



**ARCHBRIDGE**  
SOLICITORS

June 1, 2020.

THE CHIEF EXECUTIVE  
VODAFONE GROUP PLC  
VODAFONE HOUSE  
THE CONNECTION NEWBURY  
BERKSHIRE RG14 2FN  
UNITED KINGDOM

Dear MR NICK READ,

**COMPLAINT: THREATS OF PRIVACY RIGHT VIOLATIONS BY  
VODAFONE GHANA**

1. I bring you warm compliments from the committee of partners at *Archbridge Solicitors*.
2. We are the solicitors for MR FRANCIS KWARTENG ARTHUR (hereinafter referred to as our "Client") who is a subscriber to your telecommunication network - Vodafone - in Ghana. Accordingly, I write this letter on his instructions.
3. Our Client has asked us to draw your attention to the following facts:
  - a. He has been a subscriber to your network - Vodafone Ghana - for the past 20 years or so.
  - b. In March 2020, the President of Ghana issued an executive order in which he directed the National Communications Authority to collect some particulars of all telecommunication network or service subscribers' personal information for him.
  - c. The particulars of the personal information that the President requested include (but not limited to) a dump of subscriber database, the subscriber cell reference data, the unhashed subscriber mobile money transfer data; and a dump of mobile money merchant codes and addresses.

- d. According to the President's executive order, the particulars of the personal information are intended to be used for contact-tracing in the fight against the Covid-19 disease.
    - e. While other telecommunication network or service providers, like MTN, have vehemently contested the request as overly disproportionate or even irrelevant to the stated purpose and, thereby, a threat to subscribers' right to privacy, your Ghana office has, at best, remained completely silent and unconcerned about the issue.
    - f. The nonchalant posturing of your Ghana office gives our Client a cause to believe that your Ghana office has already supplied and continues to supply the particulars of his personal information together with the personal information of other subscribers to the President, even as our Client is currently contesting the matter in the Human Rights Court in Accra.
4. Based on the above facts and other considerations, we have advised our Client in respect of his rights under law, both domestic and international, including his rights under the European Convention on Human Rights.
5. We have also advised him in respect of his claims against Vodafone Ghana and the Vodafone Group itself; wherefore he has instructed us, firmly, to ask you, by way of a demand, to use your good offices to assist him with the following:
  - a. A confirmation from you that the said particulars of our Client's personal information with Vodafone Ghana have not been already given to the President of Ghana under the circumstances;
  - b. An assurance from you that the said particulars of our Client's personal information with Vodafone Ghana will not be given to the President of Ghana in violation of his fundamental human rights to privacy;
6. Accordingly, we wish to notify you (and notice is hereby given) that should you, within 14 days of receiving this letter, fail to commit, unequivocally, to meeting all the above demands, we shall, without further recourse to you, proceed and resort to other lawful avenues for resolving this matter with the aim, among others, of remedying any injuries that the conduct of Vodafone may cause to our Client.

7. Finally, in the event that a notice is required for the institution of any legal proceedings, judicial or administrative, against you in Ghana or elsewhere, this letter may constitute such a notice.

Thank you.

Very truly yours,



A handwritten signature in blue ink, appearing to read 'Justice Srem-Sai', written over a horizontal line.

**JUSTICE SREM-SAI, ESQ., B.A. LL.B. Q.C.L. LL.M. LL.M.**  
Solicitor's Licence No.: eGAR/01227/20  
**Partner**

Cc: The CEO, Vodafone Ghana.