



Three UK – Vodafone Merger: National Security Implications

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1 Summary: The Three-Vodafone merger raises major national security concerns

The proposed merger between CK Group subsidiary Three Mobile and Vodafone raises profound national security implications. If the merger is approved, CK Group will have a place at the heart of UK telecoms. **It will have significant control over:**

- **The privacy and security of 27 million UK mobile customers;**
- **Sensitive government contracts, including with the NHS and Ministry of Justice;**

Sensitive data and critical national infrastructure will be extremely vulnerable in CK's hands. Crucially, being headquartered in Hong Kong means that CK could be compelled to share sensitive information with the Chinese state through the Hong Kong National Security Law, which gives police the power to snoop on telecoms.

In addition, Unite has found that members of the top leadership of the CK Group have had close links with the state and its ruling Communist Party for decades, both at personal and institutional levels. Through these links, they have condoned and collaborated in its repression.

The CK Group is controlled by the Li family. Its patriarch, Li Ka-shing, founded the group and his son Victor currently leads it as Chair of group companies CK Hutchison and CK Assets. The Li family remain the group's biggest shareholders.

By combing through English and Chinese-language company, registry, media and official sources, plus interviews with experts and journalists, Unite has found:

- China's domestic and counter-intelligence laws and Hong Kong's National Security Law may pave the way for China's security services to obtain confidential data from companies like CK.
- Li Ka-shing and Victor Li have gone out of their way to actively campaign for the Chinese state's brutal repression of democracy in Hong Kong. They were prominent supporters of pro-Beijing hardliner John Lee and backed the National Security Law.
- The Lis, plus several other members of the CK Group leadership, occupy positions in a number of bodies that form part of the Chinese state's ruling apparatus. Victor Li, for example, is a committee member of the 13th National



Committee of the Chinese People’s Political Consultative Conference. As a member of its standing committee this gives Li access to the inner circles of the regime’s political elites.

- The merger would place an enormous breadth and depth of data at the hands of a company with significant and risky ties to the Chinese state. Specific data security dangers posed by the merger include a heightened risk of data transfer, surveillance, blackmail, and economic intelligence gathering.

The announced terms of the deal do nothing to alleviate these concerns. CK Hutchison will have the right to appoint three out of six board members of the merged entity, as well as the crucial Chief Financial Officer role.¹

The merger will give CK Group new access to highly sensitive government and public sector contracts. A host of government departments and other bodies, including the Ministry of Justice, the NHS, and the Ministry of Defence, will be open to a group with deep ties to the Chinese state.

Unite’s Executive Head of Operations Gail Cartmail says: “This dossier raises alarming questions about the Li family’s complicity with the Chinese state. Instead of idly watching the CK Group cream profits from UK businesses, the government should ask if they are a suitable custodian of British assets.”



Victor Li and Li Ka-shing



2 CK and the Hong Kong National Security Law (NSL)

Expert research commissioned by Unite indicates that the implementation of the Hong Kong National Security Law (NSL) in 2020 has effectively destroyed Hong Kong's legal autonomy within the Chinese state. In a research note prepared for Unite, former US diplomat and specialist in Chinese state intelligence, Matt Brazil, expresses concern that this significantly raises the risk that CK may be forced to comply with any and all requests made by Chinese authorities for the following reasons:

- Under the NSL, “endangering national security” is defined broadly enough to mean virtually anything.
- The NSL applies to all persons of all nationalities in the world.
- The Chinese Government has a national security office in Hong Kong staffed by central government bodies, giving it direct oversight in Hong Kong.²
- The current Hong Kong security chief has confirmed that police surveillance of communications falls with the NSL.³

With its integration into the Chinese state, Hong Kong is also subject to other far-reaching security and intelligence laws:

- China's Counterintelligence Law (2014) and its implementing Regulations (2021), have created “affirmative legal responsibilities for Chinese and, in some cases, foreign citizens, companies, or organizations operating in China to provide access, cooperation, or support for Beijing's intelligence-gathering activities.”⁴
- The Cybersecurity Law (2017) requires companies to provide “technical support and assistance” to law enforcement authorities to safeguard national security and investigate crimes.⁵

The UK's Data Protection Act (2018) and the implementation of the General Data Protection Regulation would require an international transfer agreement between Three and its parent company CK Hutchison, before any cross-border data transfer can take place.⁶ However, given the current debate regarding TikTok potentially violating the UK's Data Protection Act through the transfer of UK user data to China⁷, this requires a level of trust that CK Hutchison will continue to comply with



UK data laws, and are able to withstand future legal or economic coercion from the Chinese Government.⁸

In this context, handing over sensitive data and national infrastructure to CK poses enormous potential risks to UK national security.

3 The Li family and the Chinese state

Li Ka-shing has held a number of political and civil posts in Hong Kong, including a committee that selects the leader of Hong Kong. Many of these roles are appointed by the Chinese government.

- 1985-1990 - Member of the Drafting Committee for the Basic Law of the Hong Kong Special Administrative Region (HKSAR)
- 1992-1997 - Hong Kong Affairs Adviser
- 1993-1995 - Member of the Preliminary Working Committee for the Preparatory Committee of the HKSAR
- 1995-1997 - Member of the Preparatory Committee for the HKSAR
- 1996-2021 - Member of the Selection Committee for the government of the HKSAR⁹

Li Ka-shing has held relationships with key figures in the Chinese regime, including the current Chinese president Xi Jinping and former President Deng Xiaoping.¹⁰

Victor Li, CK chair, is also well-connected with Chinese state bodies. Victor currently attends parliamentary meetings in China. He is a committee member of the 13th National Committee of the Chinese People's Political Consultative Conference. As a member of its standing committee Li has access to the inner circles of the political elites of the regime.¹¹

US intelligence services have long been wary of the Li's family connections to the Chinese state. In 1998, the CK Group was rumoured to be taking over operations of the Panama Canal when the US handed it back to Panama the next year. The *Washington Times* gained access to a report commissioned by the US government's Defence Intelligence Agency about the takeover which concluded that "Li is directly connected to Beijing and willing to use his business influence to further the aims of the Chinese government".¹²



A later army report by US Southern Command also stated that CK Group “could provide a conduit for illegal shipments of technology or prohibited items from the West to the People’s Republic of China, or facilitate the movement of arms and other prohibited items into the Americas.”¹³

Other CK Group directors also have current and former affiliations to the Chinese state.

- **Rosanna Wong** is a director of CK Hutchison and Hutchison Telecoms and is on the Standing Committee of the 13th National Committee of the Chinese People's Political Consultative Conference.¹⁴
- **Anthony Ting Yuk Wu** is a Director of Power Asset Holdings and has extensive affiliations with the Chinese state including:
 - Member of Standing Committee of the Chinese People’s Political Consultative Conference National Committee;
 - Member of the People’s Republic of China State Council’s Medical Reform Leadership Advisory Committee;
 - Member of the Public Policy Advisory Committee;
 - Advisor of the National Health Commission of the People’s Republic of China;
 - Principal Advisor to the State Administration of Traditional Chinese Medicine of the People’s Republic of China;
 - Member of the Chinese Medicine Reform and Development Advisory Committee of the People’s Republic of China.¹⁵
- **Tom Ling Fung Cheung** is the CEO of Hui Xian REIT, which is majority-owned by CK Assets¹⁶, and is a member of the Beijing Municipal Dongcheng District Committee of the Chinese People’s Political Consultative Conference.¹⁷
- **Casey Chi Kin Lee** is the COO and an Executive Director of Hui Xian REIT and is a member of the 12th, 13th and 14th Liaoning Shenyang Committee of the Chinese People’s Political Consultative Conference.¹⁸
- **Jonathan Koon Shum Choi** is a director of Hui Xian REIT and is a Standing Committee Member of the National Committee of the Chinese People’s Political Consultative Conference.¹⁹



Five other CK Group directors have also previously held roles on Chinese Committees and have relationships with the Chinese state:

Director	CK Group affiliation	Former Chinese state affiliation
Sophie Leung	Independent director of CK Hutchison	Deputy of the National People’s Congress of the People’s Republic of China from 2003 to 2017 ²⁰
Davy Sun Keung Chung	Director of CKA	11th Guangzhou Committee of the Chinese People’s Political Consultative Conference ²¹
Justin Kwok Hung Chiu	Director of CKA	Standing Committee of the 12th Shanghai Committee of the Chinese People’s Political Consultative Conference ²²
Katherine Siu-lin Hung	Independent director CKA	Member of the Tianjin Committee of the 12th and 13th Chinese People’s Political Consultative Conference of the People’s Republic of China from January 2008 to January 2018 ²³
David Hong Tsung Lan	Director of CKI & Hutchison Telecoms Holdings	10th and 11th National Committee Member of the Chinese People’s Political Consultative Conference ²⁴

4 The Lis’ support for the repression of democracy in Hong Kong

Both Li Ka-shing and Victor are active supporters of Hong Kong Chief Executive John Lee. They acted as advisers to his campaign and spoke out in support of his repressive policies.

Described by the BBC as a pro-Beijing “hardliner”, Lee is a former Hong Kong police chief and led the efforts to crack down on the pro-democracy protest movement in 2019.²⁵ Lee was appointed Chief Executive after a closed voting process in which he was the only candidate. Hong Kong’s leaders are selected by a closed-circle committee of around 1,500 members, who are nearly all pro-Beijing loyalists.²⁶

The BBC said his appointment was seen as “a move by the Chinese government to tighten its grip on the city” and detailed his role in crushing the protests:



“[Lee] is deeply unpopular for his role in overseeing the crackdown on protestors during demonstrations over a controversial extradition bill in 2019.

“Mr Lee continued to back the bill despite the unrest, and came under intense criticism for sanctioning the police's use of water cannons, rubber bullets, tear gas and occasionally live ammunition to disperse protestors.

“In 2020, he also backed the imposition of a controversial national security law which criminalised most forms of political protest and dissent, and reduced the city's autonomy.”

Lee became subject to US sanctions for his role in the implementation of the law, and YouTube blocked adverts for his 2022 election campaign.²⁷

John Lee explicitly said telecoms surveillance could come under the new law. According to Reuters, in January 2021 “Lee said police surveillance of communications can come under the city's national security law, potentially giving officers broader powers of interception.”²⁸

Both Victor Li and Li Ka-shing spoke out in favour of Lee’s repression of protest in Hong Kong. Victor Li voiced his support for Lee’s candidacy calling him a suitable choice “as a city can only prosper when it is stable.”²⁹

In 2020, Li Ka-shing professed support for the new security law imposed by the Chinese state in Hong Kong, saying “it is within each and every nation’s [sovereign] right to address its national security concerns.”³⁰ Victor said that he hoped the law would “stabilize Hong Kong and help its society and economy return to normal.”³¹

The Lis were all active supporters of John Lee’s election campaign.³² Li Ka-shing was one of 58 consultants to the campaign while Richard Li was one of 786 Election Committee members who nominated Lee.³³

Victor Li appears most closely involved. He served with his father as an advisor on Lee’s campaign and he remains close to Lee’s government. For example, Victor is one of 34 members of the Chief Executive’s Council of Advisers. According to Hong Kong media, the government there has described the council as “a high-level advisory body to advise Chief Executive John Lee Ka-chiu on the strategic development of Hong Kong, leveraging on opportunities from national and global developments”.³⁴



John Lee

5 Data security risks posed by the transaction

In a research note prepared for Unite, Dr Alexi Drew, academic and director of Penumbra Analysis, a consultancy specialising in geopolitical risk and emerging technologies, outlines a number of specific national and human security risks posed by the transaction.

5.1 Data collection and transfer risks

5.1.1 Data transfer risk

Given the effective destruction of Hong Kong's legal autonomy within the Chinese state, the merger would result in a significantly increased risk that data on Vodafone's business operations and customers would find its way into the hands of Chinese ministries. This risk arises from three sources:

- A number of laws enacted by China – such as the Data Protection Bill³⁵, the Cybersecurity Law³⁶, and the National Security Law in Hong Kong³⁷ – that require business owners to both (i) maintain localised ownership of any data they collect or process, and (ii) allow Chinese security services access to this data, should they require it.³⁸
- Incidents – such as with TikTok – where company staff based in China have accessed the data of customers from other regions or jurisdictions, despite companies initially saying that this isn't possible.³⁹



- Even without legal compulsion, any Chinese company, if asked by the Chinese Communist Party (CCP) to supply access to resources or information they hold, would in practice simply provide it. Failing to do so would represent an existential and personal risk to the company and its executives.

In short, there is legal means for the CCP to gain access to data held or processed by any company in Hong Kong through the National Security Law and other measures. However, even without clear legal means to justify the transfer of data from a UK-based subsidiary to a Hong Kong-based parent company, this would not hinder the CCP's ability to direct the parent to carry out this transfer.

This means that while domestic laws in theory prohibit the collection or transfer of individual user data, in practice there have been numerous examples in the UK and elsewhere where data has been accessed and transferred to China.⁴⁰

This dynamic sits at the very crux of modern international intelligence gathering. Domestic laws and internal company policies will do little to hinder the exercise of nation-state intelligence gathering apparatus from leveraging any means of access to data that company mergers and acquisitions might enable. If a merger creates the technical or human means⁴¹ to collect valuable data, then the security services of any nation-state, Chinese or otherwise, are likely to make use of it.

To give a sense of such technical and human means created by the merger:⁴²

- CK Hutchison will have the right to appoint three out of six board members of the merged entity.
- CK Hutchison will appoint the Chief Financial Officer of the merged entity.

5.1.2 Data collection risks

One of the major risks arising from this merger is the breadth of data it would potentially place in the hands of the CCP and its security services.

Even some of the more simplistic and seemingly anonymised data at the fingertips of a company such as Vodafone, when collected and processed at scale, can be used to derive an incredibly rich pattern of life for individuals, supply chains, companies, and national-scale processes.

Metadata, so-called due to it often referring to data about other types of data, is deceptively valuable. Telecoms providers such as Vodafone will collect and process metadata to include the location of users' handsets, the number of calls they



make, to whom, for how long, and where they are when they make and end these calls. While this information might seem relatively harmless, it can, when collected at scale and targeted at an individual or group of individuals, deliver an extremely detailed insight into their activities.

What is notable about this data is not only its breadth, but the fact that it is personally identifiable to a single user. Thus the CCP could feasibly exert influence on the Hong Kong-based owners of Three to gain access to data about specific individuals. A merger with Vodafone would only extend and broaden this risk to cover a wider user base.

Such data are extremely valuable. The UK Government went to great legal and technical lengths to ensure that the UK security services could collect it for national security purposes. During Theresa May's term as Home Secretary and later Prime Minister, she was the driving force behind the Investigatory Powers Bill, which sought to provide the legal means for GCHQ and other security services to collect metadata on UK citizens' use of the internet, including on smart phones.⁴³

5.2 Data use risks: national and human security harms

The vast amount of personal data collected and processed by telecoms companies has a number of legitimate uses – for example enabling companies to provide services to their customers, or supporting the continued growth and development of their businesses.

This same data can, however, be used for malicious purposes that either target specific individuals or undermine the activities of other businesses or states. These risks include:

5.2.1 Surveillance risk

The metadata that the UK security services use for the purposes of counter-terrorism surveillance is just as attractive to hostile powers for their own intelligence gathering. This is especially true of China, where there has not only been a relatively rapid expansion of international foreign policy engagement, but also an increasing desire to keep track of and apply pressure to ex-patriots and dissidents abroad.⁴⁴



In the period since the introduction of the National Security Law, incidents of violence and extra-judicial pressure being exerted on Hong Kong pro-democracy advocates have intensified.⁴⁵ This has even extended to accusations of there being secret Chinese police stations present within the UK, charged with monitoring Chinese citizens abroad.⁴⁶

Within China the digital app ecosystem means that the identification and tracking of individual dissidents or groups is commonplace, as is the automated censorship used to stifle online and physical dissent.

Outside of China, access to this data is more difficult. However, through the positioning of companies such as Huawei, TikTok and HikVision throughout the data supply chain, this data can still be acquired – and the CCP's reach extended outside of its borders to international communities of dissidents.

The data supply chain includes telecoms providers such as Three and Vodafone. From the phone number of one known dissident, the metadata held by their telecoms provider could be used to not only plot out their movements, but also to identify who they talk to on a regular basis, when they do so, how often, for how long, and where they are when they do it.

With current capabilities in machine learning and pattern recognition, this data can very easily identify a whole network of other potential targets for the Chinese intelligence services, as well as building a rich pattern of life for all of these individuals. This could allow malicious actors to predict where these individuals are likely to be at any given point in time and, alongside other forms of intelligence, provide the means by which these dissidents can be threatened, bribed, or otherwise pressured into halting their activities.

5.2.2 Influence risk: blackmail

In much the same vein, this form of digital surveillance by proxy could allow the Chinese intelligence services to gather the same *pattern of life* data on political targets or those in other positions of influence within government, the civil service, or industry.

The collection of such telecoms data could either independently yield compromising information, or could inform further efforts to collect it. This information could then be used to apply pressure to individuals in order to achieve political or economic outcomes favourable to CCP interests.



These digitised intelligence-gathering methods have the added benefit of being able to be enacted remotely, often at scale, and increasingly with the assistance of machine learning to sift through the masses of data collected – identifying patterns that a human analyst may miss.

5.2.3 Economic intelligence gathering risk

Beyond intelligence gathering targeting individuals, the data collected from telecoms systems can also provide significant insight into economic processes such as supply chains. As industrial processes and shipping become increasingly dependent on remote monitoring and tracking, resources such as shipping containers, trucks, trains, or even naval vessels are utilising cellular networks – such as those provided by Three and Vodafone⁴⁷ – to monitor the status of shipments, personnel movements, and other industrial processes.

When scaled to encompass the entirety of a supply chain, this data takes on immense economic value. It could be used to gain a near-complete understanding of a competitor's resource management systems, the number of goods that it is buying or selling from any given warehouse or supplier, and the speed at which said company could reasonably adapt to a sudden influx of orders or changing market conditions.

This kind of information, when coupled with machine learning, would take on an even greater level of importance in its ability to model likely outcomes based on shifting market conditions or changes made to other parts of the supply chain.

A Chinese company given this information about a competitor in the UK, Europe, or the United States would gain the equivalent to insider knowledge of how best to out-compete its rival. It would also have an advantage when it came to e.g. pitching for new contracts or acquiring other companies.

5.2.4 Market shrinkage and dependency risk

One of the biggest national security issues presented by this merger is the overall reduction of competitors in the telecoms space within the UK – which would effectively result in a significantly larger share of the market being held by a company with deep ties to the CCP.

The merger would lead to a scenario under which any disruption, technical or otherwise, to the operations of one company would have a far larger impact than



previously. Given the increasingly critical nature of cellular connectivity for both individuals and industrial activities, such a pooling of risk into a single entity is unwise. When coupled with the other risks outlined here, the merger clearly poses a greater risk than it does a benefit in terms of national security and privacy.

6 The application of these risks to Vodafone's business

If the merger goes ahead, it would hugely extend CK Hutchison's access to UK telecoms user data, expanding its UK customer base from 9.5 million to 27.42 million: an increase of 289%.⁴⁸ As a result, CK Hutchison would become a partner in the UK's largest mobile operator.

The scale of user data that CK Hutchison would gain access to as a result of the transaction is not the only risk. The nature of the data is also of major concern. Vodafone is currently a strategic supplier to the UK public sector, whereas Three is not currently a public sector supplier – so this merger would give Three and CK Hutchison direct access to sensitive government telecoms contracts for the first time.

Unite research has found that, as of March 2023, Vodafone held 104 contracts with public sector bodies, worth a combined total of just under £240 million.⁴⁹ Sensitive public sector contracts held by Vodafone include:

- Providing telephony infrastructure to support the NHS's 111 advice service.⁵⁰
- Providing a pan-government protective monitoring service for the Cabinet Office.⁵¹
- Providing the Ministry of Justice and HM Courts & Tribunals Service with an encrypted network for vulnerable witnesses and victims to record testimonies in sensitive cases including sexual assault, human trafficking, and modern slavery.⁵²
- Providing the Ministry of Defence with video conferencing and recording services for proceedings in the Military Court Service.⁵³

¹ <https://www.vodafone.com/news/corporate-and-financial/merger-vodafone-uk-three-uk-europe-leading-5g-networks>

² <https://www.amnesty.org/en/latest/news/2020/07/hong-kong-national-security-law-10-things-you-need-to-know/>



- ³ <https://www.reuters.com/world/china/hk-security-chief-says-communications-surveillance-can-come-under-security-law-2021-01-15/>
- ⁴ <https://www.lawfareblog.com/beijings-new-national-intelligence-law-defense-offense>
- ⁵ <https://www.crowell.com/en/insights/client-alerts/summary-of-the-prc-cybersecurity-law>
- ⁶ <https://www.hongkongwatch.org/all-posts/2023/6/27/the-proposed-merger-of-three-and-vodafone-raises-questions-about-the-special-treatment-of-investment-from-hong-kong>
- ⁷ <https://www.theguardian.com/technology/2023/mar/16/mps-and-peers-ask-information-commissioner-to-investigate-tiktok>
- ⁸ <https://www.hongkongwatch.org/all-posts/2023/6/27/the-proposed-merger-of-three-and-vodafone-raises-questions-about-the-special-treatment-of-investment-from-hong-kong>
- ⁹ <https://www.lksf.org/our-founder/>
- ¹⁰ <https://www.reuters.com/investigates/special-report/hongkong-protests-tycoons/> and <https://www.youtube.com/watch?v=SSYQq8soQ1M>
- ¹¹ <https://www.scmp.com/business/china-business/article/3124252/chinas-richest-entrepreneurs-attending-two-sessions-have>
- ¹² <https://advance.lexis.com/document/?pdmfid=1519360&crd=eeef93fd-3699-4dea-b620-5d9cd82ab988&pddocfullpath=%2Fshared%2Fdocument%2Fnews%2Furn%3AcontentItem%3A3YYT-HFSO-00JJ-S4PV-00000-00&pdcontentcomponentid=8176&pdteaserkey=sr0&pditab=allpods&ecom=kwmyk&earg=sr0&prid=a42b870e-5389-4410-a5b5-982658582124&cbc=0%2C0>; originally reported in the *Washington Times* by Bill Gertz, April 5, 2000.
- ¹³ <https://advance.lexis.com/document/?pdmfid=1519360&crd=eeef93fd-3699-4dea-b620-5d9cd82ab988&pddocfullpath=%2Fshared%2Fdocument%2Fnews%2Furn%3AcontentItem%3A3YYT-HFSO-00JJ-S4PV-00000-00&pdcontentcomponentid=8176&pdteaserkey=sr0&pditab=allpods&ecom=kwmyk&earg=sr0&prid=a42b870e-5389-4410-a5b5-982658582124&cbc=0%2C0>; originally reported in the *Washington Times* by Bill Gertz, April 5, 2000.
- ¹⁴ https://www.ckh.com.hk/en/about/directors_details.php
- ¹⁵ <https://www.powerassets.com/en/about-us/board-of-directors>
- ¹⁶ https://www.ckah.com/eng/property_reits.html
- ¹⁷ https://www.huixianreit.com/eng/manager/the_board.php#BIO
- ¹⁸ https://www.huixianreit.com/eng/manager/the_board.php#BIO
- ¹⁹ https://www.huixianreit.com/eng/manager/the_board.php#BIO
- ²⁰ https://www.ckh.com.hk/en/about/directors_details.php
- ²¹ https://ckah.com/eng/about_boardofdirector.html and <https://www.crunchbase.com/person/chung-sun-keung-davy>
- ²² https://ckah.com/eng/about_boardofdirector.html
- ²³ https://ckah.com/eng/about_boardofdirector.html
- ²⁴ https://www.cki.com.hk/english/about_CKI/management_bio/index.htm
- ²⁵ <https://www.bbc.co.uk/news/world-asia-china-61267490>
- ²⁶ <https://www.bbc.co.uk/news/world-asia-china-61345463>
- ²⁷ <https://www.bbc.co.uk/news/world-asia-china-61345463>
- ²⁸ <https://www.reuters.com/world/china/hk-security-chief-says-communications-surveillance-can-come-under-security-law-2021-01-15/>
- ²⁹ <https://www.bbc.co.uk/news/world-asia-china-61267490>
- ³⁰ <https://edition.cnn.com/2020/05/27/business/li-ka-shing-hong-kong-intl-hnk/index.html>
- ³¹ <https://www.bloomberg.com/news/articles/2020-05-26/li-ka-shing-s-son-hopes-security-law-will-help-revive-hong-kong?leadSource=verify%20wall>
- ³² <https://www.thestandard.com.hk/section-news/section/11/240998/Who's-who-in-John-Lee-circle-of-consultants>
- ³³ <https://www.thestandard.com.hk/section-news/section/11/240998/Who's-who-in-John-Lee-circle-of-consultants>



- ³⁴ <https://www.thestandard.com.hk/breaking-news/section/4/201568/Victor-Li-and-Allan-Zeman-among-34-appointed-as-CE%E2%80%99s-Council-of-Advisers>
- ³⁵ <https://iapp.org/news/a/analyzing-chinas-pipl-and-how-it-compares-to-the-eus-gdpr/>
- ³⁶ <https://digichina.stanford.edu/work/behind-the-facade-of-chinas-cyber-super-regulator/>
- ³⁷ <https://digichina.stanford.edu/work/national-security-law-of-the-peoples-republic-of-china/>
- ³⁸ *Ibid.*
- ³⁹ <https://www.bbc.co.uk/news/business-63494951>
- ⁴⁰ E.g. <https://www.bbc.co.uk/news/business-63494951> and <https://english.radio.cz/former-huawei-employees-say-client-information-was-discussed-chinese-embassy-8125334>
- ⁴¹ Such as through staff working across companies, shared file structures, or even increased personal engagement.
- ⁴² <https://www.vodafone.com/news/corporate-and-financial/merger-vodafone-uk-three-uk-europe-leading-5g-networks>
- ⁴³ <https://www.theguardian.com/world/2015/nov/05/mass-snooping-and-more-the-measures-in-theresa-mays-bill>
- ⁴⁴ <https://inews.co.uk/news/hong-kongers-monitored-pro-beijing-informants-2183235>
- ⁴⁵ <https://www.bbc.co.uk/news/world-asia-china-63318285>
- ⁴⁶ <https://hansard.parliament.uk/commons/2022-11-01/debates/997662A6-CD71-41C5-BBE9-33FADB4B974/OverseasChinesePoliceStationsInUKLegalStatus> It is important to note that the CCP views anyone of Chinese heritage as a Chinese citizen for the purposes of that citizens responsibilities to China, irrespective of where they live or their nationality.
- ⁴⁷ See e.g. <https://www.three.co.uk/business/casestudies-insights> and <https://www.vodafone.co.uk/business/why-vodafone/case-studies>
- ⁴⁸ <https://www.silicon.co.uk/e-enterprise/merger-acquisition/vodafone-three-merger-industry-reaction-516632>
- ⁴⁹ [Unite analysis of contractsfinder.service.gov.uk](https://www.uniteanalysis.com/contractsfinder.service.gov.uk)
- ⁵⁰ <https://www.contractsfinder.service.gov.uk/notice/6804130a-e8cc-432b-bd56-3306c170a7d3?origin=SearchResults&p=1>
- ⁵¹ <https://www.vodafone.co.uk/business/cyber-security-solutions/security-enhanced/business-cyber-security>
- ⁵² <https://www.vodafone.co.uk/newscentre/news/secure-video-evidence-helping-protect-vulnerable-witnesses/> and <https://www.gov.uk/government/news/pre-recorded-evidence-for-rape-victims-rolled-out-to-more-north-west-courts>
- ⁵³ <https://www.contractsfinder.service.gov.uk/notice/29b05eed-8984-4a59-aa38-641fa0159b01?origin=SearchResults&p=6>