



## Conformity Assessment Body

# Confidentiality Policy

VERSION	DATE RELEASED	APPROVED BY	AMENDMENT
1	Jan 2020	Billy Dash	Review
2	Mar 2021	Billy Dash	Review and update entity name
3	July 2022	Billy Dash	Review
4	July 2023	Billy Dash	Review-update title page

# Confidentiality Policy

ComplyNet is committed to treating any and all information obtained from or having been given access to by clients, or other stakeholders with the highest degree of respect and integrity. ComplyNet maintains a process to ensure any such information is safeguarded against unintended use.

It is a requirement for any members of the ComplyNet team, clients and other stakeholders to treat all information provided as confidential.

ComplyNet considers confidential information as the following:

- Any information about business affairs, internal processes, practices, procedures and commercial activities of ComplyNet.
- Any information relating to the business affairs of clients and their personnel.
- Information relating to clients and competitors; pricing strategies, technical data, marketing materials, financial information, strategy and business plans.
- Any other information which, if disclosed, would have a negative impact on ComplyNet or their client's business.
- All other information deemed confidential under legislation, or common knowledge.
- Information about ComplyNet or their clients, received through a third-party stakeholder such as a complainant.
- Any other information communicated as confidential by a client or other stakeholder.

ComplyNet recognises that there may be exceptions to confidentiality requirements in some circumstances. Such circumstances are identified below, however, this is not an exhaustive list:

- General information about certified clients and the status of their certification will be available to third parties upon request as required in ISO17021 Requirements for Bodies providing Audit and Certification of Management Systems. Such information includes:
  - The company name, tradenames and geographical location.
  - The scope of certification.
  - Issue and expiry date of certification.
  - The standards to which the client has been certified.
- Client information may be disclosed to Accreditation Body, such as JASANZ where this is relevant for the verification of ComplyNet's compliance with accreditation requirements.
- Information may be disclosed upon request in accordance with national or state legislation, such as in the event of a criminal investigation.

ComplyNet management will be consulted prior to any disclosure of any information. Where not prohibited by law, the client will be notified of any release of confidential information to third parties.



**Billy Dash**

General Manager

July 2023