



## Privacy Policy

Sedex is committed to protecting the privacy of its website users and members. Sedex uses any personal & company information you or your company submit to us in accordance with this policy. The General Data Protection Regulation (GDPR) requires us to ensure that any personal and company information you provide us is processed fairly and lawfully. Sedex is the data controller in relation to any personal information you submit.

### 1. Who are we? Data protection

- 1.1. For the purposes of this policy, the terms "**controller**", "**data controller**", "**processor**", "**data processor**", "**data subject**", "**personal data**", "**processing**" and "**appropriate technical and organisational measures**" shall have the meanings given to them as set out in the Data Protection Legislation in force at the time.
- 1.2. This clause sets out the framework for the sharing of personal data between you, your company and Sedex ("**the Parties**"). For the purposes of this policy the parties anticipate that they are data controllers in common. Each discloser of personal data ("**Data Discloser**") acknowledges that it may disclose personal data of data subjects in the categories described in Schedule [1] of the Data Protection Act 2018; GDPR regulation ("**Shared Personal Data**"). Such Shared Personal Data shall be disclosed to parties and Users ("**Data Recipients**") in the course of receiving the Services and undertaking the Member and Auditor activities as set out in this Agreement and as more particularly described in Schedule [1] of the Data Protection Act 2018; GDPR regulation ("**Agreed Purposes**").

Each party shall comply with all the obligations imposed on a data controller under the Data Protection Legislation.

- 1.3. Each party shall:
  - 1.3.1. Ensure that all necessary notices are provided, and consents obtained to enable lawful transfer of any Shared Personal Data to the Data Recipients including, where necessary and appropriate, their responsible employees, consultants, professional advisers, sub-contractors or suppliers and any third

parties engaged by them to perform obligations in connection with this Agreement (“**Permitted Recipients**”);

- 1.3.2. Ensure that Shared Personal Data transferred by it is adequate, relevant and not excessive; is accurate, and where necessary, kept up to date.
- 1.3.3. Give notices (as required by the Data Protection Legislation) to any data subject whose personal data may be processed under this Agreement of the nature of such processing and such notices must be sufficient to permit the parties to process personal data respectively in order to exercise their rights and comply with their obligations under the Agreement. This includes giving notice that, on the termination of this Agreement, personal data relating to them may be retained by or, as the case may be, transferred to one or more of the Permitted Recipients, their successors and assignees;
- 1.3.4. Process the Shared Personal Data only for the Agreed Purposes;
- 1.3.5. Not disclose or allow access to the Shared Personal Data to anyone other than the Permitted Recipients (other than as required by law);
- 1.3.6. Ensure that all Permitted Recipients are subject to written contractual obligations concerning the Shared Personal Data (including obligations of confidentiality) which are no less onerous than those imposed by this Agreement;
- 1.3.7. Use reasonable endeavours (unless prohibited by law) to notify the other party if it is obliged to make a disclosure by law, such notification to be made in advance of such disclosure or, (if not practicable) immediately thereafter.
- 1.3.8. Ensure that it has in place appropriate technical and organisational measures, to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- 1.3.9. Not transfer any personal data received from the Data Discloser outside the EEA unless the transferor ensures that:
  - (i) The transfer is to a country approved by the European Commission as providing adequate protection pursuant to Article 45 of the GDPR; or
  - (ii) There are appropriate safeguards in place pursuant to Article 46 of the GDPR; or

(iii) One of the derogations for specific situations in Article 49 of the GDPR applies to the transfer.

1.4. Each party shall assist the other in complying with all applicable requirements of the Data Protection Legislation. In particular (without limitation), each party shall:

- Consult with the other party about any notices given to data subjects in relation to the Shared Personal Data;
- Promptly inform the other party about the receipt of any data subject access request in relation to the Shared Personal Data, unless prohibited by law;
- Provide the other party with reasonable assistance (at the cost of the other party) in complying with any data subject access request;
- Not disclose or release any Shared Personal Data in response to a data subject access request without (wherever possible or lawful to do so) first consulting the other party and reasonably considering their views;
- Assist the other party, at the cost of the other party, in responding to any request from a data subject and in ensuring compliance with its obligations under the Data Protection Legislation including those relating to security, breach notifications, impact assessments and consultations with supervisory authorities or regulators;
- Notify the other party promptly of any complaints received from data subjects or threatened proceedings relating to compliance with the Data Protection Legislation in respect of the Shared Personal Data.
- Notify the other party without undue delay (and in the case of a data security breach within 48 hours) on becoming aware of any breach of the Data Protection Legislation concerning the Shared Personal Data;
- Use compatible technology for the processing of Shared Personal Data to ensure that there is no lack of accuracy resulting from personal data transfers;
- Maintain complete and accurate records and information to demonstrate its compliance with this clause 12; and

- Provide the other party with contact details of at least one employee as point of contact and responsible manager for all issues arising out of the Data Protection Legislation, including the training of relevant staff, the procedures to be followed in the event of a data security breach, and the regular review of the parties' compliance with the Data Protection Legislation.

1.5. Members and Auditors hereby agree that:

- Sedex may use any data, information, statistics or other related information deduced from the Shared Personal Data which is anonymised or pseudonymised for its own purposes and at its sole discretion, provided such use is not in breach of Data Protection Legislation ("**Anonymised Data**");
- The Anonymised Data and any further information created, derived or generated from it shall be the sole and exclusive property of Sedex.

1.6. In accordance with the Membership Rules the parties agree that directors of the Board, Grievance Committee members, officers and employees of Sedex and the Members will have access to anonymous trend data covering, amongst other things, issues, countries, processes and sectors.

## 2. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please direct your correspondence to:

[communications@sedexglobal.com](mailto:communications@sedexglobal.com)

## 3. How do we collect personal data?

- Directly:  
We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us their business card, complete our online forms, subscribe to our newsletters and preference centre, register for webinars, attend meetings or events we host, visit our offices or apply for open roles. We may also obtain personal data directly when, for example, we are establishing a business relationship, performing professional services through a contract, or through our hosted software applications.
- Indirectly:  
We obtain personal data indirectly about individuals from a variety of sources, including recruitment services and our members. We may attach personal data to our customer relationship management records to better

understand and serve our business members, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.

- *Recruitment services.* We may obtain personal data about candidates from an employment agency, and other parties including former employers, and credit reference agencies.

#### **4. What categories of personal data do we collect?**

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

- Personal data:

Here is a list of personal data we commonly collect to conduct our business activities:

- Contact details (e.g. name, company name, job title, work and mobile telephone numbers, work email and postal address).
- Professional details (e.g. job title).
- Financial information (e.g. for company membership payment).

#### **5. What lawful reasons do we have for processing personal data?**

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- Contract:  
We may process personal data in order to perform our contractual obligations.
- Consent:  
We may rely on your freely given consent at the time you provided your personal data to us.
- Legitimate interests:  
We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These include:
  - *Delivering services to our members* – To deliver the professional services our members have engaged us to provide.
  - *Direct marketing* – To deliver timely market insights and speciality knowledge we believe is welcomed by our business members, subscribers and individuals who have interacted with us.
- Legal obligations and public interests:

We may process personal data in order to meet regulatory and public interest obligations or mandates.

## **6. Why do we need personal data?**

It's important to us we are transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports related to our professional services.
- Promoting our professional services, products and capabilities to existing and prospective business members.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Personalising online landing pages and communications we think would be of interest based on interactions with us and Sedex member firms.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Authenticating registered users to certain areas of our sites.
- Seeking qualified candidates, and forwarding candidate career inquiries to our HR team, which may be governed by different privacy terms and policies.
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.
- Contacting journalists regarding company press releases, invitations to annual press parties, highlighting messages that may be of interest on specific industry topics.
- Complying with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud and other forms of financial crime.

## **7. Do we share personal data with third parties?**

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Parties that support us as we provide our services (e.g. providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services).
- Payment services providers.

- Marketing services providers.
- Law enforcement or other government and regulatory agencies (e.g. HMRC) or to other third parties as required by, and in accordance with, applicable law or regulation.
- Recruitment services providers.

## **8. Do we transfer your personal data outside the European Economic Area?**

We store personal data on servers located in the European Economic Area (EEA). We may transfer personal data to reputable third-party organisations situated inside or outside the EEA.

## **9. Do we use cookies?**

Our website does use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our [cookie policy](#)

## **10. What are your data protection rights?**

Your data protection rights are highlighted here. To submit a data request please follow this [link](#).

- Access:  
You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- Correction:  
You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Delete:  
You can ask us to delete your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- Processing restrictions:  
You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data.
- Data portability:  
In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.
- Automated Individual Decision-making:

You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, significantly affected you.

- Right to Object to Direct Marketing including Profiling:  
You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you. Please email [communications@sedexglobal.com](mailto:communications@sedexglobal.com) if you wish to opt-out.
- Right to Withdraw Consent:  
You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

## **11. What about personal data security?**

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information.

If you have access to parts of our website or use our services, you remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the Internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

## **12. How long do we retain personal data?**

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Unless a different time frame applies as a result of business



need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for two years. We will dispose of personal data in a secure manner when we no longer need it.

### **13. Do we link to other websites?**

Our website may contain links to other sites, such as our data processing platform Sedex Advance, or partner organisations.

### **14. Do we change this privacy policy?**

We regularly review this Privacy Policy and will post any updates to it on this webpage. This Privacy Policy was last updated 06<sup>th</sup> September 2018.