

ZDHC Laboratory (Lab) and Certifier Management Platform CODE OF CONDUCT FOR REVIEW AND ASSESSMENT

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1. Introduction

Stichting ZDHC Foundation (**ZDHC Foundation**) is a not for profit organisation that facilitates the ZDHC Roadmap to Zero Programme (**Programme**) to advance towards zero discharge of hazardous chemicals in the textile, apparel, leather, and footwear industries (**Industry**) through the widespread implementation of sustainable chemistry, driving innovations and best practices in the Industry to protect consumers, workers, and the environment.

The ZDHC Lab and Certifier Management Platform (**Platform**) establishes a streamlined process for the application and maintenance of accepted Conformance Indicators for ZDHC MRSL and accepted Labs for ZDHC Wastewater. All steps regarding the application and acceptance process for all Labs and Certifiers are completed on this platform. These steps include and are not limited to: contact information, invoicing, applications, supporting documentation, review by the ZDHC review team, renewal of acceptance status, quality assurance/ quality control checks, due diligence processes, and signing of logo licensing agreements, non-disclosure agreements, and acceptance letters.

Both the ZDHC MRSL and ZDHC Wastewater Guidelines are subject to change. They are updated as needed for example, to expand the materials and processes covered, and/or to add substances that should be phased out of the value chain. As such, requirements for conformance guidance for both the ZDHC MRSL and ZDHC Wastewater Guidelines are subject to change accordingly. When this occurs, all ZDHC Accepted Labs and Certifiers are required to reapply for acceptance at the end of their acceptance period.

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By applying for Acceptance as a Lab or Certifier you are stating that you are a representative of a Lab or Certifier. Please read this Code of Conduct carefully. By confirming your consent you agree, on behalf of your entire organisation, to be bound by all the provisions stated herein.

Consent to Processing of Personal Data:

In the course of Registration or use of the ZDHC Lab and Certifier Management Platform you will be asked to provide Personal Data. By registering you declare your explicit consent to the processing of the Personal Data within the ZDHC Lab and Certifier Management Platform. The consent may be withdrawn at any time which will not affect the lawfulness of the processing before the consent was withdrawn.

ZDHC Foundation declares that all Personal Data will be stored and processed in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

For more details see the ZDHC Privacy Policy (Annex B).

2. Definitions

- 2.1. Acceptance means that the Lab or Certifier is accepted and acknowledged by ZDHC Foundation as having demonstrated the ability to attain and maintain the performance and quality standards established by the ZDHC Foundation for the ZDHC MRS L Conformance Guidance or Wastewater Testing.
- 2.2. **Acceptance Letter** means the letter issued by ZDHC Foundation and signed by the Submitting Entity and the ZDHC Foundation to formalise Acceptance.
- 2.3. Acceptance Process means the process established by ZDHC which is applied to new applications for Acceptance and Acceptance renewals.
- 2.4. **Group** means any Lab group managed remotely from the Lab itself, with a management team responsible for multiple Labs in different locations.
- 2.5. **Individual Lab** means any Lab that is being managed by a Group, and needs approval from the Group representative before any review.
- 2.6. **Outsourced Lab** means any third party Lab, to whom a Lab outside of that which was hired to facilitate testing, has outsourced the testing process. This can be another Lab

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from the same Group or a Lab that is not affiliated with that which was hired to facilitate testing for a facility or formulator.

2.7. Personal Data means Data within the meaning of Art. 4 (1) of Regulation (EU) 2016/679.

2.8. Single Lab means any Lab that is not part of any Group and that applies as a single entity.

2.9. Submission means any and all information that is added and sent for review through the ZDHC Lab and Certifier Management Platform.

2.10. Submitting Entity means any legal entity, organisation, or individual submitting information via the ZDHC Lab and Certifier Management Platform after registration to the platform.

2.11. ZDHC Lab and Certifier Management Platform means the web-based tool enabling Labs and Certifiers to apply for and request Acceptance by submitting information related to the business and detection capacity of the Lab or Certifier.

3. Review and Assessment of Applications for Acceptance

Submitting Entity agrees to participate in the Acceptance Process established by ZDHC Foundation for reviewing and assessing applications submitted by Submitting Entity via the ZDHC Lab and Certifier Management Platform within the Acceptance Process of ZDHC MRSL Conformance or Wastewater Testing. Review and assessment are solely subject to ZDHC Foundation's guidelines and criteria developed for the Lab and Certifier Acceptance Process. Submitting Entity will orient any comments, assessments and decisions made in the course of the Acceptance Process towards the principles therein.

Submitting Entity agrees that all information obtained in the context of the Acceptance Process is confidential and must not be used for purposes other than the review and assessment of Submissions within the applicable Acceptance Process

Acceptance Letter is issued to the Submitting Entity after successful completion of the Acceptance Process. Acceptance expires in accordance with date given in the Acceptance Letter unless renewed by successfully completing a new Acceptance Process.



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4. Lab and Certifier Management Platform; Access to and Use

Submitting Entity is granted a revocable, non-exclusive, non-transferable, non-sub-licensable right to use the ZDHC Lab and Certifier Management Platform. The user-ID and password issued to Submitting Entity may be used by this Submitting Entity only. Submitting Entity shall not disclose, lend or assign to any third party the user-ID and password for logging into the platform.

ZDHC Foundation provides the ZDHC Lab and Certifier Management Platform 'as is' without any warranty. ZDHC Foundation does not warrant that the operation of the Lab and Certifier Management Platform will be uninterrupted or error-free. To the fullest extent permissible under applicable law, ZDHC Foundation disclaims all representations or warranties, express, implied, and statutory, concerning the ZDHC Lab and Certifier Management Platform or otherwise related to these terms and conditions. Modifications and enhancements such as upgrades, functional enhancements, new features, and platform modifications may be implemented at the sole discretion of ZDHC Foundation.

ZDHC Foundation will ensure regular and ongoing maintenance of the ZDHC Lab and Certifier Management Platform to correct bugs or other errors in the platform. Maintenance will be scheduled so as to cause as minimal interference with usage as reasonably possible. During the maintenance, users may experience slowdowns or outages. Reasonable efforts will be made to complete maintenance within the designated maintenance window.

Responsibility for the accuracy of any and all data and information entered into the ZDHC Lab and Certifier Management Platform lies solely with the Laboratory or Certifier. Laboratory and Certifier warrants data and information submitted to the ZDHC Lab and Certifier Management Platform is accurate and reliable to the best of Lab's or Certifier's understanding and knowledge and agrees not to knowingly enter false or inaccurate data or information into the ZDHC Lab and Certifier Management Platform.

5. Additional Provisions

Governing Law and Jurisdiction. The participation of Submitting Entity in the Lab Acceptance process shall be governed by Dutch Law, without regard to the choice or conflicts of law provisions of any jurisdiction, and any disputes, actions, claims or causes of action arising out of or in connection with the use of the ZDHC Lab and Certifier Management Platform shall be subject to the exclusive jurisdiction of the courts located in the Netherlands.

Total Agreement. This Code of Conduct constitutes the entire agreement and understanding between Submitting Entity and the ZDHC Foundation with respect to the subject matter hereof and supersedes all prior or contemporaneous agreements, any representations or communications with respect to accessing the ZDHC Lab and Certifier Management Platform. The Code of Conduct may be amended by ZDHC Foundation and Submitting Entity will receive notification of such amendment. In order to access the ZDHC

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Lab and Certifier Management Platform, Submitting Entity will need to click “Agree” to the amended Code of Conduct.

Severability. In the event that any of the provisions contained in this Code of Conduct is held to be invalid, illegal, or unenforceable in any respect, such invalidity, illegality or unenforceability shall not affect any other provisions of this Code of Conduct, and this Code of Conduct shall be construed as if the invalid, illegal, or unenforceable provisions had never been contained in it.

6. Fees

The supplier will be charged a fee for the issuance/renewal of the Acceptance. The fee is per issuance/renewal and is specified in Annex A. ZDHC Foundation reserves the right to modify fees on notice. Fees are exclusive of taxes, levies, duties, governmental charges or expenses, including wire or bank expenses for payment.

7. Limitation of Liability

EXCLUDING DAMAGES ARISING FROM OR OUT OF GROSS NEGLIGENCE, WILLFUL MISCONDUCT OR FRAUD, IN NO EVENT SHALL ZDHC FOUNDATION LIABILITY EXCEED €50,000 (fifty thousand Euros). EXCLUDING DAMAGES ARISING FROM OR OUT OF GROSS NEGLIGENCE, WILLFUL MISCONDUCT OR FRAUD, TO THE FULLEST EXTENT PERMISSIBLE UNDER APPLICABLE LAW IN NO EVENT SHALL ZDHC BE LIABLE TO ANYONE FOR ANY INDIRECT, PUNITIVE, SPECIAL, EXEMPLARY, INCIDENTAL, OR CONSEQUENTIAL DAMAGES OF ANY TYPE OR KIND (INCLUDING LOSS OF DATA, REVENUE, PROFITS, USE OR OTHER ECONOMIC ADVANTAGE) ARISING OUT OF, OR IN ANY WAY CONNECTED WITH THE LAB AND CERTIFIER MANAGEMENT PLATFORM, INCLUDING BUT NOT LIMITED TO THE USE OR INABILITY TO USE THE LAB AND CERTIFIER MANAGEMENT PLATFORM, OR ANY INTERRUPTION, INACCURACY, ERROR OR OMISSION.

Annex A: Acceptance Fee on the ZDHC Lab and Certifier Management Platform

MRSL Acceptance - 850 Euro

Non-Contributor Wastewater Acceptance - 650 Euro

Contributor Wastewater Acceptance - Free

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Annex B - ZDHC Group Privacy Policy

Introduction

ZDHC Group¹ (**ZDHC Group**) is taking the opportunity to update its privacy policy² for services to make it easier to understand what information and data³ ZDHC Group collects and why (**Policy**). For ‘personal data’ (see below) this policy takes into account requirements of the EU General Data Protection Regulation (known as GDPR) and as provided for in the ZDHC Group Privacy Notice (Appendix A). This policy is included as part of the applicable User Terms and Conditions relating to ZDHC Group Services and is shared on relevant web-based Services.

This Policy is for users of ZDHC Group web-based platforms, products and services including and not limited to the ZDHC Gateway, ZDHC Academy, ZDHC Intranet (Contributors only), Implementation HUB Supplier Platform including Supplier to Zero Platform, ZDHC Group event registration tool (together called **Services**) and is intended to clarify the following:

- 1) the types of information collected by ZDHC Group;
- 2) how ZDHC Group uses, stores and processes collected information; and
- 3) how individuals (for personal data) and organisations can have their information reviewed, updated, or removed.

About ZDHC Group

The ZDHC Group works to enable the textile, apparel, and footwear (including leather) industries (the ‘Industry’) to implement sustainable chemical management best practice across the value chain, with the vision of the widespread implementation of sustainable chemistry, driving innovations and best practices in the Industry to protect consumers, workers and the environment. ZDHC Group believes that, providing guidelines, platforms and solutions, fostering collaboration and driving joint implementation among Industry stakeholders across the value chain, leads to improved chemical management in the Industry, and ultimately improves the livelihoods of consumers and workers, and the environment. ZDHC Group also carries out activities to drive implementation in the Industry of sustainable chemicals management guidelines, platforms, solutions and processes by offering training, consulting, awareness raising and advisory services.

In connection with these activities, ZDHC Group collects and processes different kinds of information and data from a range of different stakeholders including ZDHC Contributors, third party organisations that have an official (approved) role within our systems and platforms, Industry partners, users of ZDHC platforms and individuals acting on behalf of these organisations.

¹ ZDHC Group includes Stichting ZDHC Foundation, Implementation Hub B.V. and any other wholly or majority owned legal entities of either.

² This privacy policy covers a range of information and data types and including ‘personal data’ within the meaning of the EU General Data Protection Regulation.

³ Throughout this policy ZDHC Group uses the words ‘information’ and ‘data’ interchangeably and to mean the same thing.



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1. Types of Information Collected By ZDHC Group

ZDHC Group collects the following four types of information (including data) (**Information**).

Personal Information

Many of ZDHC Group Services require the user to sign up for an account. To create an account ZDHC Group may ask for personal Information such as name, email address, phone number.

Organisational Information

In the case where an individual signs up on behalf of an organisation (legal entity) such as a corporation, association or other organisation, ZDHC Group may ask for organisational information such as legal entity, place of business, registered address, address and contact details, bank and tax details etc.

Operational Information

Some of the Services provided by ZDHC Group relate to operational information such as general product information, test reports, and chemical management, sustainability and environmental information; users may be requested or required to upload such information.

Meta Information

While using ZDHC Group's Services or viewing content provided by ZDHC Group, ZDHC Group will automatically collect and store certain information in server logs; ZDHC Group files information such as internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp or number of clicks.

2. How Does ZDHC Group Use Information That Is Collected?

In general, all information collected by ZDHC Group aims at and is limited to providing/maintaining/improving Services or developing new Services in connection with ZDHC Group goals and activities (see About ZDHC Group). In pursuing this objective ZDHC Group may use the different types of Information as set out below.

Personal and Organisational Information

Both personal Information and organisational information are used exclusively to grant access to ZDHC Group's Services and to allocate any operations and/or transactions within these Services to a specific user. We always ask explicit consent, having given clear, transparent insight into what information will be used and how. For rights granted to data subjects in relation to personal data pursuant to GDPR please see Appendix A - ZDHC Group Privacy Notice.

Operational Information

Operational Information is used only to provide Services that enable and support ZDHC Group to pursue its mission and vision (see About ZDHC Group). In this context, ZDHC Group may use operational information for benchmarking and statistical purposes. Operational information is only disclosed to third parties to the extent that the information provider has agreed in advance to such disclosure e.g. by explicitly accepting applicable user terms and conditions. In that case, ZDHC Group will impose the obligation on the third party (to whom the information is disclosed) to only use the information for purposes related to the goals and objectives of ZDHC Group and with full recognition of the data providers intellectual property rights.

Meta Information



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Meta information is not linked to any identifiable information whether personal, organisational or operational. It is used exclusively to understand meta information and trends e.g. by producing statistical reports, monitoring Services and analysis.

Meta information will not be used for purposes other than those set out above unless one of the following circumstances applies:

1. The data provider/subject provides its express consent.
2. External processing: ZDHC Group provides information to its affiliates or other trusted businesses or persons to process it, based on ZDHC Group's instructions and in compliance with ZDHC Group Privacy Policy and any other appropriate confidentiality and security measures.
3. Legal reasons: ZDHC Group will share information with companies, organisations (including governmental authorities) or individuals outside ZDHC Group if ZDHC Group has a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental request, including outside of the EU. ZDHC Group would use meta information to
 - enforce applicable user terms of service, including investigation of potential violations
 - detect, prevent or otherwise address fraud, security or technical issues
 - protect against harm to the rights, property or safety of ZDHC Group, the Services users of the Services or the public, as required or permitted by law.

3. **How Can Users Access, Review and Update Information That ZDHC Group Has Collected?**

ZDHC Group strives to enable users of Services who deliver proof of their identity and authorisation to access, review and update Information that has been provided by them quickly and effectively unless this infringes the fundamental operating principles or objectives behind the Services in question.

For personal data the data subject should refer to the procedures outlined in the ZDHC Group Privacy Notice (Appendix A).

Appendix A

ZDHC GROUP PRIVACY NOTICE

Version 1.0 May 2020. Last Update: 11 May 2020

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Important Note: The current version of this Privacy Notice will always be available on <https://www.roadmaptozero.com/privacy-notice>. In the event of a discrepancy between the version in this Appendix the version online shall apply.

Introduction

This Privacy Notice explains the types of personal data⁴ we may collect about you when you interact with us at the ZDHC Group⁵ (ZDHC Group). It also explains how we store and handle personal data, and keep it safe.

We know that there's a lot of information here, however aim is to fully inform you on what personal data ZDHC Group collects, how ZDHC Group uses your data and importantly your rights in connection with your personal data. We hope the following sections will answer any questions you have but if not, please get in touch with us. See *What Are Your Rights?* section below for details of how to contact us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, and you're welcome to come back and check it whenever you wish.

The ZDHC Group works to enable the textile, apparel, and footwear (including leather) industries (the 'Industry') to implement sustainable chemical management best practice across the value chain, with the vision of the widespread implementation of sustainable chemistry, driving innovations and best practices in the Industry to protect consumers, workers and the environment. ZDHC Group believes that, providing guidelines, platforms and solutions, fostering collaboration and driving joint implementation among Industry stakeholders across the value chain, leads to improved chemical management in the Industry, and ultimately improves the livelihoods of consumers and workers, and the environment. ZDHC Group also carries out activities to drive implementation in the Industry of sustainable chemical management guidelines, platforms, solutions and processes by offering training, consulting, awareness raising and advisory services.

In connection with these activities, ZDHC Group collects and processes different kinds of information and data from a range of different stakeholders including ZDHC Contributors, third party organisations that have an official (approved) role within our platforms and solutions, Industry partners and individuals acting on behalf of those organisations.

With regard to the personal data we collect, we act as a controller of data processing. As such we are fully responsible for the adherence to the requirements of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – GDPR).

Our full contact details are:

Stichting ZDHC Foundation

Watersteeg 3,1012 NV, Amsterdam,The Netherlands

E-Mail: media@zdhc.org

⁴ Throughout this Privacy Notice we use the words data and information interchangeably and to mean the same thing.

⁵ This Privacy Notice applies to the activities of the ZDHC Group including Stichting ZDHC Foundation, Implementation Hub B.V. and any other wholly or majority owned legal entities of either.

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Our Basis for Holding Personal Data

The law on data protection sets out a number of different reasons for which an organisation may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent. For example, when you tick (check or select) a box to receive email newsletters. When collecting your personal data, we'll always make clear for you which data is necessary in connection with particular activities, platforms and solutions. You can also opt out at any time.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. Information such as your name, contact details or place of work may be needed as part of creating a contract with a ZDHC Group entity.

Legal compliance

If the law requires us to, we may need to collect and process your personal data. For example, we may need to hold onto your name, address, organisation data, and payments made to any ZDHC Group entity for auditing and tax purposes.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of operating the activities of the ZDHC Group and any related activities and services and which does not materially impact your rights, freedom or interests.

For example, if you set up an account in our event registration tool and purchase an event ticket from us:

- We will collect your address details and VAT number to generate your invoice;
- We will pass your name and job title onto a printer for printing an event name badge for attending an event we are hosting;
- We will use your email address details to send you the event agenda and any updates on the event
- We may ask for feedback on the event.

When Do We Collect Your Personal Data?

We collect your personal data in a range of circumstances amongst others:

1. When you visit our websites and platforms, and use your user account to:
 - Participate in ZDHC Group offered programmes, platforms and solutions e.g. assessment platforms such the Leader to Zero Programmes; stakeholder management platforms for Contributors and laboratories; and collaboration/engagement platforms such as the ZDHC Intranet or the MRSL Submission Platform and supplier platforms such as the Implementation HUB Supplier Platform.
 - Buy tickets to an event or meeting for example the ZDHC Annual Meeting, other ZDHC Group Meetings or events.
2. When you create an account with us on our platforms (or other systems) and/or when you need personal details changed or updated.
3. When your organisation applies to become and, if approved becomes, one or more of the following types of organisations, we request personal contact information which is in support of the organisational information and which is necessary for efficient management:

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- A ZDHC Contributor or Friend of ZDHC.
 - A ZDHC Accredited Training Provider (ATP).
 - A ZDHC Accepted Certification Standard (or Laboratory) within the ZDHC Gateway - Chemical Module.
 - A ZDHC Provisionally Accepted Laboratory within the ZDHC Gateway - Wastewater Module.
 - An Implementation HUB approved or accepted third party solution or service provider listed and/or profiled on <https://www.implementation-hub.org/>
4. When you download or install any apps we work with.
 5. When you register to attend a ZDHC hosted webinar or other virtual meeting or event being hosted remotely, digitally.
 6. When you contact us by any means with queries, complaints etc.
 7. When you ask one of our team or other relevant stakeholders to send you information or answer a query on ZDHC Group activities including and not limited to ZDHC Roadmap to Zero Programme or Implementation Hub activities, platforms and solutions.
 8. When you choose to complete any ZDHC Group surveys we send to you and request you to complete.
 9. When you agree to collaborate on creating a case study or any other marketing material, or participate in a pilot.
 10. When you download the official 'Detoxing the Fashion Industry for Dummies' book.

Before we get into more detail we want to be clear that we do not:

1. Collect the following personal data:
 - When you engage with us on our social media channels.
 - About children.
 - The great majority of personal data falling with the following categories of sensitive data: physiological data, mental identity, economic identity, social identity, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, sexual orientation, genetic data, biometric data or criminal offences/convictions.
2. Sell personal data to any third parties.

What Personal Data Do We Collect?

If you have a web account with us, e.g. on any ZDHC Group platform, the ZDHC Intranet or our event registration tool, we will collect: your name, billing/delivery address, email and telephone number. For your security and to reset your password (when requested by you) we also keep an encrypted record of your login password.

Details of your interactions with us through email, face to face, telephone/conference calls/webinars/virtual meetings and events will be stored on our customer relationship management system.

When you make a purchase on our event tool we will see some encrypted information on your credit or payment card number.

Where the law requires this, copies of documents you provide to us to prove your age or identity for example your passport / driver's licence. This is likely to include details of your full name, address, date of birth and a facial image, gender and nationality. All such provided data is not stored by us and is deleted after we have used it only for this legally required purpose.

Details of your visits to our websites or apps by way of an IP address.

Information gathered by the use of cookies in your web browser.

Of course, it's always your choice whether you share such personal data with us.

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How and Why Do We Use Your Personal Data?

We want to give you the best possible experience of dealing with the ZDHC Group. One way to achieve that is to create the richest picture we can of you by combining the data we have on you. We then use this to offer you opportunities to engage and/or collaborate that are most likely to interest you. For example, perhaps you don't want to become a ZDHC Contributor, and would rather engage in the ZDHC Gateway or perhaps become a ZDHC Accredited Training Provider or another third party approved solution/services provider for implementation activities. By gathering a certain amount of information, we can communicate and engage with you more effectively. The data privacy law allows this as part of our legitimate interest in understanding our stakeholders and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details about how to do that in the '*What Are Your Rights?*' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for. For example, if you've asked us for updates on events, but withdrawn your email address data, we may not be able to provide this kind of information. Or if you have registered to attend a ZDHC Group webinar or digitally hosted meeting or event and then removed contact details through which we would send you the link to join it.

Here are some more specific information on how we'll use your personal data and why:

1. To process any orders you make to attend a ZDHC Group hosted or co-hosted paid for event by using ZDHC Group event registration tools. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations. Your details may need to be passed to a trusted third party to provide a payment gateway for you to purchase an event ticket. We may keep your details for a reasonable period afterwards only to fulfil any contractual obligations such as refunds.
2. To respond to your queries, refund requests and complaints. Handling the information you send enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
3. To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.
4. To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
5. If we discover any criminal activity or alleged criminal activity, we will process this data for the purposes of preventing or detecting unlawful acts.
6. We always strive to protect the brand equity of any organisations who support the work of the ZDHC Group and will act immediately in the event of a breach of ZDHC Group guidelines thereof.
7. With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, telephone or otherwise about relevant events, meetings, sponsorships and so forth that may be of interest to you.
8. To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, and legally required information relating to your activities with the ZDHC Group. These messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

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9. To develop, test and improve the systems, services and offerings we provide to you. We'll do this on the basis of our legitimate business interests. For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.
10. To comply with our contractual or legal obligations to share data with law enforcement. For example, when a court order is submitted to share data with law enforcement agencies or a court of law.
11. To send you survey and feedback requests to help improve our services and activities. These messages will not include any promotional content and do not require prior consent when sent by email. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.

To build a rich picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across the ZDHC Group and third parties such as our data processors and as we have described in the section '*What Personal Data Do We Collect?*'. We do this on the basis of our legitimate business interest.

For example, by combining this data, this will help us decide which activities or content to share with you.

Sometimes, we'll need to share your details with a third party who is providing a service (such as a payment gateway). We do so to maintain our (contractual) obligation to you – for example to host and deliver a paid for event. Without sharing your personal data, we'd be unable to fulfil your request.

Combining Your Data For Personalised Direct Marketing

We want to bring you information most relevant to your interests at particular times. To help us form a better, overall understanding of your needs, we combine your personal data gathered across ZDHC Group as described above, for example your event ticket purchasing history. For this purpose, we combine the data that we collect directly from you with data that we obtain from third parties to whom you have given your consent to pass that data onto us. By doing so we practice automated decision-making within the meaning of GDPR.

How We Protect Your Personal Data

We know that data security matters to all our stakeholders. We treat your personal data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of the ZDHC intranet and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information is secured and tokenised to ensure it is protected.

We monitor our system for possible vulnerabilities and attacks, continuously enhance our data protection processes and carry out penetration testing to identify ways to further strengthen security.

How Long Will We Keep Your Personal Data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. Put another way, we will not hold onto or store personal data that is no longer needed.

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At the end of an appropriate and reasonable retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Here are some examples of customer data retention periods:

- Event Tickets - when you buy an event ticket, we'll keep the personal data you give us for a maximum of one year so we can comply with our legal and contractual obligations.
- Newsletter Subscriptions - when you have a regular subscription with ZDHC Group, we'll keep the personal data you give us for a maximum of three years so we can comply with any legal and contractual obligations.

Who Do We Share Your Personal Data With?

We sometimes share your personal data with trusted third parties such as contracted data processors. For example, payment gateways. Here's the policy we apply to these organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific contractually agreed services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them and monitor their activities to ensure your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our websites, platforms and other business systems.
- Operational companies such as delivery couriers.
- Companies who help us manage our electronic communications with you or through whom we deliver virtually hosted online ZDHC Group meetings and events.
- Payment gateway providers to facilitate handling payments for event tickets and other payments within our platforms and services.

We generally do not share your data with third parties for their own purposes and when we do it's in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party such as a collaboration partner for their direct marketing purposes.
- For example, if we run a joint event with another party, and you agree to receive direct communications from them e.g. following the SAC-ZDHC Manufacturer Forums.
- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take your privacy into consideration.

To help personalise your journey through our websites and platforms we currently use the following companies and/or products that will process your personal data as part of their contracts with us:



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ADEC Innovations; Amfori; consulting 1x1 GmbH; Google; Mailchimp; matomo Analytics; Concord; Copper; Poll Everywhere; SmartSheet; Stripe; Survey Monkey; Van Tunen & Partners; webflow; WeTransfer; Zoom; 6Connex.

In this context we may transfer your personal data to IT infrastructure located in the United States of America. The transfer is covered by adequacy decision (EU) 2016/1250 as of 12th July 2016. ZDHC's partners processing the personal data complies to the Privacy Shield Agreement.

What Are Your Rights?

You have the right to request:

1. Access to the personal data we hold about you, free of charge.
2. The correction of your personal data when incorrect, out of date or incomplete.
For example, when you withdraw consent, or object and we have no legitimate overriding interest, or the purpose for which we hold the data has come to an end (such as the end of an event).
3. That we stop using your personal data for direct marketing (either through specific channels, or all channels).
4. That we stop any consent-based processing of your personal data after you withdraw that consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.
5. Review by a ZDHC Group staff member of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).
6. In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

You always have the right to request a copy of any information about you that ZDHC Group holds at any time, and to have that information corrected if it is inaccurate.

To ask for your information or request it to be amended, please email media@zdhc.org, or update the setting in your online account.

If we choose not to action your request we will explain to you the reasons for our refusal.

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make pursuant to this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

How Can You Stop The Use Of Your Personal Data For Direct Communications?

There are several ways you can stop receiving direct communications e.g. our newsletters from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from us.
- Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.



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Contacting the Regulator

Finally, if you feel that your personal data has not been handled correctly by ZDHC Group, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Dutch Data Protection Authority (Dutch DPA):

Postal address

Autoriteit Persoonsgegevens

Postbus 93374, 2509 AJ DEN HAAG, The Netherlands

Telephone number: (+31) (0)70 888 85 00

Fax: (+31) (0)70 888 85 01

If you are based outside the Netherlands, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

Further queries?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

Email us at media@zdhc.org

Or write to us at ZDHC Foundation, Watersteeg 3, 1012 NV, Amsterdam, The Netherlands