

# Data Governance Policy

CottonConnect

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## Introduction

Data gathered from the farms and farmers is key for showcasing the impact of CottonConnect’s intervention among the farming communities. Data collection and analysis is an integral part of all projects implemented by CottonConnect. The implementation plans of all projects very clearly lay out the data collection, analysis, and reporting process envisaged for a specific project. This data governance policy is prepared with an aim to provide clarity regarding various aspects related to **data for various CottonConnect programmes (including the REEL Cotton and REEL Regenerative programmes).**

## Objectives of the data governance policy

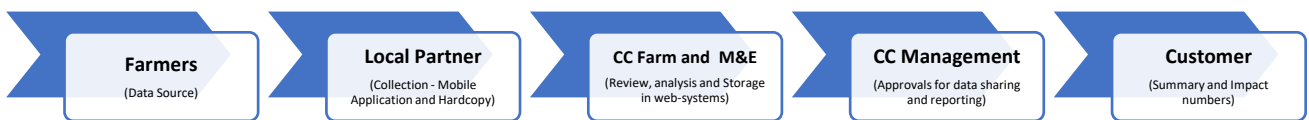
The specific objectives of the policy are:

- To clearly define the systems, methods, tools, and protocols involved in the management of data
- To set quality standards and ensure its compliance across the organisations and stakeholders involved

## Stakeholders

The key stakeholders involved in the data management process at CottonConnect are the farmers, local partners, CottonConnect, and the customer. An overview of the stakeholders involved is provided in the below diagram.

*Figure 1: Overview of the flow of data*



## Data value chain

The data value chain is summarised in the table below:

Concept	Details
Data Provenance	<ul style="list-style-type: none"> <li>• <b>Farmer Enrolment:</b> Basic details of the farmers <b>including personal details who</b> gave their consent to be part of the programme are recorded along with their total land and cotton growing area and production details.</li> <li>• <b>Baseline:</b> Basic information such as demographic, agronomic, and socio-economic details of the previous season is collected to analyse the needs of the group.</li> <li>• <b>Farmer Field Book:</b> Farm-level data is collected throughout the season to supplement the year-end impact assessment and claims. The data is collected by field executives of the local implementation partners at the respective stages of cotton production – land preparation, fertiliser and, pesticide application, irrigation, harvesting and selling. The data is reviewed and validated by the supervisors and shared with the CottonConnect team.</li> <li>• <b>Other data:</b> In addition to the above streams, need-based data collection is also carried out on a sample basis for conducting Life Cycle Assessments (LCAs),</li> </ul>

Concept	Details
	<p>Carbon Footprint Assessments, Livelihood Assessments, Social Impact Assessment, Health, Safety, Sanitation and Environmental assessments, specific project related requirements etc.</p>
<p><b>Data lineage</b></p>	<p>Data collected by the local partners is reviewed internally for manual errors, and post rectification of the same, the data is shared with the CottonConnect team in hard copies (If mobile applications, relevant submissions are made to the portal). The data received in hard copies are digitised. During the digitisation process, data is reviewed in batches and compared with the actual hard copy entries to identify and rectify manual data entry errors. Wherever digitization is carried out through external agencies, relevant non-disclosure agreements are executed.</p> <p>The digitised data is reviewed by the CC M&amp;E team and identifies any outliers or wrongful entries. The data is then shared with the local partner for revalidations and rectifications from the source. The cleaned and validated data sets are used for analysis.</p>
<p><b>Data Owner</b></p>	<p>At CottonConnect, all farm-level data is owned by the farmers. Farmers hold full legal rights over their data, including the right to withdraw consent for its use at any time. Prior to data collection, informed consent will be obtained from each farmer. This consent will clearly outline how the data will be controlled, used, and shared—including any sharing with CottonConnect’s partners or stakeholders—in either analysed or disaggregated forms. CottonConnect is committed to respecting the rights of farmers over their data and will ensure that any withdrawal of consent is implemented promptly.</p> <p>In addition to farm-level data, CottonConnect may collect personal data from other individuals involved in its programmes and operations, including but not limited to farming community members, Gin Workers and employees, CC employees, community facilitators, field staff, programme participants, and partner representatives. This data may include personal information, contact details, demographic information, employment records, training participation, and performance-related information. All such data will be collected in accordance with applicable data protection laws and with the informed consent of the individuals concerned. The purpose, scope, and intended use of the data will be clearly communicated during the consent process. Individuals will have the right to access, correct, or request deletion of their data, and may withdraw consent at any time. CottonConnect commits to using this data solely for legitimate programme, operational, or reporting purposes, statutory and legal purposes, and to ensuring that any sharing with third parties is done with adequate safeguards and only when necessary.</p>
<p><b>Data Process Owner</b></p>	<p>The data process owner within CottonConnect is the ME&amp;L team of CottonConnect. The various processes for the collection and management of data will be designed and implemented by the ME&amp;L team. Wherever relevant approvals are deemed necessary, the same will be taken from the management.</p>
<p><b>Data Controller</b></p>	<p>CottonConnect may act as either the sole data controller or a joint data controller, depending on the nature of the programme and the agreements established with stakeholders or partners. As a sole controller, CottonConnect independently determines the purposes and means of processing personal or farm-level data. In</p>

Concept	Details
	cases where data is jointly managed, CottonConnect shares this responsibility with other stakeholders—such as brand partners, implementing partners, or donors—in accordance with clearly defined roles, responsibilities, and data protection obligations outlined in formal agreements.
<b>Data Steward</b>	At CottonConnect, the ME&L team will act as the data stewards responsible for transferring data, transforming it, or ensuring the quality of data. This is ensured through a range of internal and external validation and verification processes.

## Data Collection Protocol

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The various steps involved in the data collection process are outlined below:

1. Development of data collection tools
2. Development of data collection guidelines
3. Pilot testing of data collection templates (for newly initiated templates)
4. Translation of data collection templates into the local language
5. Capacity building of local partner staff collecting the data – on data collection template, data quality, ethical considerations, and relevant methodologies – Jointly carried out by CottonConnect MEL and Farm Team
6. Communication of sample size requirements, if any
7. Monitoring of data collection:
  - a. Intensive monitoring and checks for errors in the first set of data being collected and rectifications
  - b. Periodic checks to ensure consistency and correctness by the CC Farm Team
  - c. Back checking and sample validations during the 2<sup>nd</sup> party Audit process
8. Ensure regular submission of hardcopy to the supervisors/ submission of data captured through the mobile application to the portal

## Data reporting flow

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- a. Data collected by CottonConnect through its local partners and other external agencies will remain as an internal property of CottonConnect
- b. Data that is reported outside should follow the internal sign-off process as shown below:



## Responsibility matrix

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CottonConnect ME&L Team, in collaboration with the Farm team, prepares the data collection templates and shares the same with Local Partner Organisations. The Local Partner Staff are trained on the templates and other key aspects of data collection. The responsibility of key stakeholders is summarised in the below matrix:

Process	Responsibility	Details
Data collection	Local Implementation Partner	<ul style="list-style-type: none"> <li>• Develop a better understanding of the data collection template and the purpose of the data collection processes</li> <li>• Conduct interviews with programme and control farmers and collect necessary data and evidence as per the requirements of the template</li> <li>• Verify and validate the information wherever necessary</li> <li>• Ensure that the personal information of the respondents is maintained with utmost confidentiality and not shared with any external parties</li> <li>• Conduct preliminary checks and verifications to ensure that the data collected is accurate</li> <li>• Ensure that the data is collected from the agreed stakeholders</li> <li>• Ensure that all ethical considerations are followed</li> </ul>
	CottonConnect	<ul style="list-style-type: none"> <li>• Development of data collection tools and templates</li> <li>• Training of local partner representatives for data collection, ethical considerations of data collection, and methodologies of data collection</li> <li>• Periodically monitor the data collection processes and ensure that the data is collected only for the required parameters and as per the requirements</li> <li>• Once the questionnaires are received from the local implementation partner, the questionnaires will be sent for counting</li> <li>• Data entry will be done through experienced data-entry operators under the close supervision</li> </ul>
Data Validation	CottonConnect	<p>The key responsibilities of CottonConnect are as follows:</p> <ul style="list-style-type: none"> <li>• Digitise the data, if provided by the local partner in hard copies</li> <li>• Ensure that the personal information of the respondents is maintained with utmost confidentiality and not shared with any external parties</li> <li>• For any certification audit/verification-related purpose, only share information based on the sample, with proper non-disclosure agreements in place</li> <li>• Engage external agencies to validate the data through sample-based assessment methods</li> </ul>
Data Reporting	CottonConnect	<ul style="list-style-type: none"> <li>• Analyse the data and report a truthful representation of the data</li> <li>• Prepare impact reports based on the analysed data</li> <li>• Ensure that no personally identifiable information is transmitted to any external stakeholders while reporting data</li> </ul>

## Data integrity

It is a mandate of CottonConnect to ensure the reliability and authenticity of data throughout the lifecycle. The following measures are put in place to ensure data integrity:

- **Guidelines:** Specific guidelines will be developed for the individuals engaged in the data collection. The guidelines should be prepared with an aim to provide clarity to the data collection team on all aspects related to data collection.
- **Data definitions:** Clear definitions are provided for data points so that the intended data will be captured
- **Capacity building:** In-depth capacity building and orientation of the individuals engaged in data collection need to be carried out properly
- **Inbuilt validations:** Wherever data is collected through digital means, necessary inbuilt validations are implemented to avoid any human/ manual errors.
- **Data cleaning and revalidations:** Cleaning of data should be performed for the removal of outliers, and revalidations need to be conducted based on feasibility.
- **Traceability:** Each individual farmer is given a unique farmer code to easily identify the data and retrieve for corrections and validations.

## Ethical considerations for data collection

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The following ethical considerations will be followed during the data collection process.

- **Introduction to respondents:** Before commencing the interactions, the respondent will be oriented on the background and objectives of the study. Any questions raised by the respondent will be given due consideration, and necessary clarification will be given to the respondent
- **Use informed consent:** After introducing the background and objectives of the data collection, the respondent will be asked for their consent to take part in the process. The data collection process will proceed further only if the respondent gives his/her oral consent to take part in the study.
- **Protection of confidentiality:** The information given by the respondents will be held confidential. The data collected will be used for analytical purposes and not to be reported with personal identifiable information.
- **Respect beliefs, manners, and customs:** The interviewers will familiarise themselves with the beliefs, manners, and customs they follow and give due respect for customs regarding dress, personal interaction, religious beliefs, and practices while undertaking field-level interactions.
- **Respect for silence:** The respondents will be given the freedom not to respond to any questions asked. The right of the respondent not to respond will be duly respected.
- **Avoidance of False Promises:** The respondent will not be given any false promises to make them provide responses.
- **Respect for views:** The interviewer should make sure that the views of the respondents will be respected and avoid any arguments with the respondent.
- **Awareness of Sensitive and Conflict situations:** The interviewer should be very sensitive while interacting with the community members about the sensitivities and local situations. Before making any statements, the interviewers should make sure that the statement in no way harms the community members or affects the harmony of the community.

## Data security and confidentiality

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Protecting the data collected and managed by CottonConnect is the responsibility of each team member creating, using, and accessing the same.

- a. Best data management practices, which evolve from time to time, should be replicated to ensure data security and confidentiality.
- b. Data shared with the internal team should be used only for the authorised and intended purposes.
- c. The ME&L team will be responsible for data storage and retention. The key responsibilities include:
  - o Store the datasets in a secured digital storage with designated access
  - o Ensure that the hard copy documents are stored in safe custody post digitisation
  - o Disposal of hard copies after the safe custody period as per the internal SOP
- b. Personal and sensitive data: Data that is transmitted outside does not contain any personal identifiable information – (This is excused in the case of sample data given for audit requirements, data shared for availing specific services for farmers, where proper non-disclosure agreements are in place). All members of the CottonConnect Team need to ensure that they comply with this requirement. In cases where there is a formal agreement to share personal data externally, it will be done only with the explicit consent of the data owner.
- c. Any data shared outside will be anonymised and all personal identifiable information will be removed.
- d. Non-compliance with the data security and confidentiality requirements will attract disciplinary actions by the management

(Specific details on data security can be found on CottonConnect's internal data protection policy)

## Data ownership and sharing policy

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All data collected by CottonConnect will be owned and managed by CottonConnect, unless otherwise specified through a formal agreement with an external stakeholder, in compliance with applicable laws and regulations. The aggregated or disaggregated data will be shared between internal teams within CottonConnect and Local Partners for review and verification purposes.

The data owned by CottonConnect can be shared with third parties only after entering into necessary contracts and non-disclosure agreements wherever applicable. The data shared with any external third parties will be compliant with the General Data Protection Regulation (GDPR) and/or requirements of other relevant laws of data protection and privacy where CottonConnect is operational.

Aggregated and disaggregated data may be shared with external parties, provided that appropriate disclosures are made in advance. All external data sharing must be approved through internal protocols and, where appropriate, supported by a Memorandum of Understanding (MoU) or Data Sharing Agreement (DSA).

In the event of external audits and certification requirements, data relevant to a set of samples may be disclosed after ensuring proper non-disclosure agreements are in place.

## Disposal of hard copies

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Data collected via. Hard copies are to be disposed of as per the internal SOP. As per the SOP, the hard copy data should be safely discarded upon expiry. The SOP will be amended from time-to-time basis the requirements of the programme and decisions of the management.