

# **Ranking Digital Rights - Taiwan**

**Main Research Findings and Outcomes**

**Open Culture Foundation**

# Presentation Outline

- Jurisdictional Analysis
- Methodology and Localization
- Research findings (1): Country Situation Overview
- Research findings (2): Analyzing Digital Service Providers by Type
- Recommendations



# **Jurisdictional Analysis**

# Jurisdictional Analysis

## Key Findings

- Taiwan has a rapidly growing and diverse digital service market.
- However, the current regulatory environment only demands minimum respect to digital rights and company accountabilities, especially in freedom of speech and information.
- Taiwan's general public lacks a comprehensive understanding of its digital rights and associated risks.



# Jurisdictional Analysis

## The overall state of digital economy and service usage in Taiwan

- High level of digital development
  - ▶ Ranked 9th globally in technological infrastructure (2019)
  - ▶ Ranked 5th globally in 5G network coverage (2022)
  - ▶ 91% of internet penetration rate (2022)
- A well-established digital economy, but leans toward manufacturing
  - ▶ 80% global market share in wafer foundry, motherboard manufacturing, and laptop manufacturing (2022).
  - ▶ No digital service provider with significant international presence
  - ▶ The scale of digital manufacturing economy vs. digital service economy: 140 vs. 95 billion USD



# Jurisdictional Analysis

## The overall state of digital economy and service usage in Taiwan

- A diverse and rapidly expanding domestic digital service market
  - ▶ 89.4% of the population has active social media accounts
  - ▶ 42.8% of the population shopping online
  - ▶ A free and open market with a mixture of global, regional, and local service providers

	Most frequently used social media platforms			Most frequently used e-commerce platforms		
Rank	Name	%	Platform type (country of origin)	Name	%	Platform type (country of origin)
1	Facebook	61.21%	Global Platform (US)	Shopee	61%	Local Platform under a regional company (Singapore)
2	Instagram	17.17%	Global Platform (US)	momo.com	59%	Local Platform
3	Tik Tok	2.19%	Global Platform (China)	PChome Online	43%	Local Platform
4	PTT	1.35%	Local Platform	Yahoo Mall	23%	Local Platform under a Global company (US - Hong Kong)
5	Twitter	0.66%	Global Platform (US)	Tabao	19%	Global Platform (China)
6	Dcard	0.41%	Local Platform	ETMall	12%	Local Platform

# Jurisdictional Analysis

## The regulatory landscape for digital rights in Taiwan

- While maintaining a free internet environment, Taiwan's current policies and legal frameworks only demand minimum protection to digital rights and corporate responsibilities.
- National policies mentioning digital rights
  - *DIGI+ 2025 Digital Nation Plan*: internet accessibility for the minorities
  - *National Human Rights Action Plan*: gender-based violence prevention



# Jurisdictional Analysis

## The regulatory landscape for digital rights in Taiwan

- Laws relevant to privacy rights
  - ▶ Personal Data Protection Act
    - Offer basic protection: inform-consent in data collection and sharing, use within the purpose of collection, rights to information autonomy
    - No significant change since its 2010 implementation, resulting in weak enforcement in the digital service sector
    - Low penalties: Approximately 6,500 USD maximum fine for transgression.
  - ▶ Slow progression in establishing specialized government agencies for privacy protection



# Jurisdictional Analysis

## The regulatory landscape for digital rights in Taiwan

- Laws and enforcement agencies relevant to rights to freedom of speech and information
  - ▶ No general law authorizing government-demanded online content takedown
    - Few Exceptions centered around digital gender-based violence content: Child and Youth Sexual Exploitation Prevention Act (child pornography, sexual transaction), Sexual Assault Crime Prevention Acts (nonconsensual pornography).
    - Misinformation: No takedown policies, but criminalized in subject-specific laws (Communicable Disease Control Act, Social Order Maintenance Act, Securities and Exchange Act etc.)
  - ▶ ‘Trusted flagger’: Institute of Watch Internet Network (iWIN)
    - Mainly focuses on gender-based violence



# Jurisdictional Analysis

## The regulatory landscape for digital rights in Taiwan

- Limited transparency requirement for companies
  - ▶ Only companies with greater than 6.57 billion USD capitalization are required to publish annual ESG reports.
  - ▶ Draft Digital Intermediary Service Act was pushed back by the public in 2022 due to series concerns about government abuse of power.
    - Controversies: government agencies are authorized to obtain an 'information restriction warrant' from the court, flag misinformation, and fine digital platforms for non-compliance
    - What are overlooked in the act: transparency obligations for service providers



# Jurisdictional Analysis

## Public awareness of digital rights in Taiwan

- Right to privacy: concerns do not lead to actions.
  - ▶ 71.8% of people worry about data breaches; while only 48% worries corporate misuse of personal data.
  - ▶ 68.6% of people think they don't understand the Personal Data Protection Act
  - ▶ 43% of people mistake privacy policies offered by companies as a guarantee of zero data-sharing practices
  - ▶ Only 7% of people care about privacy protection when shopping online
  - ▶ International standards create confusion: the case of LINE policy change

# Jurisdictional Analysis

## Public awareness of digital rights in Taiwan

- Right to freedom of speech and information: omitted the private sector
  - ▶ Users feel dissatisfied about companies' opaque content moderation policies and practices: 'you're Zuckerberg-ed'
  - ▶ However, fear of abuse of power and zero tolerance to government interference on the internet results in a lack of discussion on corporate responsibilities in digital rights



# Methodology and Localization

# Methodology and Localization

## Research Objectives and Design

- Objectives: Create ‘Actionable’ Data
  - ▶ Represent corporate digital rights landscape in the Taiwanese digital service market.
  - ▶ Enable consumers to choose services better respect their rights among competitors
  - ▶ Timely delivery of research findings



# Methodology and Localization

## Research Objectives and Design

- Research Design
  - ▶ Scope: local and regional service providers in the Taiwanese market
  - ▶ Produce type-specific and services-based rankings
  - ▶ Industry selected: social media, human resource bank (job-seeking platforms), e-commerce, telecoms (post-paid mobile service)
  - ▶ Total service studied: 20
  - ▶ Total RDR indicators selected: 27

# Methodology and Localization

Service Category	industry	Platform / Service Name	Company Name	Company Type	Size
Digital Platforms	Social media platforms	Dcard	British Cayman Islands Dcard Holdings Ltd	Taiwan company -investment by foreign investors	
		Bahamut	Oneup Network Co., Ltd	Taiwan company	
		Plurk	Plurk Co., Ltd	Taiwan company - investment by foreign investors	
		Xiaohongshu	Xingyin Information Technology (Shanghai) Co Ltd	Foreign company	N/A
	Job-seeking platforms	104 Human Resource Bank	104 Information Technology Co., Ltd	Taiwan company	Listed
		1111 Human Resource Bank	Global Chinese International Co., Ltd.	Taiwan company	
		<a href="#">yes123.com</a>	Yes123 Life Technology Co., Ltd	Taiwan company	
		518 Bear Work	Addcn Technology Co., Ltd	Taiwan company	OTC
		Chick On Board	Addcn Technology Co., Ltd	Taiwan company	OTC
		Yourator	WeWiz Software Co.,Ltd.	Taiwan company	
	e-commerce	Pchome Online	PChome Online Inc.	Taiwan company	OTC
		<a href="#">momo.com</a>	<a href="#">momo.com</a> Inc.	Taiwan company - associated with a domestic business group	
		Shopee	Shopee Taiwan Singapore Private Limited Taiwan Branch	Subsidiary of a foreign business group	
		Rakuten Market	Taiwan Rakuten Ichiba, Inc.	Subsidiary of a foreign business group	
		<a href="#">books.com.tw</a>	<a href="#">books.com</a> co., Ltd	Taiwan company - associated with a domestic business group	
		Ruten	PChome eBay Co., Ltd	Taiwan company - joint venture	
		ETMall	Eastern Home Shopping & Leisure Co., Ltd.	Taiwan company - associated with a domestic business group	
Telecom	Post-paid mobile services	Chunghwa Telecom	Chunghwa Telecom Co., Ltd	Taiwan company - originally a state-owned enterprise	Listed
		Taiwan Mobile	Taiwan Mobile Co., Ltd	Taiwan company - associated with a domestic business group	Listed
		FETnet	Far Eastone Telecommunications Co., Ltd.	Taiwan company - associated with a domestic business group	Listed



# Methodology and Localization

Dimension	Indicators selected	
Governance	G1 Policy commitment G4b Impact assessment: Processes for policy enforcement G6a Remedy G6b Process for content moderation appeals	
Freedom of Speech and Information	F1a Access to terms of service policies F1b Access to advertising content policies F1c Access to advertising targeting policies F3a Process for terms of service enforcement F5a Process for responding to government demands to restrict content or accounts F8 User notification about content and account restriction F11 Identity policy	
Privacy	P1a Access to privacy policies P1b Access to algorithmic system development policies P2a Changes to privacy policies P3a Collection of user information P3b Inference of user information P4 Sharing of user information P5 Purpose for collecting, inferring, and sharing user information P6 Retention of user information P7 Users’ control over their own user information P8 Users’ access to their own user information P9 Collection of user information from third parties	P11a Data about government requests for user information P12 User notification about third-party requests for user information P13 Security oversight P14 Addressing security vulnerabilities P15 Data breaches P17 Account Security (digital platforms)

# **Research Findings (1)**

## **Country Situation Overview**



# Country Situation Overview

Service Category	Rank	Platform / Service Name	Scores (domain average)	Service Type
Digital Platforms	1	Rakuten Market	32.55	e-commerce
	2	Dcard	32.39	Social media platforms
	3	Shopee	31.86	e-commerce
	4	104 Human Resource Bank	30.28	Human resource bank
	5	Bahamut	28.36	Social media platforms
	6	Xiaohongshu	26.13	Social media platforms
	7	518 Bear Work	25.21	Human resource bank
	8	Chick On Board	24.13	Human resource bank
	9	Plurk	22.93	Social media platforms
	10	<a href="#">momo.com</a>	20.37	e-commerce
	11	Ruten	19.19	e-commerce
	12	<a href="#">yes123.com</a>	17.14	Human resource bank
	13	Pchome Online	16.91	e-commerce
	14	<a href="#">books.com.tw</a>	12.43	e-commerce
	15	1111 Human Resource Bank	11.46	Human resource bank
	16	ETMall	11.37	e-commerce
	17	Yourator	10.83	Human resource bank
Telecom	1	FETnet	29.41	Post-paid mobile services
	2	Chunghwa Telecom	22.65	Post-paid mobile services
	3	Taiwan Mobile	22.15	Post-paid mobile services

# Country Situation Overview

## Corporate Digital Rights Performance: Taiwan v.s. Leading Global Players

- The Taiwanese market's local / regional services providers perform much worse than leading EU/US global players.
- Cross-domain comparison:
  - ▶ (F): Best performer, reflecting the democratic yet unruled internet environment
  - ▶ (G): Worst performer, highest variation: reflecting the lack of legal mandate in transparency
  - ▶ (P): Lowest variation: reflecting the existence of data protection regulations

	All Services Evaluated in the Taiwanese Market			
	Total Score	Domain Score		
		Governance (G)	Freedom of Speech and Information (F)	Privacy (P)
Mean ( $\bar{x}$ )	22.40	16.71	30.31	20.14
Coefficient of Variation ( $\sigma$ )	0.33	0.69	0.44	0.32

	All Services Evaluated in the Taiwanese Market			
	Total Score	Domain Score		
		Governance (G)	Freedom of Speech and Information (F)	Privacy (P)
Mean ( $\bar{x}$ )	46.83	44.29	52.89	43.32
Coefficient of Variation ( $\sigma$ )	0.28	0.46	0.37	0.28



# Country Situation Overview

## Indicator Trends: Governance

- Lack of Policy commitment (G1)
  - ▶ Companies Rarely reference international human rights standards
  - ▶ Narrow conceptualization of human rights risks and the related stakeholders
- Lake of grievance and remedy mechanisms (G6a)
  - ▶ No awareness of how business practices could impact consumers' human rights
  - ▶ Only provide general customer service / feedback channels

All Services Evaluated in the Taiwanese Market		
Indicator	Mean (x̄)	Coefficient of Variation (σ)
G1 Policy commitment	22.50	0.79*
G4b Impact assessment: Processes for policy enforcement	10.42	1.45
G6a Remedy	16.37	0.78*
G6b Process for content moderation appeals	17.13	1.30

# Country Situation Overview

## Indicator Trends: Freedom of Speech and Information

- High accessibility to terms of services (F1 a)
  - ▶ The rule of law in the private sector
  - ▶ Lack of assistance to users in understanding the content
- Processes of terms of service enforcement is often explained, albeit missing key information (F3a)
  - ▶ Often mentioned: prohibited content/behaviors and potential consequences
  - ▶ Often missed: violation detection mechanisms, proportionality statements, and decision-making process

All Services Evaluated in the Taiwanese Market		
Indicator	Mean (x̄)	Coefficient of Variation (σ)
F1a Access to terms of service policies	73.33	0.2*
F1b Access to advertising	33.50	1.08
F1c Access to advertising	4.17	4.36
F3a Process for terms of service enforcement	40.09	0.39*
F5a Process for responding to government demands to restrict content or accounts	2.86	2.15
F8 User notification about content and account	24.12	1.30
F11 Identity policy	62.50	0.66*



# Country Situation Overview

## Indicator Trends: Privacy

- Adhere to minimum legal requirements
  - ▶ Policies are accessible but lack assistive tools (P1a)
  - ▶ Information about data collection, sharing, and user control and access are provided. But they are too little to be meaningful (P3a, P4, P5, P7, P8)
  - ▶ No policy on how to mitigate privacy risks caused by algorithms (P1b)
  - ▶ No notification policies about government demand for user information (P12)

All Services Evaluated in the Taiwanese Market		
Indicator	Meas ( $\bar{x}$ )	Coefficient of Variation ( $\sigma$ )
P1a Access to privacy policies	81.67	0.16*
P1b Access to algorithmic system development policies	0.00	_*
P2a Changes to privacy policies	11.88	1.31
P3a Collection of user information	47.50	0.43*
P3b Inference of user information	7.50	2.05
P4 Sharing of user information	50.63	0.32*
P5 Purpose for collecting, inferring, and sharing user information	34.00	0.54*
P6 Retention of user information	13.50	1.20
P7 Users' control over their own user information	10.56	0.39*
P8 Users' access to their own user information	18.13	0.41*
P9 Collection of user information from third parties	7.22	1.40
P10a Process for responding to government demands for user information	3.93	2.47
P11a Data about government requests for user information	1.75	2.75
P12 User notification about third-party requests for user information	0.00	_*
P13 Security oversight	35.83	1.13
P14 Addressing security vulnerabilities	3.33	3.00
P15 Data breaches	15.00	1.31
P17 Account Security (digital platforms)	19.61	1.41

# **Research Findings (2)**

## **Analysis by Service Type**



# Research Findings

## Social Media Platforms

- A diverse and internationalized market
- Local service providers perform better than their regional counterparts
  - ▶ Better policy accessibility and clearer content moderation policies (F1a, F3a, F8).
  - ▶ Unique ‘board manager’ mechanisms lead to better openness
- How do they compare with global giants?
  - ▶ Lagging behind global platforms from the US
  - ▶ All platforms Should improve transparency in government content moderation demands (F5a)
  - ▶ A Chinese platform being the best performer in Privacy???

		Services Evaluated in the Taiwanese Market					Leading Global Services/		
		Dcard	Bahamut	Xiaohongshu	Plurk	Service Type Mean	Facebook	Twitter	Tencent Qzone
Rank (Total Score)		1	2	3	4				
Mean (Total Score)		32.39	28.36	26.13	22.93	27.45	59.04	58.03	25.65
Mean (Domain Score)	(G)	21.97	23.99	15.15	21.72	20.71	51.52	30.94	10.86
	(F)	57.23	34.52	29.93	28.57	37.56	72.87	86.82	37.07
	(P)	17.98	26.58	33.31	18.5	24.09	52.73	56.34	29.03



# Research Findings

## Social Media Platforms

Indicator content	Service				Mean
	Dcard	Bahamut	Xiaohongshu	Plurk	
G1 Policy commitment	16.67	16.67	16.67	50	25.00
G4b Impact assessment: Processes for policy enforcement	0	0	0	27.78	6.94
G6a Remedy	16.67	11.11	16.67	0	11.11
G6b Process for content moderation appeals	54.55	68.18	27.27	9.09	39.77
F1a Access to terms of service policies	100	66.67	50	50	66.67
F1b Access to advertising content policies	83.33	0	16.67	0	25.00
F1c Access to advertising targeting policies	83.33	0	0	0	20.83
F3a Process for terms of service enforcement	50	50	42.86	35.71	44.64
F5a Process for responding to government demands to restrict content or accounts	21.43	0	0	14.29	8.93
F8 User notification about content and account restriction	62.5	25	50	0	34.38
F11 Identity policy	0	100	50	100	62.50
P1a Access to privacy policies	83.33	83.33	66.67	50	70.83
P1b Access to algorithmic system development policies	0	0	0	0	0.00
P2a Changes to privacy policies	0	25	37.5	37.5	25.00
P3a Collection of user information	33.33	50	100	50	58.33
P3b Inference of user information	50	33.33	33.33	0	29.17
P4 Sharing of user information	50	62.5	100	62.5	68.75
P5 Purpose for collecting, inferring, and sharing user information	30	30	80	30	42.50
P6 Retention of user information	20	60	30	30	35.00
P7 Users' control over their own user information	12.5	18.75	18.75	6.25	14.06
P8 Users' access to their own user information	16.67	25	33.33	0	18.75
P9 Collection of user information from third parties	27.78	16.67	16.67	0	15.28
P10a Process for responding to government demands for user information	0	7.14	0	0	1.79
P11a Data about government requests for user information	0	0	0	0	0.00
P12 User notification about third-party requests for user information	0	0	0	0	0.00
P13 Security oversight	0	0	16.67	0	4.17
P14 Addressing security vulnerabilities	0	0	0	33.33	8.33
P15 Data breaches	0	0	50	33.33	20.83
P17 Account Security (digital platforms)	0	66.67	16.67	0	20.83



# Research Findings

## Human Resource Bank (Job-seeking Platforms)

- A place where people come to see only advertisements
- The most non-performing sector
  - ▶ The only highlight: best policy accessibility, especially for advertisement (F1a, F1b)
  - ▶ Worst governance and privacy performance among all types of digital platforms
- Privacy is the main concern
  - ▶ Many human resource banks do not notify users of policy changes (P2a)
  - ▶ Least transparency in data collection among all types of digital platforms (P3a)
  - ▶ Restrict user rights in requesting a copy of personal data (P8)

▶ Low Data security  
(P15, P17)

		Services Evaluated in the Taiwanese Market							Leading Global Services/Platforms
		104 Human Resource Bank	518 Bear Work	Chick On Board	<a href="#">yes123.com</a>	1111 Human Resource Bank	Yourator	Service Type Mean	Linkedin
Rank (Total Score)		1	2	3	4	5	6		
Mean (Total Score)		30.28	25.21	24.13	17.14	11.46	10.83	19.84	47.63
Mean (Domain Score)	(G)	12.5	16.41	15.28	8.08	8.33	2.78	10.56	36.49
	(F)	48.97	42.66	40.58	32.14	14.29	18.65	32.88	56.72
	(P)	29.38	16.54	16.54	11.2	11.76	11.06	16.08	49.67



Research Findings

Human Resource Bank (Job-seeking Platforms)

Indicator content	Service						Mean
	104 Human Resource Bank	518 Bear Work	Chick On Board	yes123.com	1111 Human Resource Bank	Yourator	
G1 Policy commitment	33.33	16.67	16.67	16.67	16.67	0	16.67
G4b Impact assessment: Processes for policy enforcement	0	22.22	22.22	0	0	0	7.41
G6a Remedy	16.67	22.22	22.22	11.11	16.67	11.11	16.67
G6b Process for content moderation appeals	0	4.55	0	4.55	0	0	1.52
F1a Access to terms of service policies	83.33	83.33	83.33	83.33	50	83.33	77.78
F1b Access to advertising content policies	70	83.33	83.33	66.67	0	0	50.56
F1c Access to advertising targeting policies	0	0	0	0	0	0	0.00
F3a Process for terms of service enforcement	57.14	64.29	64.29	42.86	35.71	28.57	48.81
F5a Process for responding to government demands to restrict content or	0	0	0	0	0	0	0.00
F8 User notification about content and account restriction	83.33	25	12.5	0	0	0	20.14
F11 Identity policy	N/A	N/A	N/A	N/A	N/A	N/A	-
P1a Access to privacy policies	66.67	83.33	83.33	83.33	83.33	83.33	80.56
P1b Access to algorithmic system development policies	0	0	0	0	0	0	0.00
P2a Changes to privacy policies	0	0	0	0	37.5	0	6.25
P3a Collection of user information	33.33	66.67	66.67	33.33	33.33	16.67	41.67
P3b Inference of user information	0	0	0	0	0	0	0.00
P4 Sharing of user information	62.5	50	50	37.5	12.5	50	43.75
P5 Purpose for collecting, inferring, and sharing user information	80	40	40	10	20	10	33.33
P6 Retention of user information	10	30	30	0	0	10	13.33
P7 Users' control over their own user information	12.5	5.56	5.56	12.5	12.5	12.5	10.19
P8 Users' access to their own user information	25	16.67	16.67	8.33	12.5	16.67	15.97
P9 Collection of user information from third parties	5.56	5.56	5.56	0	0	0	2.78
P10a Process for responding to government demands for user information	0	0	0	0	0	0	0.00
P11a Data about government requests for user information	0	0	0	0	0	0	0.00
P12 User notification about third-party requests for user information	0	0	0	0	0	0	0.00
P13 Security oversight	100	0	0	16.67	0	0	19.44
P14 Addressing security vulnerabilities	33.33	0	0	0	0	0	5.56
P15 Data breaches	33.33	0	0	0	0	0	5.56
P17 Account Security (digital platforms)	66.67	0	0	0	0	0	11.11



# Research Findings

## E-Commerce Platforms

- A mostly local ecosystem with few regional players
- Regional platforms respect digital rights the most
  - ▶ Much better overall performance than local platforms
  - ▶ Outperform leading global platforms in governance
- Local platforms
  - ▶ Governance is the weakest (2 out of 3 worst performers among all are e-commerce)
  - ▶ Lack of transparency and user control in algorithm-based advertisement (F1c, P3b)

		Services Evaluated in the Taiwanese Market								Leading Global Services/Platforms	
		Rakuten Market	Shopee	<u>momo.com</u>	Ruten	Pchome Online	<u>books.com.tw</u>	ETMall	Service Type Mean	Amazon	Taobao
Rank (Total Score)		1	2	3	4	5	6	7			
Mean (Total Score)		32.55	31.86	20.37	19.19	16.91	12.43	11.37	21.13	30.37	40.71
Mean (Domain Score)	(G)	28.91	22.04	24.44	2.27	8.89	0.00	3.33	14.23	12.88	13.89
	(F)	46.13	44.64	16.67	42.16	25	18.06	11.11	29.11	45	64.19
	(P)	22.62	28.89	20.00	13.13	16.83	19.24	19.68	20.05	33.22	44.05



# Research Findings

## E-Commerce Platforms

Indicator content	Service						ETMall	Mean
	Rakuten Market	Shopee	<u>momo.com</u>	Ruten	Pchome Online	<u>books.com.tw</u>		
G1 Policy commitment	66.67	16.67	33.33	0	16.67	0	0	19.05
G4b Impact assessment: Processes for policy enforcement	22.22	2.78	0	0	0	0	0	3.57
G6a Remedy	22.22	27.78	40	0	10	0	10	15.71
G6b Process for content moderation appeals	4.55	40.91	N/A	9.09	N/A	N/A	N/A	18.18
F1a Access to terms of service policies	83.33	66.67	83.33	66.67	83.33	83.33	50	73.81
F1b Access to advertising content policies	66.67	83.33	0	66.67	50	0	0	38.09
F1c Access to advertising targeting policies	0	0	0	0	0	0	0	0.00
F3a Process for terms of service enforcement	50	42.86	16.67	50	16.67	25	16.67	31.12
F5a Process for responding to government demands to restrict content	14.29	0	0	7.14	0	0	0	3.06
F8 User notification about content and account restriction	62.5	75	0	62.5	0	0	0	28.57
F11 Identity policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-
P1a Access to privacy policies	100	100	83.33	83.33	83.33	100	83.33	90.48
P1b Access to algorithmic system development policies	0	0	0	0	0	0	0	0.00
P2a Changes to privacy policies	25	12.5	37.5	0	0	0	25	14.29
P3a Collection of user information	66.67	66.67	33.33	16.67	33.33	66.67	33.33	45.24
P3b Inference of user information	0	33.33	0	0	0	0	0	4.76
P4 Sharing of user information	62.5	50	50	50	50	50	50	51.79
P5 Purpose for collecting, inferring, and sharing user information	30	40	10	30	30	40	40	31.43
P6 Retention of user information	0	30	0	0	0	0	10	5.71
P7 Users' control over their own user information	6.25	12.5	12.5	6.25	6.25	6.25	12.5	8.93
P8 Users' access to their own user information	33.33	25	16.67	16.67	16.67	16.67	16.67	20.24
P9 Collection of user information from third parties	16.67	33.33	16.67	0	0	0	0	9.52
P10a Process for responding to government demands for user	0	0	0	0	0	0	0	0.00
P11a Data about government requests for user information	0	0	0	0	0	0	0	0.00
P12 User notification about third-party requests for user information	0	0	0	0	0	0	0	0.00
P13 Security oversight	66.67	16.67	66.67	0	66.67	0	66.67	40.48
P14 Addressing security vulnerabilities	0	0	0	0	0	0	0	0.00
P15 Data breaches	0	33.33	16.67	0	16.67	0	16.67	11.90
P17 Account Security (digital platforms)	0	66.67	16.67	33.33	0	66.67	0	26.19



# Research Findings

## Telecoms (pose-paid mobile service)

- A state-controlled business filed
- Digital rights protection lags behind EU/US providers
- Good governance, but seriously lack of transparency
  - ▶ Best performer in governance mostly due to its size and legal mandates for telecoms
  - ▶ While engaging in target-advertising activities, relevant information about data sharing and inferring is lacking (F1c, P1b, P3b)
  - ▶ Albeit the scale is minimum, there is no awareness of transparency in blocking websites (F5a)
  - ▶ No detailed statistics and policies on government requests to personal information (P10a, P11a, P12)

		Services Evaluated in the Taiwanese Market				Leading Global Services/Platforms					
		FET Net	Chunghwa Telecom	Taiwan Mobile	Service Type Mean	AT&T	Deutsche Telekom	Orange	Telefónica	Telenor	Vodafone
Rank (Total Score)		1	2	3							
Mean (Total Score)		29.41	22.65	22.15	24.74	45.37	37.87	30.51	71.53	42.28	45.7
Mean (Domain Score)	(G)	48.15	24.07	25.93	32.72	48.15	42.59	40.74	92.59	38.89	48.15
	(F)	21.53	18.06	15.28	18.29	46.82	20.24	29.37	64.29	56.35	50.4
	(P)	18.56	25.82	25.24	23.21	41.13	50.79	21.41	57.72	31.61	38.55



# Research Findings

## Telecoms (pose-paid mobile service)

Indicator content	Service			Mean
	FET Net	Chunghwa Telecom	Taiwan Mobile	
G1 Policy commitment	50	33.33	33.33	38.89
G4b Impact assessment: Processes for policy enforcement	44.44	22.22	44.44	37.04
G6a Remedy	50	16.67	0	22.22
G6b Process for content moderation appeals	N/A	N/A	N/A	-
F1a Access to terms of service policies	66.67	83.33	66.67	72.22
F1b Access to advertising content policies	0	0	0	0.00
F1c Access to advertising targeting policies	0	0	0	0.00
F3a Process for terms of service enforcement	62.5	25	25	37.50
F5a Process for responding to government demands to restrict content or accounts	0	0	0	0.00
F8 User notification about content and account restriction	0	0	0	0.00
F11 Identity policy	N/A	N/A	N/A	-
P1a Access to privacy policies	66.67	100	66.67	77.78
P1b Access to algorithmic system development policies	0	0	0	0.00
P2a Changes to privacy policies	0	0	0	0.00
P3a Collection of user information	50	33.33	66.67	50.00
P3b Inference of user information	0	0	0	0.00
P4 Sharing of user information	37.5	37.5	37.5	37.50
P5 Purpose for collecting, inferring, and sharing user information	20	30	40	30.00
P6 Retention of user information	0	0	10	3.33
P7 Users' control over their own user information	12.5	6.25	12.5	10.42
P8 Users' access to their own user information	16.67	16.67	16.67	16.67
P9 Collection of user information from third parties	0	0	0	0.00
P10a Process for responding to government demands for user information	7.14	28.57	35.71	23.81
P11a Data about government requests for user information	5	20	10	11.67
P12 User notification about third-party requests for user information	0	0	0	0.00
P13 Security oversight	100	100	100	100.00
P14 Addressing security vulnerabilities	0	0	0	0.00
P15 Data breaches	0	66.67	33.33	33.33
P17 Account Security (digital platforms)	N/A	N/A	N/A	-



# Recommendations

# Conclusion & Recommendation

- Local and Regional service providers' digital rights performance leaves much to be desired. Key areas of improvement include:
  - ▶ Governance mechanisms: to mitigate risks of human rights violation in business practices.
  - ▶ Data collection and sharing policies: to reflect companies' actual practices
  - ▶ Data about government requests of content moderation and user information: to win trust from users
- Major human rights risks associated with the rising platform economy are still overlooked. Key areas of improvement include:
  - ▶ Policies related to the implementation and development of algorithmic systems
  - ▶ User control in information collection, processing and use