

Privacy Statement

APR/2025

**amfori Speak for
Change**

Table of contents

1.	Purpose and Scope	3
2.	Data Controller	3
3.	Types of Personal Data Processed	3
4.	Lawful Basis for Processing	3
5.	Purposes of Processing	4
6.	Data Sharing and Confidentiality	4
7.	Data Retention Periods	4
8.	Rights of Data Subjects	4
9.	Updates to this Privacy Statement	5

1. Purpose and Scope

This privacy statement outlines the manner in which personal data is processed in the context of the **amfori Speak for Change (S4C)** grievance mechanism. It applies to all data subjects engaging with the mechanism, including but not limited to complainants, member representatives, service providers, and individuals acting in support roles related to case handling.

This statement is issued in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR"). <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

2. Data Controller

amfori, an international not-for-profit association under Belgian law, with its registered office at Avenue de Tervueren 270, 1150 Brussels, Belgium, acts as the data controller for all processing activities conducted within the framework of the amfori Speak for Change grievance mechanism.

Contact: dataprotection@amfori.org

3. Types of Personal Data Processed

Depending on the role of the data subject within the grievance mechanism, the following types of personal data may be processed:

A. Complainants:

Description of the grievance and any personal data that the data subject provides therein
Identification data, such as name, contact details, etc., if provided.

B. Representatives of amfori Members, Investigators, and Support Personnel:

Identification and professional contact information
Usage logs and access records to digital platforms related to case handling

C. Third-Party Technology Providers:

Technical identifiers and access metadata, in accordance with contractual obligations governing confidentiality and security

4. Lawful Basis for Processing

The lawful basis for the processing is the purpose of a **legitimate interest** pursued by amfori, more specifically the handling of a grievance in the context of amfori Speak for Change.

When special categories of personal data are processed, such as data revealing racial or ethnic origin or trade-union membership, the lawful basis for the processing is the **consent** of the data subject.

The identity of the data subject is only disclosed to amfori member companies directly linked to the complaint, when the data subject gives his or her **consent** for this disclosure.

5. Purposes of Processing

Personal data is collected and processed for the following purposes:

- To assess and manage grievances submitted under the amfori Speak for Change mechanism
- To facilitate communication between stakeholders involved in a complaint
- To implement and monitor case investigation and remediation
- To administer secure access and ensure accountability of all users within associated digital systems

6. Data Sharing and Confidentiality

Personal data will be disclosed solely to parties who require access to such data in order to fulfill the objectives of the grievance process.

These may include:

- Designated case handlers within amfori
- amfori member companies directly linked to the complaint (on a non-identifiable basis unless the data subject has given his/her consent)
- Third-party actors supporting the resolution process, including investigative and remediation personnel
- Contracted service providers offering secure hosting or communication infrastructure

All recipients shall be bound by confidentiality obligations either through contract or statutory duty. Where data is transferred outside the European Economic Area, appropriate safeguards consistent with GDPR requirements shall be applied.

7. Data Retention Periods

In cases deemed inadmissible or dismissed, personal data shall be retained for a period not exceeding **one (1) year** following final notification.

In cases that are pursued and resolved, relevant data shall be retained for a period of **five (5) years** following case closure.

Personal data associated with user credentials and system access shall be retained for a maximum of **six (6) months** following the end of the user's authorised engagement.

8. Rights of Data Subjects

Data subjects have the following rights under Articles 12 to 23 of the GDPR:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to object to processing
- Right to data portability (not applicable when the processing is based on the purpose of legitimate interests)
- Right to withdraw consent at any time (where the processing is based on your consent as lawful basis). The withdrawal of the consent by the data subject will not affect the lawfulness of processing based on consent before its withdrawal.

To exercise these rights, data subjects may contact dataprotection@amfori.org. Should a data subject believe that their rights have not been respected, they may file a complaint with the **Belgian Data Protection Authority**: <https://www.dataprotectionauthority.be/citizen>

9. Updates to this Privacy Statement

This privacy statement may be subject to amendment in light of legislative, regulatory, or operational developments. The latest version will be made available at: <https://www.amfori.org/en/terms-and-policies/privacy-statement>.

Should you have any questions with regard to your personal being processed by amfori, you can contact amfori at dataprotection@amfori.org.

Should you not get an – in your opinion - adequate response to your questions or requests as data subject, you can approach the Belgian Data Protection Authority: <https://www.dataprotectionauthority.be/citizen>.

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