



CDI Privacy Data Protection Policy

1. Introduction

The Stichting Chemical Distribution Institute (CDI); (**Dutch Chamber of Commerce registration 41134185**) and **Companies House UK registration Number FCO 18383 Branch Number BR002806**, having its registered office located at St Martins House, Ockham Road South, East Horsley, Surrey, England UK. (“CDI”) takes your privacy very seriously. CDI is committed to protecting your privacy and maintaining the security of any personal information received from you. We strictly adhere to the requirements of the EU General Data Protection Requirements (GDPR) and data protection legislation in the UK

This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact CDI’s Data Protection Officer (DPO) at the following email address: cdiprivacycontrol@cdim.org.

Section 9 of this Data Protection Policy sets out the additional personal data policies regarding CDI committee members.

If you have entered into a service agreement with CDI, either as a chemical company participant or as an associated participant; or a Logistic Service Provider or are a user of CDI’s databases; are an accredited CDI inspector/auditor; are a service provider to CDI or a client of CDI’s; or a CDI committee member, then the controller of your data; your personal data and/or cyber security data to access our databases, will be CDI’s Data Protection Officer (DPO) who is contactable at cdiprivacycontrol@cdim.org as stated in your agreement and any additional consent you give us. In all other circumstances, the controller of your data will be the Chemical Distribution Institute. CDI’s personal information handling policy and procedures have been developed in line with the requirements of the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

CDI does not collect sensitive information (also known as special categories of information) about you except when you specifically knowingly provide it and have consented to this.

2. What information do we collect?

We collect and process personal data about you when you interact with us and our services and when you purchase goods and services from us. The personal data we process includes:

- Your name
- your username and password to access a CDI database
- your work address, email address and/or phone number
- your job title
- in the case of accredited CDI inspectors/auditors or applicants applying to become accredited CDI inspectors/auditors this will include your home and/or office address including date of birth and academic qualifications and copies of academic certificates

- if you purchase products from CDI this will include your payment and delivery details, including billing and delivery addresses, credit card details and/or bank account details
- additionally, in the case of CDI employees; your next of kin contact details, staff appraisals, annual training reviews, academic qualifications and staff screening reports and HMRC related information
- any other information you may provide.

3. How do we use this information and what is the legal basis for this use?

We process the personal data listed in paragraph 2 above for the following purposes.

CDI will never send you unsolicited emails. But there are some emails that we will need to send you to provide you with a good CDI service. A full list of the types of emails you will receive from CDI to ensure an effective service from CDI are shown below:

- Welcome emails – when you join a CDI scheme.
 - Payment receipt – when participation or sales invoices are made.
 - Invoices – containing participation fees and any associated reminder of payment.
 - Renewal notices – to remind you of subscription renewals.
 - Key service messages - if we need to notify you about changes and enhancements to CDI's service.
 - E-mail alerts - only if you have selected to receive email alerts regarding safety bulletins or changes in the status of an active CDI report.
 - Notifications of committee meetings, agendas and minutes and associated arrangements.
 - User Surveys – from time to time requests for feedback on CDI's service or potential new aspects of service.
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- As required to establish and fulfil an agreement with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into an agreement with you and are unable to do so without it
 - to comply with applicable laws and regulations
 - in accordance with our legitimate interests in protecting CDI's legitimate business interests and legal rights, including but not limited to: use in connection with legal claims, compliance, regulatory and investigative purposes, competition law and anti-trust requirements, (including disclosure of such information in connection with legal process or litigation)
 - with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products, services, staff or accredited inspectors/auditors
 - we may use the information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests
 - to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests

- if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties
- we may monitor any participant's user account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests.

4. With whom and where will we share your personal data?

We will share your personal data with our CDI database services provider to ensure CDI can deliver its products or services to you.

We may also share your personal data with the below third parties:

- Our professional advisors such as our Quality Management System auditors and external legal advisers and accountants
- business partners and sub-contractors.

Personal data may be shared with government authorities and/or law enforcement officials if specifically required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of CDI for the purposes above. Such third parties include, but are not limited to: providers of website hosting, maintenance and identity checking.

CDI will **“not”** share your information to a third party for commercial exploitation.

5. How long will CDI keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

- Participants: Where you are a participant of CDI, we will keep your information for the length of any contractual relationship you have with us and after that for a period of a further 12 months.
- Accredited CDI Inspectors/Auditors: If you are an accredited CDI inspector/auditor, we will also keep your information for the duration you hold your CDI accreditation, and thereafter for a period of 12 months.
- CDI employees: If you are an employee of CDI, we will keep your information for the length of your employment contract, and thereafter for a period of 7 years.
- Prospective participants/ customers: Where you are a prospective participant and you have interacted with us, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 12 months from when you last interacted with us or our content.
- Customers: Where you have bought a product from CDI we will retain your data for up to 12 months following the sale.
- General contact: In the case of any contact you may have with CDI, we will retain those details for as long as is necessary to resolve your query and for 12 months after the query is closed.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require CDI to hold certain information for specific periods other than those listed above.

6. Where is my data stored?

The personal data that we collect from you will be stored on secure servers in Holland and the UK, or in secure premises in the UK. Further information may be obtained from cdiprivacycontrol@cdim.org.

7. What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing either by checking certain boxes on the forms we use to collect your data, or requesting to unsubscribe on any communication we have sent to you or by contacting CDI's Data Protection Officer (DPO) at cdiprivacycontrol@cdim.org. Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data:

- (a) By withdrawing your consent for us to use it
- (b) if it is no longer necessary for us to use your personal data
- (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or
- (d) if we haven't handled your personal data in accordance with our obligations.

8. Where can I find more information about CDI's handling of my data?

Should you have any queries regarding this Privacy Policy, about CDI's processing of your personal data or wish to exercise your rights you can contact CDI using this email address: cdiprivacycontrol@cdim.org. Whilst CDI is exempt from registering with "the Information Commissions Office (ICO) in the UK. If you are not happy with our response, you can still contact the "Information Commissioner's Office" directly at <https://ico.org.uk/>.

9. Additional; Specific Data Protection Policy, Regarding CDI Committee Members & Directors

9.1 Introduction

Where you attend a CDI committee as an invited guest; an observer; contact us to nominate yourself or a colleague from your organisation to stand for election to a CDI committee, to be appointed to a CDI committee or are an elected member of a CDI committee or Executive Board or Board of Directors, the controller of your data will be CDI's Data Protection Officer (DPO) who is contactable at cdiprivacycontrol@cdim.org. In all other circumstances, the controller of your data will be the Chemical Distribution Institute.

9.2 What information do we collect?

We collect and process personal data about you when, (a) you attend a committee meeting; (b) you and/or your nominating organisation contacts us to either nominate a representative to a committee, undertake an election process to be a member of a Committee; (c) to register to be appointed to a committee, or your representative organisation contacts us to be their representative to attend a committee as their representative or where you attend a committee meeting as an observer.

Depending upon the committee participation the personal data we process may include:

- Your name
- email address and/or phone number; the name of the company and/or organisation you represent
- your qualifications and work experience to validate compliance with the relevant CDI committee pre-requisite requirements
- in the case of members of the CDI Board of Directors this will additionally include your home address and passport details including date of birth.

9.3 How do we use this information and what is the legal basis for this use?

We process the personal data listed in paragraph 9.2 above for the following purposes:

- To enable us to continuously improve CDI's protocols, operating and accreditation standards and the services we provide to all CDI Stakeholders, but in particular the CDI participating chemical companies. In addition, to ensure compliance with CDI operating procedures to validate compliance with committee pre-requisite requirements and enable you to liaise with other committee members to ensure the review of CDI's operating standards, accreditation processes, CDI's Information Technology requirements; financial well-being and necessary financial and legal obligations and associated compliance requirements; to facilitate thorough feedback and the itemisation of action items to facilitate the continuous improvement of CDI's schemes
- to administer CDI's governance process, including running committees and maintenance and monitoring of committee membership in order to ensure compliance with CDI quality management system (QMS)
- in connection with legal claims, compliance, regulatory and investigative purposes
- to invite you to take part in CDI user surveys or to send you CDI newsletters, meeting agendas and minutes, meeting notes, including meeting notifications and arrangements and associated meeting arrangements
- to respond to your comments or complaints, including the investigation of any complaints received from you or from others
- to generate statistics (which will not identify you), regarding the composition of committees and their regional diversity
- to monitor use of our websites and online services and use your information to help us check, improve and protect our products, content, services and websites, both online and offline
- to monitor the use of CDI committees to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime and unauthorised downloading of CDI inspection/audit reports and ensure compliance with EU and US competition law and anti-trust requirements all in accordance with applicable laws.

We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your express consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

9.4. With whom and where will we share your personal data?

We will share your personal data with our CDI database services provider to ensure CDI can deliver its products or services to you.

We may also share your personal data with the below third parties:

- Our professional advisors such as our Quality Management System auditors and external legal advisers and accountants.
- your employer or nominating organisation to validate your involvement in Committees.
- other providers of services to us, including website hosting, maintenance and identity checking services.
- business partners and sub-contractors.

Personal data may be shared with government authorities and/or law enforcement officials if specifically required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of CDI for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance and identity checking.

CDI will **“not”** share your information to a third party for commercial exploitation.

9.5 How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information by law or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

- Where you are an invited guest or an observer at a CDI committee, we will retain your name and company indefinitely for the purpose of evidencing the constitution of the Committee the decisions made and the transparency of the applicable CDI scheme and or its development.
- Where you are a committee member, or an Executive Board Member, we will keep your personal data for 12 months after you cease to be a committee member and beyond that, we will retain your name and company (though not your other details) indefinitely for the purpose of evidencing the constitution of the Committee the decisions made and the transparency of the applicable CDI scheme and or its development.
- Where you are a Director of the CDI Board of Directors, we will keep your personal data for 12 months after you cease to be a Director and beyond that, we will retain your name and company (though not your other details) indefinitely for the purpose of evidencing the constitution of the Board of Directors the decisions made and the transparency of the applicable CDI scheme and or its development.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require CDI to hold certain information for specific periods other than those listed above.

9.6 Where is my data stored?

The personal data that we collect from you may will be stored on secure servers in the UK, or in secure premises in the UK. Further information may be obtained from cdiprivacycontrol@cdim.org.

9.7 What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing either by checking certain boxes on the forms we use to collect your data, or requesting to unsubscribe on any communication we have sent to you or by contacting CDI's Data Protection Officer (DPO) at cdiprivacycontrol@cdim.org. Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it. You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data:

- (a) By withdrawing your consent for us to use it
- (b) if it is no longer necessary for us to use your personal data
- (c) if you object to the use of your personal data and we don't have a good reason to continue to use it
- (d) or if we haven't handled your personal data in accordance with our obligations.

7. Where can I find more information about CDI's handling of my data?

Should you have any queries regarding this Privacy Policy, about CDI's processing of your personal data or wish to exercise your rights you can contact CDI using this email address: cdiprivacycontrol@cdim.org. Whilst CDI is exempt from registering with "the "Information Commissions Office (ICO) in the UK, If you are not happy with our response, you can still contact the "Information Commissioner's Office" directly at <https://ico.org.uk/>.

Endorsed by the CDI Board of Directors

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