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# Sustainable Rice Platform Confidentiality Policy

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Title:	Sustainable Rice Platform Confidentiality Policy
Document number:	PO-270923-BO-EN-011
Approval date:	27 September 2023

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### About the Sustainable Rice Platform

The Sustainable Rice Platform e.V. (SRP) is a global multi-stakeholder alliance comprising over 100 institutional members from public, private, research, civil society and the financial sector. Originally co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and private partners, SRP is an independent member association, working together with its partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production, and by offering the global rice market an assured supply of sustainably produced rice.

### Contact details

E-mail: [info@sustainablerice.org](mailto:info@sustainablerice.org)

Web: [www.sustainablerice.org](http://www.sustainablerice.org)

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## Purpose and Scope

The purpose of the **Sustainable Rice Platform Confidentiality Policy** is to establish rules and expectations for the processing of confidential information by anyone working for, with, or on behalf of the Sustainable Rice Platform (SRP), as well as serving on SRP governance and technical bodies.

Information covered by this Policy includes verbal, nonverbal, written, and electronic information, regardless of how that information is collected, used, transmitted, stored, or otherwise processed.

This Policy mutually supports and reinforces the SRP Privacy Policy and SRP Antitrust Compliance Policy. It also serves as a foundation for certain SRP rules and procedures on safeguarding, whistleblowing, and grievances and dispute resolution.

This Policy applies to SRP staff, consultants, service providers, and members of the SRP Board and Technical Committee, collectively referred to as "SRP participants." Participants are required to understand and comply with the terms of this Policy.

## Terms and Definitions

Term	Definition
<b>Personal information</b>	Any information relating to an identified or identifiable natural person ("data subject"). All personal information is confidential.
<b>Confidential information</b>	<p>Any non-public information or data relating to an identified or identifiable individual, as well as the activities of legal entities, including but not limited to, SRP e.V., SRP Services Co. Ltd., SRP Members, and SRP National Chapters.</p> <p>Non-public information or data include the following:</p> <ul style="list-style-type: none"> <li>a. Identity and contact information and other personal data</li> <li>b. Financial, budgeting, and forecasting information</li> <li>c. Contractual information between SRP and other parties, including terms, conditions, and fees for individual Members</li> <li>d. Reporting information, including applications, annual reports, and audit reports relating to Members, Authorized Training Providers and Trainers, Assurance Scheme participants, and National Chapters</li> <li>e. Commercially sensitive information, which, if communicated, could influence the future business conduct of market competitors</li> <li>f. Information submitted or processed pursuant to a grievance, complaint, safeguarding incident, or whistleblowing case</li> <li>g. Information collected during SRP due diligence processes</li> <li>h. Information covered under confidentiality agreements.</li> </ul>
<b>Processing</b>	Any operation that is performed on data, including collection, use, retrieval, alteration, storage, dissemination, restriction, and erasure.

Term	Definition
<b>Participants</b>	Individuals to whom this Policy applies. Participants are SRP staff, consultants, service providers, and members of the SRP Board and Technical Committee.
<b>Ad hoc Ombuds-person</b>	An SRP participant who is assigned tasks relevant to the processing, handling, and investigation of concerns, complaints, or grievances pursuant to this Policy. Ad hoc Ombudspersons are enlisted to assist with internal processes based on their expertise and specialized training. The role of ad hoc Ombudspersons is further detailed in the Board Manual.

## Policy Statement

1. Confidential information is subject to a legal duty of confidence to keep it protected, secure, and confidential.
2. Participants coming into contact with confidential information are bound by such a legal duty.
3. Confidential information may be used only in connection with authorized work being carried out for, with, or on behalf of SRP.
4. Under no circumstances may confidential information be used in connection with other commercial, non-commercial, or personal purposes.
5. Confidential information may only be disclosed on a strictly need-to-know basis and when there is a legitimate reason for doing so, according to internal controls.
6. Participants who have been authorized to process confidential information may only do so for the purposes originally prescribed.
7. Participants coming into contact with confidential information who have not been authorized to process that information shall immediately notify the SRP data controller at [privacy@sustainablerice.org](mailto:privacy@sustainablerice.org).
8. Participants with knowledge of a breach of this Policy shall immediately notify the appropriate contact:
  - a. For breaches alleged to have been committed by staff, consultants, or service providers, participants shall contact the Executive Director.
  - b. For breaches alleged to have been committed by Members' designated representatives, Board members, Technical Committee members, or the Executive Director, participants shall contact the SRP Board Chair.
9. All contractual arrangements with SRP consultants and service providers shall include a confidentiality clause requiring compliance with this Policy.

10. Any confidential information that is personal information shall adhere to the rules and procedures established in the SRP Privacy Policy.
11. Confidential information shall be protected against unauthorized processing, loss, destruction, misuse, theft, or corruption using appropriate technical measures and organizational processes.

## Breaches of Confidentiality

Breaches of confidentiality introduce significant risk to the Sustainable Rice Platform, the SRP brand, and SRP Members, partners, and participants.

Failure to comply with any element of this Policy shall trigger an automatic review of the scope of the breach, cause of the breach, and individual(s) involved.

The Executive Director shall be accountable for breaches pursuant to [§ 8\(a\)](#) and the Board Chair shall be accountable for breaches pursuant to [§ 8\(b\)](#). Either may delegate responsibility for conducting the review to an ad hoc Ombudsperson.

Reviews shall be documented, including their scope, method of investigation, evidence, and recommended or resulting actions.

Breaches may result in discipline including dismissal of staff, termination of contracts with consultants or service providers, and suspension or termination of SRP membership.

## Contact Information

We invite any participant with knowledge of a breach of confidentiality to contact the appropriate focal point:

### Sustainable Rice Platform

Name	Position	Email
Dr. Wyn Ellis	Executive Director	<a href="mailto:wyn.ellis@sustainablerice.org">wyn.ellis@sustainablerice.org</a>
Dr. Keith Jones	Board Chair	<a href="mailto:Keith.jones@sustagri.com">Keith.jones@sustagri.com</a>

## Review Schedule

The SRP Board will review this Policy at least every three years and may amend the Policy at any time. The Secretariat will notify SRP Members, staff, consultants, and service providers of any future versions and will publish these versions on the SRP website at <https://www.sustainablerice.org>.

### **Related Documents**

SRP Antitrust Compliance Policy

SRP Global Code of Conduct

SRP Privacy Policy