

POLICY OF CONFIDENTIALITY

Revision 00

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1. Introduction

This policy defines how confidentiality of the information obtained or created during the certification activities, is ensured.

2. Obligations of ESQ CERT Ltd

- 2.1 ESQ CERT Ltd commits itself to confidentiality concerning all information available to it in the context of its activities on the Client's premises, whether this information relates to internal matters of the client or to its business relations. This also applies to verbal or written results of the audit.
- 2.2 ESQ CERT Ltd shall not disclose the Client's confidential information, trade secrets or processing procedures to any third party (unless required to do so by Law).
- 2.3 ESQ CERT Ltd shall allow access to both its own documents and Client-related data to Accreditation Authorities as relevant.
- 2.4 ESQ CERT Ltd shall inform the Client, in advance, of any proprietary information it intends to place in the public domain. All but information that is publicly accessible by the Client shall be considered confidential.
- 2.5 Information about the Client from sources other than the Client (e.g. complainants, regulators) shall be treated as confidential, consistent with this Policy.
- 2.6 All personnel, including committee members, technical experts, subcontracted/external bodies or individuals acting on behalf of the ESQ CERT Ltd, shall keep confidential all information obtained or created during the certification activity.
- 2.7 For issues at hand, declaration of interest shall be expressed using an appropriately designed form. All involved personnel (i.e. ESQ CERT Ltd auditors, technical experts, subcontracted/external auditors, committee members and other associates as relevant) shall sign an undertaking committing them to comply with the confidentiality and independence requirements
- 2.8 ESQ CERT Ltd shall ensure there is adequate equipment and facilities for secure handling of confidential documents and records for the certification activity.

3. Obligations of the Client

The Client is obliged to maintain strict confidentiality about any information revealed within the terms of the Certification Contract as well as knowledge of matters relating to ESQ CERT Ltd, its employees and auditors. This obligation also applies after termination of the Contract. The Client similarly accepts the obligation on behalf of his auxiliary persons and associates.