

Obviously Three and Shine are secretive about what exactly they are doing for good commercial reasons, but the Ts&Cs seem to be far too vague. Someone signing up consents to the use of "the technology" but doesn't specify what exactly the technology is doing or what data is being processed at all.

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**From:** Abigail Saul  
**Sent:** 26 May 2016 09:02  
**To:** Simon Rice; Darren Read  
**Subject:** FW: Shine - Ad Filtering - Update from Hutchison 3G UK Ltd



Abigail Saul  
Senior Policy Officer – Strategic Liaison, Business and Industry  
Group

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Any views or opinions expressed in this message are those of the author only. Furthermore, this message (including any attachment) does not create any legally binding rights or obligations whatsoever, which may only be created by the exchange of hard copy documents signed by a duly authorised representative of Hutchison 3G UK Limited. Hutchison 3G UK Limited is a company registered in England

and Wales with company number 3885486. Registered Office Star House, 20 Grenfell Road, Maidenhead, Berkshire SL6 1EH

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For info,

I'll keep you updated as things develop. Clear PECR implications regarding the interception of communications.

Simon

Dr Simon Rice  
Group Manager (Technology)

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**From:** Garreth Cameron  
**Sent:** 22 February 2016 11:29  
**To:** Joanne Stones; Press Team (internal); Andy Curry; Robert Johnson; Lisa Herbert; Mary Morgan; Joff Gray  
**Cc:** Simon Rice; Abigail Saul; Darren Read  
**Subject:** Three / Shine Technologies - network level ad blocking

I was just wondering whether anybody has received any contact from Three regarding their recent announcement to introduce network level ad-blocking? We were planning to contact them, but wanted to check whether there were any other interests first.

Thanks

Garreth Cameron  
Group Manager - Business & Industry

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Yes that works for me – thanks all

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**From:** Simon Rice  
**Sent:** 06 April 2016 13:18  
**To:** Abigail Saul; Gordon Hart  
**Cc:** Garreth Cameron  
**Subject:** RE: Update on Three UK case

How about

"we are continuing with our enquiries"

Simon

Dr Simon Rice  
Group Manager (Technology)

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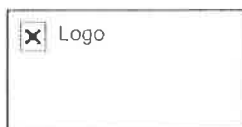
**From:** Abigail Saul  
**Sent:** 06 April 2016 13:01  
**To:** Gordon Hart  
**Cc:** Garreth Cameron; Simon Rice  
**Subject:** RE: Update on Three UK case

Hi Gordon

I'd be reluctant to as we have not really got far yet – are still arranging a meeting with them (end April) on basis that the press release was, according to them, about an aspirational solution rather than a currently existing one.

Have copied Simon and Garreth in in case they have additional thoughts.

Abi



Abigail Saul  
Senior Policy Officer – Strategic Liaison, Business and Industry Group

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**From:** Gordon Hart  
**Sent:** 06 April 2016 12:17  
**To:** Abigail Saul  
**Subject:** Update on Three UK case

Hi Abigail

There have been a couple of Twitter enquires about a recent case involving ThreeUK - is there an update on the case that I could go back to the enquirer with very briefly on Twitter?

@ICOnews @ThreeUK Have those enquiries been concluded yet? If so what if anything was the outcome?

It seems I wasn't the first one to ask @ICOnews this sort of question...  
[https://www.whatdotheyknow.com/request/use\\_of\\_shine\\_by\\_3uk\\_follow\\_up](https://www.whatdotheyknow.com/request/use_of_shine_by_3uk_follow_up)

Gordon Hart  
Lead Communications Officer

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As discussed earlier, I looked over PECR for anything relating to intercepting or changing traffic, and I think you're correct, there's no specific requirement in PECR. I think perhaps I was thinking of the security requirements for CSPs but they're not relevant in this case...

I suspect the relevant law is RIPA, but I'm not intimately familiar with it. Let me check and see. We can also refer to the case of 3 and their adblocking – it's the same principle so we might get a steer on how to proceed here.

**Andrew Paterson**  
**Senior Technology Officer**

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