

**De :** POILVÉ Benjamin  
**À :** Pascale Arguinarena Villegas, Vodafone; VALLET Félicien; BEKHAT Nacéra  
**Cc :** William Harmer, Vodafone; Michail Piperakis, Vodafone; Mikko Niva, Vodafone; patricia le large; AskGroupPrivacy, Vodafone Group  
**Objet :** RE: Vodafone - CNIL  
**Date :** jeudi 16 mars 2023 13:54:00  
**Pièces jointes :** [image001.png](#)  
[TrustPID\\_20230303\\_List of questions.docx](#)  
**Sensibilité :** Privé

---

Dear all,

As promised, after a feedback period for colleagues to propose their input, here is the compiled list of questions from our meeting session with DPAs.

Regards,

**Benjamin Poilvé**

Ingénieur Expert

[www.cnil.fr](#)

---

**De :** POILVÉ Benjamin

**Envoyé :** mercredi 8 mars 2023 15:45

**À :** 'Pascale Arguinarena Villegas, Vodafone' >;

VALLET Félicien >; BEKHAT Nacéra >

**Cc :** William Harmer, Vodafone >; Michail Piperakis, Vodafone <>; Mikko Niva, Vodafone <>; patricia le large <>; AskGroupPrivacy, Vodafone Group <[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear Pascale,

Indeed we are rounding up the questions, and should be able to transmit them to you middle of next week. We will then share the provided answers with the DPAs.

Regarding the next steps I'll have to get back to you as we have to discuss different possibilities with our colleagues. In any case should you wish to circulate more information, I'll be happy to relay it.

Regards,

**Benjamin Poilvé**

Ingénieur Expert

[www.cnil.fr](#)

---

**De :** Pascale Arguinarena Villegas, Vodafone >

**Envoyé :** mercredi 8 mars 2023 14:59

**À :** POILVÉ Benjamin >; VALLET Félicien >; BEKHAT Nacéra >

>

**Cc :** William Harmer, Vodafone >; Michail Piperakis, Vodafone >; Mikko Niva, Vodafone >; patricia le large >; AskGroupPrivacy, Vodafone Group <[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear Benjamin, CNIL team,

Thank you very much to you as well for coordinating and hosting the session and providing us with the opportunity to present the project and discuss. It has been very valuable for us and we are keen to work towards addressing the points discussed during the webinar.

I understand you will be sharing a transcript of all questions raised during the session and any others that the DPAs may have submitted afterwards too. We'd particularly appreciate your feedback on the project and the DPIA previously shared. We'd also like to understand any next steps.

Once again thank you, we look forward to hearing from you on the above.

Kind regards,

Pascale  
Vodafone Group Privacy

C2 General

**From:** POILVÉ Benjamin [REDACTED]  
**Sent:** 03 March 2023 15:54  
**To:** Pascale Arguinarena Villegas, Vodafone [REDACTED];  
VALLET Félicien [REDACTED]; BEKHAT Nacéra <[REDACTED]>  
**Cc:** William Harmer, Vodafone <[REDACTED]>; Michail Piperakis, Vodafone  
[REDACTED]; Mikko Niva, Vodafone [REDACTED]; patricia  
le large [REDACTED]; AskGroupPrivacy, Vodafone Group  
<[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>  
**Subject:** RE: Vodafone - CNIL  
**Sensitivity:** Private

**This is an external email.** Do you know who has sent it? Can you be sure that any links and attachments contained within it are safe? If in any doubt, use the Report Message button in your Outlook client to report this mail.

Thank you all for the presentation, it was very interesting !

Have a good weekend,

**Benjamin Poilvé**  
Ingénieur Expert

[REDACTED] | [www.cnil.fr](http://www.cnil.fr)

**De :** POILVÉ Benjamin  
**Envoyé :** mercredi 15 février 2023 14:26  
**À :** 'Pascale Arguinarena Villegas, Vodafone' [REDACTED];  
VALLET Félicien [REDACTED]; BEKHAT Nacéra [REDACTED]  
**Cc :** William Harmer, Vodafone <[REDACTED]>; Michail Piperakis, Vodafone  
[REDACTED]; Mikko Niva, Vodafone [REDACTED]; patricia  
le large [REDACTED]; AskGroupPrivacy, Vodafone Group  
[REDACTED]  
**Objet :** RE: Vodafone - CNIL  
**Critère de diffusion :** Privé

Dear Pascale,

Great thank you, we'll make sure to circulate this version with the invitation.

Do you wish to test the conferencing tools together for example the Thursday before the meeting? Just to make sure that everything is in order, that supports work on your side and so on?

In any case I'll send you an invite with the connection link, that is common to all participant.

Regards,

**Benjamin Poilvé**

Ingénieur Expert

[www.cnil.fr](http://www.cnil.fr)

**De :** Pascale Arguinarena Villegas, Vodafone

**Envoyé :** mercredi 15 février 2023 13:20

**À :** POILVÉ Benjamin; VALLET Félicien; BEKHAT Nacéra

**Cc :** William Harmer, Vodafone; Michail Piperakis, Vodafone; Mikko Niva, Vodafone; patricia le large; AskGroupPrivacy, Vodafone Group

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear Benjamin,

Thanks for the confirmation.

Please find attached a slightly updated version of our DPIA. Could we ask that this version is circulated with the invitations please?

Below I also provide the list of attendees from our side.

Vodafone:

Mikko Niva -

Pascale Arguinarena -

William Harmer -

Michail Piperakis -

Michael Wohlfarth -

Marc Schramm -

Orange:

Patricia Le Large -

Telefonica:

Oscar Casado Oliva -

Ismael Simon Moreno -

Telekom/emetriq:



Andreas Zolper - [REDACTED]

Sascha Woyde - [REDACTED]

Many thanks,



**Pascale Arguinarena Villegas**

Commercial Privacy Manager

Legal Privacy, Security & Content Standards

C2 General

**From:** POILVÉ Benjamin [REDACTED]

**Sent:** 14 February 2023 10:01

**To:** Pascale Arguinarena Villegas, Vodafone [REDACTED]

VALLET Félicien [REDACTED]; BEKHAT Nacéra [REDACTED]

**Cc:** William Harmer, Vodafone [REDACTED] Michail Piperakis, Vodafone

[REDACTED]; Mikko Niva, Vodafone [REDACTED]; patricia

le large [REDACTED]; AskGroupPrivacy, Vodafone Group

<[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>

**Subject:** RE: Vodafone - CNIL

**Sensitivity:** Private

**CYBER SECURITY WARNING:** This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

Dear Pascale,

Thank you for your understanding,

It's confirmed then.

Regards,

**Benjamin Poilvé**

Ingénieur Expert

[REDACTED] | [www.cnil.fr](http://www.cnil.fr)

**De :** Pascale Arguinarena Villegas, Vodafone [REDACTED]

**Envoyé :** mardi 14 février 2023 10:12

**À :** POILVÉ Benjamin [REDACTED]; VALLET Félicien [REDACTED] BEKHAT Nacéra

[REDACTED]

**Cc :** William Harmer, Vodafone [REDACTED] Michail Piperakis, Vodafone

[REDACTED] Mikko Niva, Vodafone [REDACTED]; patricia

le large [REDACTED]; AskGroupPrivacy, Vodafone Group

[REDACTED]

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear Benjamin,

No problem, Friday the 3<sup>rd</sup> of March 15h-17h also works for us.

Thank you,



**Pascale Arguinarena Villegas**

Commercial Privacy Manager

Legal Privacy, Security & Content Standards

C2 General

**From:** POILVÉ Benjamin [REDACTED]

**Sent:** 14 February 2023 08:31

**To:** Pascale Arguinarena Villegas, Vodafone [REDACTED]

VALLET Félicien [REDACTED]; BEKHAT Nacéra [REDACTED]

**Cc:** William Harmer, Vodafone [REDACTED] Michail Piperakis, Vodafone

[REDACTED]; Mikko Niva, Vodafone [REDACTED] patricia

le large [REDACTED] AskGroupPrivacy, Vodafone Group

<[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>

**Subject:** RE: Vodafone - CNIL

**Sensitivity:** Private

**CYBER SECURITY WARNING:** This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

Dear Pascale,

Sorry, but due to a little organisational mishap on my part, this date just became unavailable.

This time I've make sure to pre-book the proposed time, so if one of those work for you, we'll make it work :

- Thursday the 2d of March 16h-18h
- Friday the 3<sup>rd</sup> of March 15h-17h
- Monday the 6<sup>st</sup> of March, 15h30-17h30

I'll circulate the invitation this Thursday and ideally documents could be circulated at least a week before the meeting.

Once again sorry for the issue.

Regards,

**Benjamin Poilvé**

Ingénieur Expert

[www.cnil.fr](http://www.cnil.fr)

**De :** Pascale Arguinarena Villegas, Vodafone [REDACTED]

**Envoyé :** mardi 14 février 2023 09:11

**À :** POILVÉ Benjamin [REDACTED]; VALLET Félicien [REDACTED] BEKHAT Nacéra

**Cc :** William Harmer, Vodafone [REDACTED] Michail Piperakis, Vodafone

[REDACTED]; Mikko Niva, Vodafone [REDACTED] patricia

le large [REDACTED] AskGroupPrivacy, Vodafone Group

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear Benjamin,

Thank you very much for the guidance provided.

In terms of dates, Wednesday the 1<sup>st</sup> of March 15h-17h would be preferable.

We are still finalising some of the materials part of the information package, so would be great if the DPIA could be sent with the invitation in the meantime and the additional materials shared a bit later.

Thank you,



**Pascale Arguinarena Villegas**

Commercial Privacy Manager

Legal Privacy, Security & Content Standards

C2 General

**From:** POILVÉ Benjamin [REDACTED]

**Sent:** 10 February 2023 08:55

**To:** Pascale Arguinarena Villegas, Vodafone [REDACTED]

VALLET Félicien [REDACTED] BEKHAT Nacéra [REDACTED]

**Cc:** William Harmer, Vodafone [REDACTED]; Michail Piperakis, Vodafone

[REDACTED]; Mikko Niva, Vodafone [REDACTED] patricia

le large [REDACTED]; AskGroupPrivacy, Vodafone Group

[REDACTED]

**Subject:** RE: Vodafone - CNIL

**Sensitivity:** Private

**CYBER SECURITY WARNING:** This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

Dear Pascale,

Thank you for your answer and your support.

I think the topic that would be useful to cover are:

- The current timeline (both past and future)
- The general system and how it works
- The qualification, both in terms of GDPR and ePrivacy of the different operations that are carried out
- The user-facing interfaces, especially in terms of consent

When I circulate the invitation I can also circulate a call for questions from the DPA, but given the planned timeline, I am not sure we'll be able to make them available to you much in advance of the meeting.

It's a great idea to make available an information package to the colleagues. If you wish to provide it, ideally it would be before next Thursday (when we plan to circulate the invitation), but it can be done a bit later.

Would any of those dates be ok for you ?



- Wednesday the 1<sup>st</sup> of March, 15h-17h
- Thursday the 2<sup>d</sup> of March 16h-18h
- Friday the 3<sup>rd</sup> of March 15h-17h

Thank you for the update on the project.

Looking forward our meeting,

**Benjamin Poilvé**

Ingénieur Expert

[www.cnil.fr](http://www.cnil.fr)

**De :** Pascale Arguinarena Villegas, Vodafone [REDACTED]

**Envoyé :** jeudi 9 février 2023 17:45

**À :** POILVÉ Benjamin [REDACTED] VALLET Félicien [REDACTED] BEKHAT Nacéra [REDACTED]

**Cc :** William Harmer, Vodafone [REDACTED]; Michail Piperakis, Vodafone [REDACTED]; Mikko Niva, Vodafone [REDACTED]; patricia le large [REDACTED]; AskGroupPrivacy, Vodafone Group  
<[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear Benjamin,

Many thanks for your email. We very much support having a collective session and are happy to proceed with your proposal.

In order to help us prepare, we would welcome the CNIL's advice on whether there are any topics or aspects in particular we should focus on in the presentation and if possible, any questions that you could share in advance.

We also understand from your email that you will be sending the invitations to all other DPAs. We think it would be very helpful to provide all invitees with some pre-read materials including the DPIA, an Executive Summary and our presentation slides. We should be able to share the last two a week ahead of the session.

In terms of dates, we are happy to set a date for the end of this month as you propose. We are confirming the list of attendees on our side and will share as soon as possible.

Finally, I would also like to confirm the current status of the project. The trial is currently only active in Germany and we are working to enable the trial in France towards the end of this month, and in Spain, in March. We are not planning to extend it to any other countries at the moment. Please also note that the Joint Venture is expected to be set up in Belgium, subject to the European Commission antitrust decision, which we expect to receive this Friday.

Please let us know if there's anything else you require from our side at this stage.

Kind regards,



**Pascale Arguinarena Villegas**

Commercial Privacy Manager

Legal Privacy, Security & Content Standards

C2 General

**From:** POILVÉ Benjamin [REDACTED]  
**Sent:** 03 February 2023 08:41  
**To:** Pascale Arguinarena Villegas, Vodafone [REDACTED]  
VALLET Félicien [REDACTED]; BEKHAT Nacéra [REDACTED]  
**Cc:** William Harmer, Vodafone [REDACTED]; Michail Piperakis, Vodafone [REDACTED]  
[REDACTED]; Mikko Niva, Vodafone [REDACTED]; patricia  
le large [REDACTED]; AskGroupPrivacy, Vodafone Group  
<[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>  
**Subject:** RE: Vodafone - CNIL  
**Sensitivity:** Private

**CYBER SECURITY WARNING:** This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

Dear Mikko, Pascale,

Thank you for the documentation and information you made available.

After discussing with the concerned European colleagues, we feel it would be useful to have a presentation and a session of Q&A in common with all DPAs than can make themselves available. Indeed, while the current experimentation is currently limited to a set of countries, it would be best to include feedbacks from all sides as soon as possible.

If you are willing to proceed to said presentation, in terms of modalities, I would propose :

- A two hour timeslot be agreed upon (to make time for both presentation and questions). Ideally such a meeting would take place at the end of February;
- We will at the CNIL handle the technical details of the webinar and invitation, you would just have to share in advance the email of the participating persons on your side;
- We will circulate the invitation to our colleagues;
- The meeting will take place. All question will be written by a secretary;
- After the meeting, we will transmit you the question in case you wish to provide written answers. Ideally the presentation support could be shared with the colleagues.

Let me know what you think of this proposition.

Regards,

**Benjamin Poilvé**

Ingénieur Expert

[REDACTED] | [www.cnil.fr](http://www.cnil.fr)

**De :** Pascale Arguinarena Villegas, Vodafone [REDACTED]  
**Envoyé :** mercredi 18 janvier 2023 12:57  
**À :** Tiphaine CAULIER [REDACTED]; POILVÉ Benjamin [REDACTED]; VALLET Félicien [REDACTED]; BEKHAT Nacéra [REDACTED]  
**Cc :** William Harmer, Vodafone [REDACTED]; Michail Piperakis, Vodafone [REDACTED]  
[REDACTED]; Mikko Niva, Vodafone [REDACTED]; patricia



le large [REDACTED]; AskGroupPrivacy, Vodafone Group

<[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>

**Objet :** RE: Vodafone - CNIL

**Critère de diffusion :** Privé

Dear CNIL,

We wanted to take the opportunity to check-in with you as we continue to progress with preparations for the MVP in France, which we are looking to launch within the next month. We will inform you once we have an exact launch date.

We hope you have found the DPIA informative and sufficiently comprehensive. As always, we remain at your disposal and are very much looking forward to receiving any feedback you may have.

Kind regards,



**Pascale Arguinarena Villegas**

Commercial Privacy Manager

Legal Privacy, Security & Content Standards  
[REDACTED]

C2 General

**From:** Mikko Niva, Vodafone [REDACTED]

**Sent:** 18 November 2022 12:55

**To:** Tiphaine CAULIER [REDACTED]; Benjamin Poilvé [REDACTED] Félicien Vallet [REDACTED]; patricia le large [REDACTED]; Pascale Arguinarena Villegas, Vodafone [REDACTED]; AskGroupPrivacy, Vodafone Group <[ask.groupprivacy@vodafone.com](mailto:ask.groupprivacy@vodafone.com)>; Nacéra BEKHAT [REDACTED]

**Cc:** William Harmer, Vodafone [REDACTED] Michail Piperakis, Vodafone [REDACTED]

**Subject:** RE: Vodafone - CNIL

**Sensitivity:** Private

Dear CNIL,

*Since our last communication below, we have been working on an updated version of our DPIA that we are happy to share with you today. Please find it attached.*

*It took us slightly longer than expected to finalise this version so please accept our apologies for the delay. We hope this updated version will bring further clarity on the points discussed during our engagement as well as the solution as a whole. However, please do not hesitate to get in touch should you have any additional questions. In addition, I would like to share with you that we will be meeting with the AEPD in Spain in a similar process as what we have had with CNIL, in addition to the engagements we've had with the BfDI and the UK ICO.*

*We look forward to receiving your feedback in due course.*

Kind regards,



**Mikko Niva**

Global Privacy Officer

[REDACTED]  
Vodafone Group Services Limited, One Kingdom  
Street, Paddington Central, London W2 6BY  
[vodafone.com](https://www.vodafone.com)

C2 General

**From:** Mikko Niva, Vodafone

**Sent:** 10 October 2022 08:35

**To:** Tiphaine CAULIER [REDACTED]; Benjamin Poilvé [REDACTED]; Félicien Vallet [REDACTED]  
[REDACTED] patricia le large [REDACTED]; Pascale Arguinarena Villegas, Vodafone [REDACTED]; AskGroupPrivacy, Vodafone Group [REDACTED]; Nacéra BEKHAT [REDACTED]

**Cc:** William Harmer, Vodafone [REDACTED]; Michail Piperakis, Vodafone [REDACTED]

**Subject:** RE: Vodafone - CNIL

**Sensitivity:** Private

Dear Madam and all,

We would first like to extend our thanks for sharing your time and feedback during last Tuesday's call. We greatly appreciated the opportunity to present to you our solution. Our priority is to make this a privacy first solution that can address the many challenges currently faced in the online advertising ecosystem. To this end we welcomed your excellent questions and observations which we found very helpful.

We also wanted to follow up with a short summary of what was discussed and immediate actions we'll be taking as a result.

**Specific points discussed:**

-

We will work on ensuring that our documentation provides a clear account regarding all of the below, to provide a better view of the controls and limitations available as part of the solution.

**Technical**

- [REDACTED] and limitations imposed, technical and contractual, to prevent data misuse by DSPs.
- IP address origin/usage by operators.
- Hashing solution implemented by operators to secure IDs.
- Availability of segment limitations – We have started exploring the introduction of limitations to segmentation to help mitigate risk of microtargeting.
- Hotspot/Tethering – [REDACTED]



[REDACTED] Due to the technical conditions for the current test operation of the solution, users are informed in the Privacy Portal that those using the same hotspot/tethering will be able to see and manage the same information on the Privacy Portal. We are exploring how to make this disclaimer more prominent to users whilst we work on a technical solution for the full commercial launch.

#### Consent

- Consent management – Global (Privacy Portal) vs client-side interaction when consent is granted/revoked/managed and effect on IDs generated.
- How consent and use of IDs works in the context of media groups and how communicated to user given it is generally not easily explainable to users that sites are connected.
- Block service – The block remains in place indefinitely as part of the trial. [REDACTED]

[REDACTED] We welcome feedback in this respect to help us provide a better user experience whilst remaining in compliance with privacy obligations.

#### Legal analysis

- Value added service under Article 6(3) ePrivacy Directive – The solution's reliance on the mobile network operator provision of hashed identifier based on IP address entails a service on top of the essential provision of communications, qualifying as value added service. Specifically, the service envisaged is the provision of a one-stop-shop platform to the user enabling centralised management of consents and user data.
- Relevance of Article 5(3) ePrivacy Directive – Applicability is triggered by the storage of MarTech ID and AdTech ID on user's device. We have revised our consent text to ensure we comply with the requirements contained in this article and will be sharing an updated version with CNIL together with our DPIA.
- Prior consultation under Article 36 of GDPR – A formal consultation was not submitted as pursuant to our data protection impact assessment no high risks remained following measures taken which could trigger the threshold for prior consultation as per Article 36. Nevertheless, given the novelty of the solution, we have voluntarily engaged relevant regulators in the countries where we planned to trial the solution to inform them, to discuss the solution and to learn from their expertise and to obtain any recommendations offered.

#### Next steps:

1. Vodafone to share updated DPIA and more details on German and French trial scope with CNIL as soon as possible, within the next two weeks;
2. CNIL to provide Vodafone with their feedback once they've reviewed additional updated documentation and had opportunity to align internally;
3. Vodafone will inform CNIL before trial in France goes live.

Kind regards,

Mikko



**Mikko Niva**

Global Privacy Officer



Vodafone Group Services Limited, One Kingdom  
Street, Paddington Central, London W2 6BY  
[vodafone.com](https://www.vodafone.com)

-----Original Appointment-----

From: Tiphaine CAULIER [REDACTED]



**Sent:** 03 October 2022 10:01

**To:** Tiphaine CAULIER; Benjamin Poilvé; Félicien Vallet; Mikko Niva, Vodafone; patricia le large; Pascale Arguinarena Villegas, Vodafone; AskGroupPrivacy, Vodafone Group; Nacéra BEKHAT

**Subject:** Vodafone - CNIL

**When:** 04 October 2022 10:00-11:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

**Where:**

**Sensitivity:** Private

**CYBER SECURITY WARNING:** This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

## Tiphaine CAULIER vous invite à une réunion en ligne

Tiphaine CAULIER invites you to an online meeting

### Vodafone - CNIL

mardi 4 octobre 2022 • 11:00  
(heure d'été d'Europe centrale)  
Durée : 60 min

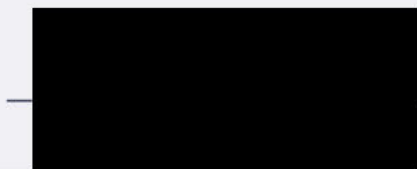
[Rejoindre la réunion](#)

[Join the meeting](#)

Accès personnel à la réunion • Ce lien ne doit pas être partagé

#### Informations personnelles de connexion

(pour les utilisateurs sans compte Tixeo)



**Besoin d'aide ? • Need help?**

[Contacter notre équipe support](#)

## Contact the support team

Copyright 2003-2022 [Tixeo](#) | Tous droits réservés | Vidéo Conférence sécurisée

C2 General