

**Privacy policy notice**  
**HRDD Working Group**  
**22 March 2020**

Center of Excellence (CoE), which facilitates the work of the Human Rights Due Diligence Working Group (hereafter HRDD WG), under the auspices of Fairtrade Finland, collects **personal information from individuals:**

1. who have indicated their willingness, by contacting the CoE, to become a member of the HRDD WG or wish to be informed of its work.
2. who have subscribed to the HRDD WG newsletter.

For more information about what personal data we process and how it is processed, as well as your rights, visit our register descriptions:

[HRDD WG membership register description](#)

[HRDD WG newsletter register description](#)

## HRDD WG membership register description

### **1. Controller:**

Center of Excellence c/o Fairtrade Finland  
Kuortaneenkatu 1  
FIN-00520 Helsinki  
FINLAND

### **2. Representative of the Controller/contact person**

Meri Hyrske-Fischer, Human Rights Coordinator  
[meri.hyrske-fischer@fairtrade.fi](mailto:meri.hyrske-fischer@fairtrade.fi)

Tytti Nahi

[tytti.nahi@reilukauppa.fi](mailto:tytti.nahi@reilukauppa.fi)

### **3. Name of the register**

HRDD WG membership register

### **4. What personal information we can collect**

- First name and last name
- Name of the Organization the individual is associated with
- Title/position in the organization
- Country
- Email address
- Membership of the HRDD WG subgroup(s)

### **5. How we use the data**

- To update on the work of the HRDD Working Group and its subgroups.
- To update on HRDD related work by other Fairtrade bodies.
- To share information on external developments related to HRDD, such as new studies as well as national, regional and global HRDD policy developments.

- To inform of any capacity building opportunities, events and campaigns organized around HRDD.

## **6. Legal basis for processing personal information**

When we communicate via email, we do this with your **consent**.

Consent is expressed when an individual contacts the CoE staff

- a) to become de facto active member of the HRDD WG **or**
- b) to obtain information of the HRDD WG and its subgroups' work (e.g. leadership team member).

## **7. How we keep your personal information safe and who has access to it**

Data is compiled in an Excel Worksheet (=register) and is digitally stored in the ICT system of Fairtrade Finland.

Only authorized staff have access to your personal information, and only if essential. They are trained and understand the policies, processes and protocol for keeping it safe.

There are times when our emails to you may contain links to other **external sites**. We are not responsible for their privacy policies. There may be information that can personally identify you. Check their privacy notice to learn more.

## **8. How long we keep the information?**

If you request that we stop sending you communications, we will remove your personal data from our register.

You can opt-out from our email communication by contacting the representative of the controller: [meri.hyrsk-fischer@fairtrade.fi](mailto:meri.hyrsk-fischer@fairtrade.fi) or [tytti.nahi@reilukauppa.fi](mailto:tytti.nahi@reilukauppa.fi)

Should the Center of Excellence and/or Human Rights Coordinator's post be relocated from Fairtrade Finland to another Fairtrade organization, the data can continue to be stored and utilized for the purposes detailed above. If the Center of Excellence ceases to exist, your data will be destroyed.

## **9. How to access, correct or delete your personal information**

Data protection legislation allows you to request a copy of the personal information relating to you which is kept by the Center of Excellence at Fairtrade Finland.

Please email the representative of the controller if you would like to submit a request to:

- Tell that your personal data has changed (e.g. email address, position).
- Advise that we have incorrect, out-of-date or inaccurate details for you.
- Ask to stop sending you information or communications.
- Have your details removed from our register.

We will proceed with your request at latest within 14 days from receipt of your request.

## **10. Changes to this register**

We will review and update our register description at our discretion, when deemed necessary. Any significant changes to the way we treat your personal information will be made clear and will be emailed to you separately.

This membership register description has been created on 22 March 2020.

## HRDD WG newsletter register description

### 1. Controller:

Center of Excellence c/o Fairtrade Finland  
Kuortaneenkatu 1  
FIN-00520 Helsinki  
FINLAND

### 2. Representative of the Controller/contact person

Meri Hyrske-Fischer  
[meri.hyrske-fischer@fairtrade.fi](mailto:meri.hyrske-fischer@fairtrade.fi)

Tytti Nahi  
[tytti.nahi@reilukauppa.fi](mailto:tytti.nahi@reilukauppa.fi)

### 3. Name of the register

HRDD WG newsletter register description

### 4. Newsletter

Center of Excellence (CoE), under the auspices of Fairtrade Finland, publishes a digital HRDD newsletter 3-4 times a year.

### 5. Subscription:

There are two ways to subscribe to the HRDD newsletter:

#### a. Automatic subscription:

- All HRDD WG members (as of 22 March 2020) will be automatically added as recipients of the newsletter, based on the decision of the HRDD WG meeting (5-6 March 2020) deciding the following: "A newsletter will be published once every two (2) months *and sent to all those interested in HRDD within the FT system.*"
- Membership in the HRDD WG or any of its subgroups is considered as a statement of interest outlined in italics above, authorizing automatic addition to the newsletter subscriber list.
- These existing contacts will be contacted via email including a link to update their privacy settings.

#### b. Sign up for the newsletter by clicking: <http://eepurl.com/g3jg41> and authorizing a written consent to receive newsletters.

### 6. What personal information we can collect:

- Name of the Organization the individual is associated with
- Title/position in the organization
- First name and last name
- Email address

### How we use the data

- To update on the work of the HRDD Working Group and its subgroups.
- To update on HRDD related work by other Fairtrade bodies.

- To share information on external developments related to HRDD, such as new studies as well as national, regional and global HRDD policy developments.
- To inform of any capacity building opportunities, events and campaigns organized around HRDD.

### **Legal basis for processing personal information**

When sending information via newsletter, we do this with your **consent**.

You can opt-out from our newsletter communication by unsubscribing from the newsletter platform (Mailchimp) or by sending an email to [meri.hyrske-fischer@fairtrade.fi](mailto:meri.hyrske-fischer@fairtrade.fi).

### **How we keep your personal information safe and who has access to it**

Only authorized staff have access to your personal information, and only if essential. They are trained and understand the policies, processes and protocol for keeping it safe.

There are times when our newsletter to you may contain links to other **external sites**. We are not responsible for their privacy policies. There may be information that can personally identify you.

Check their privacy notice to learn more.

CoE is not transferring your personal data to any third party. Should the CoE and/or Human Rights Coordinator's post be relocated from Fairtrade Finland to another Fairtrade organization, the data can continue to be stored and utilized for the purposes detailed above.

We use Mailchimp as our newsletter platform. Mailchimp has its own privacy policy. For example, they use web beacons in the newsletter emails they send on our behalf, which enables tracking certain behavior, such as whether the email sent through the Service was delivered and opened and whether links within the email were clicked. More information, click: <https://mailchimp.com/legal/privacy/>

### **How long we keep the information?**

Personal data is stored until the individual remains subscribed to the newsletter (=is not opting-out), or as long as the newsletter service is provided.

### **How to access, correct or delete your personal information**

Data protection legislation allows you to request a copy of the personal information relating to you which is kept by the Center of Excellence/Fairtrade Finland.

Please email [meri.hyrske-fischer@fairtrade.fi](mailto:meri.hyrske-fischer@fairtrade.fi) if you would like to submit a request to:

- Tell us that your personal data has changed
- Advise us that we have incorrect, out-of-date or inaccurate details for you
- Ask us to stop sending you information or communications
- Have your details removed from our newsletter database.

The newsletter subscriber has the opportunity to unsubscribe each time s/he receives a newsletter or by sending an email to [meri.hyrske-fischer@fairtrade.fi](mailto:meri.hyrske-fischer@fairtrade.fi). In the latter case the CoE receives the right to delete the personal data within 14 days of reception of the request.

### **Changes to this register**

We will review and update our register description at our discretion, when deemed necessary. Any significant changes to the way we treat your personal information will be made clear and will be emailed to you separately.

This newsletter register description has been created on 22 March 2020.