



## GS1 Activate & GCP Allocation Privacy Policy

(version 4 June 2018)

**GS1 AISBL ("GS1") respects the privacy of its users. This Privacy Policy sets out the terms on which your personal data is collected, stored and processed - as well as your rights with respect to your personal data. If you have any questions, please contact [privacy@gs1.org](mailto:privacy@gs1.org).**

### 1. Collection & Use of Personal Data

#### Collecting Personal Data

GS1 Activate automatically collects your personal information to enable it to provide its services to you. When completing an application for a GS1 Global Company Prefix (**GCP**) (**GCP Application**), we also collect your information in order to validate and complete your application. When you submit a GCP Application or use GS1 Activate, your personal data is collected for registration and security purposes. Personal data includes your first and last name and email address. You must register your details to submit a GCP Application or access GS1 Activate and GS1 will maintain a record of such registration details. GS1 is responsible as controller of your personal data and will control and process your personal data in accordance with this Privacy Policy and relevant laws and regulations as enacted from time to time.

#### Use of Personal Data

The personal data GS1 collects allows GS1 to fulfil its legitimate interests to review and complete a GCP Application and securely provide you access to GS1 Activate and inform you of any updates or changes to the service, and to access your account and communicate with you in troubleshooting problems with your access to GS1 Activate. You may oppose the collection and storage of your personal data at any time by contacting [privacy@gs1.org](mailto:privacy@gs1.org).

By consenting to the terms of this Privacy Policy, you authorise GS1 to store, use and share your personal data for the purposes described in this Privacy Policy. Your consent may be withdrawn at any time.

#### Disclosure to Third Parties

GS1 may disclose your personal data to necessary third party processors for the purpose of development. When your personal data is shared for such purposes, it will only be shared for the purpose of improving GS1 Activate. Any third party to which personal data is shared, will be subject to processing such data in accordance with this Privacy Policy and as authorised and instructed by GS1.

If required by law, GS1 may disclose your personal data upon request of a public authority and upon receipt of a Court order, or similar, to disclose your personal data. GS1 may disclose your personal data if such disclosure is necessary to enforce GS1 Activate Terms of Use.

#### Data Transfer to Third Countries

If it is necessary for us to share your personal data internally or with third parties in other countries, we ensure the necessary safeguards are in place to protect it. In the case of a transfer to a country outside the European Economic Area whose local data protection regime is not considered as adequate by the European Commission, we rely, amongst other things, on:

- The conclusion or the execution of an agreement that adequately protects your personal data in line with the GDPR;
- EU Model clauses, which are standardised contractual clauses used in agreements with service providers to ensure personal data transferred outside of the European Economic Area complies with the GDPR. We may provide you with a copy of these clauses upon request;
- Reasons necessary for the public interest;
- Your explicit consent; and
- The Privacy Shield framework that protects personal data transferred to the United States.

## **Retention of Personal Data**

GS1 will store and process your personal data for the purposes stated in this Privacy Policy. You are responsible for maintaining the accuracy of your personal data by contacting GS1 to notify it of any changes to or errors in your personal data. GS1 will retain your personal data for the time necessary for the purposes described in this Privacy Policy, subject to extension as permitted by law, and will delete your personal data after such time that it is no longer required.

## **2. Protection of Personal Data**

### **Security**

All information collected via GS1 and GS1 Activate is saved and stored in secure operating environments and is only accessible by authorised personnel. GS1 Activate is monitored regularly to ensure that no violations to its security have occurred and data is not being accessed or used improperly. GS1 Activate is protected by appropriate security measures as required by relevant laws and regulations to safeguard, prevent loss, unlawful use and unauthorised access to personal data to the maximum reasonable extent.

## **3. Your Rights**

### **Right to Information**

GS1 recognises the importance of transparency in the ways it processes your personal data. You have the right to obtain information about the source of your personal data (i.e. how it is collected), the purpose for collecting personal data, methods of and reasons for processing your personal data, and identification of the controller. You can request such information from GS1.

### **Accessing your Personal Data**

You have the right to access your personal data stored for a GCP Application and by GS1 Activate to update, amend and rectify your personal data record. Where such request is reasonable and proportionate, GS1 will provide such service free of charge, however if your request requires disproportionate technical or administrative effort GS1 may charge a fee. You have the right to have your personal data erased, noting that without the retention of such personal data, GS1 may be unable to process a GCP Application or grant you access to GS1 Activate.

If you request access to your personal data, GS1 may request verification of your identity to ensure to the fullest extent possible that personal data is not unlawfully disclosed – failure to adequately validate your identity may result in GS1's refusal to allow access to requested personal data.

### **Objection**

You have the right to object, in whole or in part, to your personal data being collected and processed. You have the right to restrict processing of your personal data if its accuracy is contested, or due to a claim of unlawful basis for processing.

### **Complaints**

You have the right to lodge a complaint with the relevant data protection supervisory authority, however we encourage you to direct your concerns or complaints to [privacy@gs1.org](mailto:privacy@gs1.org) at first instance. The relevant data privacy authority for GS1 is:

#### **Data Protection Authority**

Rue de la Presse 35, 1000 Brussels, Belgium  
<https://www.dataprotectionauthority.be/>

## **4. Contact & Information**

This Privacy Policy may change from time to time when reviewed and in compliance with applicable laws and regulations. Your rights under this Privacy Policy will not be reduced without your explicit consent. Where changes are significant, you will be notified by email and/or by prominent notice via GS1 Activate platform.

If you would like further information about this Privacy Policy or your privacy rights in relation to GS1 Activate, please contact [privacy@gs1.org](mailto:privacy@gs1.org) or by mail to attention to: **Corporate and Legal Affairs Department, GS1 AISBL, Blue Tower Avenue Louise 326, b. 10, 1050 Brussels, Belgium.**



