

## Data Policy

The purpose of this document is to establish a general GLOBALG.A.P. data policy. Due to the increasing amount of data being collected by GLOBALG.A.P. and the sensitivity of this data, GLOBALG.A.P. wants to provide maximum transparency for all system participants and utilize its governance structure in the best possible way.

This data policy covers data collected from legal entities in the course of compliance with GLOBALG.A.P. owned standard(s)/add-on(s) or standard(s)/add-on(s) operated by GLOBALG.A.P. but owned by a third party. Such entities are hereinafter referred to simply as “producers,” though they may include other entities than just producers.

Other entities with which data is shared, including but not limited to retailers, certification bodies, NGOs, and the public, are hereinafter referred to as “stakeholders.”

### 1 General

GLOBALG.A.P.:

- i. Respects the European Union’s GDPR and other legal obligations
- ii. Acknowledges the producer as the data owner
- iii. Understands it has been awarded a position of trust by the producer to collect data, manage access to this data, and provide reasonable transparency of this data – or information generated from this data – to the market without exposing producers at an individual or collective level to stakeholders
- iv. Envisions that sharing data can create a tangible value for the owner of the data, in particular producers
- v. Aspires to accelerate progress and innovation in the sector through responsible data management and clearly defined relationships with those who supply and receive data
- vi. Respects opportunities to collect data from producers also on aggregate level, e.g., from producer groups for producer group members

### 2 Justification per data point or data set

For every data point or data set collected, GLOBALG.A.P. will:

- i. Clearly outline, in writing, its justification for collecting this data and make this justification available to the participating producer within the respective GLOBALG.A.P. owned standard/add-on or standard/add-on operated by GLOBALG.A.P. but owned by a third party
- ii. Require certification bodies to collect and maintain the producer’s formal consent to the outlined justifications via the sublicense and certification agreement (SLCA) or other contracts, in order to maintain full transparency

### 3 Internal use

Regarding internal access to the collected data points or data sets, GLOBALG.A.P. may use the collected data internally for:

- i. Standard/add-on development purposes, by using the data to improve its standards/add-ons and develop fit-for-purpose solutions
- ii. Integrity purposes, i.e., in order to improve Certification Integrity Program (CIPRO) activities

### 4 External sharing

Regarding external access to the collected data points or data sets, GLOBALG.A.P.:

- i. Will clearly outline the minimum data access rules for each data point or data set within any GLOBALG.A.P. owned standard/add-on or standard/add-on operated by GLOBALG.A.P. but owned by a third party
- ii. Will require certification bodies to collect and maintain records of the producer’s formal consent to the minimum data access rules activated by their participation in the respective standard/add-on
- iii. Will enable IT partners to deliver or retrieve data points or data sets according to the applicable data access rules, although the role of collecting and maintaining records of the producer’s consent shall remain the responsibility of certification bodies or farm management systems

- iv. Will enable producers to extend and restrict access to their data points or data sets at will, beyond the minimum data access rules
- v. Will work to make the consequences of extending or restricting access to such data points or data sets directly visible to the individual producers by compiling general stakeholder requirements regarding data points or data sets or information generated from the data points or data sets
- vi. May provide aggregated reports to various stakeholders based on data points or data sets which do not allow identification of the individual and do not conflict with 1.iii
- vii. Will actively seek alliances with other like-minded organizations to share data in accordance with commonly agreed rules, in order to reduce duplication

## **5 Governance**

To govern this data policy, the System and Rules Technical Committee shall:

- i. Advise on any amendments to this data policy
- ii. Consult other technical committees where necessary
- iii. Not make decisions on the above, but rather make recommendations to the GLOBALG.A.P. Secretariat
- iv. Add one seat for a specific expert on data policies in supply chains to be appointed by the GLOBALG.A.P. Advisory Board (terms of reference to be adopted)

To govern the technical input and stakeholder demand, the respective technical committee(s) (e.g., Fruit and Vegetables, Aquaculture, Livestock, GRASP) shall:

- i. Advise on any additional data points or data sets being collected and on amendments to existing ones, including justifications, for any GLOBALG.A.P. owned and public standard/add-on
- ii. Advise on any additional amendments to the minimum data access rules for any GLOBALG.A.P. owned and public standard/add-on
- iii. Consult other technical committees where necessary
- iv. Not make decisions on the above, but rather make recommendations to the GLOBALG.A.P. Secretariat

Furthermore, GLOBALG.A.P. will be audited against this data policy, including the European Union's GDPR, by an accredited third party and shall publish the results to the System and Rules Technical Committee.

## 6 Annex

### 6.1 Example of justification for each additionally collected data point or data set (2i):

Data point or data set	GLOBALG.A.P. standard/add-on in which collected	Justification
Active ingredient used within a plant protection activity (incl. quantity and crops applied to)	Impact-Driven Approach module or add-on	To quantify the total amount in kg of active ingredient being used and allow a valuable comparison between peer group members – per crop or other element identifying their peer group
Production area of certified produce/products	Integrated Farm Assurance	To apply the area-based fee table and for market transparency, which can indicate possible fraud

### 6.2 Example of minimum data access rules (4i):

	Data Access Groups			
	GLOBALG.A.P. Secretariat	Certification Body	Market Participant	Public
Product	x	x	x	x
Product status	x	x	x	x

For each GLOBALG.A.P. owned standard/add-on or standard/add-on operated by GLOBALG.A.P. but owned by a third party as agreed in the [data access rules](#).