

# CERT

Certified Emissions Reduction Technologies Foundation

## WEBSITE PRIVACY POLICY

*Public Privacy Notice for the CERT Website and Online Services*

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Classification: Public

## Document Control

Field	Detail
Document ID	CERT-LGL-004
Title	CERT Website Privacy Policy
Version	1.0
Status	Approved
Owner	General Counsel / Data Protection Officer
Approver	Chief Executive
Review cycle	Annually, and upon material legal or service change
Related documents	CERT-GOV-007 (Part B); CERT-GOV-004; CERT Registry Terms of Use (planned); CERT-WEB-001

## Version History

Version	Date	Author	Description
1.0	2026-07-02	CERT Founding Secretariat	Initial draft for founding Board review.

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# CERT Website Privacy Policy

Effective date: [DATE] · Version 1.0

## 1. Who We Are

The Certified Emissions Reduction Technologies Foundation ("CERT", "we", "us") is a not-for-profit foundation incorporated in India, with its registered office at [ADDRESS]. CERT operates this website, the public CERT Registry views, and related online services (together, the "Site"). For personal data processed through the Site, CERT is the data fiduciary under India's Digital Personal Data Protection Act, 2023 (the "DPDP Act") and, where EU/EEA or UK data protection law applies to you, the data controller under the GDPR.

This policy explains what personal data we collect through the Site, why, and your rights. Processing connected with registry accounts, project submissions, KYC, and accreditation is additionally governed by the CERT Registry Terms of Use and our Information Security and Data Protection Policies (CERT-GOV-007), whose protections apply as a minimum standard.

## 2. What This Policy Covers

This policy covers personal data — information that identifies or can identify you as an individual. It does not cover project and credit data published in the CERT Registry, which concerns organisations and mitigation activities and is published under our transparency framework. Where project documentation contains personal data (for example, signatures or individual contact details), we redact it from public versions unless a legal basis supports publication.

## 3. Personal Data We Collect

- Data you provide: name, organisation, role, email, telephone and message content when you contact us, register for events or newsletters, respond to public consultations, apply for an account or accreditation, or apply for a role at CERT.
- Consultation responses: name, organisation and comments. Note that consultation synthesis reports are published; we publish commenter names and organisations unless you request anonymity in the consultation form.
- Data collected automatically: IP address, device and browser type, pages visited, referring page, and timestamps, collected through server logs and cookies (see Section 6).
- Whistleblowing reports: our Raise a Concern channel is operated by an independent provider and permits anonymous reporting. Data submitted there is governed by the Whistleblower Policy (CERT-GOV-004), which imposes stricter confidentiality than this policy; identity data is accessible only to the case team.

We do not knowingly collect data revealing sensitive characteristics through the Site, and we ask that you do not submit such data through general contact forms.

## 4. Why We Process Your Data and Our Lawful Bases

Purpose	Examples	Lawful basis
Responding to you	Answering enquiries; processing applications	Consent (DPDP); contract or pre-contractual steps (GDPR Art. 6(1)(b))

Running consultations	Receiving, analysing and publishing comment syntheses	Consent; legitimate interests in transparent standard-setting (GDPR Art. 6(1)(f))
Operating and securing the Site	Logs, abuse prevention, debugging	Legitimate uses (DPDP s.7); legitimate interests (GDPR)
Communications you request	Newsletters, event notices	Consent, withdrawable at any time via the unsubscribe link
Integrity and legal obligations	Investigating misuse; responding to lawful orders	Legal obligation; legitimate interests in registry integrity
Analytics	Aggregate usage statistics	Consent (cookie banner); data is aggregated or pseudonymised

We do not sell personal data, use it for behavioural advertising, or make automated decisions producing legal effects about you through the Site.

## 5. AI-Assisted Processing

Where we use automated or AI-assisted tools (for example, to triage enquiries or screen submissions), outputs affecting an individual are reviewed by a person, in line with CERT-GOV-007 §8.4. We do not train AI models on your personal data without a documented legal basis.

## 6. Cookies

The Site uses: (a) strictly necessary cookies (session management, security, load balancing), which do not require consent; and (b) optional analytics cookies, set only if you accept them via the cookie banner. You can withdraw cookie consent at any time through the cookie settings link in the footer, and configure your browser to reject cookies. A full list of cookies, durations and providers is maintained in the Cookie Notice.

## 7. Sharing Your Data

- Service providers acting on our instructions under contract: website hosting, email delivery, event management, analytics, and the independent whistleblowing channel operator.
- Professional advisers and auditors, under confidentiality obligations.
- Public authorities, courts or regulators, where disclosure is required by law; where lawful, we will notify you before disclosing.
- In connection with governance transparency: names, roles and declared interests of trustees, committee members and senior staff are published under our governance framework — this applies to office-holders, not to Site visitors.

We do not share Site visitor data with project proponents, VVBs, or market participants.

## 8. International Transfers

CERT operates globally, and our service providers may process data outside India. We transfer personal data only: (a) to countries not restricted under the DPDP Act; and (b) where GDPR applies, under adequacy decisions, standard contractual clauses, or other appropriate safeguards. Details of the safeguards for a specific transfer are available from the contact in Section 12.

## 9. Retention

Category	Retention
Enquiries and correspondence	Up to 24 months after resolution
Newsletter and event data	Until you unsubscribe, then suppressed
Consultation responses	Retained as part of the standard-setting record (published syntheses are permanent; unpublished personal contact details deleted after 5 years)
Server logs and security data	Up to 12 months, or longer where required for an investigation
Account/KYC and whistleblowing data	Per CERT-GOV-007 and CERT-GOV-004 respectively (stricter regimes)

When retention ends, data is deleted or irreversibly anonymised. Registry-integrity records that must be retained under the Rulebook are documented exceptions (CERT-GOV-007 §9.1).

## 10. Security

Personal data is protected under our ISO/IEC 27001:2022-aligned information security management system: encryption in transit and at rest, role-based access on a need-to-know basis, logging, and tested incident response. If a breach is likely to affect you, we will notify the Data Protection Board of India and affected individuals as required by the DPDP Act, and comply with GDPR notification duties where they apply.

## 11. Your Rights

- Under the DPDP Act: to access a summary of your personal data and processing activities; to correction, completion and updating; to erasure where processing is no longer necessary or consent is withdrawn; to grievance redressal; and to nominate a person to exercise your rights in case of death or incapacity.
- Where GDPR applies: rights of access, rectification, erasure, restriction, portability, and objection (including to legitimate-interests processing), and the right to withdraw consent at any time without affecting prior processing.

To exercise any right, contact us per Section 12. We respond within 30 days. We may need to verify your identity. Some rights are subject to documented exceptions — for example, records we must retain for registry integrity or legal compliance.

## 12. Contact and Grievance Redressal

Role	Contact
Grievance Officer (DPDP Act)	<a href="mailto:secretariat@certglobal.org">secretariat@certglobal.org</a>

If you are not satisfied with our response, you may complain to the Data Protection Board of India. If GDPR applies to you, you may also complain to your local supervisory authority.

## 13. Children

The Site is not directed at children (persons under 18 in India). We do not knowingly process children's personal data without verifiable parental consent, and we do not undertake tracking or targeted advertising directed at children.

## **14. Third-Party Sites**

The Site links to external resources (for example, standards bodies and host-country authorities). Their privacy practices are their own; this policy does not apply to them.

## **15. Changes to This Policy**

We may update this policy as our services or the law change. Material changes are announced on the Site with the new effective date, and prior versions remain available in the document library — the same version-control discipline we apply to every CERT document.