

# GLOBAL SALMON INITIATIVE

## PRIVACY POLICY

### Introduction

The Global Salmon Initiative is a leadership initiative established by leading farmed salmon CEOs from around the world who share a vision of providing a healthy and sustainable source of protein to feed a growing population, while minimizing their environmental footprint, and continuing to improve their social and economic contribution. Representing approximately 40% of the global farmed salmon sector, we recognize our ability – and our responsibility – to drive positive change at scale, and we are committed to seeking and supporting advancements in aquaculture that drive healthy, sustainable food systems.

Global Salmon Initiative respects your privacy and is committed to protecting your Personal Data. In the context of our activities and to operate efficiently we collect, hold, and /or process personal data about people with whom we work and people that use our website. This Privacy Policy will inform you as to how we look after your Personal Data including when you visit our website <https://globalsalmoninitiative.org/en/> (“the Website”), (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

We keep our Privacy Policy under regular review. This Privacy Policy was last updated in March 2022.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Global Salmon Initiative collects and processes your Personal Data including any data you may provide through the Website when you sign up to our newsletter or contact us through the Website.

The Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

#### Controller and contact details

Global Salmon Initiative Limited is the controller and responsible for your Personal Data (collectively referred to as “we”, “us” or “our” in this Privacy Policy). We are a private company limited by guarantee, registered in England and Wales (company registration number 13099915) and our registered office address is at First Floor, Ridgeland House, 15 Carfax, Horsham, West Sussex, RH12 1DY

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us by email at [admin@globalsalmoninitiative.org](mailto:admin@globalsalmoninitiative.org) or, by writing to us at First Floor, Ridgeland House, 15 Carfax, West Sussex, RH12 1DY.

#### Third-party links

The Website may include links to social media and other third-party websites, plug-ins and applications, not owned or managed by us to which different privacy policies may apply. Clicking on those links or enabling those connections may allow third parties to collect or share

data about you. We do not control these third-party websites and are not responsible for the privacy of information they collect. When you leave the Website, we encourage you to read the privacy policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

**Personal Data**, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

**Identity Data** such as first name, maiden name, last name, username or similar identifier, title, age, date of birth and gender.

**Contact Data** such as billing address, delivery address, email address and telephone numbers.

**Financial Data** such as bank account details.

**Transaction Data** such as invoices and details about payments to and from you for products and services exchanged between us

**Technical Data** about the devices you use to access the Website, such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, platform and other technology.

**Profile Data** such as your log-in and password details.

**Usage Data** such as information about how you use the Website, products and services and about your visits to and use of the Website including your referral source, length of visit, page views and website navigation.

Media data photographs, video, audio and news clips that we take or is taken by our employees, agents or contractors

**Marketing and Communications Data** such as your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, criminal convictions, trade union membership, information about your health and genetic and biometric data).

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect Personal Data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
  - sign up for our GSI newsletter; or.
  - contact us through contact form on the Website: your name, email address, telephone (optional) and your communication with us; or
  - Providing a CV.
- **Automated technologies or interactions.** As you interact with the Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may also receive Personal Data about you from various third parties and public sources as follows:
  - **Technical Data** from the following parties:
    - (a) analytics providers, such as Google, based outside the UK;
    - (b) advertising networks, such as Facebook, Instagram, Twitter, LinkedIn, , Google and Bing, based inside or outside the UK; and
    - (c) search information providers, such as such as Google and Bing, based inside or outside the UK.

#### 4. HOW WE USE THE DATA, AND OUR LEGAL BASIS FOR DOING SO

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data when:

- we need to perform the contract or services we are about to enter into or have entered into with you;
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- we need to comply with a legal obligation; or
- we have your consent to do so.

In this section, we have set out, in table form, a description of the different types of Personal Data we may collect, use, store and transfer, the ways we plan to use the Personal Data, and the legal justification on which we rely in order to do so. Where we rely on the justification that it is necessary to process the Personal Data for our legitimate interests we have, where appropriate, also identified what we consider those legitimate interests to be.

In the table below, we use the following abbreviations:

##### **Type of data**

- 1 = Identity Data.
- 2 = Contact Data.
- 3 = Financial Data.
- 4 = Transaction Data.
- 5 = Technical Data.

- 6 = Profile Data.
- 7 = Usage Data.
- 8 = Media Data.
- 9 = Marketing and Communications Data.

**Legal justification for processing**

- A =** We process your Personal Data because it is **necessary for the performance of a contract** to which you are a party or to take steps at your request before entering into such a contract.
- B =** We process your Personal Data because it is **necessary for compliance with a legal or regulatory obligation** to which we are subject.
- C =** We process your Personal Data because it is necessary for the **legitimate interests** of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

**If you fail to provide Personal Data**

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new member	1, 2	A
Customer or supplier administration (a) delivering the services provided with membership (b) sending statements and invoices;	1, 2, 4, 9	A, C (to recover debts due to us)

<p>(c) managing payments, fees and charges;</p> <p>(d) collecting and recovering money owed to us.</p>		
<p>To manage our relationship with you which will include:</p> <p>(a) sending you information you have requested, or answering the questions you have raised through the website contact form;</p> <p>(b) sending you our newsletters or other general non-marketing commercial communications;</p> <p>(c) sending you email notifications which you have specifically requested;</p> <p>(d) sending you our newsletter and other marketing communications relating to our business</p> <p>(e) notifying you about changes to our terms or privacy policy</p> <p>(f) asking you to leave a review or take a survey</p>	<p>1, 2, 6, 9</p>	<p>A, B, C (to keep our records updated and to study how members use our products/services)</p>
<p>To administer and protect our business and the Website (including troubleshooting, dealing with enquiries and complaints made by or about you relating to the Website, audit the downloading of data from the Website; data analysis, testing, system maintenance, support, reporting and hosting of data, security and fraud prevention)</p>	<p>1, 2, 5</p>	<p>B, C (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>
<p>To improve your browsing experience by personalising the Website and delivering</p>	<p>1, 2, 5, 6, 7, 9</p>	<p>C (to study how members and customers use our products/services, to develop them,</p>

relevant Website content and advertisements to you, to enable your use of the services available on the Website, and to measure or understand the effectiveness of the advertising we serve to you		to grow our business and to inform our marketing strategy)
To use data analytics to analyse statistics based on use of the Website to carry out market research on our users' demographics and tracking of sales data, to identify visitors to the Website, improve the layout and/or content of the pages of the Website and customise them for users, products/services, marketing, customer relationships and experiences	5, 7	C (to define types of users for our products and services, to keep the Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you, including information on offers, promotions and events about our products and services.	1, 2, 5, 6, 7	C (to develop our products/services and grow our business)

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

### **Opting out**

We rely on consent as a legal basis for processing your Personal Data to send you the newsletters for which you have subscribed. You have the right to withdraw your consent at any time by [contacting us](#) or by clicking unsubscribe at the bottom of the newsletter.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of any existing transaction, in respect of which we need to retain your Personal Data for the purposes stated in the table above.

### **Third-party marketing**

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

### **Cookies**

Cookies are pieces of information that a website transfers to your computer hard drive to store and sometimes track information about you. Although they do identify a user's computer,

cookies do not personally identify users. Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the internet.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly. For more information about the cookies we use, [please see our cookie policy](#).

### **Change of purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish us to explain why we believe the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your Personal Data for the above purposes with external third parties such as:

- Service providers acting as processors such as Avenir Global, with operations in the UK, USA and Canada and WebbyTech Ltd, based inside the UK, who provide IT and system administration and support services, and The Rocket Science Group, LLC based in the USA, who provide an all-in-one marketing platform called Mailchimp that we use for sending out our newsletters.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances, or if we believe that such action is necessary to prevent fraud or cyber crime or to protect the Website.

We may disclose aggregate statistics about visitors to the Website, members, customers and sales in order to describe our services to prospective partners, advertisers, sponsors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Some of our external third parties are based outside the UK so their processing of your Personal Data will involve a transfer of data outside the UK.

Whenever we transfer your Personal Data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data.
- Where we use certain service providers based in countries which are not deemed to provide an adequate level of protection for Personal Data, we may use specific contracts approved for use in the UK which give Personal Data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the UK.

## **7. DATA SECURITY**

We place great importance on the security of your Personal Data, and have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, our security and privacy policies are periodically reviewed and enhanced as necessary.

In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via the Website whilst it is in transit over the internet and any such submission is at your own risk.

It is advisable to close your browser when you have finished your user session to help ensure others do not access your **Personal Data** if you use a shared computer or a computer in a public place.

## **8. DATA RETENTION**

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We delete your Personal Data from our database eight years after you cease to be a member of the Global Salmon Initiative, or, in the case of a non-member who has made direct contact after five years, or if signed up to receive our newsletter immediately such member unsubscribes.

## **9. YOUR LEGAL RIGHTS**



Under certain circumstances, you have the right under data protection laws to:

**Request access** to your Personal Data (commonly known as a "**data subject access request**"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

**Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

**Note:**

1. You will not have to pay a fee to exercise any of the above rights. However, we may refuse to comply with a subject access request access or, alternatively, may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive.

2. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of the above rights. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
3. We try to respond to all legitimate requests within one month but, if your request is particularly complex or you have made a number of requests, it may take us longer. In this case, we will notify you and keep you updated.
4. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.