

## **DATA CONTROL SOP**

### **1. GENERAL**

This standard operating procedure covers data control issues within Fairtrade Ireland.

### **2. DATA PROTECTION**

#### **2.1 Legislation Compliance**

Fairtrade Ireland complies with the General Data Protection Regulation (EU) 2016/679 (GDPR).

#### **Accountability**

Fairtrade Ireland is responsible for the information under its control.

The Licensing Director has responsibility for the protection of Licensing related data including GDPR compliance.

#### **Purposes**

Data is collected for the purposes of licensing, approving and for promoting Fairtrade products and Fairer Trade Relations in general.

#### **Collection**

Data is collected by fair and lawful means. Only relevant data is collected, that is no more data will be collected than is necessary for the stated purposes.

#### **Retention**

Data will not be retained for longer than is necessary for the stated purposes though data will be retained to demonstrate historical trends in Fairtrade, as follows:

1. Information relative to financial transactions need to be maintained for up to 7 years, which would include details of whom payments were made to and received from (suppliers, etc.)
2. Information on Commercial contacts should be reviewed, updated and deleted, as relevant every 7 years.

#### **Use of Data**

The publicly available Fairtrade Ireland Confidentiality Policy outlines the use and disclosure of data.

### **Consent**

The Licensing Contract obtains the Licensee's consent to collect and use data.

FLOCERT has obtained consent from organisations for the information from INTACT, its certification database, that it shares with Fairtrade Ireland.

Where other organisations and individuals provide Fairtrade Ireland with email, phone and address information unrequested then Fairtrade Ireland considers consent has been given to collect this information.

### **Access**

Licensees, organisations and individuals have a right to ask for access to data held on them.

### **Accuracy**

Fairtrade Ireland has measures to ensure that data is as accurate as is practically possible. The measures are outlined in this document as well as the Fairtrade Ireland Quality Management SOP and the Fairtrade Ireland Document Control SOP.

Licensees may contact the Licensing Director to request a correction if they believe data is not accurate.

Other individuals may contact the Quality Manager to request a correction if they believe data is not accurate.

### **Safeguards**

Personal information is protected through appropriate security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

### **Compliance**

Licensees may lodge a complaint with the Licensing Director if they believe that Fairtrade Ireland is not compliant with the GDPR.

### **Openness**

This Data Control SOP and the Confidentiality Policy are publicly available documents.

## **2.2 Training**

All staff are trained on data protection.

## **2.3 Former Employees**

When a staff person, consultant or volunteer no longer works for Fairtrade Ireland their logins to systems are disabled on their last day or as soon as access is no longer required.

- Connect
- Salesforce
- Quickbooks
- Intact

## **3. DATA OWNERSHIP**

### **3.1 Connect**

All data in Connect where Fairtrade Ireland is the Home NFO is owned by Fairtrade Ireland.

This data is generally confidential and may only be shared as set out in the Fairtrade Ireland Confidentiality Policy.

### **3.2 Salesforce**

All data in Salesforce is owned by Fairtrade Ireland.

This data is generally confidential and may only be shared as set out in the Fairtrade Ireland Confidentiality Policy.

## **4. DATA QUALITY CHECKS**

The Licensing Director is responsible to ensure that the following data quality checks are performed. This activity will be delegated to the Licensing Manager, but overall responsibility remains with the Licensing Director

### **4.1 Connect Product Quality Check**

#### **4.1.1 Fairtrade Ireland Licensed Product Validation Status**

At least once every 6 months the Licensing Manager checks the Validation Status of finished and intermediate products.

Once a year the percentages of products, recipes and artworks Approved / Declined / Incomplete / In Review are reviewed. Any anomalous changes, such as unexpected increases in the number of records declined, incomplete or in review, are investigated and resolved or the explanation recorded.

All products that are currently being sold with a Fairtrade Mark should be up to date in Connect.

#### **4.1.2 Ingredient Validation Status**

At least once a year the Licensing Manager checks the Validation Status of ingredients.

The percentages of ingredients, recipes and artworks Approved / Declined / Incomplete / In Review are reviewed. Any anomalous changes, such as unexpected increases in the number of records declined, incomplete or in review, are investigated and resolved or the explanation recorded.

#### **4.2 Salesforce Quality Check**

Once a year the Commercial Relations Manager records:

- Current number of Licensees
- Number of new Licensees since last check
- Number of delicensing since last check
- The current number of Licensees is consistent with the number of licensees at the last check plus the number of new Licensees less the number delicensed.

Once a year the Commercial Relations Manager checks:

- There are no operators with a Licensee status that should not be Licensed.
- There are no operators with a De-Licensed status that should be Licensed.
- Licensee and Trader start dates are plausible.
- Licensee and Trader “Industry” and “Product” are an accurate reflection of their operations.
- All Pure Licensees have Fairtrade Ireland as their “Certifier”.
- All certified licensees and traders should have FLOCERT as their certifier.
- All certified operators have a primary contact
- Licensees and Traders have the correct country location.

#### **4.3 Databases Cross Check**

Once a year the list of Licensees, Pure Licensees and Pure Traders is checked by the Licensing Manager and compared and updated across the following databases

- Connect
- Salesforce
- Intact Fairtrade Finder (Fairtrade International)

Possible discrepancies are:

- Certification status of an operator (certified and not certified)
- Licensing status of an operator (licensed and not licensed)
- FLO ID

## **5. DATA PROTECTION MEASURES**

All Fairtrade Ireland electronic documents are stored on the Fairtrade Ireland file server. No data is permanently stored on any personal computer or other device. Copies of data may be temporarily stored on a company computer for the purposes of a meeting or a presentation off site, however that information must be deleted once it is no longer needed for the meeting or presentation. Sensitive personal information may never be copied from the file server even temporarily.

### **5.1 Salesforce**

All user logins have username, password protection and dual authentication.

Other Salesforce data protection measures are handled by Salesforce.com Inc.

### **5.2 Connect**

All licensing staff have username and password protection.

Connect data protection measures are handled centrally by the ICC Support Team in Fairtrade Belgium, a National Fairtrade Organisation and Licensing Body of Fairtrade International who are subject to the General Data Protection Regulation (EU).

### **5.3 Fairtrade Ireland Fileserver**

Fairtrade Ireland personal computers have access to the fileserver and have username password protection, dual authentication and virus protection software.

The Fairtrade Ireland servers, firewalls and backup are managed by an external IT company.

### **5.4 Software no longer in use**

Software that is no longer in use is removed from our systems on an annual basis by our IT company.

## **6. DATA BREACH MEASURES**

### **6.1 Reporting to Data commissioner**

Fairtrade Ireland will notify the Data Commissioner of Ireland if we become aware of any breaches of security safeguards involving personal information that pose a real risk of significant harm to individuals.

Fairtrade Ireland, with third party investigator where necessary, will assess the real risk of significant harm of the data breach. Factors taken into consideration are the sensitivity of the personal information involved in the breach and the probability that the personal information might be misused.

### **6.2 Records**

Fairtrade Ireland will keep records of all breaches of security safeguards for two years, whether these breaches were reported to the Data Commissioner of Ireland or not. The record includes:

- date or estimated date of the breach
- general description of the circumstances of the breach
- nature of information involved in the breach
- whether or not the breach was reported to the Data Commissioner of Ireland /individuals were notified
- any other relevant specific details of the breach.

### **6.3 Informing Individuals**

Fairtrade will also inform individuals affected by such breaches if there is a real risk of significant harm to individuals. The notification will include the following information:

- a description of the circumstances of the breach
- the day on which, or period during which, the breach occurred or, if neither is known, the approximate period
- a description of the personal information that is the subject of the breach to the extent that the information is known
- a description of the steps that the organization has taken to reduce the risk of harm that could result from the breach
- a description of the steps that affected individuals could take to reduce the risk of harm that could result from the breach or to mitigate that harm
- contact information that the affected individual can use to obtain further information about the breach.

### **6.4 Informing Law Enforcement**

Fairtrade Ireland will notify law enforcement organisations of a data breach if law enforcement may be able to reduce the risk of harm that could result from the breach or mitigate the harm.