

Information about Processing of Personal Data

in Accordance with Art. 14 GDPR

BACKGROUND AND PURPOSE

The “**Customer**” of FLOCERT wishes to receive a verification and certification against the **EDGE** Standards and, for this purpose, has entered into a certification agreement with FLOCERT.

FLOCERT has been accredited by the EDGE Certified Foundation (<https://edge-cert.org/>) to be able to undertake and provide certification services in accordance with the EDGE Certification Requirements. EDGE is a global assessment methodology and business certification standard for gender equality. It measures where organizations stand in terms of gender balance across their pipeline, pay equity, effectiveness of policies and practices to ensure equitable career flows as well as inclusiveness of their culture. The certification services include the audit, verification, and certification that a company conforms with the EDGE Standard to one of the three EDGE Certification Levels.

In order to perform the EDGE audit and certification, FLOCERT will conduct a remote audit to validate that the data and information entered by the Customer in the EDGE Strategy Assessment Tool is correct, has been derived from original organizational databases, is relevant to the chosen Reference Period and relates to all eligible employees of the Customer (the “**Employees**”). During the online interaction, the auditor will **review a sample** of Employees personal information and cross-check the reported data against the Customer’s HR system or original information sources to confirm that the reported data is correct and matches with the original sources. The auditor **will not be in possession** or have **direct access** to any of the original data sources. Also, the auditor will not make screenshots nor record the online interaction, so FLOCERT will not be able to use any personal data after the audit or pass them on.

FLOCERT and its auditors are under strict obligation to respect the **confidentiality** of the Employees’ personal data; they have the **awareness**, the **experience** and the **technical/organisational measures** in place to safeguard this. Due to the sensitive nature of such personal data, and because such audit of Employee data may be perceived as “processing” of personal information, despite the temporary and remote nature of the audit, FLOCERT would however like to **inform** the Customer’s Employees **of their rights**.

PROCESSING OF PERSONAL INFORMATION

In order to perform the certification, FLOCERT will conduct a review of certain personal data of certain Employees provided by the Customer to FLOCERT during the audit. In particular, the following data may be reviewed by FLOCERT (on a sample basis) within the context and for the purpose of the EDGE certification:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Employee names | <input checked="" type="checkbox"/> Personal and identification numbers |
| <input checked="" type="checkbox"/> Salary and wage data | <input checked="" type="checkbox"/> Employee qualifications and features |
| <input checked="" type="checkbox"/> Employee age | <input checked="" type="checkbox"/> Contractual data |
| <input checked="" type="checkbox"/> Data of working times | <input checked="" type="checkbox"/> Payment data |
| | <input checked="" type="checkbox"/> Employee assessments |

DURATION OF PROCESSING

The Employee’s data would only be processed for the duration of the certification process and the validity of the certification contract between the Customer and FLOCERT.

Certifier for



DATA TRANSFER AND SHARING

FLOCERT would not share the Employee's personal data with third parties for purposes other than the ones below. Personal data would only be passed on to third parties if: (1) the Customer's Employee have expressly given consent

pursuant to Art. 6 seq. 1 sentence 1 lit. a GDPR; (2) the transfer pursuant to Art. 6 seq. 1 sent. 1 lit. f GDPR is required for the assertion, exercise or defense of legal claims and there is no reason to assume that you have a prevailing legitimate interest in not transferring the Employee's data; (3) there is a legal obligation to transfer data pursuant to Art. 6 seq. 1 sentence 1 lit. c GDPR; (4) this is required by law and pursuant to Art. 6 seq. 1 sentence 1 lit. b GDPR for the execution of a contractual relationships with the Employee.

In addition, the Employee's personal data might be processed by FLOCERT's order processors in compliance with instructions, insofar as this is necessary for the fulfilment of the order. FLOCERT's contract processors do not have an own right to use the Employee's data. Due to the nature and the obligations of the certification standards, the EDGE Certified Foundation as scheme owner has the right to request audit information from its assurance bodies for the purpose of verification of the certification services.

EMPLOYEE'S RIGHTS

Being the owner of their own personal data, the Employees have the right,

- (1) pursuant to Art. 15 GDPR, to obtain information about their personal data processed by FLOCERT. Insofar as FLOCERT processes the Employee's data they may request information especially about the processing purpose, the categories of personal data, the recipients of their disclosed personal data, especially recipients in third countries, the planned storage period or the criteria of determination, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint with a supervisory authority, the origin of your data, if it was not collected by us as well as the existence of an automated decision-making including profiling and, if applicable, meaningful detailed information.
- (2) pursuant to Art. 16 GDPR, to obtain the immediate rectification of incorrect or incomplete of the Employee's personal data stored with FLOCERT.
- (3) pursuant to Art. 17 GDPR, to request the erasure of the personal data stored with FLOCERT, unless the processing is required to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.
- (4) pursuant to Art. 18 GDPR, to request the restriction of processing of the Employee's personal data, if the correctness of data is disputable, the processing is unlawful, but they refuse its erasure and FLOCERT does not need the data anymore. On the other hand, the Employees might need it to assert, exercise or defend legal claims or they have lodged an objection against the processing pursuant to Art. 21 GDPR and it is not yet clear whether FLOCERT's legitimate reasons prevail their interests.
- (5) pursuant to Art. 20 GDPR, to obtain the Employee's personal data which they provided to FLOCERT, in a structured, common and machine-readable format or to demand the transfer to any other responsible person, insofar as the processing is based on the Employee's consent or a contract and the processing is made by means of automated procedures.
- (6) where applicable, in accordance with Art. 7 seq. 3 GDPR, to revoke the Employee's uniquely given consent at any time. This entails that a continued processing of the personal data is prohibited.
- (7) pursuant to Art. 77 GDPR, to lodge a complaint with the supervisory authority. As a rule, the Employees can address their complaint to the supervisory authority at their usual place of residence or workplace or at FLOCERT's company headquarter.

If the personal data are processed on the basis of legitimate interests pursuant to Art. 6 seq. 1 sent. 1 lit. e or f GDPR, Employees have the right, pursuant to Art. 21 GDPR, to appeal against processing their personal data insofar as there are reasons resulting from their particular situation that would justify their claim. In this case FLOCERT will no longer process their data unless FLOCERT can prove compelling reasons that prevail their interests, liberties and rights or FLOCERT's processing serves to assert, exercise or defend legal claims.



If an Employee want to make use of his right of revocation or objection, he can send an email to info@flocert.net.

INFORMATION ABOUT FLOCERT

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