Matters for Democracy
November 2018

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CHAPTER 1

INTRODUCTION

Context

According to a research carried out by IBM, the annual cost of data loss accrued by around 400 organizations in 11 countries in 2016 stood at US\$ 3.62 million¹. As more countries are evaluated and technological interdependence increases, this cost is bound to rise in the coming years. The increased exchange of data between states also brings increased danger to privacy of individuals. This is because regulating vast data exchanges between countries becomes more and more widespread and increasingly difficult to oversee. Mindful of the fact that data breaches could have severe economic and human rights implications, 100 countries around the world have put in place data protection laws².

Additionally, in some countries, the same laws sanction setting up of data protection authorities/privacy commissions to oversee the enforcement of data protection law and compliance by the government departments and private organisations.

Some of the countries that have put in place privacy commissions include Canada, UK, Romania, USA, Hong Kong, Japan and Philippines. In South Asia, including Pakistan, no country so far has set up any official body that would monitor data protection compliance.

Data Protection in Pakistan or lack thereof

With more than 44 million³ of our population on the internet, the debate around data protection and privacy in Pakistan is also becoming relevant with every passing day. Over the past couple of years, a number of data beaches have come into limelight and exposed how vulnerable the consumer data is in Pakistan.

In 2017, Media Matters for Democracy (MMfD) found out through a small investigation that call center representatives from various food chains were casually doling out personal information including names, phone number, all the house addresses where the food was delivered and also the last food item delivered through food chains such as McDonalds and KFC⁴.

01 Ponemon Institute LLC, “2017 Cost of Data Breach Study”, IBM, June 2017, accessed September 10, 2017, <https://www.ibm.com/security/data-breach>.

02 Kriangsak Kittichaisaree, and Christopher Kuner, “The Growing Importance of Data Protection in Public International Law”, *Blog of the European Journal of International Law*, October 15, 2015, accessed September 11, 2017, <https://www.ejiltalk.org/the-growing-importance-of-data-protection-in-public-international-law>.

03 “Pakistan: Internet usage, Broadband and Telecommunication Reports”, *Internet World Stats*, accessed August 20, 2018, <https://www.internetworldstats.com/asia/pk.htm>.

04 Talal Raza, “No one to protect digital identity: how vulnerable is consumer data in Pakistan?”, *Digital Rights Monitor*, accessed November 24, 2017, <http://digitalrightsmonitor.pk/no-one-to-protect-digital-identity-how-vulnerable-is-consumer-data-in-pakistan>.

While MMfD’s investigation was controlled and small in scale, a host of serious data breaches have come to light in the last two years. In 2016, renowned websites including [Zameen.com](#) and [Pakwheels.com](#) were hacked and personal details of their users were leaked. In case of Pak Wheels, data of more than **600,000 users** was dumped.⁵

On November 08, 2017, Telenor Pakistan encountered a malware attack. Although, it was not clear to what extent the consumer data was affected, Telenor Pakistan also acknowledged that they came under malware attack and some of their systems were affected⁶. However, despite repeated attempts for further information, not much was forthcoming. So much so that it is still not clear whether the breach was limited to their internal data or consumer data was also compromised.

In April 2018, Careem revealed that a data breach happened in January 2018 and allowed hackers to access names, email addresses, ride histories and phone numbers of more than 14 million customers and 500,000 captains across the world. In its statement, Careem also insisted that there was no “evidence” to suggest that credit card details had also been stolen. It could not be clear that how many Pakistani customers’ data was also compromised⁷. It also was not clear who was responsible for the breach, why Careem had neglected to inform consumers for two months and what kind of measures were put in place to minimize damage and protect consumers from further losses.

The data breaches and thefts were not limited to private and corporate entities. In May 2017, owing to a security threat caused by a computer virus in the Punjab’s Information Technology Board (PITB)’s system, personal information of thousands of users was compromised⁸. This included their CNIC numbers, scanned copies of CNIC (full name), degree documents, as well as resumes. Furthermore, there have also been reports of organized criminal cells obtaining biometric data (fingerprints) of people in exchange for food items⁹. Given the fact that biometrics can be used for the issuance of mobile SIM cards, this data theft can create legal liabilities and have serious implications for data subjects.

The public remains vulnerable

While alternate media outlets and websites have all reported on these data breaches, only a handful of data breaches reaches the national news or is discussed in the media as it is considered an embarrassment for that entity. Coverage of such breaches also presents a potential conflict of interest for media entities who take advertisements from telcos and other corporations.

05 Ibid.

06 Talal Raza, “Telenor Pakistan comes under cyber-attack; the extent of damage remains unclear,” *Digital Rights Monitor*, accessed November 24, 2017, <http://digitalrightsmonitor.pk/telenor-pakistan-comes-under-a-cyber-attack-the-extent-of-damage-remains-unclear>.

07 Media Matters for Democracy expresses concern at the recent data breach at Careem; calls for a data protection framework to hold corporations accountable,” *Digital Rights Monitor*, April 25, 2018, accessed August 20, 2018, <http://digitalrightsmonitor.pk/media-matters-for-democracy-expresses-concern-at-the-recent-data-breach-at-careem-calls-for-a-data-protection-framework-to-hold-corporations-accountable/>

08 Ibid.

09 Ibid.

However, it is clear that personal data is extremely vulnerable in Pakistan.

In addition, even if someone does find out about potential breach and compromise of their personal data, they don't have much in the way of legal support. And thus, in the absence of legal remedies, the problem magnifies.

A law for data protection

After years of advocacy and pressure building, the government of Pakistan has finally made some headway towards the enactment of a data protection legislation. The ministry of Information Technology and Telecommunications has recently published the draft data protection bill on its website and is seeking comments and suggestions of different stakeholders through its website.

This research has been conducted to help different stakeholders understand how the corporate sector is currently responding to its data protection responsibilities. We hope that this baseline will help all stakeholders understand the context and the situation better in order to formulate conducive, forward looking recommendations and inputs. We also hope that the corporates themselves will take this research positively and respond to the gaps that have been identified in this basic assessment.

CHAPTER 2

METHODOLOGY AND SCOPE

Scope

Given the recent data breaches involving different companies, the research aims to look at the privacy policies of Pakistan based entities to assess to what extent they are transparent in their data handling and processing practices. For the sake of this research, privacy policies of following entities have been reviewed:

1. Telenor
2. Zong
3. Ufone
4. Jazz
5. Careem
6. Zameen.com
7. Pakwheels.com
8. Daraz.pk

These entities have been chosen for being renowned and enjoying a significant profile in their relative sectors. Some of them have also been chosen as they have recently been victims of cyber-attacks in the recent past. A brief profile of these companies can be read in the **Annex A**.

Methodology and indicators

Through literature review of data protection best practices, the researcher reviewed the policies of all the entities and has tried to find answers to following questions:

1. Do privacy policies of corporations uphold the spirit of transparency and accountability while sharing information about their handling of personal data?
 - a) Are they accessible and easy to understand for common users?
 - b) Do they reveal sufficient information about the type of data sets collected by them?
 - c) Do they reveal anything about security measures for protection of personal data?
 - d) Do they reveal any information about data retention?
 - e) Do they reveal any information about handling of data by third parties?
 - f) Do they explicitly inform the users about their rights on data?
2. How welcoming are entities in sharing more information about privacy policies via email?

In the light of these questions, a list of indicators was laid down for this research and analysis of policies against those indicators was carried out.

CHAPTER 3

FINDINGS AND ANALYSIS

Accessibility of Privacy Policies

Given the age of data, it is very important for corporations to ensure that the privacy policies pertaining to consumers are easily accessible and that users are able to find them without any hassle. While the majority of our population is not over the internet, corporations in Pakistan have chosen to list the privacy policies only on their websites. Given the lax attitude people have had about how corporations house their data, it does not happen that corporations especially telecom companies encourage their clients to read about privacy policy before using their services, such as buying SIM at their customer care centers.

For the research, the researcher looked at how easy it is to find the links to privacy policies of corporations on their websites. It was noted that out of eight corporations, six of them had given the link to privacy policy in the footer of their websites respectively. This makes it easier to find them out for anybody willing to learn more about privacy and how the corporation handles data.

On the other hand, it was difficult to find privacy policy on the website of Zong. It was quite easier for the researcher to find links about how to contribute towards “Bhasha Dam Fund” and do online shopping on Zong’s home page. As the researcher opened the home page of the Zong, it was difficult to find the pathway to the privacy policy. However, the website has a search bar that allowed researcher to write privacy policy and reach to the page with policies written on it.

Meanwhile, Ufone does not have a privacy policy that explains its handling of personal data through different services. Probably that is the reason why there is no link to that policy embedded in its footer at all. Researcher was also unable to find out the page on privacy policy through the search bar on the homepage. The only privacy policy available is related to the Ufone app. Even for that, the researcher had to type Ufone privacy policy to be able to reach to the actual link of privacy policy. It only shows the carelessness and also priority both these companies give in being transparent and open about their data processing and privacy practices.

Out of 8 corporations, 6 had given the link to privacy policy in the footer of their websites respectively. This makes it easier to find them out for anybody willing to learn more about privacy and how the corporation handles data.

Entities	Privacy Policy Easily accessible on website
Telenor	Yes
Jazz	Yes
Ufone	No
Zong	Partially (No direct link, have to write in search bar)
Careem	Yes
Daraaz	Yes
PakWheels	Yes
Zameen	Partially. There is no icon embedded with title "Privacy". One has to go into "Terms of Use" to read privacy policy.

Language of Privacy Policies

Out of eight corporations, seven of them have privacy policies in English language. Only one website Pakwheels.com that also hosts content in Urdu language has an Urdu version of privacy policy.

By having privacy policies in only one language, the corporations are depriving a major chunk of population from being able to understand how they handle personal data of their huge consumer base. It seems that the corporations have only posted these policies as a formality and are not interested in making sure that every

user of their services understands privacy policy and their handling of consumer data. To the very least, the privacy policies could have been in Urdu.

Only 1 out of 8 entities, PakWheels has made the privacy policy available in Urdu.

Types of Data sets collected and processed

For the sake of transparency, it is important for corporations to clarify what sort of data is collected by them, how do they collect them and lastly how do they use that information. The more specific the responses are, the easier it is for a common person to understand the reason for collection and processing of a particular data. In this regard, all the corporations have made an attempt to specifically mention the types of data sets that they collect and process. They have also provided reasons as to how do they process the data collected by them. However, some corporations have taken the high road and structured the information in a way that it is easier to identify what particular data set is used for what purpose.

Telenor's privacy policy addresses the issue of data processing in a more comprehensive manner. It not only specifically mentions various types of data sets that it collects, but also specifies when and how each data set is collected and what purpose it serves while the company is collecting that particular data set. The way it is structured gives a clear cut idea as what data is collected when one is using, for instance their SIM card and what type of data is collected when one is visiting their website. They have also made an effort in explaining this in palatable terms by sharing specific examples of data while discussing the type of dataset. This is close to an ideal way of explaining in clear terms how a company collects data, the justification for collecting it and the purpose it serves. Unfortunately,

majority of the corporations studied for this paper did not disclose about their data collection and processing in such elaborate and specific terms.

On the other, it seems as if Zong's privacy policy is a word to word copy of Telenor's privacy policy, they have also opted for a similar structure.

Meanwhile, Ufone's privacy policy is written with assumption that it is for those who are using Ufone app/account. The policy also clearly mentions the data sets collected through app, the purpose of the data collection and how it is processed. The main critique on Ufone is that it doesn't have an overarching privacy policy that takes into account other services offered by Ufone, data collected through other means, its purpose and how it is processed. In this regard, Ufone could probably follow the example of Telenor/Zong that has an elaborate structure.

Additionally, Jazz has also mentioned some specific types of datasets and provided

Telenor's privacy policy addresses the issue of data processing in a more comprehensive manner. It not only specifically mentions various types of data sets that it collects, but also specifies when and how each data set is collected and what purpose it serves while the company is collecting that particular data set. Zong's privacy policy appears to be a word by word copy of Telenor.

reasons for collecting that data. However, the way it is structured makes it a bit difficult to understand what information is collected when. Thus the result is that despite that it is very elaborate as compared to other entities, one gets confused about understanding the purpose behind collection of a data set.

Careem’s privacy policy also shares a comprehensive list of different types of datasets that they collect when anybody uses their services. Unlike Jazz, they have also tried to use simple terms and gave specific examples to make it understandable for people the different types of data collected by them. However, the structuring of the policy is such that it is difficult to understand what particular data is collected using website, app or customer care.

Meanwhile Zameen.com does not explicitly list down all the data sets that it may have collected. It only mentions name and email address and insert a vague phrase such as “any other details you provide to us”. It is not that other entities have not used this term but they have been more elaborate in laying out and talking about even non-identifiable information that they gather. Also, Zameen.com did not do a good job in clearly elaborating on different ways they collected data. For instance, more clarity is required on what sort of data is collected when an account on website is made, what data is collected when anyone contacts them and lastly what sort of data is collected from their app. Only a paragraph on Cookies gives an idea how data is collected when anyone visited website. Nevertheless, the policy was quite clear on different ways the collected information was processed.

Pakwheels and Daraz.pk also mentioned some specific data sets that are collected and processed. Again the structure of their privacy policies are not very impressive and do not clearly reflect the specific purpose for which each data is collected. Just like Zameen.com, they also did not clarify how data was collected differently through their mobile apps.

Entities	Specify the type of data sets collected	Specify how the data is collected	Specify how information is processed
Telenor	Yes	Yes	Yes
Jazz	Yes	Yes	Yes
Ufone	Partially	Partially	Partially
Zong	Yes	Yes	Yes
Careem	Yes	Yes	Yes

Daraaz	Yes	Yes	Yes
PakWheels	Yes	Yes	Yes
Zameen	Partially	Partially	Yes

Security of Personal Data

Given the recent reported instances where data of consumers was vulnerable owing to cyberattacks at corporations, it becomes pertinent that corporations take stringent measures about data security and also be transparent to consumers about the measures that they have taken to secure their data. A number of companies around the world are investing millions of dollars to enhance the security of consumer data.

Keeping in view the rising cyber-attacks, the same is expected from Pakistan based entities. However, it looks like the absence of a stringent data protection regime has allowed many corporations to get away by not revealing adequate information through their privacy policies.

The researcher wanted to check whether the privacy policy gives out specific details around how corporations maintain the security of our data. It is disappointing to note

that five organizations did not give any specific response while talking about the data security measures. This included Jazz, Ufone, Careem, Daraz and Pakwheels.

What it is ironic to note that not only are they vague on data security but some of them also seem to shrug off their responsibilities to protect consumer data.

Careem states, “Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, Careem cannot guarantee the security of any Personal Data you transmit to us, and you do so at your own risk. If you have any further questions on this issue, refer to our customer terms of use. To the extent permitted by applicable law, Careem expressly disclaims any liability that may arise should any other individuals obtain the Personal Data you submit to Careem.”

Meanwhile, Ufone holds that “We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic

Five organizations did not give any specific response while talking about the data security measures. These included **Jazz, Ufone, Careem, Daraz and Pakwheels**. **Telenor and Zong** have the most elaborate security policies, which interestingly seem to be an exact copy of each other.

storage is 100% secure and reliable, and we cannot guarantee its absolute security.”

Similarly, PakWheels states that, “While there is no such thing as 'perfect security' on the Internet, we will take all reasonable steps to insure the safety of your personal information.”

On the other, the mention of security measures in policies of Jazz and Zameen.com also would not reveal any specific information beyond some generic statements.

Entities	Specify measures to protect personal data
Telenor	Yes
Jazz	No
Ufone	No
Zong	Yes
Careem	No
Daraaz	Partially
PakWheels	No
Zameen	No

In order to get clarity on these matters, the researcher reached out to these organizations and asked them to share any specific measures that they had undertaken lately to enhance protection of personal data of users. Unfortunately no response was given. A more proactive response was expected from organizations such as Careem, PakWheels and Zameen.com as their databases had been exposed by hackers.

However, no response was received.

Meanwhile, there are some corporations who have tried to be elaborate on their data security section. For instance, Daraz’s policy tries to shed light on some of the specific measures -including use of firewalls to secure server and requesting proof of identity before handing over information to anyone. However, there could have been a lot more

discussed like in the privacy policies of Zong and Telenor.

Lastly, the privacy policies of Telenor and Zong seemed most elaborate but ironically, the security section seems a word to word copy of each other. It is not clear who has copied whose section. Zong did not clarify its position when the researcher reached out to get clarity on whether Telenor may have copied their policy. However, Telenor's representative came forward and clarified and indicated that they were the ones who put together their own policies after internal consultations. Irrespective of who has copied, the security section lays out an elaborate plan that these two organizations have undertaken to protect personal data. It goes beyond the customary jargon of "universally accepted industry practice" to talk about a number of measures including use of encrypted servers, automatic log out feature in case an account is dormant for some time, access control to third party servers/contractual agreement with them and also conducts data Protection/Privacy Impact Assessment. It is not to say that there are no ambiguities at all. But as compared to aforementioned companies, it is the most elaborate and detail-oriented version of security measures undertaken by the corporations.

Data Retention Time

For the sake of transparency, human rights activists around the world argue that corporations and governments should clearly stipulate the time for which the data of a person will be retained in their respective data centers. The researcher tried to find the data retention period in privacy policies of corporations. To the sheer dismay, four entities did not even mention about data retention in their

privacy policies. These include Ufone, Careem, Zameen.com and Pakwheels.com. Meanwhile, Zong, Telenor and Daraz touched upon data retention. Under the garbs of vague terms, the policies of these corporations only suggest that they collect personal data as "required subject to applicable laws" and "as long as it is necessary to achieve....legitimate purposes". No specific data retention period is mentioned. It is important to mention that just like the data security part, the data retention policies mentioned on Zong and Telenor's website seemed a word to word copy of each other.

The only company that specified the data retention period is Jazz. It specifically refers to licensing clause under which they are required to retain data for a year for scrutiny by Pakistan's Telecommunication Authority and law enforcement agencies.

These include "record/store data session logs/info along with IP address,.... call records including called and calling numbers, date, duration, time, IMEI and location details with regard to the communications made on our Telecommunication System."The policy also states that since the licensing agreement does not mention about retaining billing data, they retain it for six months in case of postpaid customers and for 40 days in case of prepaid customers.

Ufone, Careem, Zameen.com and Pakwheels.com do not mention anything about data retention in their privacy policies.

The only company that specifies the retention period is Jazz.

Entities	Specify data retention time
Telenor	No
Jazz	Yes
Ufone	No
Zong	No
Careem	No
Daraaz	No
PakWheels	No
Zameen	No

Third Parties

It is also important for corporations to be more transparent about their affiliated partners or any other companies to whom they provide data. This information is essential to allow consumers to know more about their data handling and take control of who gets to have access to their data.

Thus the research also looked at privacy policies of corporations to assess to what extent were they transparent about sharing information on third parties to whom they provide data. Out of eight corporations, five corporations were able to specify the categories of third parties (Telenor, Zong, Jazz, Daraz, Careem), two companies partially talked about them (Ufone, Zameen) whereas one entity (PakWheels) did not even specify the type of third parties.

Telenor, Zong, Jazz, Daraz, Careem were able to specify the categories of third parties. Ufone, Zameen partially talked about them. PakWheels did not even specify the type of third parties. Entities were more secretive about specifically naming the third parties with whom the data is shared.

On the other, more entities did a poor job in specifically naming entities with whom they shared or could share consumer data. Out of eight corporations, six entities (Telenor, Zong, Careem, Daraz, PakWheels, Zameen) did not specify the third parties. Only two entities (Jazz, Ufone) named some third parties with whom they shared data. The researcher tried to reach out to corporations to seek more clarity on the kind of third parties with whom they shared data and also if they could specify government agencies or law enforcement agencies with whom they frequently shared data. None of them responded to the questions and hesitated to answer them.

Entities	Specify type of third parties to whom they give data	Specify third parties to whom they share data
Telenor	Yes	No
Jazz	Yes	No
Ufone	Partially	Partially
Zong	Yes	Partially
Careem	Yes	No
Daraaz	Yes	No
PakWheels	No	No
Zameen	Partially	No

Rights of the consumers on their personal data

Globally, privacy policies of the companies stipulate certain rights to the consumers that they have on their personal data. These rights are usually mentioned based on the data protection legal regime present in a country. It is welcoming to note that despite the absence of a data protection legal regime, all the corporations except Ufone, have stipulated rights of the consumers upon their data.

Data policies of Telenor, Jazz, Zong, Careem, Zameen.com, Daraz.pk and Pakwheels.com talk about the following rights that the data subjects have on their personal data:

1. Right to access: Every consumer has the right to request the corporation to provide him/her with a copy of the data that is in possession with them.
2. Right to modify: Consumers have the right to request a corporation to modify or correct any information housed in their data centers and remove factual inaccuracies.
3. Right to withdraw consent: Every consumer also has the right to prevent the corporation from processing his personal data for marketing
4. Right to erasure: Every consumer has the right to request the company to remove its information from their databases for further processing.

Below is the chart to evaluate which corporation touches upon what aspects of rights.

Company	Right to Access	Right to Access	Right to Consent Withdrawal	Right to Erasure
Telenor	Yes	NA	Yes	Yes
Zong	Yes	NA	Yes	Yes
Jazz	Yes	Yes	Yes	Yes
Ufone	NA	NA	NA	NA
Careem	Yes(6.35 Euros)	NA	Yes	Yes
Daraz.pk	Yes (free)	Yes	Yes	NA
Zameen.com	X (USD 10)	NA	X	NA
Pakwheels.com	NA	X	X	NA

(NA=Not Applicable)

It is important to mention here that two entities namely Careem and Zameen.com explicitly mentioned the costs that the data subject will have to incur if they requested a copy of the data available with them. On the other, Daraz.pk clearly mentions in its policy that the access to data would be free of cost. However, other corporations did not specify whether or not they would charge the fee or not. From the rights standpoint, digital rights advocates believe that corporations should not be charging money for providing access to data rather that service should be afforded free of cost.

Additionally, unlike other telecom companies reviewed, Jazz has explicitly mentioned measures that the consumers can take in case they wish to prevent data processing in

certain circumstances. Other telecom companies including Telenor, Zong and Ufone has not specified how one can prevent them from sending promotional text messages.

Similarly, Daraz, PakWheels and Zameen.com have mentioned how one can unsubscribe from their promotional messages. Meanwhile, Careem does not provide any specific pathway to do the same in its case.

Laws under which personal data is processed

Out of all the eight corporations, only two corporations namely Zong and Telenor explicitly shared a list of all the laws under which they collect and process consumer data.

These laws include:

- I. Pakistan Telecommunication (Re-organisation) Act, 1996
- II. Prevention of Electronic Crimes Act, 2016.
- III. Investigation for Fair Trial Act, 2013.
- IV. Telecom Consumer Protection Regulations, 2016
- V. Protection from SPAM, Unsolicited fraudulent and obnoxious communication Regulations 2009

Meanwhile, Jazz did not specifically list down all the laws as mentioned by Telenor and Zong but referred to the Pakistan Telecommunication act 1996 to which its privacy policy conformed. Jazz policy also referred to licensing agreement under which it retained data for scrutiny by PTA and law enforcement agencies. Additionally, it mentioned “Protection from SPAM, Unsolicited fraudulent and obnoxious communication Regulations 2009” while discussing how can consumers protect themselves from SPAM messages.

The rest of the entities including Ufone, Careem, Daraz.pk, Pakwheels.com and Zameen.com did not specify under what laws they processed data.

Entities	Mention laws under which they gather and process data
Telenor	Yes
Jazz	Yes
Ufone	No
Zong	Yes
Careem	No

Daraaz	No
PakWheels	No
Zameen	No

IN A NUTSHELL

Entities	Privacy Policy Easily accessible on website	Language of Privacy Policy	Specify the type of data sets collected	Specify how the data is collected	Specify how information is processed	Specify measures to protect personal data	Specify data retention time	Specify type of third parties to whom they give data	Specify third parties to whom they share data	Explicitly mention rights of data subjects	Mention laws under which they gather and process data
Telenor	Yes	English	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes
Jazz	Yes	English	Yes	Yes	Yes	No	Yes	Yes	Partially	Yes	Yes
Ufone	No	English	Partially	Partially	Partially	No	No	Partially	Partially	No	No
Zong	Partially (No direct link, have to write in search bar)	English	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes
Careem	Yes	English	Yes	Yes	Yes	No	No	Yes	No	Yes	No
Daraaz	Yes	English	Yes	Yes	Yes	Partially	No	Yes	No	No	No
PakWheels	Yes	English/ Urdu	Yes	Yes	Yes	No	No	No	No	Yes	No
Zameen	Partially There is no icon embedded with title "Privacy". One has to go into "Terms of Use" to read privacy policy.	English	Partially	Partially	Partially	No	No	Partially	No	Partially	No

General attitude towards information sharing

The privacy policies of each of the corporations leave some unanswered questions.

On one hand, Ufone has not published a privacy policy covering all its services and on the other hand privacy policies of Telenor and Zong seem a copy of each other. Meanwhile, in other cases, there have been ambiguities in the framing of policies that make it difficult for the lay man to understand them.

However, in order to provide an opportunity to corporations to address some of the ambiguities, the researcher prepared a list of questions for each entity and sent out an email to them with those questions. It was hoped that there will be genuine interest to satisfy the researcher. To the sheer dismay, representatives of six entities did not even care to respond to the email. Only two organizations namely Zong and Telenor responded but did not share the information asked from them.

The lack of interest on the part of entities to proactively respond to queries pertaining to privacy reflects how much value do the representatives give to their customers while quelling their concerns around handling of the data. This can be explained by two ways. Firstly, employees of the corporations do not have a legal liability to satisfy the customers about their concerns around their data. That is the reason why many either chose to ignore the email or hide behind the “confidentiality” of the information. Secondly, while corporations around the world are opting for some best practices in the light of data protection laws, Pakistani corporations lag behind in even considering those best practices. Some of the corporations including Telenor, having international footprints, have been a bit responsive partly because of their experience in other countries.

ANNEX A: COMPANY PROFILES

TELENOR

Telenor the second largest mobile operator in Pakistan has over 43 million subscriber base in the country. Owned by Telenor Group, it started its business in Pakistan in 2005 and has a workforce of over 1,900 employees. Besides providing the mobile network, Telenor also offers 3G and 4G internet services for its subscribers. Bringing in the benefits of digital communication to the people of Pakistan, Telenor has developed schemes like Khushhal Zamindar, Easy Paisa and Telenor Velocity to facilitate its customer base across the country.

ZONG

Zong, owned by China Mobile Pakistan, took over the Pakistani market in 2007 and has managed to raise its subscriber's base to 30 million in 2018. Pakistan's second largest GSM mobile service provider and third largest mobile service provider, Zong offers 2G, 3G, 4G and mobile banking services to its customers.

JAZZ

Jazz, Pakistan's largest mobile operator is serving 55 million Pakistani's nationwide. Jazz established its business in Pakistan in 1994 as the first GSM operator in the country and within four years, introduced Pakistan's first prepaid brand 'Mobilink JAZZ' in 2008. Jazz provides 3G, 4G services to its customers along with the microfinance banking facility - Mobicash for its subscribers.

UFONE

Ufone, an initiative of Pakistan Telecommunication Company Limited, started its operations in Pakistan in 2001. Ufone has managed to build a subscriber base of over 24 million nationwide, with the network coverage in 10,000 locations of Pakistan. Ufone currently provides international roaming and 3G internet services to its customers in the country.

CAREEM

Careem, a ride-hailing service in Pakistan connects passengers with the drivers. Careem has over 15 million users with over 975 thousand captains in more than 14 countries around the world. Started its business in 2012, Careem now is the leading transport providing service in MENA, Turkey and Pakistan.

ZAMEEN.COM

A leading real estate web-portal, Zameen.com, connects buyers with sellers and owners with renters across the country. Founded in 2006 by two Pakistani brothers, collaborated with France's largest property web portal, SeLogger.com. The venture provides an Urdu version of the website, a mobile app, and a dedicated monthly property magazine, and also.

DARAZ.PK

Daraz.pk, an online shopping space, started its operations in Pakistan in 2012. Daraz now extended its user base to Bangladesh, Myanmar, Nepal and Sri Lanka with 30,000 sellers, over 500 brands catering to 5 million consumers in South Asia. It offers multiple payment methods including cash-on-delivery, comprehensive customer care and hassle-free returns.

PAKWHEELS

Pakwheels, an automotive web-portal, founded in 2003, serves millions of Pakistani's since its inception to buy and sell their automotives. The web-portal annually attracts over 25 million visitors, viewing more than 250 million pages on the website.

ABOUT MEDIA MATTERS FOR DEMOCRACY

Media Matters for Democracy works to defend the freedom of expression, media, Internet, and communications in Pakistan. The main premise of our work is to push for a truly independent and inclusive media and cyberspace where the citizens in general, and journalists in specific, can exercise their fundamental rights and professional duties safely and without the fear of persecution or physical harm.

We undertake various initiatives including but not limited to training, policy research, advocacy, movement building and strategic litigation to further our organizational goals. We also work on acceptance and integration of digital media and journalism technologies and towards creating sustainable 'media-tech' initiatives in the country.

MMfD recognises diversity and inclusion as a core value of democracy and thus all our programs have a strong focus on fostering values and skills that enable and empower women, minority communities, and other marginalized groups.

