



World Benchmarking Alliance

Digital Inclusion Benchmark Scoring guidelines

1	Overview	2
1.1	Indicator scoring.....	2
1.2	Measurement area scoring	2
1.3	Company benchmark score.....	3
2	Access.....	4
A.1	The company contributes to digital technology access	4
A.2	The company supports digital inclusivity for women and girls.....	5
A.3	The company facilitates digital access for diverse users.....	6
A.4	The company discloses its direct economic contribution	8
3	Skills	9
S.1	The company supports basic digital skills development	9
S.2	The company supports intermediate digital skills development.....	10
S.3	The company supports technical digital skills development	11
S.4	The company supports school connectivity	12
4	Use	13
U.1	The company assigns accountability for cybersecurity at a senior level	13
U.2	The company monitors, remedies and reports cybersecurity incidents	14
U.3	The company applies responsible practices for personal data.....	15
U.4	The company mitigates digital risks and harms.....	18
5	Innovation	19
I.1	The company practices open innovation	19
I.2	The company supports technology innovation ecosystems	20
I.3	The company collaborates on big data for sustainable development	21
I.4	The company applies inclusive and ethical research and development	22
6	Annexes.....	23
6.1	List of vulnerable groups	23
6.2	Questions used for scoring.....	24
6.3	Conversion of 0-2 score to percentile	31
6.4	GRI 201-1 Direct economic value generated and distributed	32
6.5	GRI 418-1 Customer Privacy	35

1 Overview

The World Benchmarking Alliance (WBA) Digital Inclusion Benchmark (DIB) consists of 16 indicators equally divided into four measurement areas: access, skills, use and innovation. More details can be found in the methodology report.¹ This document describes how the indicators and measurement areas are scored to result in an overall benchmark score.

This is the first iteration of the DIB. Therefore, scoring is oriented towards whether companies commit to certain principles or carry out certain activities. While metrics are asked for in a number of other indicators, they are used to confirm the availability of information and their values are not utilized to score companies in this iteration. This maiden benchmark allows companies to familiarize themselves with the information required and adapt reporting systems for providing the information in subsequent years. Consultation will also continue to solicit input from all stakeholders to refine the methodology and scoring for future iterations.

1.1 Indicator scoring

The 16 indicators are scored on a scale of between 0 - 2. Each indicator consists of several elements. Each element is assigned a certain number of points, which sum to a value between 0 - 2 for the indicator.

There are examples of all the indicator elements being publicly available in company reports. Hence, if a company provides no relevant information on an indicator the score is zero.²

The principles below hold for company programmes relating to six indicators in the access and skills measurement areas:

- Group or subsidiary programmes are treated in the same manner in this iteration.
- Company programmes that fit the scope of multiple indicators are counted under every indicator where they fit. For instance, if a company has a digital literacy training programme exclusively for women and girls it can be included under both indicator A.2 and indicator S.1.³

Company scores are evaluated by multiple analysts to ensure consistency. Companies that choose not to complete the questionnaire, or participate in other engagement opportunities, are evaluated based solely on publicly available information that was identified during the benchmark time period from main public disclosures (e.g., company reports and websites). Companies were also invited to only provide information which can be considered public.

1.2 Measurement area scoring

Stakeholders suggested that all indicators and measurement areas are considered equally important for digital inclusion. Therefore, each of the four indicators per measurement area carries the same weight.

¹ World Benchmarking Alliance. 2020. *Digital Inclusion Benchmark Methodology Report*. <https://www.worldbenchmarkingalliance.org/research/methodology-digital-inclusion-benchmark-covers-four-critical-themes/>

² There may be exceptions for some indicators in the case of pure-play hardware companies or data centre operators that do not provide consumer products.

³ There may be cases in which the same programme is scored differently in different indicators due to indicators being composed of different elements.

Measurement areas are scored as a simple average of the indicator scores. Since every indicator scores in the range between 0 - 2, the measurement area average will also fall between 0 - 2.⁴

1.3 Company benchmark score

Given that each measurement area is considered equally important for achieving digital inclusion, they are all given the same weight in calculating the overall benchmark score. A company's overall score will equal the average of the scores received for each measurement area, resulting in a score of between 0 - 2 with two significant digits. A percentile score is calculated by multiplying by 50 (See section 6.3).

⁴ In case of pure-play hardware companies or data centre operators, some indicators can be assigned a null value instead of a 0, meaning that the measurement area score is calculated over fewer indicators.

2 Access

A.1 The company contributes to digital technology access

Scope	This indicator covers company efforts to contribute to the universality and affordability of access to digital technologies. Such efforts include programmes that help connect previously unconnected populations and maintain or improve connection of already connected vulnerable populations through affordable digital goods or services. Programmes must go beyond company's legal or contractual requirements and standard business practices. Hence, they should involve some financial, staff or other commitment by the company in support of the programme.
Indicator scoring	After meeting basic criteria of having a programme (0.5 points), further points are added based on different elements.
0	No evidence was found or the company does not have a programme that fits the scope of the indicator.
0.5	The company has a programme that fits the scope of the indicator.
Scores above 0.5 are determined by adding the following elements:	
+0.25	The programme is intended specifically for vulnerable / disadvantaged groups (see definition in Section 6.1).
+0.25	The programme has been in operation for more than one year.
+0.25	The programme is delivered in multiple locations or the company has more than one programme.
+0.25	The company reports metrics on its contribution to the programme (cash, time or in-kind).
+0.25	The company reports metrics on programme participation (number of beneficiaries, number of schools, etc.).
+0.25	There is a third-party impact assessment of the programme.

A.2 The company supports digital inclusivity for women and girls

Scope	This indicator covers company efforts that support digital inclusivity of women and girls through the provision of digital opportunities. Such efforts must be specifically targeted to women and girls, excluding efforts that are targeted to company's employees. Commercial offerings are also excluded unless specifically targeted to women and girls for free or at a discounted price. Digital opportunities include increased access to digital industries or digital programmes that improve women's well-being, as well as digital skills programmes for women. Support for the programme should involve financial, staff or other commitment by the company.
Indicator scoring	After meeting basic criteria of having a programme (0.5 points), further points are added based on different elements.
0	No evidence was found or the company does not have a programme that fits the scope of the indicator.
0.5	The company has a programme that fits the scope of the indicator.
Scores above 0.5 are determined by adding the following elements:	
+0.25	The programme is intended specifically for vulnerable / disadvantaged groups (see definition in Section 6.1).
+0.25	The programme has been in operation for more than one year.
+0.25	The programme is delivered in multiple locations or the company has more than one programme.
+0.25	The company reports metrics on its contribution to the programme (cash, time or in-kind).
+0.25	The company reports metrics on programme participation (number of beneficiaries, number of schools, etc.).
+0.25	There is a third-party impact assessment of the programme.

A.3 The company facilitates digital access for diverse users

Scope	This indicator covers company efforts that facilitate digital access. This iteration of the benchmark looks specifically at support for persons with disabilities. The definition of disabilities follows the framework set by the Web Content Accessibility Guidelines, which includes auditory, cognitive, neurological, physical, speech, and visual disabilities. The indicator considers whether universal disability design standards are adhered to and special product features for users with disabilities. It also considers the company's employment of persons with disabilities as well as inclusive workplace adaptations such as wheelchair ramps and sign language interpreters at company meetings.
Relevance	Except for employment and workplace (elements 4&5), other elements may not be relevant for pure-play, non-consumer hardware or data centre companies.
Indicator scoring	Addition of different elements. ⁵
Element scoring	1. Design Does the company show evidence of adhering to accessibility design principles where applicable? This could include, but are not limited to hardware, web pages, apps, and programs. Examples of evidence could be compliance documents or third-party certifications.
0	No evidence was found or the company does not adhere to accessibility design principles.
+0.4	The company shows evidence of adhering to accessibility design principles for some products.
Element scoring	2. Accessible Products and Services Does the company have goods or services that accommodate users with disabilities? This could include products designed specifically for users with disabilities, or additional features to accommodate these users.
0	No evidence was found that the company has goods or services that accommodate users with disabilities.
+0.4	The company has goods or services that accommodate users with disabilities.
Element scoring	3. Initiatives Does the company initiate or partner with initiatives focused on accessibility for users with disabilities?
0	No evidence was found that the company initiates or partners with initiatives focused on accessibility for users with disabilities.
+0.4	There is evidence that the company initiates or partners with initiatives focused on accessibility for users with disabilities.
Element scoring	4. Employment Does the company hire people with disabilities?
0	No evidence was found that the company discloses metrics on employment of people with disabilities.
+0.2	The company discloses metrics on employment of people with disabilities.

⁵ If pure-play, non-consumer hardware and data center companies report metrics for element 4 and 5, they will be assigned a null value for this indicator. If they do not report elements 4 and 5, they will be assigned a zero for this indicator.

Element scoring	5. Workplace Does the company provide an inclusive workplace for employees with disabilities?
0	No evidence was found that the company makes its workplace inclusive.
+0.2	There is evidence that the company makes its workplace inclusive.
Element scoring	6. User Feedback Does the company solicit feedback to make their products more accessible? This could be from, for example, disabled advocacy groups, employees in their company, or individual users.
0	No evidence was found that the company solicits feedback to make their products more accessible.
+0.4	There is evidence that the company solicits feedback to make their products more accessible.

A.4 The company discloses its direct economic contribution

Scope	This indicator covers company disclosures on information across global operations where it has a customer base in order to assess value creation for each stakeholder. International guidelines for reporting this type of information are relevant (i.e., GRI 201-1) ⁶ . Information on the creation and distribution of economic value provides a basic indication of how an organization has created wealth for stakeholders. Indirect economic impacts are also relevant in this context.
Indicator Scoring	Addition of different elements for all companies.
0	No evidence was found that the company refers to GRI-201-1 nor reports all of the elements to compile Economic Value Generated and Distributed (EVG&D) nor reports on its indirect economic impacts.
+0.25	The company includes GRI 201-1 in its GRI index.
+0.25	All of the elements except community investments are available in company reports.
+0.25	Company discloses community investments.
+0.5	The company reports all of the elements to compile EVG&D at the group level in one table.
+0.5	The company discloses EVG&D separately for main markets.
+0.25	The company reports indirect economic impacts.
+0.25	The company does not disclose EVG&D separately for main markets but does disclose country-by-country taxes paid for main markets.

⁶ Disclosure 201-1 Direct economic value generated and distributed
<https://www.globalreporting.org/standards/media/1039/gri-201-economic-performance-2016.pdf>

3 Skills

S.1 The company supports basic digital skills development

Scope	This indicator covers company programmes that aim to teach basic digital skills that allow users to communicate with others and access online commerce, public services, and financial services. This excludes skills programmes that are: 1) only for the company's employees, 2) focused only on how to use company products, 3) conditional on purchase of company products, and 4) revenue-earning. Programmes must be delivered in-person. Basic digital skills refer to the proficiencies needed to carry out fundamental digital tasks such as using a computer keyboard or smartphone touchscreen, managing privacy settings, and sending email, searching the web, or filling out an online form.
Indicator scoring	After meeting basic criteria of having a programme (0.5 points), further points are added based on different elements.
0	No evidence was found or the company does not have a programme that fits the scope of the indicator.
0.5	The company has a programme that fits the scope of the indicator.
Scores above 0.5 are determined by adding the following elements:	
+0.25	The programme is intended specifically for vulnerable / disadvantaged groups (see definition in Section 6.1).
+0.25	The programme has been in operation for more than one year.
+0.25	The programme is delivered in multiple locations or the company has more than one programme.
+0.25	The company reports metrics on its contribution to the programme (cash, time or in-kind).
+0.25	The company reports metrics on programme participation (number of beneficiaries, number of schools, etc.).
+0.25	There is a third-party impact assessment of the programme.

S.2 The company supports intermediate digital skills development

Scope	This indicator covers programmes that aim to teach intermediate digital skills useful for employment or entrepreneurship. This excludes basic digital literacy programmes and technical skills programmes such as coding or networking; those programmes should be entered in indicator S.1 or S.3. This also excludes skills programmes that are: 1) only for the company's employees and 2) conditional on purchase of company products. Programmes may be delivered in-person or online, however, online skills programmes that are free and accessible to everyone at no additional cost to the company are also excluded . Programmes may include teaching how to use company products, as long as the skills acquired are transferable to non-company products. Intermediate digital skills include but are not limited to: word processing and spreadsheet competencies used in offices; web design, desktop publishing, digital marketing, podcasting or other skills that prepare individuals for jobs in these areas or help entrepreneurs to publicise and grow their businesses.
Indicator scoring	After meeting basic criteria of having a programme (0.5 points), further points are added based on different elements.
0	No evidence was found or the company does not have a programme that fits the scope of the indicator.
0.5	The company has a programme that fits the scope of the indicator.
Scores above 0.5 are determined by adding the following elements:	
+0.25	The programme is intended specifically for vulnerable / disadvantaged groups (see definition in Section 6.1).
+0.25	The programme has been in operation for more than one year.
+0.25	The programme is delivered in multiple locations or the company has more than one programme.
+0.25	The company reports metrics on its contribution to the programme (cash, time or in-kind).
+0.25	The company reports metrics on programme participation (number of beneficiaries, number of schools, etc.).
+0.25	There is a third-party impact assessment of the programme.

S.3 The company supports technical digital skills development

Scope	This indicator covers company programmes that aim to teach technical digital skills required to become a specialist in digital professions such as software programming, data analysis, network management and hardware design. This excludes skills programmes that are: 1) only for company's employees, 2) focused only on how to use company products, 3) conditional on purchase of company products, 4) intended for hiring programme participants, and 5) revenue-earning. Programmes may be delivered in-person or online, however, online skills programmes that are free and accessible to everyone at no additional cost to the company are also excluded . Technical digital skills include but are not limited to the following: UX/UI design skills; networking and programming skills; and digital product development and management skills.
Indicator scoring	After meeting basic criteria of having a programme (0.5 points), further points are added based on different elements.
0	No evidence was found or the company does not have a programme that fits the scope of the indicator.
0.5	The company has a programme that fits the scope of the indicator.
Scores above 0.5 are determined by adding the following elements:	
+0.25	The programme is intended specifically for vulnerable / disadvantaged groups (see definition in Section 6.1).
+0.25	The programme has been in operation for more than one year.
+0.25	The programme is delivered in multiple locations or the company has more than one programme.
+0.25	The company reports metrics on its contribution to the programme (cash, time or in-kind).
+0.25	The company reports metrics on programme participation (number of beneficiaries, number of schools, etc.).
+0.25	There is a third-party impact assessment of the programme.

S.4 The company supports school connectivity

Scope	This indicator covers company programmes that aim to enable or improve connectivity in primary and secondary schools. This excludes school connectivity programmes that are: 1) targeted to universities, 2) focused on the use of company products for educational purposes (unless offered at a discounted price), 3) requiring additional equipment to access contents of the programme, and 4) revenue-earning. Examples of programmes that fit the scope of this indicator include but are not limited to those that involve provision of internet access to schools and donation of digital devices for education purposes.
Indicator scoring	After meeting basic criteria of having a programme (0.5 points), further points are added based on different elements.
0	No evidence was found or the company does not have a programme that fits the scope of the indicator.
0.5	The company has a programme that fits the scope of the indicator.
Scores above 0.5 are determined by adding the following elements:	
+0.25	The programme is intended specifically for vulnerable / disadvantaged groups (see definition in Section 6.1).
+0.25	The programme has been in operation for more than one year.
+0.25	The programme is delivered in multiple locations or the company has more than one programme.
+0.25	The company reports metrics on its contribution to the programme (cash, time or in-kind).
+0.25	The company reports metrics on programme participation (number of beneficiaries, number of schools, etc.).
+0.25	There is a third-party impact assessment of the programme.

4 Use

U.1 The company assigns accountability for cybersecurity at a senior level

Scope	This indicator relates to high-level leadership of and accountability for cybersecurity. Steps include clearly identifying cybersecurity as a senior-level concern and how high-level responsibility for cybersecurity within the company is carried out.
Elements	Does the company explicitly mention cybersecurity in business codes, governance statements or similar documents?
	What is title of the highest management-level position with responsibility for cybersecurity?
	Who does this person report to and how?
Reference	If the company has a document describing how cybersecurity is managed, please provide the reference
Indicator scoring	Addition of elements.
0	No evidence was found that the company has senior-level oversight and accountability for cybersecurity.
+1	The company explicitly mentions cybersecurity in business codes, governance statements or similar documents.
+0.5	A high-level individual or committee has specific responsibility for cybersecurity.
+0.5	The company discloses who such an individual or committee reports to.

U.2 The company monitors, remedies and reports cybersecurity incidents

Indicator scope	This indicator measures various implementation measures to combat security risks. One measure is the existence of a security incident response team and evidence of global cooperation in this area. ⁷ Another measure is valid ISO 27001 certification to reflect adherence to the international framework for protecting information assets. ⁸ A third measure regards transparency in the extent to which the company discloses information about cybersecurity incidents with reference to international standards (see Section 6.5).
Indicator scoring	Addition of elements.
Element Scoring	1. CERT/CSIRT/PSIRT Does the company have an emergency response team such as a Computer Emergency Response Team (CERT) or Computer Security Incident Response Team (CSIRT)? If so, is it a member of a Forum of Incident Response and Security Teams (FIRST)? Is the company's CERT/CSIRT/PSIRT, etc. involved in any other cooperation at the national, regional, or international level?
0	No evidence was found that the company has an incident response security team.
+0.25	Company has a CERT/CSIRT (can be for a specific part of the company).
+0.25	Has a CERT/CSIRT and is a member of FIRST or any other national, regional, or international organization <u>or</u> is involved in cooperation at a national, regional, or international level.
Element Scoring	2. ISO/IEC 27001 Does the company have ISO/IEC 27001 certification? Please provide the link to the ISO 27001 certificate.
0	No evidence was found that the company has ISO/IEC 27001 certification.
+0.25	The company has a valid ISO/IEC 27001 certification.
+0.25	The ISO/IEC 27001 certificate is publicly available and within the period of validity.
Element Scoring	3. Does the company publicly report the number of data breaches?
0	No evidence was found that the company discloses the number of data breaches.
+0.25	Refers to GRI 418-1.
+0.25	Discloses the number of data breaches.
+0.25	Discloses the number of losses of customer data.
+0.25	The company discloses the number of data breaches in an unqualified manner.

⁷ Forum of Incident Response and Security Teams, <https://www.first.org>

⁸ ISO/IEC 27001 INFORMATION SECURITY MANAGEMENT, <https://www.iso.org/isoiec-27001-information-security.html>

U.3 The company applies responsible practices for personal data

Scope	This indicator is based on two indicators from Ranking Digital Rights: P4. Sharing of user information. ⁹ P8. Users' access to their own user information. ¹⁰
Scoring	Each of two sub-indicators is summed based on four elements and then the two sub-indicators are averaged to obtain the indicator score.
Reference	Company privacy policy. ¹¹
Sub-indicator	P4. Sharing of user information
Element scoring	1. For each type of user information the company collects, does the company clearly disclose whether it shares that user information? [P4] P4.1 If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it shares user information.
0	No statement.
+0.25	The company discloses that it shares user information but does not disclose the types of user information.
+0.25	For each type of user information, the company collects, the company clearly discloses whether it shares that user information.
Element scoring	2. For each type of user information the company shares, does the company clearly disclose the types of third parties with which it shares that user information? [P4] P4.2 If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it discloses the types of third parties with which it shares user information.
0	No statement.
+0.25	The company discloses some examples of the types of third parties.
+0.25	The company discloses the type of third parties that information is shared with including the type of information shared with them.
Element Scoring	3. Does the company clearly disclose that it may share user information with government(s) or legal authorities? [P4] P4.3. If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it clearly discloses that it may share user information with government(s) or legal authorities. If the company publishes data on government requests relating to personal information, please provide the reference. <i>Note: If a company does not share information with government(s) or legal authorities, it should clearly state the same.</i>
0	No statement.
+0.25	Company discloses it may share user information with government(s) or legal authorities.

⁹ <https://rankingdigitalrights.org/2019-indicators/#P4>

¹⁰ <https://rankingdigitalrights.org/2019-indicators/#P8>

¹¹ In case the company did not have a group privacy policy, the research was conducted on the privacy policy of the most relevant subsidiary or the subsidiary that has a privacy policy in English.

+0.25	Company publishes data on government requests relating to personal information.
Reference	Transparency report or Law enforcement disclosure report.
Element Scoring	4. For each type of user information the company shares, does the company clearly disclose the names of all third parties with which it shares user information? [P4] P4.4. If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it clearly discloses the names of all third parties with which it shares user information.
0	No statement.
+0.25	Company discloses some names of third parties.
+0.25	Company states that the list it provides is exhaustive.
Sub-indicator	P8. Users' access to their own user information
Element scoring	1. Does the company clearly disclose that users can obtain a copy of their user information? [P8] P8.1. If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it clearly discloses that users can obtain a copy of their user information.
0	No statement.
+0.25	Company mentions the right to access data or request a copy but not to obtain it, or the company places geographic restrictions on data availability, or obtaining a copy is provided for a fee.
+0.25	The company states that users may obtain a free copy of their information regardless of geographic area or other restrictions.
Element scoring	2. Does the company clearly disclose what user information users can obtain? [P8] P8.2 If available, please provide the relevant language from the company privacy statement or other relevant document which clearly discloses what user information users can obtain.
0	No statement.
+0.25	Some elements are indicated but it is reasonably expected that a company is collecting other types of data which are not listed.
+0.25	The company discloses a list of the types of user information that is reasonably expected that it would collect.
Element scoring	3. Does the company clearly disclose that users can obtain their user information in a structured data format, or in a machine-readable format? [P8] P8.3 If available, please provide the relevant passage from the company privacy statement or other relevant document which describes whether the company clearly discloses that users can obtain their user information in a structured data format.
0	No statement.
+0.25	The company discloses that users can obtain their user information in a structured format but does not specify those formats.
+0.25	The company discloses specific file formats (e.g., .vcf, .ics, .html, .eml, .json, .csv,.pdf, etc.).

Element scoring	<p>4. Does the company clearly disclose that users can obtain all public-facing and private user information a company holds about them? [P8]</p> <p>P8.4 If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether the company clearly discloses that users can obtain all public-facing and private user information a company holds about them.</p>
0	No statement.
+0.25	The company discloses that the user can obtain all public-facing user information.
+0.25	The company discloses that the user can obtain all public-facing user information and all private user information a company holds about them.

U.4 The company mitigates digital risks and harms

Scope	Digital technologies have introduced a range of risks and harms which discourage use or incite overuse. This version of the benchmark focuses on online child protection. It covers whether companies have a mechanism in place for reports about online abuse and a process to act upon the reports. It also asks about alignment of company internal processes with international standards, participation in initiatives promoting online protection and content control.
Relevance	Except for commitment to child online safety, possibly not relevant for pure-play, non-consumer hardware or data centre companies.
Indicator scoring	Addition of elements.
+0.25	Evidence was found that company explicitly mentions child digital safety in business codes, human rights policies or risk assessment frameworks.
+0.25	Evidence was found that the company has a mechanism for reporting online harms to children.
+0.25	Evidence was found that the company cooperates with national and international authorities on reporting children online abuse.
+0.25	Evidence was found that the company partners with third parties on child safety.
+0.25	Evidence was found that the company provides content control for its products.
+0.25	Evidence was found that the company has a child safety website.
+0.25	Evidence was found that the company supports educational initiatives for child online safety.
+0.25	Evidence was found the company has other significant initiative(s) not covered above (e.g., online child safety programs for parents, online child safety training for employees, etc.).

5 Innovation

I.1 The company practices open innovation

Scope	This indicator is designed to capture evidence of openness and cooperation in innovation. This includes participation in standards organizations, support for open source and collaboration with universities.
Indicator scoring	Addition of elements.
Element Scoring	1. Membership in standards organizations
+0.5	Either company is a member of ITU and/or company is a member of W3C and/or a member of a local, regional or another relevant international standards body.
Element Scoring	2. Support for open source/standards
+0.5	Evidence was found that the company has a publicly available pledge, policy statement or a similar document in which it shows its support for open source/standards.
Element scoring	3. Open source/standards projects
+0.25	Company has an active GitHub account.
+0.25	Evidence was found that the company has current open source/standards projects.
Reference	Company has an open source/standards web page.
Element Scoring	4. University collaboration
+0.5	Evidence was found that the company partners with universities on open source/standards or in other research areas.

I.2 The company supports technology innovation ecosystems

Scope	Support for this indicator includes venture capital investment. Other measures include supporting innovation hubs such as incubators and accelerators. Providing start-ups with affordable access to relevant company goods and services is another example of support, as is assistance for social entrepreneurship.
Indicator scoring	Addition of elements.
Element scoring	1. Venture capital
0	No evidence was found that company makes venture capital investments.
+0.5	Company makes venture capital investments.
+0.25	Company provides a list of its portfolio or has a website on which it lists its portfolio investments.
+0.25	Company makes venture capital investments and provides more information about its portfolio, especially with regards to gender of investee founder and country of investee.
Element scoring	2. Start-up support
0	No evidence was found that company supports start-ups.
+0.5	Company supports start-ups, through accelerators, incubators, innovation hubs or other start-up facilities.
+0.5	In addition, company also supports social and/or non-profit start-ups / entrepreneurs.

I.3 The company collaborates on big data for sustainable development

Scope	This indicator measures support for sustainable development. An example is the presence of mechanisms for sharing relevant data sets or sharing processing, storage and computing facilities for sustainability research.
Relevance	All digital industries. There may be companies that do not generate data relevant for sustainability analysis. Support for sustainability projects is applicable to all companies as is commitment to the SDGs. The scoring is adjusted so that not having publicly available data sets does not affect the score.
Indicator scoring	Addition of two element scores (either contributes resources for sustainability research or provides relevant public data sets and commitment to SDGs).
0	No evidence was found that the company has any of the two elements.
+1	Company contributes resources for non-profit or university research on sustainability issues and/or company provides publicly available data sets.
+1	Company indicates support for SDGs in a published report or company web page.
Reference	Company has a dedicated web page on Big Data for Good/Sustainable Development.

I.4 The company applies inclusive and ethical research and development

Scope	This indicator captures the degree to which company practices reflect the participation of diverse groups and consideration of ethics in product development. Diversity is reflected by a high percentage of technical and R&D staff of different genders, ethnicities, and nationalities. Another measure of diversity is the distribution of research in different countries. Consultation with ethics bodies within company as well as wider stakeholder dialogue on the ramifications of product design is another good practice.
Indicator scoring	Addition of elements.
Element scoring	1. Does the company publish sex-disaggregated employment breakdowns?
0	No evidence was found of overall sex-disaggregated employment available.
+0.125	Overall sex-disaggregated employment available.
+0.5	Tech/engineering/R&D sex-disaggregated employment available.
Element scoring	2. Does the company have R&D facilities outside the headquarters country?
0	No evidence was found about location of R&D facilities.
+0.125	The company discloses some information about its R&D facilities locations.
+0.5	The company discloses all R&D locations outside the headquarters country.
Element scoring	3. Ethics
0	No evidence was found about ethics responsibility or consideration in R&D.
+0.25	Company has a committee or other governance body responsible for ethics.
Element scoring	4. Ethical considerations in R&D
+0.25	Company considers ethics in R&D.
+0.25	Company aligns considerations with ethical AI frameworks. ¹²
Reference	Corporate framework, guidelines or principles.

¹² FAT/ML: <https://www.fatml.org/>

6 Annexes

6.1 List of vulnerable groups

Vulnerable groups in the Digital Inclusion Benchmark include:

- elderly
- jobless
- low-income
- people with disabilities
- racial or ethnic minorities
- refugees
- people in rural areas
- women and girls

6.2 Questions used for scoring

The number before the question indicates the number of the question as it shows in the survey. The gaps between the questions were opportunities for companies to comment and provide references.

A.1 The company contributes to digital technology access

3. Does the company have any programme that aims to contribute to the universality and affordability of access to digital technologies?
7. Please describe the company programme.
6. If the company has more than one relevant programme, please provide the name and details of other relevant programmes through a file upload.
16. Please provide the target area(s) of the company programme (region(s) or country(ies)).
17. Start year of company programme.
21. How much financial resources did the company commit to the programme?
 - Financial resources, total amount:
 - Financial resources, amount in the last reporting year:
22. How much human resources did the company devote to the programme?
 - Staff, total amount:
 - Staff, amount in the last reporting year:
23. Please specify any other type of resources committed to the programme including the amount.
25. How many individuals have participated in the company programme?
 - Participants, total number:
 - Participants, number in the last reporting year:
27. What vulnerable group(s) is/are targeted by the company programme? (e.g. low-income individuals, individuals with disabilities, etc.).
29. Is there any third-party impact assessment of the company programme?

A.2 The company supports digital inclusivity for women and girls

33. Does the company have any programme that supports digital inclusivity for women and girls?
37. Please describe the company programme.
36. If the company has more than one relevant programme, please provide the name and details of other relevant programmes through a file upload.
42. Please provide the target area of company programme (region(s) or country(ies)).
43. Start year of company programme.
47. How much financial resources did the company commit to the programme?
 - Currency (e.g. USD, EUR, etc.):
 - Financial resources, total amount:
 - Financial resources, amount in the last reporting year:
48. How much human resources did the company devote to the programme?
 - Unit (e.g. number of persons or number of hours):
 - Staff, total amount:
 - Staff, amount in the last reporting year:
49. Please specify any other type of resources committed to the programme including the amount.
51. How many women have participated in the company programme?
 - Woman participants, total number:
 - Woman participants, number in last reporting year:
52. What vulnerable group(s) is/are targeted by the company programme? (e.g. low-income individuals, individuals with disabilities, etc.).

54. Is there any third-party impact assessment of the company programme?

A.3 The company facilitates digital access for diverse users

59. Does the company adhere to internationally recognized design principles for people with disabilities.

60. Please provide any evidence that the company adheres to internationally recognized design principles for people with disabilities.

62. Does the company have products or services that accommodate users with disabilities?

63. Please describe these products.

65. Does the company initiate or partner with initiatives focused on accessibility for users with disabilities?

66. Please describe these initiatives.

69. Please provide the number of employees with disabilities.

- Total employment in-scope:
- Number of employees with disabilities:

72. Does the company have efforts on creating an inclusive workplace for employees with disabilities.

73. Describe how the company creates an inclusive workplace for its employees with disabilities.

75. Does the company solicit feedback from different stakeholders to make their products more accessible?

76. Please describe how feedback is provided.

A.4 The company discloses its direct economic contribution

80. Does the company report its direct Economic Value Generated and Distributed (EVG&D) based on GRI Disclosure 201- 1?

82. If from GRI 201-1, please provide text in the disclosure.

83. Indicate the currency and unit of economic value generated and distributed. Please type the currency in three letter code (e.g. USD, EUR, etc.).

84. Indicate the amount of revenues in the year referenced above.

85. Indicate the amount of operating costs and employee wages and benefits in the year referenced above.

86. Indicate the amount of payments to providers of capital in the year referenced above.

87. Indicate the amount of payments to government and community investments in the year referenced above.

88. Indicate the amount of capital expenditures and net profit in the year referenced above.

90. Is EVG&D available separately at the country (C), regional (R) or market level (M)? Please also indicate if no disaggregation (N) is available.

92. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

93. Please upload a spreadsheet with the EVG&D at the country, regional or market level.

94. Does the company calculate its indirect economic impact?

95. Please describe the impact.

S.1 The company supports basic digital skills development

3. Does the company have any programme for individuals outside the company that aims to teach basic digital skills that allow users to communicate with others and access online commerce, public services and financial services?

6. If the company has more than one relevant programme, please provide the name and details of other relevant programmes through a file upload.

7. Please describe the company programme.
12. Please provide the target area(s) of the company programme (region(s) or country(ies)).
13. Start year of the company programme.
17. How much financial resources did the company commit to the programme?
 - Currency (e.g. USD, EUR, etc.):
 - Financial resources, total amount:
 - Financial resources, amount in the last reporting year:
18. How much human resources did the company devote to the programme?
 - Unit (e.g. number of persons or number of hours):
 - Staff, total amount:
 - Staff, amount in the last reporting year:
19. Please specify any other type of resources committed to the programme including the amount.
21. How many individuals have participated in the company programme?
 - Participants, total number:
 - Participants, number in the last reporting year:
23. What vulnerable group(s) is/are targeted by the company programme? (e.g. low-income individuals, individuals with disabilities, etc.).
25. Is there any third-party impact assessment of the company programme?
26. Please provide background on the third-party.

S.2 The company supports intermediate digital skills development

31. Does the company have any programme for individuals outside the company that aims to teach intermediate digital skills applicable across various digital platforms?
34. If the company has more than one relevant programme, please provide the name and details of other relevant programmes through a file upload.
35. Please describe the company programme.
40. Please provide the target area(s) of the company programme (region(s) or country(ies)).
41. Start year of the company programme.
45. How much financial resources did the company commit to the programme?
 - Currency (e.g. USD, EUR, etc.):
 - Financial resources, total amount:
 - Financial resources, amount in the last reporting year:
46. How much human resources did the company devote to the programme?
 - Unit (e.g. number of persons or number of hours):
 - Staff, total amount:
 - Staff, amount in the last reporting year:
47. Please specify any other type of resources committed to the programme including the amount.
49. How many individuals have participated in the company programme?
51. What vulnerable group(s) is/are targeted by the company programme? (e.g. low-income individuals, individuals with disabilities, etc.).
53. Is there any third-party impact assessment of the company programme?
54. Please provide background on the third-party.

S.3 The company supports technical digital skills development

59. Does the company have any programme for individuals outside the company that aims to teach technical digital skills required to become a specialist in digital professions such as software programming, data analysis, network management and hardware design?

62. If the company has more than one relevant programme, please provide the name and details of other relevant programmes through a file upload.
63. Please describe the company programme.
68. Please provide the target area of the company programme (region(s) or country(ies)).
69. Start year of the company programme.
73. How much financial resources did the company commit to the programme?
- Currency (e.g. USD, EUR, etc.):
 - Financial resources, total amount:
 - Financial resources, amount in the last reporting year:
74. How much human resources did the company devote to the programme?
- Unit (e.g. number of persons or number of hours):
 - Staff, total amount:
 - Staff, amount in the last reporting year:
75. Please specify any other type of resources committed to the programme including the amount
77. How many individuals have participated in the company programme?
79. What vulnerable group(s) is/are targeted by the company programme? (e.g. low-income individuals, individuals with disabilities, etc.)
83. Is there any third-party impact assessment of the company programme?
84. Please provide background on the third-party

S.4 The company supports school connectivity

89. Does the company have any programme that aims to enable or improve connectivity in primary and secondary schools?
92. If the company has more than one relevant programme, please provide the name and details of other relevant programmes through a file upload.
93. Please describe the company programme.
98. Please provide the target area of the company programme (region(s) or country(ies)).
99. Start year of the company programme
103. How much financial resources did the company commit to the programme?
- Currency (e.g. USD, EUR, etc.):
 - Financial resources, total amount:
 - Financial resources, amount in the last reporting year:
104. How much human resources did the company devote to the programme?
- Unit (e.g. number of persons or number of hours):
 - Staff, total amount:
 - Staff, amount in the last reporting year:
105. Please specify any other type of resources committed to the programme including the amount.
107. How many schools have participated in the company programme?
108. How many students have participated in the company programme?
- Students, total number:
 - Students, number in the last reporting year:
110. How many teachers have participated in the company programme?
- Teachers, total number:
 - Teachers, number in the last reporting year:
112. What vulnerable group(s) is/are targeted by the company programme? (e.g. schools with students from low-income households, students with disabilities, etc.)
114. Is there any third-party impact assessment of the company programme?

115. Please provide background on the third-party.

U.1 The company assigns accountability for cybersecurity at a senior level

- 3. Does the company explicitly mention cybersecurity in business codes, governance statements or similar documents?
- 6. What is title of the highest management-level position with responsibility for cybersecurity?
- 8. Who does this person report to and how?

U.2 The company monitors, remedies and reports cybersecurity incidents

- 13. Does the company have an emergency response team such as a Computer Emergency Response Team (CERT) or Computer Security Incident Response Team (CSIRT)?
- 22. If so, is it a member of a Forum of Incident Response and Security Teams (FIRST)?
- 24. Is the company's CERT/CSIRT/PSIRT, etc. involved in any other cooperation at the national, regional, or international level?
- 28. Does the company have ISO/IEC 27001 certification?
- 32. Please provide the link to the ISO 27001 certificate.
- 37. Does the company refer to GRI 418-1 for reporting data breaches?
- 41. Number of data breaches.
- 42. Number of people affected.

U.3 The company applies responsible practices for personal data¹³

- 46. Please provide the title and link to the company's privacy policy.
- 47. P4.1 If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it shares user information.
- 48. P4.2 If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it discloses the types of third parties with which it shares user information.
- 49. P4.3. If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it clearly discloses that it may share user information with government(s) or legal authorities.
- 50. If the company publishes data on government requests relating to personal information, please provide the reference.
- 51. P4.4. If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it clearly discloses the names of all third parties with which it shares user information.
- 53. P8.1. If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether it clearly discloses that users can obtain a copy of their user information.
- 54. P8.2 If available, please provide the relevant language from the company privacy statement or other relevant document which clearly discloses what user information users can obtain.
- 54. P8.2 If available, please provide the relevant language from the company privacy statement or other relevant document which clearly discloses what user information users can obtain.

¹³ The number next to the question number indicates the respective question number in the Ranking Digital Rights questionnaire.

56. P8.4 If available, please provide the relevant language from the company privacy statement or other relevant document which describes whether the company clearly discloses that users can obtain all public-facing and private user information a company holds about them.

U.4 The company mitigates digital risks and harms

59. Does the company explicitly mention child digital safety in business codes, human rights policies or risk assessment frameworks?

60. Please describe child safety business codes, policies, or frameworks.

62. Does the company have a mechanism for reporting online harms to children?

63. Please describe the reporting mechanism.

65. Does the company cooperate with national and international authorities on reporting children online abuse?

66. Describe the cooperation.

68. Does the company partner with third parties on child safety?

69. Please describe the partners and nature of the cooperation.

71. Does the company provide content control for its products?

72. Please describe the content control product.

78. Does the company have a child safety website?

79. Link to website.

80. Does the company support educational initiatives for child online safety?

81. Please describe the child safety educational support.

83. Please describe any other initiatives related to child safety not covered above.

I.1 The company practices open innovation

3. Is the company a member of the International Telecommunication Union (ITU)?

7. Is the company a member of the World Wide Web Consortium?

10. Does the company participate in the work of any other local, regional or international standards bodies?

11. Please describe the company's participation in local, regional or international standards bodies?

13. Does the company have a GitHub account?

15. Does the company support open source/standards as evidenced through a pledge, policy statement, etc.?

16. Please describe the commitment to open source/standards.

18. Does the company have any open source/standards projects?

19. Please describe the open source/standards projects.

22. Does the company collaborate with universities on open source/standards or in other research areas?

23. Please describe the university collaboration.

I.2 The company supports technology innovation ecosystems

27. Does the company make venture capital investments?

31. Please describe the venture capital strategy or aims and any other relevant information.

33. Please upload the company's venture capital investments with the following information:

a. Name of investee

b. Gender of investee founder

c. Country of investee

d. Date of investment

e. Amount invested (US\$)

34. Does the company provide support to start-ups such as accelerators, incubators, or innovation labs?
35. Please describe the nature of the support to start-ups.
37. Does the company provide support to social and/or non-profit start-ups / entrepreneurs?
38. Please describe the support provided to non-profit or social enterprise start-ups.

I.3 The company collaborates on big data for sustainable development

42. Does the company contribute resources for non-profit or university research on sustainability issues?
44. Please describe the nature of the company's contribution, a brief description of the project and any partners.
46. Does the company provide publicly available data sets?
47. Please describe the data sets.
50. Does the company indicate support for the Sustainable Development Goals (SDGs) in a published report or company web page?
52. Please describe the support for the SDGs.

I.4 The company applies inclusive and ethical research and development

56. How many women did the company employ in its latest reporting period?
 - Total number of women employees
 - Women employees (% of total employees)
58. How many women are employed in technical or engineering areas?
 - Total number of women employees in technical/engineering
 - Women (% of total technical/engineering employees)
60. How many women are employed in R&D?
 - Total number of women employees in R&D
 - Women (% of total R&D employees)
65. Does the company have research and development centers outside of its headquarters country?
67. How many R&D facilities does the company have?
68. Which countries are the R&D facilities located in?
70. Does the company have a committee responsible for ethics?
71. Please describe its activities briefly including its relationship with top management.
73. Are ethics considered in R&D?
75. Please describe how the company deals with ethical considerations in R&D.
77. Do ethical considerations for Artificial Intelligence (AI) research include fairness, accountability and transparency?
79. Please describe the AI ethical considerations the company follows.

6.3 Conversion of 0-2 score to percentile

0-2 score	Percentile (%)	0-2 score	Percentile (%)	0-2 score	Percentile (%)	0-2 score	Percentile (%)
0.02	1	0.52	26	1.02	51	1.52	76
0.04	2	0.54	27	1.04	52	1.54	77
0.06	3	0.56	28	1.06	53	1.56	78
0.08	4	0.58	29	1.08	54	1.58	79
0.10	5	0.60	30	1.10	55	1.60	80
0.12	6	0.62	31	1.12	56	1.62	81
0.14	7	0.64	32	1.14	57	1.64	82
0.16	8	0.66	33	1.16	58	1.66	83
0.18	9	0.68	34	1.18	59	1.68	84
0.20	10	0.70	35	1.20	60	1.70	85
0.22	11	0.72	36	1.22	61	1.72	86
0.24	12	0.74	37	1.24	62	1.74	87
0.26	13	0.76	38	1.26	63	1.76	88
0.28	14	0.78	39	1.28	64	1.78	89
0.30	15	0.80	40	1.30	65	1.80	90
0.32	16	0.82	41	1.32	66	1.82	91
0.34	17	0.84	42	1.34	67	1.84	92
0.36	18	0.86	43	1.36	68	1.86	93
0.38	19	0.88	44	1.38	69	1.88	94
0.40	20	0.90	45	1.40	70	1.90	95
0.42	21	0.92	46	1.42	71	1.92	96
0.44	22	0.94	47	1.44	72	1.94	97
0.46	23	0.96	48	1.46	73	1.96	98
0.48	24	0.98	49	1.48	74	1.98	99
0.50	25	1.00	50	1.50	75	2.00	100

2. Topic-specific disclosures

An organization is expected to compile information for economic disclosures using figures from its audited financial statements or from its internally-audited management accounts, whenever possible. Data can be compiled using, for example:

- the relevant International Financial Reporting Standards (IFRS), published by the International Accounting Standards Board (IASB), and the Interpretations developed by the IFRS Interpretations Committee (specific IFRS are referenced for some of the disclosures);
- the International Public Sector Accounting Standards (IPSAS) issued by the International Federation of Accountants (IFAC);
- national or regional standards recognized internationally for the purpose of financial reporting.

Disclosure 201-1

Direct economic value generated and distributed

Reporting requirements

The reporting organization shall report the following information:

- a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:
 - i. Direct economic value generated: revenues;
 - ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
 - iii. Economic value retained: 'direct economic value generated' less 'economic value distributed'.
- b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

Disclosure
201-1

- 2.1 When compiling the information specified in Disclosure 201-1, the reporting organization shall, if applicable, compile the EVG&D from data in the organization's audited financial or profit and loss (P&L) statement, or its internally audited management accounts.

Guidance

Background

Information on the creation and distribution of economic value provides a basic indication of how an organization has created wealth for stakeholders. Several components of the economic value generated and distributed (EVG&D) also provide an economic profile of an organization, which can be useful for normalizing other performance figures.

If presented in country-level detail, EVG&D can provide a useful picture of the direct monetary value added to local economies.

Guidance for Disclosure 201-1

Revenues

An organization can calculate revenues as net sales plus revenues from financial investments and sales of assets.

Net sales can be calculated as gross sales from products and services minus returns, discounts, and allowances.

Revenues from financial investments can include cash received as:

- interest on financial loans;
- dividends from shareholdings;

Disclosure 201-1 Continued

- royalties;
- direct income generated from assets, such as property rental.

Revenues from sale of assets can include:

- physical assets, such as property, infrastructure, and equipment;
- intangibles, such as intellectual property rights, designs, and brand names.

Operating costs

An organization can calculate operating costs as cash payments made outside the organization for materials, product components, facilities, and services purchased.

Services purchased can include payments to self-employed persons, temporary placement agencies and other organizations providing services. Costs related to workers who are not employees working in an operational role are included as part of services purchased, rather than under employee wages and benefits.

Operating costs can include:

- property rental;
- license fees;
- facilitation payments (since these have a clear commercial objective);
- royalties;
- payments for contract workers;
- training costs, if outside trainers are used;
- personal protective clothing.

The use of facilitation payments is also addressed in [GRI 205: Anti-corruption](#).

Employee wages and benefits

An organization can calculate employee wages and benefits as total payroll (including employee salaries and amounts paid to government institutions on behalf of employees) plus total benefits (excluding training, costs of protective equipment or other cost items directly related to the employee's job function).

Amounts paid to government institutions on behalf of employees can include employee taxes, levies, and unemployment funds.

Total benefits can include:

- regular contributions, such as to pensions, insurance, company vehicles, and private health;
- other employee support, such as housing, interest-free loans, public transport assistance, educational grants, and redundancy payments.

Payments to providers of capital

An organization can calculate payments to providers of capital as dividends to all shareholders, plus interest payments made to providers of loans.

Interest payments made to providers of loans can include:

- interest on all forms of debt and borrowings (not only long-term debt);
- arrears of dividends due to preferred shareholders.

Payments to government

An organization can calculate payments to governments as all of the organization's taxes plus related penalties paid at the international, national, and local levels. Organization taxes can include corporate, income, and property.

Payments to government exclude deferred taxes, because they may not be paid.

If operating in more than one country, the organization can report taxes paid by country, including the definition of segmentation used.

Community investments

Total community investments refers to actual expenditures in the reporting period, not commitments. An organization can calculate community investments as voluntary donations plus investment of funds in the broader community where the target beneficiaries are external to the organization. Voluntary donations and investment of funds in the broader community where the target beneficiaries are external to the organization can include:

- contributions to charities, NGOs and research institutes (unrelated to the organization's commercial research and development);
- funds to support community infrastructure, such as recreational facilities;
- direct costs of social programs, including arts and educational events.

If reporting infrastructure investments, an organization can include costs of goods and labor, in addition to capital costs, as well as operating costs for support of ongoing facilities or programs. An example of support for ongoing facilities or programs can include the organization funding the daily operations of a public facility.

Community investments exclude legal and commercial activities or where the purpose of the investment is exclusively commercial (donations to political parties can be included, but are also addressed separately in more detail in [GRI 415: Public Policy](#)).

Disclosure 201-1**Continued**

Community investments also exclude any infrastructure investment that is driven primarily by core business needs, or to facilitate the business operations of an organization. Infrastructure investments driven primarily by core business needs can include, for example, building a road to a mine or a factory. The calculation of investment can include infrastructure built outside the main business activities of the organization, such as a school or hospital for workers and their families.

See references 5, 6, 7 and 9 in the [References section](#).

2. Topic-specific disclosures

Disclosure 418-1

Substantiated complaints concerning breaches of customer privacy and losses of customer data

Reporting requirements

The reporting organization shall report the following information:

- a. Total number of substantiated complaints received concerning breaches of customer privacy, categorized by:
 - i. complaints received from outside parties and substantiated by the organization;
 - ii. complaints from regulatory bodies.
- b. Total number of identified leaks, thefts, or losses of customer data.
- c. If the organization has not identified any substantiated complaints, a brief statement of this fact is sufficient.

Disclosure
418-1

2.1 When compiling the information specified in Disclosure 418-1, the reporting organization shall indicate if a substantial number of these breaches relate to events in preceding years.

Guidance

Background

Protection of customer privacy is a generally recognized goal in national regulations and organizational policies. As set out in the Organisation for Economic Co-operation and Development (OECD) *OECD Guidelines for Multinational Enterprises*, organizations are expected to 'respect consumer privacy and take reasonable measures to ensure the security of personal data that they collect, store, process or disseminate'.

To protect customer privacy, an organization is expected to limit its collection of personal data, to collect data by lawful means, and to be transparent

about how data are gathered, used, and secured.

The organization is also expected to not disclose or use personal customer information for any purposes other than those agreed upon, and to communicate any changes in data protection policies or measures to customers directly.

This disclosure provides an evaluation of the success of management systems and procedures relating to customer privacy protection.