

Privacy Policy

1. General

In this Privacy Policy references to "Sedex", "our" and "we" mean Sedex Information Exchange Limited, a company incorporated and registered in England and Wales (No. 05015443), whose registered office is 5 Old Bailey, London, England, EC4M 7BA. We are part of a group of companies (the "**Sedex Group**") and we operate in the United Kingdom from our registered office address. We are the controller of your personal data.

References to "you" or "your" means any individual whose personal data we process in connection with the users of this website and provision of the Sedex Platform and includes individuals employed by our members and affiliate audit companies and individuals whose personal data is processed in connection with the provision of information to members.

This Privacy Policy (together with any other documents referred to on it) sets out the basis on which we collect and use personal data about you.

It describes in detail who is responsible for the personal data that we collect about you, the nature of the personal data we collect and how we will use it. We will also set out who we disclose it to and your rights and choices in relation to your personal data.

In this Privacy Policy where we use the words personal data we use these words to describe information that is about you and which identifies you.

The personal data that we process tends to consist of:

- Name and contact details of individuals who use our website
- Names and contact details of individuals who are employed or engaged by our members ("Members") and affiliate audit companies ("Auditors")
- Personal data about other individuals who we interact with (e.g. details of individuals whose personal data is collected as part of the SMETA Report Template and SMETA CAPR templates such as site contacts and auditor team names).

You may submit your personal data to us directly, or indirectly via an organisation that you are employed or engaged by or otherwise in connection with our services.

Sedex is committed to protecting your privacy. Sedex uses any personal data you or your organisation submit to us in accordance with this policy.

This Privacy Policy is intended to satisfy our obligations to tell you about how we use your personal data in accordance with data protection legislation.

You have the **right to object** to our use of your personal information in certain circumstances. Please see the **What are your data protection rights?** section below for a summary of your right to object (along with your other rights under data protection legislation) and the details of who to contact if you want to exercise them. Please see the **Who can you contact for privacy questions or concerns?** section if you need to get in touch.

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

We have appointed a Data Protection Officer whose role in relation to data protection includes informing and advising us and those of our employees who are involved in processing personal data of their obligations under data protection legislation. The Data Protection Officer is the Sedex Company Secretary.

If you have questions, comments or complaints about this Privacy Policy or how we handle personal data, please direct your correspondence to the Data Protection Officer at: communications@sedexglobal.com

You also have the right to complain to the Information Commissioner's Office who can be contacted on 0303 123 1113. Please also see www.ico.org.uk

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 Members, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.

Members and Auditors. We may obtain personal data about employees or individuals otherwise engaged by Members and Auditors. This personal data includes names and contact details of those individuals.

Recruitment services. We may obtain personal data about candidates from an employment agency, and other parties including former employers, and credit reference agencies this information includes your name, contact details, details included in your CV and third party references.

ZoomInfo: We may obtain personal data about Individuals from a third party organisation called ZoomInfo (which collects personal data as a data controller in its own right from publicly available sources). This personal data is transferred to us as an independent controller. When we receive your personal data we use it as set out in this privacy policy and in particular to contact you for marketing purposes. This personal data consists of your name and business contact details.

4. What categories of personal data do we collect?

We may obtain, and then use, personal data about individuals through their 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.

Here is a list of the information we commonly collect to conduct our business activities:

Type of Personal Information	Examples
Contact information	Name, company name, job title, work and mobile telephone numbers, work email and postal address
Professional details	Job title

5. How do we process your personal data?

Under data protection legislation we can only use your personal data if we have a proper reason to do so (this is also known as a legal basis). We have set out our reasons for using your personal data below.

You have the **right to object** to our use of your personal information at any time. Please see the **What are your data protection rights?** section below for a summary of your right to object and the details of who to contact if you want to exercise them. Please see the **Who can you contact for privacy questions or concerns?** section if you need to get in touch.

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 where we have a contract with an individual.

- **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 Members, subscribers and individuals who have interacted with us
- Compliance with applicable legal and regulatory obligations, and any guidelines, standards and codes of conduct - for example, by carrying out background checks or otherwise preventing, detecting or investigating fraud or money laundering
- Improvement and development of our business operations and service offering, or those of a third party
- Protection of our business, shareholders, employees and customers, or those of a third party - for example, ensuring IT network and information security
- Analysing competition in the market for our services - for example, by carrying out research, including market research.

- **Legal obligations and public interests:**

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

Where we process your personal data on the legal basis of our **legitimate interests**, we have carefully considered and assessed your rights and freedoms which require protection of your personal data in respect of each specific purpose. Having undertaken this assessment, we have determined that our legitimate interests are not overridden by your rights under data protection legislation. If you would like further information about how we have balanced your rights and freedoms against our legitimate interests, please get in touch using the details in the **Who can you contact for privacy questions or concerns?** section above.

We may be required to obtain your personal data to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. If you do not provide the relevant personal data to us, we may not be able to provide you with membership services or otherwise interact with you (e.g. in respect of audits you are involved in).

If you wish to change your marketing preferences and you do not wish to hear from us, please let us know by contacting us on the details provided in the **Who can you contact for privacy questions or concerns?** section above.

6. Why do we need personal data?

It's important to us that we are transparent when we collect and use personal data, and that we tell you why we need it and more specifically the purposes for which we process it. These typically include:

- Providing professional advice and delivering reports related to our professional services
- Promoting our professional services, products and capabilities to existing and prospective 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 our Members
- 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 for the purposes set out above. 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.

We may share your personal data with other third parties, for example:

- in the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets
- if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal data held by us will be one of the transferred assets
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our legal rights under any contract we have with you.

Where we act as an independent controller of your personal data we will use your personal data for our own purposes. Sometimes third parties and other companies in the Sedex Group will act as controllers of your personal data that we collect. This is where they determine the purposes and means of processing your personal data. They will use your personal data for their own legitimate purposes as described in this Privacy Policy.

8. Do we transfer your personal data outside the UK?

We store personal data on servers located in the UK and the European Economic Area (EEA). We may transfer personal data, including to third-party organisations, outside of the UK including to the EEA.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. For further details, see [here](#) and [here](#) for compliance with the UK GDPR. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to us and any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

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?

You have certain rights with respect to your personal data. The rights will only apply in certain circumstances and are subject to certain exemptions.

Your rights are highlighted below. To submit a data request please follow this link.

- Access:

You have the right to receive a copy of your personal data that we hold about you and information about how we use it, subject to certain exemptions.

- Rectification:

You have the right to ask us to correct your personal data that we hold where it is incorrect or incomplete.

- Erasure:

You have the right to ask that your personal data be deleted in certain circumstances. For example:

- Where your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise used
- If you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal data
- If you object to the use of your personal data (as set out below)
- If we have used your personal data unlawfully
- If your personal data needs to be erased to comply with a legal obligation.

- Processing restrictions:

You have the right to suspend our use of your personal data in certain circumstances. For example:

- Where you think your personal data is inaccurate but only for so long as is required for us to verify the accuracy of your personal data
- The use of your personal data is unlawful and you oppose the erasure of your personal data and request that it is suspended instead
- We no longer need your personal data, but your personal data is required by you for the establishment, exercise or defence of legal claims
- You have objected to the use of your personal data and we are verifying whether our grounds for the use of your personal data override your objection.

- Data portability:

You have the right to obtain your personal data in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.

The right only applies:

- To personal data you provided to us
- Where we rely on the following legal bases
- Consent
- For the performance of a contract

- When the use of your personal data is carried out by automated (i.e. electronic) means.

- Right to object:

Right to object to the use of your personal data (including to object to direct marketing, automated decision making and profiling)

You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example:

- Where you have grounds relating to your particular situation and we use your personal data for our legitimate interests (or those of a third party)
- If you object to the use of your personal data for direct marketing purposes. We may need to keep some minimal information to comply with your request to cease marketing to you. Please email communications@sedex.com if you wish to opt-out.

- Right to Withdraw Consent:

You have the right to withdraw your consent, to one or more forms of processing, at any time where we rely on consent to use 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.

- Right to complain to the relevant data protection authority:

If you think that we have processed your personal data in a manner that is not in accordance with data protection legislation, you can make a complaint to the data protection regulator. In the UK this is the Information Commissioner's Office (ICO) and they can be contacted on 0303 123 1113 or please see www.ico.org.uk.

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, and 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. Where appropriate, we will give you reasonable advanced notice of any changes.

This Privacy Policy was last updated August 2022.