

# PrivacyPassport™ Methodology

## INTRODUCTION

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hoggo introduces its Privacy Passport™ and hoggo Trust Grade™ solution for vendors and buyers. This solution monitors vendors' privacy policies and practices and produces a Trust Grade for each one, while also monitoring regulatory developments and best practices and adjusting the Trust Grade accordingly.



## METHODOLOGY

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Our methodology for calculating a hoggo Trust Grade and any changes to it are published on our website, along with the version number, in order to provide transparency and allow you to compare our methodologies and practices.

## OUR MISSION AND GOAL

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hoggo aims for maximum accuracy and provides comprehensive Privacy Passports and Trust Grades so you can assess related risks, mitigate them and work with trustworthy service providers easily. We also reach out to the vendor's representatives to gain a better understanding of their privacy practices, as well as claim and create passports, so companies can boost trust and close deals faster. For accuracy and reliability, we combine automated and human review processes.

As a business, hoggo aims to transition privacy from a burdensome legal requirement to an business advantage while also boosting customer trust by improving businesses' privacy practices.

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## SCORING METHODOLOGY FOR “TRUSTHUB” “PRIVACY PASSPORTS”

hoggo assesses vendors and their services by gathering data from various publicly available online sources which we then feed into our specialized AI model designed to sift through the information and extract what's relevant.

Our hoggo risk calculation algorithm is then applied to this data, allowing us to evaluate a vendor's privacy practices and assess how mature or risky their operations are. Ultimately, this assessment leads to the calculation of a risk score for the vendor's “Privacy Passport” and “Trust Grade”.

The information shown in the “Privacy Passport” reflects scores calculated by the hoggo risk calculation algorithm in real time.

## SCORING METHODOLOGY FOR “MY VENDORS”

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When hoggo customers use the “MyVendors” feature, a separate tailored assessment is conducted and they receive a a risk “Impact Score” unique to them. This unique score is determined by a combination of:

- A** The information found in a vendor's Privacy Passport score;
- B** The vendor's hoggo Trust Grade, and
- C** **Additional details that our customers provide about their engagement with the vendor.** These details encompass factors like the customer's location, the specific services they're obtaining from the vendor, the kinds of personal data they'll be sharing with the vendor, and the location and type of data subjects linked to this personal data.

As such, “MyVendors” scores are not a one-size-fits-all metric; they are inherently different for each customer, and they can change based on their particular situation or use case, as well as ongoing monitoring of the vendor's privacy practices.

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## REVIEW METHODOLOGY

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We put a lot of effort into making sure we gather and thoroughly examine as much information as possible about a vendor's privacy practices. Our goal is to provide a fair and comprehensive overview of the vendor's privacy practices, their level of maturity, and the risks involved by engaging with them.

To achieve this, we assure that humans are involved in our AI review process to ensure that the results we obtain truly represent a vendor's privacy practices (based on the information available to us). We gather our data from different sources such as (but not limited to):

**A**

Publicly available data from sources such as a vendor's website, third party review platforms, enforcement authorities (including Data Protection Authorities), and publicly available legal documents;

**B**

Information provided by vendor when claiming its TrustHub Privacy Passport and completing missing information;

**C**

From hoggo customers using hoggo's MyVendor feature to manage their vendors.

It's important to acknowledge that it's not always easy to obtain all the necessary information from a company to create a complete picture. As a result, some of the passports we generate may not accurately reflect a vendor's true status.

A vendor's Trust Grade can be negatively impacted by the fact that we do not have enough information about them and that they do not claim and complete their passport with missing information. As a result, the passport will be marked as "incomplete," indicating that crucial information is missing, so the score may not accurately represent the actual score. In situations where vendors claim passports and fill out information inconsistent with their ongoing policies, we present this conflict to our users.

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## HOGGO POINT RATING METHODOLOGY

The scores and Trust Grades are calculated by combining the total score of proprietary scoring components that are divided into different categories, where each category has a certain weight assigned to it based on its importance. You can find more details on the categories in the chart below:

Category	Metrics	Description
<b>Scope of Services</b>	<ul style="list-style-type: none"> <li>• Public Policies</li> <li>• GDPR info pages</li> <li>• Data Processing Addendums</li> <li>• Information provided directly by the vendors or our customers.</li> </ul>	Includes topics such as: Types of services/sector, categories of data subjects, types of personal data, role of vendor, and legal basis for processing
<b>Internal Privacy Practices</b>	<ul style="list-style-type: none"> <li>• Public Policies</li> <li>• GDPR info pages</li> <li>• Data Processing Addendums</li> <li>• Information provided directly by the vendors or our customers.</li> </ul>	Includes topics such as: Privacy policy, data subject rights, DPO appointments, 3rd party certificates, employee privacy training, and retention practices.
<b>3rd Party Transfers</b>	<ul style="list-style-type: none"> <li>• Public Policies</li> <li>• GDPR info pages</li> <li>• Data Processing Addendums</li> <li>• Information provided directly by the vendors or our customers.</li> </ul>	Includes topics such as: Location of 3rd parties, reason for transfers, contractual measures, sub-processor locations and obligations

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## HOGGO POINT RATING METHODOLOGY

Category	Metrics	Description
<b>Security Measures</b>	<ul style="list-style-type: none"> <li>• Public Policies</li> <li>• GDPR info pages</li> <li>• TOMs</li> <li>• Security Info pages</li> <li>• Data Processing Addendums</li> <li>• Information provided directly by the vendors or our customers.</li> </ul>	<p>Includes topics such as: Incident response plans, breach notifications, and technical and organizational measures (TOMs)</p>
<b>Processing Locations</b>	<ul style="list-style-type: none"> <li>• Public Policies</li> <li>• GDPR info pages</li> <li>• Data Processing Addendums</li> <li>• Information provided directly by the vendors or our customers.</li> </ul>	<p>Includes topics such as: Location of vendor, locations of vendor affiliates, vendor processing location, international transfer mechanism</p>
<b>Privacy/Legal Exposures</b>	<ul style="list-style-type: none"> <li>• Publicly available data from sources such as a vendor’s website, third party review platforms, enforcement authorities (including Data Protection Authorities), and publicly available legal documents.</li> </ul>	<p>Includes topics such as: Past breaches, enquiries, and legal actions</p>

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## UPDATING VENDOR INFORMATION IN “PRIVACY PASSPORTS”

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Should you find irregularities in the information presented in your company’s “Privacy Passport”, or, due to updates to your services or company, there is certain information you would like to have displayed in the “Privacy Passport”, please follow the following steps.

A

If you (or someone else from your company) hasn’t claimed your company’s “Privacy Passport” on [hoggo](https://hoggo.com), please do so by using the “Claim Passport” button at the top of your company’s Privacy Passport.

B

Once you have claimed your company’s “Privacy Passport” please make sure to review the information included and either confirm it reflects the current status of your company, or update the information.

C

Once you have updated the information click the “Update” button.

By clicking update, you agree and accept that all the information you have provided is correct and that you have the authority to bind your company legally. In the event that your confirmation is false, you will be personally held responsible for any damages caused to either hoggo or any third party that relied on the information you provided or have confirmed to be correct.

All updates to metrics affecting our algorithms or the “Privacy Passport” scores are updated on an ongoing manner due to the ever developing privacy sector.

These updates are necessary due to events such as regulatory updates, new court cases, enforcement authority decision, or newly published guidelines. Vendors that have claimed their “Privacy Passport” and have confirmed their contact details, will be updated on the score they had prior to the updates and, should the updates have affected the score, their new one following the update.

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## FINAL WORDS

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The information in this document is meant to act as a general overview and description on our scoring system for our “TrustHub” “Privacy Passport” and how you can manage it and improve your score.

All the rights regarding the scoring, methodology methods and names (“Privacy Passport”, “Trust Grade”, “Trust Hub”) are reserved to hoggo and cannot be used by others.



Read more  
about Trust Hub



Read more about  
My Vendors



Read more  
about our team

## Questions & Concerns

Should you have any questions, please don't hesitate to reach out at [hello@hoggo.io](mailto:hello@hoggo.io).

