



**A GREENER WORLD**

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## **A Greener World GDPR Policy**

### **Introduction**

This document sets out A Greener World's (AGW) policy regarding the General Data Protection Regulation (GDPR). It outlines how AGW collects, processes and protects personal data in line with EU Regulation 2018/1725. AGW is committed to collecting, processing and storing data in line with the GDPR.

### **Why do we process personal data?**

AGW holds personal data in order to carry out its functions as an ISO/IEC 17065 accredited certifier and deliver services as a 501c3 non-profit organisation.

### **How do we receive consent to process data?**

AGW's mechanism for consent for recording data is voluntary submission of information directly to AGW.

### **Who do we hold information about?**

AGW holds information on individual operators: This contains their names and addresses and information on their business. AGW also holds information on its employed staff, contractors, donors, subscribers and customers. This information is collected to function as a certifier and non-profit organisation.

### **What information does AGW hold?**

AGW holds information from operators. This is typically the names of persons, addresses, job title, details of the business and if appropriate, their suppliers. To process invoices AGW may also have information on their payments if payment is submitted via physical cheque.

AGW also holds information on employees and contractors as well as donors, customers and subscribers. These are typically the name, address and banking details for payments to employees or contractors. Donor, subscriber or customer information generally includes name and address. AGW may hold financial information if the donor pays via physical cheque.

AGW maintains an internal GDPR Data Controller Information Spreadsheet for recordkeeping and compliance.

### **Who do we share the information with and why?**

AGW shares the information with governments where required. Operator data may be shared with other operators if consent is given. Certification details may be publicised or released where marketing preferences indicate that information may be shared. Certification details will be shared with contractors as needed to perform work functions. Where permission has been given, AGW may use the names, location and contact information of businesses in marketing communications. Financial information is never shared for any reason.

### **How long do we hold information for?**

AGW holds information on operators for as long as the operator remains certified with AGW. Following certification termination, AGW transfers the operator file to the AGW archives. Archives



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will remain active as needed for AGW reference. AGW will permanently delete operator files upon request and with approval of the Executive Director.

If it is not likely the operator will request re-certification in the future, AGW may delete the information after seven years. This period of time may be required in order to demonstrate historical compliance actions by AGW as required by the accreditation to ISO/IEC 17065.

AGW holds copies of physical bank cheques for a minimum of seven years, as recommended by the US government. Cheques that have bank account information redacted may be held indefinitely.

## **How do we keep information safe?**

AGW uses Microsoft Sharepoint, Microsoft 365 and Microsoft Dynamics. These systems use the Microsoft cloud which is encrypted. The servers that store the data are based in the USA. AGW may also use third-party data management systems that are GDPR compliant.

AGW does not store any data on a server based within the company's offices or on user laptops except for very short temporary use before being uploaded to the cloud. AGW also has a policy of training staff and requires laptops to be stored securely and locked when not in use. Any data on a laptop must be put in the desktop recycle bin once uploaded to SharePoint and deleted once no longer required.

## **Training**

AGW Staff attend internal training regarding data processing and how to keep it safe. This is carried out on an annual basis with the training being recorded and subsequently available for reference. The training covers the 7 principles of GDPR as well as the practical application of the requirements.

## **Privacy Policy**

Please see the privacy policy available on AGW's website here: <https://agreenerworld.org/privacy-policy/>

## **Data Retention**

AGW only retains information on operators, leads, employees and contractors for as long as necessary. This varies depending on the data. Records are maintained internally in the AGW GDPR Data Controller Information Spreadsheet.

## **Data Security**

AGW requires users to maintain good data management and to attend training annually. Users are required to keep work equipment secure and out of sight when not in use. Equipment must also be locked when not in use. Users will also get prompts to require regular password changes. Data used and processed must also only be used in the process of carrying out work for AGW. AGW must be informed by team members of any data loss as soon as possible after the data loss has occurred.

## **System Use Procedures**

New users are introduced and trained in the systems they will be required to use. These include but are not limited to Microsoft Office 365, Microsoft Dynamics, Microsoft SharePoint, Constant Contact and Kindful. Users may only use systems once a contract, Confidentiality and Non-Disclosure



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agreement and a conflict of interest agreement have all been signed. New users will also receive AGW's GDPR training.

### **Data Processor Agreement**

Where AGW processes data on behalf of a company, for example as part of an Internal Control System or other group's scheme in order to carry out certification, AGW will have an agreement in place regarding how that data is received, processed and handled. The agreement will contain: The subject matter and the duration of the processing, the nature and purpose of the processing, the type of personal data and categories of the data subject and the controller's obligations and rights. The agreement requires signing by both parties.

### **Governance**

AGW has a specific team that meets as needed to discuss any areas of data protection. This group may amend policy as well as discuss specific issues.

### **Data Sharing**

Within the application form, a check box is used to inform AGW if a certification applicant does not wish for their data to be shared via press releases, social media or the AGW website.

### **Data Subject Rights**

Individuals have the right to view, rectify or erase their data by request to AGW.

### **Data Requests**

AGW will reply to a requests to view, edit or erase third-party data within one month.

### **Data Breaches**

Should a data breach occur, A Greener World will take the following actions within 72 hours of becoming aware of such breach, and as soon as practically possible. AGW will: (a) Notify potentially impacted users via email. (b) Notify potentially impacted users via in-site notification. (c) Report the breach to the applicable authorities or regulatory body.

### **GDPR and Compliance Monitoring**

AGW has a data team that meets as needed to discuss data policy and operate the Data Protection Impact Assessment (DPIA). This follows the process of: Identification, description of processing, consider consultation, assess necessity and proportionality, identify and assess risks, identify measures to mitigate risk, sign off and record outcomes, integrate outcomes into the plan and finally keep under review.