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

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Acknowledgements

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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: https://rankingdigitalrights.org/who/partners/.
This document summarizes key revisions introduced in the 2020 Ranking Digital Rights Corporate Accountability Index methodology.

The final version of the 2020 RDR Index methodology, with research guidance and glossary, can be viewed and downloaded at: https://rankingdigitalrights.org/2020-indicators.
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, 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, alongside companies' disclosed policies affecting users' freedom of expression and privacy.

2. About the RDR Index methodology

The standards the RDR Index uses to measure companies are built 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 environmental, social, and governance (ESG) research to investors.

Previous iterations of the RDR Index:

- In 2015, we launched the inaugural RDR Index, which ranked 16 internet and telecommunications companies on 31 indicators.

- The 2017 RDR Index expanded the ranking to 22 companies, which included all of the companies ranked in 2015, plus an additional six companies. Along with internet and telecommunications companies, the RDR Index was expanded to

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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, investors, 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. 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 evaluation of company grievance and remedy mechanisms and procedures. In addition, the 2019 RDR Index expanded to include two new companies—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. This work has focused on three main areas:

- Improving 2019 RDR Index methodology: We reviewed 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...
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.

In April 2020, RDR published a draft version of the final 2020 RDR Index methodology, which integrated work across these three areas. We then opened a final round of public consultation to solicit key feedback from stakeholders, which informed decisions we made as we finalized the methodology.

Visit [https://rankingdigitalrights.org/2020-indicators](https://rankingdigitalrights.org/2020-indicators) to read the fully updated indicators for 2020.

### 4. RDR Index scope and terminology

Integrating new indicators on targeted advertising and algorithmic systems required us to expand the methodology to include a broader scope of human rights. In addition, integrating new platforms like Amazon and Alibaba required us to rename the “internet and mobile ecosystem” company category.

#### 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, as a set of human rights risk scenarios published by RDR in 2019 highlighted, companies’ failure to respect privacy and freedom of expression can cause or contribute to a range of other human rights violations. [7]

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[7] 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).
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 of companies in service of targeted advertising business models. They are 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 particular people, companies, or products differently from others, especially in an unfair way.”

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.

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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.”

5. Revisions to 2019 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. The key structural and substantive revisions are summarized below.

5.1 Structural revisions

The 2020 RDR Index methodology includes a number of structural revisions, which do not change the evaluation standards but rather help clarify the methodology and better surface the data we are already collecting 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, in an effort to clarify the basis of the evaluation and to help ensure this data is more visible. Previously, each element in the Governance category combined an evaluation of company commitments to freedom of expression and privacy.9

**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 companies’ 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 practices,10 has been broken out into five indicators evaluating company due diligence on government regulations (Indicator G4a), policy enforcement (Indicator G4b), targeted advertising policies and practices (Indicator G4c), algorithmic systems (G4d), and zero-rating (Indicator G4e).

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• **Indicator G6**, which evaluates whether companies provide clear and predictable remedy when users feel their freedom of expression or privacy has been violated, 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 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 rules—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 accounts, 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 how they handle government requests than they are when asked how they handle requests that come through private processes, such as 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 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 policies, 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 collects, has been broken out into an indicator “family” by adding a new indicator that measures how transparent companies are 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 information, have been broken out into separate indicators focused on

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government demands (Indicators P10a, P11a) and private requests (Indicators P10b, P11b), respectively. A review of RDR Index data across multiple years shows that companies are more transparent about how they handle government demands than they are about how they handle requests for user information that come through private processes. In this 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 2020 RDR Index methodology:

- **Indicator G4**, which evaluates company human rights due diligence practices,\(^{17}\) has been broken out into five indicators evaluating different areas of company due diligence: government regulations (Indicator G4a), policy enforcement (Indicator G4b), targeted advertising policies and practices (Indicator G4c), algorithmic systems (Indicator G4d), and zero-rating (Indicator G4e).\(^{18}\) We also added elements to each of these indicators asking if companies assess discrimination risks.

- **Indicator G5**, which asks 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 (GNI) would automatically score full credit on this indicator since GNI is a multi-stakeholder organization, with a governing board made up of human rights organizations, investors, and academics, in addition to company representatives. However, GNI focuses 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 receive full credit on this indicator.

- **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. Indicator F4 has been broken out into three indicators: Indicator F4a evaluates company disclosure of data about content restrictions as a result of terms of service violations; Indicator F4b


evaluates company disclosure of data about account restrictions as a result of terms of service violations; Indicator F4c evaluates company disclosure of data about its enforcement of its ad content and ad targeting rules.

- **Indicator F9**, which evaluates how transparent telecommunications companies are about their network management policies and practices, has been revised to more clearly ask whether companies publicly commit to upholding net neutrality principles. We added a new 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 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 through cookies, plug-ins, and widgets. New 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.

- **New Indicators P10a and P11b** ask whether companies disclose data about requests for user information 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, RDR has noted some cases of companies responding to private requests for user data, such as requests for “non-public information” (like a user’s email or IP address). We have therefore developed this indicator to set 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 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 dynamics of such interactions. 

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19 See: [https://rankingdigitalrights.org/2019-indicators/#F9](https://rankingdigitalrights.org/2019-indicators/#F9)
SUMMARY OF REVISIONS: 2020 RDR INDEX METHODOLOGY

- **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 any type of request which companies receive that does not come through a court or government. 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. We also clarified that private requests for user data are informal requests that do not involve any formal legal process. Examples could include cases in which another company sends a letter or an email requesting “non-public information” about one of its users. This could include a user’s IP address and email.

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.\(^{20}\)

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.\(^{21}\) These draft indicators were pilot-tested by the RDR research team and the results of this pilot study were published in March 2020.\(^{22}\) These indicators were then further revised and integrated into a draft version of the 2020 RDR Index methodology, published in April 2020.\(^{23}\)

The final version of the 2020 RDR Index methodology sets key baseline standards of corporate transparency for the development and use of algorithmic systems in a way that minimizes human rights harms. Specifically, new indicators and elements ask companies to publish a formal policy articulating their commitments to respect human rights as they develop and deploy algorithmic systems (Indicator G1, Element 3), in line with recommendations put forward by the Council of Europe and by a growing number of experts and digital rights advocates.\(^{24}\) New indicators also ask companies to publish overarching policies that describe how algorithms are developed (Indicator P1b) and deployed (Indicator F1d) across their platforms and services.

In addition, the 2020 RDR Index methodology includes new indicators aimed at holding companies accountable for their targeted advertising policies and practices. Specifically, we ask companies to conduct robust human rights impact assessments on how targeted advertising may affect users’ fundamental rights to expression, information, and non-discrimination (Indicator G4c). New indicators also ask companies to clearly

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20 See: [https://rankingdigitalrights.org/2019/10/18/newindicators/](https://rankingdigitalrights.org/2019/10/18/newindicators/)
disclose rules around ad targeting (Indicator F3c) and how those rules are enforced (Indicator F4c).

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 critical 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, mainly due to its Alexa software. Alibaba’s 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 a set of public consultation documents that synthesized our approach to incorporating these companies into the RDR Index.25 This background research laid the groundwork for incorporating e-commerce platforms and “personal digital assistant ecosystems” into the 2020 RDR Index methodology.

E-commerce platforms have been integrated into the methodology without having to create any new indicators or elements unique to these types of services. 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 therefore opted 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 elements to various indicators, similar to our approach when integrating mobile ecosystems into the RDR Index methodology in 2017. While many mirror the elements that apply to mobile ecosystems, we opted to separate elements for PDA ecosystems so that we could highlight these ecosystems’ unique features.

The incorporation of PDA ecosystems also required us to develop 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 a combination of natural language processing, machine learning, and speech recognition technologies.

ecosystems through **skills**, which are either made available by third-party developers/providers or the PDA itself.

- **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** is 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 2020 RDR Index glossary, which is appended at the end of the 2020 RDR Index methodology.²⁶

### 8. For more information

The 2020 RDR Index methodology was developed over more than a year of research, pilot testing, and stakeholder consultation. We believe that rigorous research, stakeholder feedback, and transparency about the methodology development process are vital if a ranking is to be credible and effective.

View and download the 2020 RDR Index methodology: [https://rankingdigitalrights.org/2020-indicators](https://rankingdigitalrights.org/2020-indicators)

Read a summary of our research process: [https://rankingdigitalrights.org/2020-research-process](https://rankingdigitalrights.org/2020-research-process)

Learn which companies we are ranking in the 2020 RDR Index: [https://rankingdigitalrights.org/2020-companies](https://rankingdigitalrights.org/2020-companies)

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