

# Data Protection Policy | Better Cotton Initiative

21 June 2019

## Orientation

**The following document is the Better Cotton Initiative Data Protection Policy with regards to its members and website users. The purpose of this policy is to inform you about the nature, extent, and purposes of the collection and use of personal data.**

This website (bettercotton.org) is operated by the Better Cotton Initiative (BCI), Ch. de Balexert 7-9, 1219 Châtelaine, Switzerland.

We recognise that data protection is an important issue and have therefore developed a Data Protection Policy (this Policy) to outline our practices regarding the personal and organisational information we collect when you become a BCI Member, access the services provided as part of this membership, or when you use this website. BCI commits to this Policy for the use and protection of information provided by you.

The Data Protection Policy will be reviewed from time to time in line with BCI's commitment to continuous evaluation and improvement. Updates will be posted in this document. If you would like any further information, or have any questions regarding this Policy, please contact us at [membership@bettercotton.org](mailto:membership@bettercotton.org)

## 1. What information do we collect?

When you apply for BCI membership, personal data<sup>1</sup> (such as name, phone number, and email address) and organisation data<sup>2</sup> is captured from your application form, through email conversations, as well as through any other form of communication exchange between you and BCI. Reporting information is also gathered from member reports on an annual basis.

We also collect personal data if you share it with us on your own initiative, e.g., when using our website, for purposes of executing an agreement, contacting us, or when registering for personalised services such as our quarterly newsletter.

In addition, for technical reasons, your browser will transmit a series of data to us as soon as you access our website. This includes, for instance, the page visited, the name and version of the browser used, and your IP address.

Statistical information (such as number of users, pages most accessed and timing of access) is collected through the BCI ICT platforms (incl. the website and the Better Cotton Platform) and processed into aggregated data. Individual persons or organisations are not identified in this collection.

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<sup>1</sup> Personal Data shall mean any information relating to an identified or identifiable natural person.

<sup>2</sup> Organisation Data shall mean any information relating to an identified or identifiable organisation/company/business.

## 2. Use of information collected

We use your data for several purposes:

- Personal and organisation data collected is used to enable BCI to deliver stated membership services and benefits (performance of a contract). This includes, but is not limited to, providing members with information about meetings, events, application support, member support, and access to specific account/profile information for administrative purposes. Email addresses of BCI members may be shared in group communications between BCI and its members (for instance, in the organisation of workshops and communications with specific BCI working groups).
- Information transmitted by your browser is used for security reasons, specifically to defend against attacks on our web server (legitimate interests). You can object at any time by contacting us. This data is stored for seven days and then anonymised. Aggregated and reporting data is used to enable the monitoring and evaluation of the BCI services and system, understand progress and challenges, identify successes, improve efficiency, and ensure high value.
- Anonymised aggregated organisation data may be made available to the public by BCI.
- We will further disclose personal information if we are required to do so by law or administrative or court order.

BCI may use third-party providers for data collection, storage and processing. All data collected may be kept and used by BCI and its contracted third-party provider inside and outside Switzerland, or of your country of residence for non-commercial purposes.

BCI will not sell or otherwise disclose your personal, organisation and reporting information to third parties except as described above.

Personal data will be stored as long it is necessary for us to provide the specific service, e.g. during your membership, and for the duration of the applicable retention periods. It will be deleted afterwards unless a longer storage is required by laws.

## 3. Third-Party Plugins and Cookies

Our websites use Cookies. Cookies are small, often encrypted text files, located in browser directories. We use Cookies to help you navigate our website efficiently and perform certain functions. Cookies collect information and technical details on your use of our website such as the pages you have visited, choices you have made from menus, any specific information you have entered into forms and the time and date of your visit.

There are three types of Cookies: Session Cookies, Permanent Cookies and Third-Party Cookies.

3.1 Most Cookies used by our websites are Session Cookies. Session Cookies allow our websites to link the actions of a user during a browser session. They are used for a variety of purposes such as remembering your language settings. Session Cookies expire after a browser session and will not be stored for a longer term. We use Session Cookies to help us maintain security and verify your details whilst you use our websites navigating from page to

page, which enables you to avoid having to re-enter your details each time you enter a new page.

The Session Cookie we use is called "PHPSESSID".

3.2 Persistent Cookies are stored on a user's device in between browser sessions which allows the preferences or actions of the user to be remembered across our website. Persistent Cookies are in particular used to remember your preferences and choices when you use websites so that you do not have to input your details multiple times, to remember how you have customised your use of our websites and to compile pseudonymous, aggregated information for statistical and evaluation purposes to help the website provider understand how users use the websites and help to improve the structure of the website.

We do not use any Persistent Cookies on this website.

### 3.3 Third-Party Plug-ins and Cookies:

3.3.1 Our website uses Google Analytics which is a web analytics tool offered by Google Inc. that generates detailed statistics about a website's traffic and traffic sources. We use Google Analytics for statistical reasons, e.g. to measure how many users have clicked on certain information. Google Analytics uses Cookies to obtain information about your use of our website including your IP-address. As your IP-address is an individual element that would allow identifying you, we have implemented a specific code to ensure that your IP-address will only be collected in a shortened and anonymised form. Thus, Google will not be able to identify you from the IP-address that is collected from you when using this website. The information collected by this Cookie will be transferred to Google Inc. in the United States of America. The legal basis for processing your personal data using analysis cookies is our legitimate interest. The transfer of personal data to the USA is in accordance with the EU-U.S. Privacy Shield, to which Google is a part of.

You may opt out of Google Analytics by using the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

Google stores the following cookies on your computer:

- \_gid
- \_gcl\_au
- \_ga
- \_utma

These cookies expire after two years.

### 3.3.2 We use the following social media plug-ins: Twitter

By using the plug-ins, we offer you the option to interact with social networks and other users. This enables us to improve our services and make them more interesting for you as a user. The legal basis for the use of the plug-ins is our legitimate interest.

When using social plug-ins, we use the so-called double click solution: When you visit our website, the plug-ins are not fully integrated into the website. This ensures that a connection to the social network provider is established only if you click on the plug-in icon. After the connection has been established, we cannot influence the type and scope of data that are collected and processed by the provider; please refer to the data privacy notice of the relevant provider for more information in this regard.

More information on the purpose and scope of the data collected and processed by the plug-in providers can be found in the providers' data privacy notices specified below. In these notices, you will also find further information on your rights in this respect and the setting options to protect your privacy:

Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA;  
<https://twitter.com/privacy>. Twitter has submitted to the EU-US Privacy Shield,  
<https://www.privacyshield.gov/EU-US-Framework>.

3.3.3 For the integration of videos we use Vimeo, a service provided by Vimeo LLC with its headquarters at 555 West 18th Street, New York, New York 10011, USA ("Vimeo"). When you watch a video embedded with Vimeo, a connection is established to the Vimeo servers located in the USA. For storage in the U.S., Vimeo's self-certification under the Privacy Shield provides an appropriate level of privacy protection. The Vimeo server receives information about which of our Internet pages you have visited. If you are logged in as a member of Vimeo, Vimeo assigns this information to your personal user account. When you click on the start button of a video, this information is also assigned to your user account. You can prevent this assignment by logging out of your Vimeo user account before using our website and deleting the corresponding cookies from Vimeo. The legal basis for this data processing derives from the legitimate interests of BCI to embed videos and thus to enable an improved user experience on their website.

Vimeo uses Persistent Cookies which expire between a few days and two years after the last viewing of a Vimeo video.

The purpose and scope of the data collection and the further processing and use of the data by Vimeo as well as your related rights and setting options for the protection of your personal data can be found in Vimeo's privacy policy: <https://vimeo.com/privacy>

3.4 Most browsers are initially set to accept Cookies. However, you have the ability to disable Cookies if you wish, generally through changing your internet software browsing settings. It may also be possible to configure your browser settings to enable acceptance of specific cookies or to notify you each time a new Cookie is about to be stored on your computer enabling you to decide whether to accept or reject the Cookie. To manage your use of Cookies there are various resources available, for example the "Help" section on your browser. You can also disable or delete the stored data used by technology similar to cookies, such as Local Shared Objects or Flash Cookies, by managing your browser's "add-on settings" or visiting the website of its manufacturer. As our Cookies allow you to access some of our website's features, we recommend that you leave Cookies enabled. Otherwise, if Cookies are disabled, it may mean that you experience reduced functionality or will be prevented from using this site altogether.

#### 4. Your rights

BCI and its contracted third-party provider will take the appropriate measures (technology) to protect information collected against unauthorised access, loss, misuse and alteration of information under our control.

You have the right to ask for information regarding the personal data that the BCI holds about you and your organisation, and to have this information modified, deleted and, if applicable, restricted. You may also have the right to data portability. In case you have given us your consent, you can withdraw this consent at any time with future effect. **You may object to the**

**data processing which is based on our legitimate interest.** If you believe any of your rights have been infringed, you may file an appeal with the competent data protection authority.