

PRIVACY NOTICE: AIM-PROGRESS WEBSITE

Welcome to the AIM - European Brands Association's ("AIM", "we" or "us") privacy notice.

AIM is the umbrella organisation for AIM-PROGRESS – our global initiative on responsible sourcing.

AIM respects your privacy and is committed to protecting your personal data or personal information (herein, "**personally identifiable information**"). This privacy notice will inform you as to how we look after your personally identifiable information when you visit the AIM-PROGRESS website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Notice

This privacy notice aims to give you information on how We collect and process your personally identifiable information through your use of this website, including any data you may provide through this website when you sign up to our website.

This website is not intended for children and we do not knowingly collect data relating to children.

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

Contact Details

Our full details are:

AIM - European Brands Association

AIM-PROGRESS – Program for responsible Sourcing

Katrin Recke, AIM-PROGRESS Manager

katrin.recke@aim.be

Avenue des Gaulois 9

B-1040 Brussels

Belgium

You have the right to make a complaint at any time to the *Commission de la protection de la vie privée* ("**CPVP**"), the Belgian supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the CPVP so please contact us in the first instance.

Changes To The Privacy Notice And Your Duty To Inform Us Of Changes

This version was last updated on 3 May 2018 and historic versions can be obtained by contacting us.

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

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. 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 their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personally identifiable 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).

The member zone of the AIM-PROGRESS website is a private zone and is accessible to AIM-PROGRESS members only. In order to give members access to the member zone we may collect, use, store and transfer different kinds of personally identifiable information about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, gender.
- **Business Contact Data** includes job title, email address, company name, company address and telephone numbers.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personally identifiable information but is not considered personally identifiable information in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personally identifiable information so that it can directly or indirectly identify you, we treat the combined data as personally identifiable information which will be used in accordance with this privacy notice.

HOW IS YOUR PERSONALLY IDENTIFIABLE INFORMATION COLLECTED?

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

Direct interactions. You may give us your Identity or Business Contact Data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personally identifiable information you provide when you join AIM-PROGRESS as a member by creating an account to access the member zone of this website.

Automated technologies or interactions. In addition, AIM-PROGRESS uses Google Analytics which collects the information generated about website usage (including your shortened IP address) and this is transmitted to Google Analytics. Google Analytics uses cookies and similar technologies to analyse how you use the website, and provides other services related to the site and internet use. Google may also collect information about domain visitors' use of other websites. For more

information about Google Analytics, or to opt out of Google Analytics, please click [here](#). If you disable Google Analytics, please note that some parts of this website may become inaccessible or not function properly.

HOW WE USE YOUR PERSONALLY IDENTIFIABLE INFORMATION

We will only use your personally identifiable information when the law allows us to. Most commonly, we will use your personally identifiable information in the following circumstances:

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

Generally we do not rely on consent as a legal basis for processing your personally identifiable information.

Purposes For Which We Will Use Your Personally identifiable information

We have set out below, in a table format, a description of all the ways we plan to use your personally identifiable information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personally identifiable information 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 personally identifiable information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member of AIM-PROGRESS	(a) Identity (b) Business Contact	Performance of a contract with you
To share a list of our members' contact details (only with other members) in order to allow our members to contact each other through AIM-PROGRESS	(a) Identity (b) Business Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to fulfil the purposes of the AIM-PROGRESS website, by allowing members to contact and connect with one another).
To manage our relationship with you which will include notifying you about changes to our privacy policy	(a) Identity (b) Business Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)

Cookies

The only cookies used on our website are provided via Google Analytics as explained above. AIM-PROGRESS does not use any other cookies on its website.

Change Of Purpose

We will only use your personally identifiable information 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 to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us - see Section 1 (**Contact Details**).

If we need to use your personally identifiable information 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 personally identifiable information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONALLY IDENTIFIABLE INFORMATION

We may have to share your personally identifiable information with External Third Parties for the purposes set out in the table in Section 4 (**How we use your Personally identifiable information**) above.

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

INTERNATIONAL TRANSFERS

We do not transfer your personally identifiable information outside the European Economic Area (**EEA**).

DATA SECURITY

We have put in place appropriate security measures to prevent your personally identifiable information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personally identifiable information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personally identifiable information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personally identifiable information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

How Long Will You Use My Personally identifiable information For?

We will only retain your personally identifiable information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personally identifiable information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

You have the right to object to us processing your personally identifiable information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us - see Section 1 (**Contact Details**).

No Fee Usually Required

You will not have to pay a fee to access your personally identifiable information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personally identifiable information (or to exercise any of your other rights). This is a security measure to ensure that personally identifiable information 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.

Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Your Legal Rights

You have the right to:

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

Request correction of the personally identifiable information 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 personally identifiable information. This enables you to ask us to delete or remove personally identifiable information 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 personally identifiable information 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 personally identifiable information 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 personally identifiable information 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 personally identifiable information 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 personally identifiable information. This enables you to ask us to suspend the processing of your personally identifiable information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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 personally identifiable information to you or to a third party. We will provide to you, or a third party you have chosen, your personally identifiable information 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 personally identifiable information. 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.

Last updated on 3 May 2018