



**SRP**

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# Sustainable Rice Platform Privacy Policy

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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 Sustainable Rice Platform (“SRP,” “us,” “our,” and “we”) is committed to protecting your privacy and personal information (also referred to as “personal data”).

The purpose of this Policy is to explain how and why we process your personal information, including through our Membership Program, Authorized Training Program, Assurance Scheme, and website (<https://www.sustainablerice.org>), or when you sign up for our newsletter or attend an event.

This Policy also communicates your privacy rights and whom you may contact for more information regarding the processing of your personal information.

This Policy applies to the data processing activities conducted by or on behalf of the Sustainable Rice Platform e.V., based in Bonn, Germany, and its wholly owned subsidiary, Sustainable Rice Platform Services Co., Ltd., located in Bangkok, Thailand.

In observing this Policy, we are committed to complying with the European Union General Data Protection Regulation (GDPR) and Thailand Personal Data Protection Act (PDPA).

## Terms and Definitions

Term	Definition
Consent	Freely given, specific, informed and unambiguous indication of the data subject’s agreement to the processing of their personal data.
Data controller	An individual or entity with authority to determine the purposes and means of processing personal data. In this Policy, SRP is the data controller.
Data processor	An individual or entity that processes personal data on behalf of the data controller in this Policy (SRP). Processors are service providers.
Data subject	An individual (“you”) to whom personal data directly or indirectly relates.
Personal data	Any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified directly or indirectly by information in our possession. Personal data is also referred to as “personal information.” We may use these terms interchangeably.
Processing	Any operation that is performed on personal data, including collection, use, retrieval, alteration, storage, dissemination, restriction, and erasure.
Service provider	An individual or entity who, under the authority of the data controller (SRP), is authorized to process personal data. By definition, a service provider is not the data subject or data controller.
Third party	An individual or entity <i>other</i> than the data subject, controller, processor, and persons authorized to process personal data.

*Note:* These terms and definitions have been adapted from the European Union’s GDPR and Thailand’s PDPA.

## Why do we collect personal information?

Personal information is anything that allows you to be identified or identifiable. We collect and process as limited personal information as is necessary for us to deliver on our mission.

The primary lawful purposes for the processing of your personal information are to (1) comply with legal obligations in the countries where SRP operates; (2) perform a contract with you; and (3) pursue our legitimate interests as a global multi-stakeholder membership organization, except where such interests are overridden by your interests or fundamental rights and freedoms.

Purposes	Data processing activities
Compliance with legal obligations	<ul style="list-style-type: none"> <li>– Financial and non-profit regulatory reporting</li> <li>– Responding to an administrative or court order.</li> </ul>
Performance of a contract with you	<ul style="list-style-type: none"> <li>– Enabling your participation in SRP as a representative of an applicant for SRP membership, or maintaining your representation and participation vis-à-vis an existing Member</li> <li>– Enrolling you or your business in the SRP Assurance Scheme</li> <li>– Entering into a formal partnership with your organization (e.g., signing a memo of understanding).</li> </ul>
Pursuit of our legitimate interests	<ul style="list-style-type: none"> <li>– Improving the design and performance of our website</li> <li>– Delivering membership services and benefits</li> <li>– Monitoring and evaluating the performance of the SRP System, Assurance Scheme, and Training Program</li> <li>– Demonstrating sector outcomes and societal impacts</li> <li>– Enhancing our services to SRP's global stakeholders</li> <li>– Updating your contact information.</li> </ul>
Your consent	<ul style="list-style-type: none"> <li>– Setting cookies when you navigate our website</li> <li>– Interviews related to our programs and services.</li> </ul>

## What personal information do we collect?

### Information we collect

Depending on how you choose to interact with SRP, we may process personal information you provide us voluntarily when your organization seeks SRP membership, enters into a partnership with our organization, or pursues verification. We also may your personal information when you apply to work for us, carry out services on our behalf, receive training, navigate our website, sign up for our newsletter, or attend an event.

The personal information we may collect, use, store, and transfer include:

**Identity and contact data.** Your individual title, first name, last name, gender, date of birth, country of residence, nationality, email address, mailing address, billing address, phone number, and organizational affiliation.

**Financial and transaction data.** Your bank details, including bank name, bank address, account number, and SWIFT/BIC, your payment card details, and summaries of your financial transactions with us.

**Technical and usage data.** Your internet protocol (IP) address, website URL from which you access our website, date and time of your access, approximate location, browser type, operating system, webpages you visit on our site, and the items you download, read, watch, and share. For more information, please consult the SRP Cookie Policy.

**Communications and reporting data.** Your responses to our surveys, information you provide in annual reports, information you provide in interviews, pertinent contents of email correspondence, and your communication preferences related to our newsletter and events.

**Aggregated data.** We use the above categories of personal information to generate and otherwise process aggregated data. We generate such data by anonymizing personal information before aggregating the anonymized data into quantitative variables and statistical summaries.

### Information we do not collect

We do not process special categories of personal data, including your race and ethnicity, sexual orientation, political views, religious beliefs, trade union membership, genetic data, biometric data, or health data.

Additionally, we do not knowingly collect personal information of or relating to children (persons under the age of 16). If we become aware we inadvertently collected personal data from a child, we take immediate steps to erase the relevant data from our servers. For more information, please consult the SRP Safeguarding Policy.

## **How do we collect personal information?**

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### Means of collecting Information you provide to us

There are several ways you may voluntarily provide us with your personal information. In processing this information, we rely on the lawful purposes as described in the “Why do we collect personal information?” section of this Policy.

**Applying for and maintaining membership.** When you apply for membership on your organization's behalf, you share identity and contact data on the application form, in email conversations, and other communication channels. If your organization designates you as its representative to SRP upon admission, you are required to file annual reports of the Member's activities as they relate to the sustainable rice sector. Your reporting data may contain information about the actions and activities of identifiable individuals. We may also gather limited financial data to invoice the Member and receive membership fees.

**Receiving or performing training.** When you enroll in one of our training courses from an Authorized Training Provider, you provide identity and contact data that allows us to evaluate our services, follow up with you to assess your performance, and document your training journey. You also provide reporting data when filling out satisfaction surveys. Authorized Trainers also provide us with identity/contact data to promote their services.

**Engaging with the SRP Assurance System.** When you participate in the SRP Assurance Scheme as a producer or producer group, or the SRP Chain of Custody Assurance Scheme as a participating operator, you provide our service providers and us with identity and contact data, including your name, company name, address, gender, geolocation, and farm plot size(s). You also provide performance data against the standard and indicators that are used to complete verification audits.

**Registering a sustainable rice project.** If you represent an SRP Member and register a sustainable rice project with the Secretariat, you provide identity and contact data of the registrant, which we use to stay informed of the project's implementation and outcomes.

**Partnering with us.** When you contact us on your own initiative by email, phone, post, or an in-person meeting, either to collaborate or formally enter a partnership, you may provide identity data (e.g., name, email address, title, and organizational affiliation) that we use to document and cultivate our relationship with you.

**Providing us information on our website.** When you contact us using the online form at <https://sustainableice.org/contact/>, you share your name and email address. We use this information to reply to your question, comment, or concern. Additionally, when you sign up for our newsletter on our website, you share your name and email address. We use this information to deliver our newsletter to you electronically.

### **Means of collecting information automatically**

When you visit our website, we automatically process personal information from you depending on your settings and cookie preferences. The most common sources of information include server logs, cookies, and third-party analytics providers.

**Server logs.** Your browser automatically sends technical and usage data to our servers when you visit our website, storing it in a so-called log file. This data includes your internet protocol (IP) address, website URL from which you access our website, the date and time of your access, geolocation, browser type, and operating system.

**Cookies.** Cookies are small text files that your browser automatically creates and stores when you visit our website. They collect technical and usage data, including the date and time of your visit, pages visited, and navigation choices, which allow us to distinguish you from other users. Our lawful basis for the use of cookies is your consent; when you visit our website, a cookie consent manager prompts you to set your preferences. To learn more, please consult the SRP Cookie Policy.

**Third-party analytics providers.** We use Google Analytics to collect technical and usage data when you visit our website. Google Analytics initiates the placement of tracking cookies on your browser to gather information about your navigation choices on our



domain. The data that are generated are transferred to Google in the United States, where they are aggregated and used to compile reports on the use of our website. We interpret this statistical information to improve the performance of our website.

To prevent Google Analytics from processing your data when visiting our website (and other websites), you can disable their tracking cookies by installing the Opt-Out Browser Add-On, available at <http://tools.google.com/dlpage/gaoptout?hl=en>. To learn more about Google's data privacy practices, please review its privacy policy at <https://policies.google.com/privacy>. You may also reject these cookies using the cookie consent manager at the bottom of our website.

**Links from our website to third-party sites.** Our website may contain links to websites that are operated neither by us nor our service providers. If you click on a third-party link, you will be directed to the corresponding website. We assume no responsibility for the privacy practices of third-party sites. We advise you to review the notices of such sites.

## How do we share personal information?

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We would only disclose your personal information to third parties if one of the following conditions is met: (1) you have provided your consent; (2) we are required to disclose it to meet a legal obligation, such as responding to a court order or protecting ourselves against liability; or (3) it is legally permissible and necessary for entering into or performing a contract with you.

### Service providers

We share your personal information with our service providers if doing so is necessary for them to fulfill their contractual obligations to us. These individuals and entities may only process your data in the ways we prescribe, and they are obligated to maintain security and confidentiality pursuant to this Policy and the SRP Confidentiality Policy.

### Publication on our website

If we receive your express, written consent, we may publish personal information on our website to increase transparency, advertise the services of our service providers, and highlight the accomplishments of our members. This information may include Board member names and affiliations; Authorized Trainer names, emails, and countries of operation; and Conformity Assessment Body names, emails, and countries of operation.

### Disclosure to third parties

We would only disclose your personal information to third parties if one of the following conditions is met: (1) you have provided your express consent; (2) we are required to disclose to meet a legal obligation, such as responding to court order or protecting against legal liability; or (3) it is legally permissible and necessary for settling a contract with you.

### We do not sell your personal information

We do not give your personal data to any individual or entity in exchange for money.



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## Data Protection, Security, and Retention

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### Data protection and security

We employ technical and organizational measures to protect and secure your personal information from accidental partial or total loss, disclosure, or destruction; unauthorized access; or manipulation and sabotage. These measures include:

- The use of SSL (Secure Socket Layer) and HTTPS encryption protocols to safeguard the collection, transmission, and storage of your data electronically.
- Access controls and multi-factor authentication for the data controller and processors.
- Secure connections when transferring data between SRP and service providers.
- Mandatory data protection and cybersecurity training for all SRP employees.
- Periodic data security audits to identify and remediate system vulnerabilities.
- Access limitations based on a business “need-to-know” principle, restricting access to authorized individuals whose work cannot be conducted without it. These persons only process data on our instructions and in line with the SRP Confidentiality Policy.

### Data retention

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including our primary lawful purposes of complying with legal obligations, performing a contract with you, and pursuing our legitimate interest.

We determine the retention periods for personal information using myriad factors, including legal and regulatory requirements, type of data, utility of the data, the risks to you and us in the event of an unauthorized breach, and whether we can attain the purposes for which we collected your personal information without your data.

## Your Legal Rights

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You may have certain rights under applicable law in relation to the personal information we hold about you. These rights include the right to:

- Receive information about how we process your personal data.
- Receive a copy of the personal information we hold about you. You may be entitled to request this information to be provided in a structured, commonly used and machine-readable format and to transmit those personal data to another data controller.
- Update the personal information we hold about you or correct any information that you believe is inaccurate or incomplete. In doing so, we may need to verify the updated information you provide to us.
- Object to the processing of your personal information in circumstances where we rely on our legitimate interest but where you believe our processing impinges on your

fundamental rights and freedoms. In certain cases, we may demonstrate compelling legitimate grounds for processing that override your rights.

- Restrict the processing of your personal data under the following circumstances:
  - You contest the accuracy of the personal data in our possession, and you seek to restrict processing until we can verify its accuracy
  - Our processing is unlawful, and you prefer its restriction rather than erasure
  - Your personal information is no longer needed by us for processing but is required by you to navigate legal claims
  - You have objected to processing pending verification that our legitimate grounds override your rights and freedoms.
- Erase your personal information in our possession without undue delay.
- Be notified of the rectification, restriction, or erasure of your personal information.
- Withdraw your consent to our processing of your personal information in cases where we rely on consent to process personal data.
- Not to be subject to a decision based solely on automated processing.
- File complaints with the relevant public authority (see contact information below).

Please note that these rights may not always apply. For example, we cannot erase your personal information if we are under a legal obligation to retain it.

### **Help exercising your rights**

If you need help exercising your rights, please contact us at [privacy@sustainableice.org](mailto:privacy@sustainableice.org).

You will not be asked to pay a fee to exercise any of these rights. However, we may need to confirm specific information with you before proceeding with your request, e.g., to maintain the integrity and security of data in our possession or the possession of a service provider.

We aim to respond to all requests within one month. If your request is particularly complex or you have made more than one request, our response time may be longer.

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## Contact Information

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If you have questions or comments about this Privacy Policy, or would like help exercising your rights pursuant to this Policy, please contact the SRP data controller by email, telephone, or post:

### Sustainable Rice Platform

Sustainable Rice Platform  
C/o Data Controller  
AIA Sathorn Tower, Unit 1405  
11/1 South Sathorn Road, Yannawa, Sathorn  
Bangkok 10120, Thailand

Phone: +66 2 116 1055  
Email: [privacy@sustainablerice.org](mailto:privacy@sustainablerice.org)

If you have any concerns, please contact us first so we may help resolve your concern. Alternatively, you may contact the appropriate data protection authority directly:

### Relevant German data protection authority

N. Rhineland-Westphalia Commissioner for Data Protection and Freedom of Information  
(Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen)  
Postfach 20 04 44  
40102 Düsseldorf

Phone: +49 (0) 211 38424 ext. 0  
Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

### Relevant Thai data protection authority

Office of the Personal Data Protection Committee  
Government Complex Commemorating His Majesty the King's 80th Birthday Anniversary  
Ratthaprasasanabhakdi Building (Building B), 7th Floor  
120 Moo 3 Chaengwattana Road  
Thung Song Hong, Lak Si  
Bangkok 10210

Phone: +66 (02) 142 1033 or (02) 141 6993  
Email: [saraban@pdpc.or.th](mailto:saraban@pdpc.or.th)

## Review Schedule

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The SRP Board will review this Policy at least annually and may amend the Policy at any time. We will notify you of changes to the Policy by providing notice on our website at <https://www.sustainablerice.org>, or by sending you an email, if you provided us with one while interacting with us.

### **Related Documents**

SRP Confidentiality Policy

SRP Cookie Policy

SRP Data Strategy