

# Standards Data Policy

This Standards Data Policy (“Policy”) outlines how data submitted to Textile Exchange – as part of requirements of one or more Textile Exchange-owned standard and their related procedures and supplemental documents – is collected, used, and disclosed by Textile Exchange, and its subsidiaries and affiliated companies (“Textile Exchange” or “we” or “us” or “our”).

This policy applies to accreditation bodies, certification bodies, certified organizations, subcontractors, and members of certified groups (collectively, “User” or “Users”) of Textile Exchange Standards for the provision of data in all forms and tools (paper-based, electronic, system interface, or other). When capitalized, Standard refers to all Textile Exchange standard(s) for which the User is authorized (e.g. scope of certification or accreditation).

By providing data to Textile Exchange, the Users confirm that the data (including but not limited to the types listed in Section B) have been collected in accordance with applicable national laws, including data protection laws to protect the confidentiality of identifiable persons.

Users consent to the collection, cleaning, processing and use of its data (“data processes” or “data processing”) as described in this policy. This Policy will be reviewed from time to time in line with Textile Exchange’s commitment to continuous evaluation and improvement. For further information, please contact [Assurance@TextileExchange.org](mailto:Assurance@TextileExchange.org).

## Section A - Policy Statement and Principles

- A1.1** Textile Exchange is committed to the good use and protection of the data we collect. Our key principles are:
1. Ethical and secure data processing, subject to appropriate acknowledgement and acceptance from data subjects.
  2. Use data for monitoring, evaluation, improvement, development, and aggregate reporting purposes only.
  3. Withhold from structurally changing or altering the data collected without first consulting relevant data subjects.
  4. C1.14 Except for the reasons listed in Section C, Textile Exchange will not sell or disclose personal or organization data collected with any third party without the consent of data subjects.
- A1.2** Textile Exchange is respectful of personal privacy. In compliance with the Global Data Protection Regulation (GDPR), we are committed to ensure that all personal data is:
1. Processed lawfully, fairly, and in a transparent manner;
  2. Processed for **specified, explicit, and legitimate purposes** and not in a manner that is incompatible with those purposes;
  3. Adequate, relevant, and limited to what is necessary for the purposes for which it is being processed;

4. **Accurate** and, where necessary, up-to-date;
5. **Not kept longer than necessary** for the purposes for which it is being processed;
6. Processed in a **secure** manner, by using appropriate technical and organizational means; and
7. Processed in keeping with the **rights of data subjects** regarding their personal data.

## Section B - Data We Collect

### B1. Organizational Data – Certified Organization

- B1.1** Organizational data Textile Exchange receives as owner of the Standard(s), includes all data obtained or created regarding the certified organization – including subcontractors, facilities, and group members – by the certification body or otherwise during the course of its certification related activities to Textile Exchange Standards. The data includes, but is not limited to:
1. **Company Details**  
Company details are company related identification, legal registration, licensing, location, and contact data.
  2. **Scope Certificate Data**  
Scope certificate data is information required to create and/or is contained in a scope certificate.
  3. **Transaction Certificate Data**  
Transaction certificate data is information required to create and/or is contained in a transaction certificate. This includes any supporting documentation required by the certification body for a transaction certificate application (e.g. shipping documents, purchase orders, invoices, product details).
  4. **Site Level Indicator Data** (where required to be reported by the standard)  
Data pertaining to the certified organization's site(s) or product(s) that is required by the Standard to be reported to Textile Exchange (e.g. *RAF-503a RWS Farm Questions*).
  5. **Audit Data**  
Audit data is any information collected by a certification body during the course of an audit, including the application period preceding the on-site audit, and any corrective actions after the report. Any unannounced audit data is included, if applicable.
  6. **Non-Conformity Data**  
Non-conformity data is information relating to the non-conformities issued at any time by the certification body during assessment of the Standard's requirements.
- B1.2** Financial, business, and technical records that are commercially sensitive are not expected as a routine submission but may be required as part of an investigative enquiry.

## B2. Organizational Data – Certification Bodies

- B2.1 Certification body data Textile Exchange receives as owner of the Standard(s), includes all data obtained or created regarding the certification body by the certification body or by the accreditation body during the course of its accreditation-related activities to Textile Exchange Standards. The data includes, but is not limited to:
1. [Company Details](#)  
Company details are company related identification, ownership structure (including regional offices), accreditation, location, and contact data.
  2. [Assurance](#)  
Data pertaining to certification activities, subcontractors, and certification body personnel calibration.
  3. [Personal Data](#)  
Personal data is identification and contact data of a User representative to Textile Exchange Standards. In no circumstances is sensitive personal data, such as ethnicity, religion, or race, collected or processed.

## B3. Organizational Data – Accreditation Bodies

- B3.1 Accreditation body data Textile Exchange receives as owner of the Standard(s), includes all data obtained or created regarding the accreditation body during the course of its accreditation-related activities to Textile Exchange Standards. The data includes, but is not limited to:
1. [Company Details](#)  
Company details are company related identification, ownership structure, relationship between sites, location, and contact data.
  2. [Assurance](#)  
Data pertaining to accreditation activities and certification body clients.
  3. [Personal Data](#)  
Personal data is identification and contact data of a User representative to Textile Exchange Standards. In no circumstances is sensitive personal data, such as ethnicity, religion, or race, collected or processed.

## B4. Complaints Data

- B4.1 Data Textile Exchange receives about the misuse of its Standard(s), accreditation procedures, certification procedures, and claims/labelling procedures, includes all data obtained from or created by the complainant and/or complainee during the course of the complaints process. The data includes, but is not limited to:
1. [Company Details](#)  
Company details are company related identification, accreditation, location, and contact data.

2. **Personal Data**  
Personal data is identification and contact data of a User representative to Textile Exchange Standards. In no circumstances is sensitive personal data, such as ethnicity, religion, or race, collected or processed.
3. **Nature of Complaint**  
Data related to the type, scope, description and subject of the complaint, including evidence supporting the complaint.

**B4.2** Disclosure of identity is subject to consent of complainant. However, non-disclosure of identity may hinder full investigation of the complaint.

## **B5. Web Browser Cookies**

**B5.1** Our website and system interface use cookies to capture selected User data (e.g. Internet Protocol (IP) address, browser type, activity data)

**B5.2** Users may choose to remove and/or reject cookies in the internet browser settings. However, doing so may affect certain features and services from our website and system.

## **Section C - Use of Information We Collect**

### **C1. Organizational Data – Certified Organization**

**C1.1** The organizational data on certified organizations – including subcontractors, facilities, and group members – is collected and analyzed for the following purposes:

1. To increase the effectiveness, efficiency, traceability, and transparency of certification and its related activities.
2. To prevent duplication or fraud by creating a single source for certificate verification and volume reconciliation.
3. To provide standards' impact data for Textile Exchange standards improvement.
4. To provide public facing data about certified companies. This may include all scope certificate data except for subcontractors, farms, and homemaker identification data. The certified organization may choose to have their contact details shared publicly or not.
5. To provide opportunity for traceability and transparency of material sources.

### **C2. Organizational Data – Certification Bodies**

**C2.1** The organizational data on certification bodies is collected and analyzed for the following purposes:

1. To provide a list of certification bodies authorized to certify against Textile Exchange standards;
2. Invoicing and tracking payment terms; and

3. Monitoring and evaluation of certification activities for quality assurance.

### C3. Organizational Data – Accreditation Bodies

- C3.1 The organizational data on accreditation bodies is collected and analyzed for the following purposes:
1. To provide a list of accreditation bodies authorized to perform accreditation for Textile Exchange standards; and
  2. Monitoring and evaluation of accreditation activities for quality assurance.

### C4. Complaints Data

- C4.1 Complaints data is collected and analyzed for the following purposes:
1. To investigate and resolve complaints in accordance with the *ASR-110 Complaints Procedure*.
  2. Monitoring and evaluation of standard setting, accreditation, certification, claims/label activities for quality assurance.

### C5. Web Browser Cookies

- C5.1 Cookies data is collected and analyzed for the following purposes:
1. User identification;
  2. Secure web connection;
  3. Enhance user experience; and
  4. Gain usage insight for website and system improvement and development.

## Section D - Personal Data

- D1.1 Personal data of representatives from users is collected for the following purposes:
1. To identify the person as a representative of a User;
  2. As a means to communicate or seek feedback on issues relating to Textile Exchange standards; and
  3. To better deliver value of being accredited or certified to Textile Exchange standards.
- D1.2 Designated primary contacts are required to receive notifications from Textile Exchange as a complainant, certified organization, certification body or accreditation body.
- D1.3 Group based outreach such as newsletters and notifications may be delivered through electronic communications (e.g. email automation platforms) with non-disclosure of personal data, always subject to User consent.

## Section E - Choice and Consent

- E1.1 Textile Exchange respects Users' choice on data sharing and processing. This Policy sets out the type of data we collect, how it is collected, and how it is used. Consent to our data collection and use is given:
1. By certification bodies when signing the Licensing Agreement (*ASR-208 Certification Body Contract*) for Textile Exchange Standards.
  2. By accreditation bodies when signing the Authorization Agreement (*ASR-209 Accreditation Body Contract*) for Textile Exchange Standards.
  3. By certified organizations choosing to be certified to a Textile Exchange Standard. Certification bodies are to reference this document in their certification agreements for Textile Exchange Standards to inform their clients.
  4. By accepting the terms of use of our system.
  5. By giving consent directly in our system beyond what is considered publicly available data (see C1.1).
  6. By giving consent through the complaints form.

## Section F - Access to User Data

- F1.1 The following persons are provided access to User data to carry out their work:
1. Textile Exchange affiliates such as employees and consultants who need User data to carry out work related to system support, assurance, data management, monitoring, and evaluation.
  2. Third-party vendors, contractors, and service providers employed by Textile Exchange that need User data to carry out work related to system support, assurance, data management, monitoring, and evaluation. Access to User data will only be provided to a third-party that has signed a Non-Disclosure Agreement or a contract with a component of non-disclosure clause with Textile Exchange.
- F1.2 User data may be shared with relevant parties in connection with or during mergers, financing, acquisition, dissolution, transaction, or proceeding involving the sale, transfer divestiture, or disclosure of all or part of our business to another company. In the event of an insolvency, bankruptcy, or receivership, User data may also be transferred as a business asset. If another organization acquires Textile Exchange, its business or assets, that organization will assume the obligations to User data as outlined in this Policy.
- F1.3 Users retain access to their information at all times. For data access, please contact [Assurance@TextileExchange.org](mailto:Assurance@TextileExchange.org).

## Section G - Relevance and Accuracy of Data

- G1.1 All data on Textile Exchange Standards are currently collected via certification bodies. To ensure the relevance and accuracy of both organizational data and personal data, we have put in place mechanisms to strengthen and continuously improve our data collection process (see Section 3).
- G1.2 Organizational data collected is reviewed (not audited) and cleaned for accuracy and completeness. Certification bodies or certified organizations may be contacted by Textile Exchange during the review and cleaning process for clarification and confirmation.

## Section H - Lifespan of Data

- H1.1 User data will remain in our database for the lifespan of the Textile Exchange Standards.
- H1.2 Certification bodies are required to update personal data in our system to ensure existing personal User data is up-to-date and accurate, and inactive personal data is removed.
- H1.3 Users may, contact Textile Exchange to have his/her personal data removed from our database. However, requests to do so may have causal impacts on the provisions within the Textile Exchange Standards Licensing Agreement and system's terms of use.

## Section I - Security of Information

- I1.1 User data is securely stored in our databases and systems. Processes are in place to ensure that:
1. The system is secure;
  2. Data is regularly backed up;
  3. Accidentally removed data is retrievable; and
  4. Access to data is limited to authorized personnel responsible for system support, assurance, data management, monitoring, and evaluation.
- I1.2 Additional data may be shared with written or electronic agreement from all relevant parties.