

Data Protection Compliance and Removal Requests for Communication on Progress Submissions

1. General Policy on Data Protection and Removal Requests

1.1 The UN Global Compact (“UNGC”) and the Foundation for the Global Compact (“FGC”) (from now on “**we**”, “**us**” or “**our**”) are committed to compliance with applicable data protection laws and regulations in its handling of personal data contained in Communication on Progress (“CoP”) submissions and/or any other documents that have been submitted voluntarily by participants as part of their engagement with our initiative.

1.2 In alignment with our standard procedure, we generally do not delete the online profile of a former participant, nor its letters of commitment, CoPs and/or any other documents that have been submitted voluntarily by participants as part of their engagement with our initiative. Transparency and disclosure are core values to which participants adhere when joining the UN Global Compact and we continue to uphold these values by ensuring a transparent record of our current and past participants on our public database. However, we recognize the need to consider removal or redaction requests based on data protection laws.

2. Consideration of Removal Requests

2.1 GDPR Compliance: we will consider requests for removal or redaction of personal data from CoP submissions when required to comply with the European Union General Data Protection Regulation (GDPR).

2.2 Other Data Protection Laws: We will also consider requests for removal or redaction of personal data from CoP submissions based on compliance with data protection laws other than GDPR, including but not limited to:

- The California Consumer Privacy Act (CCPA)
- The New York Stop Hacks and Improve Electronic Data Security (SHIELD) Act
- Other applicable state, federal, or international data protection laws

3. Request Submission and Evaluation Process

3.1 Participants or individuals seeking removal or redaction of personal data must submit a written request to legal@globalcompactfoundation.org.

3.2 The request must clearly state:

3.2.1 The specific personal data to be removed or redacted

3.2.2 The applicable data protection law(s) forming the basis of the request

3.2.3 The reason for the request, including any potential harm or risk associated with the continued publication of the data

3.3 We will evaluate each request on a case-by-case basis, considering:

3.3.1 The applicability of the cited data protection law(s)

3.3.2 The nature and sensitivity of the personal data in question

3.3.3 The potential impact on transparency and accountability principles

3.3.4 Any overriding legitimate interests in maintaining the data

4. Action on Approved Requests

4.1 If a request is approved, we will take reasonable steps to remove or redact the specific personal data from the relevant CoP submissions while preserving the overall integrity of the document and the public database.

4.2 We will maintain a confidential record of all approved removal or redaction actions.

5. Limitations

5.1 We reserve the right to deny requests that are overly broad, would compromise the integrity of the CoP program, or are not sufficiently supported by applicable data protection laws.

5.2 This policy does not create any additional rights or obligations beyond those provided by applicable data protection laws.