

## **TOGETHER FOR SUSTAINABILITY AISBL**

### **PRIVACY NOTICE FOR SUPPLIERS AND AUDITORS**

Together for Sustainability AISBL ("**We**", "**TfS**", "**TfS Office**", "us", "our"), is committed to complying with EU Privacy Law. This privacy notice (the "**Notice**") describes how We process the Personal Data (as defined below) We collect from suppliers ("**You**") and auditors.

The Notice also covers the Personal Data collected from auditors in relation to the use of TfS OASIS (our database) and the Personal Data We collect from companies that are requested by TfS' members to undergo a TfS Audit according to the TfS Audit Program. The TfS Audit Program is administered by the TfS Office and We are a data controller. This means that We are responsible for deciding how We collect and use (process) Personal Data about You. We are required under GDPR to provide the information contained in this Notice.

#### **1. Processing of auditors' Personal Data in relation to the use of TfS OASIS**

We collect from data subjects working at auditors a username and password when they create an account on TfS OASIS – the Online Audit Sharing IT Solution We rely on to share TfS Audit Reports. We also collect the picture used for the TfS OASIS profile (for those auditors who use that function).

We do so based upon our legitimate interest, as We believe We have the interest in relying on TfS OASIS to manage the TfS Audit Program. When We collect and process Personal Data based on legitimate interest, data subjects have specific rights (see s.8 below for more information in that regard).

Your Personal Data are shared with ChainPoint, the online secure platform We rely on to share the TfS Audit Reports.

Please also read sections 4 to 12, as they contain other important information.

#### **2. What Personal Data do We collect about You?**

The Personal Data We collect about You are:

- (a) First name and last name;
- (b) Email address;
- (c) Name and address of the organization (office location) You belong to;
- (d) Function within the organization and your level within the organization;
- (e) Your professional office and mobile phone number;
- (f) Signature;
- (g) Country;

- (h) Username and password of Tfs OASIS, the Online Audit Sharing IT Solution (our database); The picture You upload on your Tfs OASIS profile (only if You make use of this function); and
- (i) Records of webinars where You might appear (i.e., your image and voice), for instance joint webinars We organize with Ecovadis or other workshops / events You might join.

We typically collect Personal Data directly from You, from the organization You belong, or from our members (your customers) when they provide us details of their suppliers for audit purposes. When We collect data from the organization You belong to or from our members, We do so under the assumption that specific measures have been put in place by such organizations to lawfully provide us with the your Personal Data.

3. **Why and how do We collect and process (use) your Personal Data? And on which legal basis?**

We use your Personal Data:

- (a) For the general purposes of conducting a Tfs Audit and to ensure that the Tfs' members (your customers) can reach out to the respective contacts at your site to work with You on sustainability improvements;
- (b) To review the Tfs Audit Report and CAP of the Tfs Audit You conducted to ensure that no confidential information such as customer/supplier relationships is accidentally disclosed;
- (c) To allow You to log in and access Tfs OASIS and upload a profile picture if You wish to do so;
- (d) To enable You to share your Tfs Audit Report and Corrective Action Plan ("**CAP**") with all the Tfs' members, allowing multiple customers to access your sustainability audit results all at once so that they can work together with You on sustainability improvements, in line with the purposes of Tfs; and
- (e) To invite You to login to Tfs Academy (our e-learning platform) for the first time.
- (f) To invite You to attend certain courses on Tfs Academy based on the results of the Tfs Audit.
- (g) To publish recorded webinars on Tfs Academy and support continuous learning for our community;
- (h) Invite You to meetings conducted with our workstreams and regional teams and coordinate them (including populating the attendees' list, recording the event and share the record with representatives of our members);

- (i) Invite You to our workshops and events (including populating the attendees' list, recording the event and share the record with representatives of our members); and
- (j) Establish and maintain communication with You.

We do so based upon our legitimate interest. We manage the TfS Audit Program in order to reduce the burden of multiple audit requests for information regarding your company sustainability performance and increase efficiency and transparency by sharing TfS Audit Reports with our members. By sharing your TfS Audit Report, You can work with your customers (TfS' members) on sustainability improvements. For this purpose, We use the TfS OASIS database, where auditors, members and suppliers can interact in relation to Audit Reports. With regard to TfS Academy, We think it is a great opportunity for our community to get access to our e-learning platform and improve your skills. We might also upload previously recorded webinars for the benefit of the TfS Academy users. In doing so, We considered your rights and expectations as a Data Subject and have assessed that your interest, fundamental rights and freedoms are not put at risk. When We collect and process your Personal Data based on legitimate interest, You have specific rights (see s.8 below for more information in that regard).

#### 4. **Change of purpose**

We will only use your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use your Personal Data for an unrelated purpose, We will notify You and We will explain the legal basis which allows us to do so (as well as your rights in relation to such further processing).

#### 5. **Which third-parties process your Personal Data? Do We Share, Disclose or Transfer Personal Data?**

In order to conduct our activities, We may have to share or disclose your Personal Data with third parties, including third-party service providers.

We share your Personal Data with:

- (a) IT experts who provide services to TfS Office, such as ChainPoint, the online secure platform We rely on to share the TfS Audit Reports (hosting TfS OASIS) and Docebo, the e-learning platform We rely on for our TfS Academy;
- (b) TfS members, when sharing the TfS Audit Reports; and
- (c) Audit companies We work with for the purpose of running the TfS Audit Program.
- (d) Virtual conferences platforms, such as Microsoft Teams.

ChainPoint relies on Microsoft Azure to store your Personal Data in the EEA.

When We transfer Personal Data outside of the EEA, We comply with EU Privacy Law and put safeguards in place, such as EU Standard Contractual Clauses. If You would like to know more about the measures We take to protect your Personal Data, You can contact us at [info@tfs-initiative.com](mailto:info@tfs-initiative.com).

## 6. **Data security**

We take appropriate technical and organisational measures to safeguard and protect your Personal Data, against unauthorised or unlawful processing and against accidental destruction, loss, access, misuses, damage and any other unlawful forms of processing of the personal data in our possession.

## 7. **How long will You retain my Personal Data?**

We retain your Personal Data in accordance with our Retention/Destruction Procedures and Policy. As a general principle, We keep your Personal Data only as long as it is necessary.

If You never access Tfs Academy, We will de-active your account after twelve months from its setup and delete it after two further months.

## 8. **Your rights in connection with Personal Data**

Under certain circumstances, by law You have the right to:

- (a) **Request access to your Personal Data.** This enables You to receive a copy of the Personal Data We hold about You and to check that We are lawfully processing it.
- (b) **Request correction of the Personal Data** that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
- (c) **Request erasure of your Personal Data.** This enables You to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where You have exercised your right to object to processing (see below).
- (d) **Object to processing of your Personal Data** where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes You want to object to the processing on this ground.
- (e) **Request the restriction of processing of your Personal Data.** This enables You to ask us to suspend the processing of Personal Data about You, for example if You want us to establish its accuracy or the reason for processing it.
- (f) **Request the transfer of your Personal Data** to another party (data portability).

If You are dissatisfied with any aspect of our handling of your Personal Data, You have the right to make a complaint at any time to the Supervisory Authority.

9. **How can You contact us?**

For more information, or if You have questions about your Personal Data, or on the way We collect and process Personal Data, or want to exercise any of your rights under this Notice, You can e-mail us at: [info@tfs-initiative.com](mailto:info@tfs-initiative.com).

10. **Effect of Notice and changes to Notice**

We may revise this Notice from time to time and any revisions will be made available to You on our website.

11. **Our contact details**

Together for Sustainability AISBL (TfS)  
Rue Belliard 40, bte 20  
1040 Brussels  
Belgium  
E: [info@tfs-initiative.com](mailto:info@tfs-initiative.com)

12. **Glossary**

In this Notice:

**"Data Subject"** means an identified or identifiable individual.

**"EU Privacy Law"** means the General Data Protection Regulation 2016/679 ("GDPR") and the Belgian national privacy laws, as amended from time to time.

**"Personal Data"** means for the purpose of this Notice, your first name, last name, email address, name and address of your organization, function within the organization, and your professional office and mobile phone number.

**"Processing"** means any operation performed on Personal Data, manually or by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**"Supervisory Authority"** means the Belgian Data Protection Authority or the relevant data protection authority of the Data Subjects' habitual residence or place of work.

**"TfS Audit", "TfS Audit Program", "TfS Audit Report"** have the meaning ascribed to such terms under the Audit Process' section of our website (<https://tfs-initiative.com/audit-process/>).

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