



Sustainable Fibre Alliance

Data Protection Policy

February 2022

The following document is the Sustainable Fibre Alliance's Data Protection Policy with regards to its members and website users. As required under the terms of the GDPR legislation, the purpose of this policy is to inform you about the nature, extent, and purposes of the collection and use of personal data.

We recognise that data protection is an important issue and have therefore outlined our practices regarding the personal and organisational information we collect when you become a member of the SFA, participate in the SFA's Chain of Custody or Individual Work Programmes, or when you use our website. The SFA commits to this Policy for the use and protection of information provided by you.

The Data Protection Policy will be reviewed from time to time in line with the SFA's commitment to continuous improvement. If you have any comments or questions about this notice, feel free to contact us at info@sustainablefibre.org.

1. Terms

SFA	Sustainable Fibre Alliance
Personal Data	Any information relating to an identified or identifiable natural person
Organisation Data	Any information relating to an identified or identifiable organisation/company/business

2. Personal data that we process

When you apply for SFA membership, personal data (such as name, phone number, and email address) and organisation data is collected from your application form, through email conversations, as well as through any other form of communication exchange between you and the SFA.

We also collect personal data if you share it with us on your own initiative, e.g. when using the SFA's website and Cashmere Connect, when executing an agreement with the SFA, contacting us, making donations, or registering for membership meetings and newsletters. For technical reasons, your browser will transmit a series of data to us as soon as you access

our website. This includes the page visited, the name and version of the browser used, and your IP address.

Statistical information (such as number of users, pages most accessed and timing of access) is collected through the SFA's online platforms (including the SFA website, SFA Members' Area and Cashmere Connect), and processed into aggregated data. Individual persons or organisations are not identified in this collection.

The SFA may use third party providers for data collection, storage and processing (e.g. Salesforce for the SFA's Chain of Custody transactions). For more information on how Salesforce uses and stores data, please see [HERE](#).

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our work	Name, email	Consent - you have given your active consent.
Making a payment or donation	Name, email, address, payment information	Legitimate interests - this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message.
Signing up as a member	Name, email	Contract - by paying your membership fees you have entered into a contractual relationship with us as set out in our membership terms and conditions.
Functionality of Websites	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process.
Submitting and Recording Transactions	Name, contact information, transaction	Ensure the integrity and smooth operation of the SFA's Chain of

for the SFA's Chain of Custody Programme	numbers, information about the sale or purchase of cashmere fibre, certification status of companies	Custody programme which requires each transaction of cashmere fibre to be recorded. This collection of data allows the SFA to trace certified fibre from herder to store and provide evidence of the fibre's certification status if requested. Information on available fibre, contact information and certification status of organisations will also be shared on the website Cashmere Connect.
Filling in forms and surveys	Email, Name, organisation data related to cashmere sourcing and strategy	Consent - you have provided consent for the collection of this data for analytical and research purposes
Conference and meeting participation	Name, email, organisation data, video content, images, written content	Anyone participating in an SFA hosted event or meeting will have given consent for their information to be collected for the purpose of accessing the event. Any content shared at an SFA event will be collected and stored with consent of the individual or organisation. This includes but is not limited to exhibition booth materials, speaker scripts, recorded videos, live video recordings and notes.

3. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle payments ;
- manage and verify the integrity of our Chain of Custody traceability programme.
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- Provide members with information about meetings, events, application support, and member support.
- Access specific account/profile information for administrative purposes.

Email addresses of SFA members may be shared in group communications between the SFA and its members (for instance, in the organisation of workshops and communications with specific SFA working groups).

Information transmitted by your browser is used for security reasons, specifically to defend against attacks on our web server. Aggregated and reporting data is used to enable the monitoring and evaluation of the SFA services and system, understand progress and challenges, identify successes, improve efficiency, and ensure high value.

The SFA may use third-party providers for data collection, storage and processing. All data collected may be kept and used by the SFA and its contracted third-party provider for non-commercial purposes.

The SFA will not sell or otherwise disclose your personal, organisation or reporting information to third parties except as described above.

4. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

If you give us false or inaccurate information and we suspect fraud, we will record this and have the right to cooperate with law enforcement agencies should legal actions be required.

5. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Personal data will be stored as long as it is necessary for us to provide the specific service (e.g. during your membership, and for the duration of the applicable retention periods). It will be deleted afterwards unless a longer storage is required by laws.

7. Cookies & usage tracking

The SFA website uses SSL to help protect (and encrypt) any data sent between your browser and the site. We have achieved the Government approved 'Cyber Essentials' compliance and are fully insured with public/product liability, employee liability, and professional indemnity insurance.

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your login details, recording what you have put in an online form, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

6. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of our newsletters and bulletins).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.