



**Summary of proposed revisions to the
2020 Ranking Digital Rights
Corporate Accountability Index methodology**

Consultation draft

April 2020

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About Ranking Digital Rights

Ranking Digital Rights (RDR) is a non-profit research initiative housed at New America's Open Technology Institute that works with an international network of partners to set global standards for how companies in the information and communications technology (ICT) sector should respect freedom of expression and privacy.

For more about RDR and its Corporate Accountability Index, please visit

www.rankingdigitalrights.org.

For more about New America, please visit <https://www.newamerica.org/>.

For more about the Open Technology Institute, please visit

<https://www.newamerica.org/oti/>.

For a full list of project funders and partners:

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This document summarizes the key draft revisions introduced to the 2020 Ranking Digital Rights Corporate Accountability Index methodology.

The draft of those revisions can be accessed here:

<https://rankingdigitalrights.org/wp-content/uploads/2020/04/2020-draft-methodology-redline-version.pdf>

We invite feedback on these draft revisions through **Friday, May 15, 2020**.
Comments should be sent to: methodology@rankingdigitalrights.org.

1. About Ranking Digital Rights

[Ranking Digital Rights](#) (RDR) works to promote freedom of expression and privacy on the internet by creating global standards and incentives for companies to respect and protect users' rights. We do this by producing the Ranking Digital Rights Corporate Accountability Index, which evaluates the world's most powerful digital platforms and telecommunications companies on relevant commitments and policies, based on international human rights standards. We work with companies as well as advocates, researchers, investors, and policymakers to establish and advance global standards for corporate accountability.

The RDR Corporate Accountability Index offers a roadmap for companies to build and operate internet platforms and services that respect and protect human rights. The 2019 RDR Index ranked 24 companies on 35 indicators,¹ using a rigorous, seven-step [research process](#) and an [open methodology](#) that looked at companies' governance mechanisms to identify and prevent potential threats to users' human rights, plus disclosed policies affecting users' freedom of expression and privacy.

2. About the RDR Index methodology

The standards the RDR Index uses to measure companies build on more than a decade of work by the human rights, privacy, and security communities. These standards include the [U.N. Guiding Principles on Business and Human Rights](#), which affirm that just as governments have a duty to protect human rights, companies also have a responsibility to respect human rights. The RDR Index also builds on the [Global Network Initiative principles](#) and [implementation guidelines](#), which address ICT companies' specific responsibilities towards freedom of expression and privacy in the face of government demands to restrict content or hand over user information. It further draws on a body of emerging global standards and norms around data protection, security, and access to information.

The RDR Index methodology has been developed over years of research, testing, and consultation. Since its inception, the project has engaged closely with researchers around the globe. For the initial methodology development, pilot study, and the inaugural RDR Index, we also partnered with Sustainalytics, a leading provider of ESG (environmental, social, and governance) research to investors.

We have produced four iterations of the RDR Index to date:

- In 2015, we launched the inaugural RDR Index, which [ranked](#) 16 internet and telecommunications companies on [31 indicators](#).
- For the [2017 RDR Index](#), RDR expanded the ranking to [22 companies](#), which included all of the companies ranked in 2015, plus an additional six companies. In addition to internet and telecommunications companies, the RDR Index was

¹ 2019 RDR Index, May 2019, <https://rankingdigitalrights.org/index2019/>.

expanded to include new types of services, including those that produce software and devices that we call “[mobile ecosystems](#).” As a result, we [further revised the 2017 methodology](#) based on a detailed review of the raw data from the 2015 RDR Index as well as consultations with stakeholders from civil society, academia, the investor community, and companies.

- The [2018 RDR Index](#) applied the same methodology to evaluate the same [22 companies](#) as in the 2017 Index. This enabled us to produce comparative analyses of each company’s performance and to track overall trends.
- The [2019 RDR Index](#) methodology introduced changes to two indicators in the Governance category.² These revisions were aimed at introducing baseline standards for identifying and mitigating human rights risks associated with companies’ use of algorithms and for their targeted advertising policies and practices. We also revised one indicator (Indicator G6) in order to strengthen and clarify our current evaluation of company grievance and remedy mechanisms and procedures.³ In addition, the 2019 RDR Index was expanded to include two new companies⁴—Deutsche Telekom and Telenor—and five additional cloud services.

3. About the 2020 RDR Index methodology revision

Since its launch in 2015, the RDR Index has contributed to improved company disclosure of policy and practice across a number of areas, including transparency reporting, content removals, account restrictions, network shutdowns, and handling and securing user information. However, given the geopolitical and technological developments with clear human rights implications that have taken place in the years since the RDR Index methodology was first developed, it has become clear that the methodology needs to be updated if companies are to be held fully accountable for the range of potential online threats to human rights.

In January 2019, RDR began a process of expanding and revising the methodology to include new issue areas and new company types.⁵ This work has focused on three main areas:

- **Improving current methodology:** This has involved reviewing the 2019 RDR Index methodology to identify key areas for revision and improvement.
- **Incorporating new indicators on targeted advertising and algorithms:** Since early 2019, RDR has been developing new indicators that set global accountability and transparency standards for how companies can demonstrate respect for human rights online as they develop and deploy these

² “2019 Corporate Accountability Index Research Indicators,” *Ranking Digital Rights*, September 2019, <https://rankingdigitalrights.org/index2019/assets/static/download/RDRIndex2019indicators.pdf>

³ “Proposed revisions to the 2019 Corporate Accountability Index methodology (consultation draft),” *Ranking Digital Rights*, July 2018, https://rankingdigitalrights.org/wp-content/uploads/2018/06/2019-Index-Methodology_-Consultation-Draft.pdf

⁴ See 2019 company list: <https://rankingdigitalrights.org/2019-companies/>.

⁵ “RDR 2019 Index Launch Slated for May; Big Plans Ahead,” *Ranking Digital Rights*, February 2019, <https://rankingdigitalrights.org/2019/02/13/rdr-2019-index-launch-plans/>

new technologies. In October 2019, RDR published [draft indicators on targeted advertising and algorithms](#), based on nearly a year of internal research and incorporating feedback from more than 90 expert stakeholders. These draft indicators were pilot-tested by the RDR research team. The results of this pilot study were published in [March 2020](#).

- **Incorporating new companies:** In early 2019, we began the process of research and public consultation on ways to expand the RDR Index to include Amazon and Alibaba. This process laid the groundwork for incorporating two new services—e-commerce platforms and “personal digital assistant ecosystems”—into the 2020 RDR Index methodology.

This document summarizes the key revisions introduced to the 2020 RDR Index methodology as a result of our work in these three areas. Revisions are presented in further detail in the following documents:

- [Draft 2020 RDR Index methodology](#), which incorporates suggested revisions made to the current methodology, new indicators on targeted advertising and algorithms, as well as new services offered by Amazon and Alibaba.
- [A table](#) comparing the 2019 RDR Index indicators to the draft 2020 RDR Index indicators.

We invite feedback on the proposed revisions through **Friday, May 15, 2020**. Comments should be sent via email to methodology@rankingdigitalrights.org.

Feedback and input from stakeholders is essential to developing a credible, rigorous, and effective methodology—and this feedback has been integral to our methodology work since RDR’s inception. The new and revised indicators presented in this document are a result of extensive in-person and remote consultations with a broad range of civil society, academic, industry, and policy experts since early 2019. This process began with the release of consultation documents for targeted advertising, algorithmic systems, and on the expansion of the RDR Index to include new company types.

A description of the process we followed can be found [on our website](#).

4. RDR Index scope and terminology

Our ongoing work to integrate new indicators addressing human rights harms posed by companies’ targeted advertising-based business models and their use of algorithmic systems has required RDR to expand the scope of which human rights the RDR Index addresses. In addition, the integration of new platforms like Amazon and Alibaba has prompted RDR to rename the “internet and mobile ecosystem” company category. These changes are discussed below.

4.1 Expanded human rights scope

The RDR Index focuses on two fundamental human rights: freedom of expression (Article 19, Universal Declaration of Human Rights) and privacy (Article 12, Universal Declaration of Human Rights). We do so because these two fundamental human rights are most directly affected by the companies ranked in the RDR Index and because the ability to exercise these fundamental rights unlocks the ability to exercise many other human rights: If peoples' fundamental freedom of expression and privacy rights are not protected and respected, they cannot use technology effectively to exercise and defend political, religious, economic, and social rights. Indeed, and as the set of human rights risk scenarios published by RDR in 2019 highlighted, companies' failure to respect privacy and freedom of expression causes or contributes to a range of other human rights violations.⁶

While the RDR Index methodology cannot address the full range of human rights harms associated with the companies it ranks (for example, labor and environmental rights are beyond our scope), two areas can and must be expanded: freedom of information (UDHR art. 19) and freedom from discrimination (UDHR art. 7, art. 23):

- Freedom of expression and information:** Internet users' rights are affected not only when their online expression is restricted but also when companies fail to enact and enforce rules against harmful expression, and when their use of content-shaping technologies boosts harmful expression (such as hate speech, incitement to violence, and disinformation). This infringes on the right to freedom of information and opinion. Indeed, human rights experts and many courts refer to freedom of expression and information, emphasizing the importance of the right to receive information as being fundamental to the ability to exercise freedom of expression rights. In this area of our methodology work, we found it necessary to expand the scope of our Freedom of Expression category to include "Freedom of Expression and Information."
- Freedom from discrimination:** Targeted advertising business models and algorithmic systems are two closely related phenomena that carry high risks of discrimination harms. In addition to posing critical risks to privacy and freedom of expression and information, these technologies can also threaten the right to non-discrimination. These discrimination harms are enabled by the mass data collection practices by companies in service of targeted advertising business models, and enacted through algorithmic decision-making systems whose design can replicate and reinforce existing patterns of discrimination. This constitutes discrimination in the most basic sense of the definition: "the practice of treating

⁶ Specifically: the right to life, liberty and security of person (Universal Declaration of Human Rights (UDHR), Article 3); the right to non-discrimination (UDHR, Article 7, Article 23); freedom of thought (UDHR, Article 18); freedom of association (UDHR, Article 20); and the right to take part in the government of one's country, directly or through freely chosen representatives (UDHR, Article 21).

particular people, companies, or products differently from others, especially in an unfair way.”⁷

Because discrimination harms are tightly interwoven with freedom of expression, information, and privacy harms, we have opted to integrate indicators and elements that assess companies’ respect for freedom from discrimination within the existing RDR Index categories (Governance, Freedom of Expression and Information, and Privacy) rather than creating a new category focused on discrimination.

4.2 Company categories

The inaugural 2015 RDR Index evaluated two main company types: internet companies and telecommunications companies. For the 2017 RDR Index, we expanded the internet company category to include mobile ecosystems, which enabled us to add Apple iOS, the Google Android operating system, and Samsung’s implementation of Android to our ranking.

With the expansion of the 2020 RDR Index to include new services offered by Amazon and Alibaba—specifically, e-commerce platforms and personal digital assistant ecosystems—we have renamed the “internet and mobile ecosystem” category to “**digital platforms**,” the scope of which includes a range of products and services offered by internet companies, as well as mobile ecosystems, e-commerce platforms, and personal digital assistant ecosystems. Indicators and elements that previously applied specifically to internet and mobile ecosystem companies have been expanded to apply to “digital platforms,” as highlighted in the draft 2020 RDR Index methodology.

A more detailed discussion of the addition of these new services by Amazon and Alibaba, including key terms, is presented in Section 7 of this document, below.

5. Revisions to existing RDR Index methodology

Since early 2019, the RDR research team has been conducting an in-depth review of the existing RDR Index methodology in order to identify areas for improvement, clarification, or revision. As is typical of other rankings, RDR has identified some indicators that require revision as both industry trends and issues evolve. While we plan to introduce some revisions to these existing indicators in the final 2020 RDR Index methodology, the goal is to ensure that revisions improve the data while still retaining year-on-year comparability. The key structural and substantive revisions made to the current methodology are summarized below.

5.1 Structural revisions

The draft 2020 RDR Index methodology includes a number of structural revisions, which do not change the basis of the RDR Index evaluation standards, but rather help clarify

⁷ Discrimination (n.d.). In Cambridge Business English dictionary, <https://dictionary.cambridge.org/dictionary/english/discrimination>.

the methodology and company disclosure on these issues. The key structural revisions are as follows:

Governance category: In the Governance category, we broke out questions on freedom of expression and privacy into separate elements. Previously, each element in the Governance category combined an evaluation of company commitments to freedom of expression and privacy.⁸ The draft 2020 RDR Index methodology breaks freedom of expression and privacy questions into separate elements, which clarifies the basis of the evaluation and will help ensure this data is more visible.

Indicator “families”: Across the RDR Index, we introduced “families” of indicators—groups of indicators that apply to similar issue areas. This enables us to integrate new indicators addressing company targeted advertising and algorithmic systems without having to renumber the existing indicators, while also allowing us to build out more modular groups of indicators based on common issues. The following indicator “families” have been introduced:

- **Indicator G4**—which evaluates company human rights due diligence practices⁹—has been broken out into five indicators evaluating company due diligence on government regulations (G4a), policy enforcement (G4b), targeted advertising policies and practices (G4c), algorithmic systems (G4d), and zero-rating (G4e).
- **Indicator G6**—which evaluates whether companies provide clear and predictable remedy when users feel their freedom of expression or privacy has been violated¹⁰—has been broken out into two indicators: Indicator G6a is the same as Indicator G6 from the 2019 RDR Index; Indicator G6b is a new (draft) indicator that applies standards for how platforms should handle content moderation appeals.
- **Indicators F1, F2, F3, F4**—which evaluate how clear companies are about rules for what types of content or activities are prohibited, as well as how transparent companies are about how they enforce these rules¹¹—have all been broken out into indicator “families” to accommodate new indicators on targeted advertising and on algorithmic systems, respectively.
- **Indicator F5**—which addresses how transparent companies are about their process for handling third-party (government and private) requests to restrict content or accounts¹²—has been broken out into two indicators: Indicator F5a, which focuses just on government demands, and Indicator F5b, which addresses private requests. A review of RDR Index data across multiple years shows that companies are more transparent about their handling of government requests as

⁸ See: <https://rankingdigitalrights.org/2019-indicators/#G1>.

⁹ See: <https://rankingdigitalrights.org/2019-indicators/#G4>.

¹⁰ See: <https://rankingdigitalrights.org/2019-indicators/#G6>.

¹¹ See: <https://rankingdigitalrights.org/2019-indicators/#F1>.

¹² See: <https://rankingdigitalrights.org/2019-indicators/#F5>.

compared to how they deal with requests that come through private processes, such as through the U.S. Digital Millennium Copyright Act or through Europe’s “Right to Be Forgotten” ruling. Indicator scores for F5 are typically lower since this data includes questions about how companies handle private requests. Therefore, in this draft 2020 RDR Index, we have separated questions that focus on government demands from questions that focus on private requests into two different indicators in order to clarify data on both types of requests.

- **Indicators P1 and P2**—which evaluate whether companies provide privacy policies that are easy to access and understand and if they commit to notifying users of changes to these policies¹³—have been broken out into families in order to accommodate new indicators asking companies to clearly disclose policies describing how they develop algorithmic systems.
- **Indicator P3**—which asks companies to clearly disclose all of the types of user information it collects¹⁴—has been broken out into indicator “families” which address company policies affecting users’ privacy. Specifically, we added new indicators that look for companies to be transparent about their data inference policies (P3b).
- **Indicators P10 and P11**—which address how transparent companies are about their process for handling third-party (government and private) requests for user information¹⁵—have been broken out into separate indicators focused on government demands and private requests, respectively. A review of RDR Index data across multiple years shows that companies are more transparent about their handling of government demands in comparison to how they deal with requests for user information that come through private processes. In this draft 2020 RDR Index, we have separated questions that focus on government demands from questions that focus on private requests into different indicators in order to have more coherent data on both types of requests.

5.2 Substantive revisions

The following are key substantive revisions that have been introduced to the draft 2020 RDR Index methodology. We plan to prioritize soliciting feedback from stakeholders on these revisions as we make decisions about the final methodology:

- **Indicator G4**—which evaluates company human rights due diligence practices¹⁶—has been broken out into five draft indicators evaluating different areas of company due diligence on government regulations (G4a), policy enforcement (G4b), targeted advertising policies and practices (G4c), algorithmic systems (G4d), and zero-rating (G4e). In October 2019, as part of our work on targeted

¹³ See: <https://rankingdigitalrights.org/2019-indicators/#F1>.

¹⁴ See: <https://rankingdigitalrights.org/2019-indicators/#P3>.

¹⁵ See: <https://rankingdigitalrights.org/2019-indicators/#P10>.

¹⁶ See: <https://rankingdigitalrights.org/2019-indicators/#G4>.

advertising and algorithms, RDR published draft indicators that broke Indicator G4 out into four different indicators addressing company human rights due diligence practices on the impacts of government regulations (G4a), the enforcement of their own policies enforcement (G4b), their targeted advertising policies and practices (G4c), and their development and use of algorithmic systems (G4d) on users' freedom of expression and information and privacy.¹⁷ We also added elements to these draft indicators asking if companies assess discrimination risks of their policies and practices.

In addition to these four draft G4 indicators, we have proposed one additional indicator to the G4 family that addresses human rights due diligence about zero-rating programs. "Zero-rating" refers to programs—which can be offered by both telecommunications companies and by platforms, in partnership with telecommunications companies—that provide access to certain online services or platforms without counting against a person's data plan. Zero rating is a form of network prioritization that undermines net neutrality principles, and which can cause a range of possible harms to freedom of expression and information, and to privacy, and can exacerbate discrimination.

While the RDR Index already has one indicator (Indicator F9) that evaluates zero-rating programs offered by telecommunications companies, this indicator does not address the full range of human rights risks associated with these programs. The purpose of including this draft indicator in the Governance category is to set clear accountability standards to ensure that any company (including platform companies) offering zero-rating type programs is conducting human rights due diligence in order to identify and mitigate human rights risks associated with these programs.

- **Indicator G5**—which sets standards for companies to engage with stakeholders about their policies and practices affecting users' freedom of expression and privacy—has been revised to reflect our expanded scope to include accountability mechanisms that extend beyond just government demands. In previous RDR Index cycles, companies that were members of the Global Network Initiative would automatically score full credit on this indicator since GNI is an inherently multi-stakeholder organization (with a governing board made up of human rights organizations, investors, and academics, in addition to company representatives). However, GNI focuses primarily on holding its members accountable for upholding principles of freedom of expression and privacy, primarily in relation to *government demands*. Revisions to this indicator are aimed at accommodating the broadened scope of issues and standards addressed in the RDR Index methodology. With this revision, GNI members will no longer automatically

¹⁷ "Draft indicators: Transparency and accountability standards for targeted advertising and algorithmic decision-making systems," *Ranking Digital Rights*, October 2019, https://rankingdigitalrights.org/wp-content/uploads/2019/10/RDR-Index-Draft-Indicators_-_Targeted-advertising-algorithms.pdf.

receive full credit on this indicator. RDR welcomes stakeholder feedback on this proposed revision.

- **Indicator G6b**—In order to address the evolving expert consensus around the need for increased accountability by platforms for their content moderation policies and practices,¹⁸ we added one new indicator (G6b) aimed at setting clear standards for how users can appeal decisions by platforms to remove or restrict content. This draft indicator consists of 11 elements, which would be evaluated for all platforms ranked by RDR that undertake any type of content moderation activities.
- **Indicator F4**—which asks companies to publish data about the volume and nature of content and accounts they restrict for violations to the companies' own rules—has been both restructured and revised. F4 has been broken out into two indicators: draft Indicator F4a examines company disclosure of data about *content* restrictions as a result of terms of service violations; draft Indicator F4b examines company disclosure of data about *account* restrictions as a result of terms of service violations. The current F4 evaluates both content restrictions and account restrictions in one element; this proposed revision separates these types of restrictions into different indicators, the aim of which is to clarify the data.

In addition to this structural revision, RDR revised three elements in this indicator and added two new elements. Revisions reflect the evolution of standards for company disclosure of the actions they take to enforce their own terms of service. Since introducing this indicator in 2015,¹⁹ RDR has tracked progressive improvements by companies in this area.²⁰ At the same time, there has been a growing consensus among digital rights experts about the types of data that companies should be publishing about the actions they take to enforce their rules.

²¹

- **Indicator F9**—which evaluates how transparent telecommunications companies are about their network management policies and practices²²—has been revised to clarify disclosure standards. Element 1 has been revised to more clearly ask whether companies publicly commit to upholding net neutrality principles. We added a new draft element (Element 2) that asks if companies engage in network prioritization practices, such as offering zero-rating programs, which may directly undermine a company's net neutrality commitments in practice. Element 3 has been revised to clarify that, in this element, we are looking for companies to

¹⁸ "The Santa Clara Principles On Transparency and Accountability in Content Moderation," <https://santaclaraprinciples.org>.

¹⁹ See: <https://rankingdigitalrights.org/2019-indicators/#F9>

²⁰ See Section 4.2 of the 2019 RDR Index, <https://rankingdigitalrights.org/index2019/report/freedom-of-expression/#section-42>

²¹ "The Santa Clara Principles On Transparency and Accountability in Content Moderation," <https://santaclaraprinciples.org>.

²² See: <https://rankingdigitalrights.org/2019-indicators/#F9>

disclose any other reasons for which they might engage in network prioritization practices, such as by government order during national emergencies.

- **Indicator P9**—which evaluates how transparent companies are about their collection of information about users from third parties—has been expanded to include four new elements which apply to all ranked companies, including telecommunications companies. Elements 1 to 5, which apply to digital platform companies, evaluate whether companies disclose if they track users across the internet through technical means, such as by using cookies, plug-ins, and widgets. New draft Elements 5 to 9 ask companies to disclose their policies and practices of acquiring information about users through “non-technical” means, such as through data brokers or other types of sharing agreements. These draft elements apply to telecommunications companies since they can acquire data through non-technical means.
- **Indicator P11b**—this draft indicator looks for companies to disclose data about requests for user data that they receive through private processes. RDR defines “private requests” as any type of request which companies receive that does not come through a court or government. While examples of these types of private requests are more clear for content removals (see Section 6.3 below), RDR has noted some cases of companies responding to private requests for user information. We have therefore developed a draft indicator that sets baseline standards for company disclosure of data about how they comply with these types of requests.

5.3 Revisions to indicators to clarify evaluation standards

The draft 2020 RDR Index methodology also includes numerous revisions to the wording of certain indicators and elements in order to clarify evaluation standards. Notably, we also clarified our definitions for government and private requests:

- **Government demands** — The term “government requests” (referenced in Indicators F5, F6, F10, P10, P11, and P12) has been replaced with “government demands,” which more accurately reflects the nature of those types of demands.
- **Private requests** — The meaning of the term “private requests” has been clarified in the element language across indicators F5, F6, F10, P10, P11, and P12. RDR defines private requests as those that are made through a private process rather than a judicial or governmental process. For instance, private requests for content restrictions can come from a self-regulatory body such as the Internet Watch Foundation, or through a formal notice-and-takedown system, such as the U.S. Digital Millennium Copyright Act.

Note that additional key terms are defined in the Glossary that is appended at the end of the [draft 2020 RDR Index methodology](#).

6. New indicators on targeted advertising and algorithmic systems

In January 2019, RDR began the process of drafting new indicators on targeted advertising and algorithmic systems, to be integrated into the 2020 RDR Index methodology. Since then, we have published a series of consultation documents that have laid the foundation for our methodology work on these issues.

Consultation documents on targeted advertising and algorithmic systems

Targeted advertising	<p><i>Published in February 2019:</i></p> <ul style="list-style-type: none"> • Rationale for expanding the RDR Index methodology to include new indicators aimed at setting corporate transparency and accountability standards for targeted advertising policies and practices. • Human rights risk scenarios: a list of “risk scenarios,” each describing human rights risks directly or indirectly related to targeted advertising-based business models. • Best practices: a number of best practices for company disclosure and policy that could help prevent or mitigate these risks.
Algorithmic systems	<p><i>Published in July 2019:</i></p> <ul style="list-style-type: none"> • Rationale for expanding the RDR Index methodology to include new indicators aimed at setting transparency and accountability standards for companies’ development and deployment of algorithmic systems. • Human rights risk scenarios: a list of “risk scenarios,” each describing human rights risks directly or indirectly related to companies’ development and deployment of algorithmic systems. • Best practices: a number of best practices for company disclosure and policy that could help prevent or mitigate these risks.

In October 2019, RDR published draft indicators on targeted advertising and algorithms, based on nearly a year of internal research and incorporating feedback from more than 90 expert stakeholders.²³ These draft indicators were pilot-tested by the RDR research team and the results of this pilot study were published in March 2020.²⁴

Based on our learnings from this pilot, we have opted to incorporate most of these indicators into the draft version of the 2020 RDR Index methodology, with some revisions to those draft indicators.²⁵ We have decided at this stage to delete draft indicator F14 and two elements added to Indicator P18—which address company digital literacy commitments—as pilot research showed that these would need significant revision in order to include them in the methodology.

We will continue to engage with stakeholders and to conduct internal research as we make further decisions about which of these draft indicators to include in the final 2020 RDR Index methodology.

7. Incorporation of new companies: Amazon and Alibaba

In early 2019, we began the process of research and public consultation on ways to expand the RDR Index to include Amazon and Alibaba. As two of the world's largest digital platforms, Amazon and Alibaba's absence from the RDR Index was a key gap in our ranking. There have been growing concerns about both companies' privacy practices and respect for human rights in general. Amazon collects an enormous amount of information about people, notably through its e-commerce platform and through its dominance in the personal digital assistant ecosystem market. Alibaba's (mis)handling of user data, including its practice of sharing user data with its credit-scoring arm and other third-party services without explicit consent, has also raised concerns.

In July 2019, we published the following public consultation documents that synthesized RDR's approach to incorporating these companies into the RDR Index:

- **[Rationale for RDR's methodology expansion to include Amazon and Alibaba](#)**: an overview of why and how the RDR research team is approaching the addition of these companies into the RDR Index.
- **[Human rights risk scenarios](#)**: a list of "risk scenarios," each describing human rights harms directly or indirectly related to privacy and expression that can result from e-commerce platforms and personal digital assistant ecosystems.
- **[Best practices](#)**: a number of best practices for company disclosure and policy that could help prevent or mitigate these risks.

²³ "RDR releases draft indicators on targeted advertising, algorithmic systems," *Ranking Digital Rights*, October 2019, <https://rankingdigitalrights.org/2019/10/18/newindicators/>.

²⁴ 2020 Pilot Study and Lessons Learned," *Ranking Digital Rights*, March 16, 2020, <https://rankingdigitalrights.org/wp-content/uploads/2020/03/pilot-report-2020.pdf>.

²⁵ "Draft 2020 Ranking Digital Rights Corporate Accountability Index methodology," *Ranking Digital Rights*, April 2020, <https://rankingdigitalrights.org/wp-content/uploads/2020/04/2020-draft-methodology-redline-version.pdf>

This background research laid the groundwork for incorporating two new services—e-commerce platforms and “personal digital assistant ecosystems”—into the 2020 RDR Index methodology.

According to our background research, **e-commerce platforms** can be integrated into the RDR Index methodology without having to create any new indicators or elements unique to these types of services. After an in-depth review, we concluded that all indicators across the Governance, Freedom of Expression and Information, and Privacy categories in the RDR Index methodology can be applied to e-commerce platforms. While the privacy risks posed by e-commerce platforms may be more evident, these platforms can also affect users’ fundamental rights to expression and information. We are therefore opting to apply indicators in the Freedom of Expression and Information category to e-commerce platforms.

To integrate **personal digital assistant (PDA) ecosystems**, we added separate draft elements to various indicators, similar to our approach when integrating mobile ecosystems into the RDR Index methodology in 2017. While many of these draft indicators mirror the elements that apply to mobile ecosystems, we opted to draft separate elements for PDA ecosystems so that we could highlight these ecosystems’ unique features.

The incorporation of PDA ecosystems also required us to draft the following explanatory terms or definitions:

- **Personal digital assistant (PDA) ecosystem** — refers to an artificial intelligence-powered interface installed on digital devices that can interact with users through text or voice to access information on the Internet and perform certain tasks with personal data shared by the users. Users can interact with PDA ecosystems through **skills**, which are either made available by third-party developers/providers or the PDA itself.
- **Skills** — Skills are voice-driven personal digital assistant capabilities allowing users to perform certain tasks or engage with online content using devices equipped with a personal digital assistant. Personal digital assistant ecosystem skills are similar to mobile ecosystem apps: users can enable or disable built-in skills or install skills developed by third parties through stores similar to app stores.
- **Skill store** — The platform through which a company makes its own skills as well as those created by third-party developers available for download. A skill store (or skill marketplace) is a type of digital distribution platform for computer software.

These definitions have been added to the RDR Index glossary, which is appended at the end of the draft version of the 2020 RDR Index.²⁶

²⁶ “Draft 2020 Ranking Digital Rights Corporate Accountability Index methodology,” *Ranking Digital Rights*, April 2020
<https://rankingdigitalrights.org/wp-content/uploads/2020/04/2020-draft-methodology-redline-version.pdf>

8. Stakeholder feedback

We encourage stakeholders to review the following documents for additional detail on revisions and additions summarized in this document. Feedback will be integral to the decisions that RDR will make regarding the final methodology.

- [Draft 2020 RDR Index methodology](#), which incorporates suggested revisions made to the current methodology, new indicators on targeted advertising and algorithms, as well as new services offered by Amazon and Alibaba.
- [A table comparing](#) the 2019 RDR Index indicators to the draft 2020 RDR Index indicators.

The deadline to submit comments is **Friday, May 15, 2020**. Comments should be sent via email to methodology@rankingdigitalrights.org.