



# Data Governance Policy

Fair Trade USA®

Version 2.0.0

## Introduction

---

Fair Trade USA operates in a data-oriented environment that supports the mission of driving impact through the empowerment of farmers and workers by cultivating an equitable global trade model. To support this mission, the organization's data must be collected, managed, and shared in a systematic, reliable, and accurate manner. All data collected and generated by Fair Trade USA are valued as key assets to support the continued strategic growth of the organization, monitor and inform our internal systems, and share value-add information with external stakeholders.

## Purpose

---

The purpose of this policy is to ensure that Fair Trade USA data is reliable and accurate by establishing a framework to ensure data integrity, usage, and access. Adherence to this policy will result in greater accuracy, timeliness, and quality of information for future decision-making and data analysis. This policy includes principles to guide best practices in managing data assets and roles for managing, collecting, sharing, and verifying data.

## Scope

---

This policy applies to data that is gathered and managed from internal and external sources by Fair Trade USA, including compliance-related information from Certificate Holders, applicants, licensees, and Conformity Assessment Bodies (CABs).

## 1. Principles

---

The following principles guide data governance for Fair Trade USA.

### 1.1. Data Management

#### 1.1.1. Statement

Data is an asset that is managed.

#### 1.1.2. Rationale

Fair Trade USA is a mission-driven organization that uses data as a core means to convey impact. The data has real value and is treated accordingly. Data is a key tool in decision making.



### 1.1.3. Implications

Fair Trade USA, rather than any individual or team, is the owner of all data.

It is clearly defined who is accountable and responsible for the data quality and integrity of every data set, and who makes decisions for proper use.

## 1.2. Confidentiality

### 1.2.1. Statement

Fair Trade USA takes reasonable measures to safeguard confidential data obtained through the course of its activities to ensure that the information is not disclosed to unauthorized parties. Fair Trade USA respects confidentiality while striving for a culture of transparency.

### 1.2.2. Rationale

Trade secrets, intellectual property, and other proprietary information is often obtained through the course of Fair Trade USA activities and involvement with partners.

Ensuring data confidentiality builds trust and respect with our partners and confirms Fair Trade USA is operating within contractual obligations.

### 1.2.3. Implications

Confidentiality is considered before any data is shared internally or externally.

Different types of data and data sets will have varying requirements regarding maintenance of confidentiality, and staff must adhere to the associated access and use requirements.

## 1.3. Data Quality

### 1.3.1. Statement

Data quality is expected and supported at all levels of the organization to ensure accuracy, reliability, and consistency.

### 1.3.2. Rationale

Fair Trade USA's partners expect high quality data; excellent stewardship of the data will allow the organization to meet partners' expectations and bring optimal value to the organization.

Accurate and timely data is critical for better decision making and for many staff, departments, and teams use data to perform their daily duties and functions.

### 1.3.3. Implications

All users abide by a common set of data standards and processes.

Quality control process for documents and records and stewardship process for data model changes are adhered to.

Data records must be kept up-to-date throughout every stage of the workflow. Records shall be managed in accordance with Fair Trade USA's Document Control and Record Retention Procedure.

Information about data quality shall be made available to users.



## 1.4. Data Storage, Access, and Use

### 1.4.1. Statement

Data storage is secure and protected, and data is accessed in a controlled fashion. Data that has shared value must be accessible to those who need it.

### 1.4.2. Rationale

Users must have access to the data necessary to perform their duties and have responsibility to adhere to confidentiality requirements to protect the integrity of the organization and its partners.

### 1.4.3. Implications

Files are stored and shared across the Fair Trade USA File Management System so that all users can access the information needed to perform their functions to the best of their abilities.

Data usage, or use rights, for a given data and data set is defined.

Data stored in an electronic format is protected by appropriate safeguards that restrict access to authorized users, including permissions to manipulate data. All data is protected from unauthorized use and disclosure.

Data analytics are organized within information delivery tools in folders that are appropriate for specific audiences, such as Internal Use or the General Public, to support alignment with confidentiality requirements.

## 2. Roles and Responsibilities

---

### 2.1.1. Data Steward

2.1.1.1. A Data Steward is responsible for the collection, maintenance, and interpretation of data. The steward role can be established in various ways, including by data set, business process, or function.

### 2.1.2. Data Custodian

2.1.2.1. A Data Custodian is responsible for the physical storage, backups, and access to the data. The custodian role is normally served by the system owners.

### 2.1.3. Data User

2.1.3.1. A Data User is any staff member who utilizes data to perform their daily duties and functions. Data user responsibilities include:

- a) Ensuring that their access to data is carried out in a way which does not jeopardize data security and privacy;
- b) Striving to ensure that data is complete, accurate, and up-to-date;
- c) Complying with relevant policies, work flows, and procedures to ensure data integrity.

## 2.2. Data Science Team

2.2.1. The Data Science team seeks to improve Fair Trade USA's business outcomes by improving access to insightful data and analytics.



2.2.2. They are responsible for management of the Enterprise Data Warehouse (EDW). The EDW integrates different data sources from various operational systems in a consistent, trusted manner to provide data insights.

2.2.3. The Chief Impact Officer makes decisions pertaining to data access and use.

2.2.4. The head of the Data Science team is accountable for the data management of analytics, ensuring that the appropriate deliverables are accessible by the appropriate staff.

2.2.5. The Data Science team is, at a minimum, informed of all data collection and management workstreams that support analytics.

## 3. Use Rights

---

### 3.1. Access Rights

3.1.1. Access rights are read rights only.

3.1.2. All staff have access to all source data.

### 3.2. Manipulation Rights

3.2.1. Manipulation rights include entering and writing data, editing, and deleting.

3.2.2. The duty to define who has access to data or restrict access, who can create, edit, and modify, can be delegated and established in various ways, including but not limited to:

- a) By data type;
- b) By process owner; or
- c) By department, or function.

### 3.3. Sharing Rights

3.3.1. Sharing rights must be considered regardless of whether the information is being shared within the organization or externally.

3.3.2. FTUSA shares certain information with the market in order to stimulate sales of Fair Trade Certified™ products and to promote Certificate Holders as suppliers of such products.

3.3.3. Individual company records, such as compliance findings or transaction totals, should be considered confidential when interacting with all parties other than the individual company.

3.3.4. Certification staff regularly share individual company records during the compliance assessment process. Individual company records may be shared with external parties as outlined below:

- a) Auditors and Conformity Assessment Bodies (CABs) may receive all information pertinent to the Certificate Holder or Applicant to facilitate audit planning.
- b) Individual companies may receive information reported by other parties in their supply chain, where necessary to validate or reconcile data.

3.3.5. Where they exist, data sharing agreements between Fair Trade USA and partners describe any additional parameters or permissions for use rights pertaining to individual company records.

### 3.4. Publicly Available Information

3.4.1. Fair Trade USA makes public certain information pertaining to its operations and partners, including financial statements, impact reports, and company profiles.

3.4.2. Individual company attributes, such as name, country, or number of workers, are public.



3.4.3. Aggregated records or data analytics are public.

## 4. Review of the Data Governance Policy

---

The Data Governance Policy is communicated to all staff. The Data Science Team reviews this policy annually for updates.

