KQC Confidentiality Policy

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Document owner	Document approver
Operations and Technical Manager	Director, Operations

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1. Purpose

This Policy document serves to set the principles that KQ Certification Limited (KQC) operates within to manage confidential information.

2. Scope

This policy applies to the full scope of KQC operations, Certification activities and geographies in which it operates.

The Certification process offered by KQC is applicable to manufacturing and service organisations, in public and private sectors and is administered in a non-discriminatory manner.

This process is designed to provide the client service of system assessment and Certification by assessing and monitoring the client's definition and implementation of their management System in an objective and impartial manner, against the audit criteria defined.

KQC's management system is maintained in accordance with, the current requirements of:

- ISO/IEC 17021 series, including the management system requirements of 17021-1 - option A.
- IAF Mandatory and Guidance Documents
- IAF Decisions
- Accreditation body specific requirements

3. Definitions

Please refer to the KQC Quality Manual (M001) Annex 01 for the current definitions that relate to KQC Management System.

Term	Definition
Confidential Information	Any data or information, whether oral, written, electronic, or in any other form, which is considered private or proprietary to the organization, its clients, or stakeholders. This includes, but is not limited to, trade secrets, client records, certification reports, audit findings, financial data, and strategic plans.
Non-Disclosure Agreement (NDA)	A legally binding contract that establishes a confidential relationship between parties. It outlines the obligations of the parties to protect and refrain from disclosing confidential information to unauthorized third parties.
Data Protection	The process and policies involved in ensuring the security and privacy of personal and sensitive data, in compliance with legal and regulatory requirements. This includes measures to prevent unauthorized access, disclosure, alteration, and destruction of such data.
Access Control	Security measures that regulate who can view or use resources within the organization. Access control policies define who is granted access to confidential information and under what circumstances.
Breach of Confidentiality	An incident where confidential information is disclosed to unauthorized individuals or entities, either intentionally or unintentionally. Breaches can result from actions such as data theft, hacking, or improper handling of documents.
Need-to-Know Basis	A principle where access to confidential information is restricted to individuals who require the information to perform their job duties. This is a key aspect of ensuring that sensitive information is necessarily disclosed.
Client Confidentiality	The obligation to protect and not disclose any information related to the clients of the certification body, except where authorized by the client or required by law. This includes client identities, records, and certification outcomes.

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Third-Party Disclosure	The sharing of confidential information with entities or individuals outside the organization. This is generally prohibited unless expressly authorized by the organization or required by law, and often requires a formal agreement such as a Non-Disclosure Agreement.
Retention and Disposal	Policies and procedures regarding the length of time confidential information is kept (retention) and the methods used to destroy it once it is no longer needed (disposal) to prevent unauthorized access or breaches.

4. Responsibility and authority

Responsibility	
Director, Operations	The Director, Operations has ultimate responsibility for approval of the Certification Body's Confidentiality Policy and decisions related to it.
Operations and Technical Manager	The Operations and Technical Manager has responsibility for the definition of the Certification Body's Confidentiality policy, processes, and controls. In addition, the Operations and Technical Manager has responsibility for coordinating the implementation of the Certification Body's Confidentiality policy.
Employees and contractors	Employees are each individually responsible, relative to their role, for the implementation of the Certification Body's Confidentiality policy, processes, and controls, in accordance with their contractual obligations.
Contractors	Individual Contractors are each individually responsible, relative to their role, for the implementation of the Certification Body's Confidentiality policy, processes, and controls, in accordance with their contractual obligations.
Sub-contractors	Subcontracting organisations, if used, are responsible, relative to their role, for the implementation of the Certification Body's Confidentiality policy, processes, and controls, in accordance with their contractual obligations.
Authority	
Director, Operations	The Director, Operations has ultimate authority for the implementation of processes and controls that reflect the organisation's Confidentiality Policy (this document). This authority may be delegated to the Operations and Technical Manager as required.
Operations and Technical Manager	The Operations and Technical Manager, under the authority of the Director, Operations has operational authority for the implementation of processes and controls that reflect the organisation's Confidentiality Policy (this document). This extends to orientation of new recruits (employee and contract) to the organisation.

5. Reference documents

Document number	Document title
ISO 17021-1:2015	Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements
IAF Mandatory and Guidance documents	As applicable to the scope of operation.
IAF Decisions	As applicable to the scope of operation.
Accreditation body specific requirements	As applicable to the accreditation held.

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6. Policy

In accordance with its policy, KQC will safeguard the confidentiality of all information obtained or created during the performance of its operations and Certification activities. This policy is being enforced through the establishment of legally enforceable confidentiality agreements with all personnel, either permanent, contractual or members of any committees, and sub-contracted organisations, involved in Certification activities, as well as the establishment of processes designed to ensure the secure handling of confidential information (see F002-4 Confidentiality and Non-Conflict of Interest Agreement).

If, for any reason, confidential information needs to be disclosed to a third party, KQC will first notify the affected client(s), see F101-1 - Certification Agreement.

Except as required in the applicable accreditation documents, KQC shall obtain written consent from the client or individual for disclosing information to a third party. Where required by law or authorized by contractual arrangements (such as with the accreditation body) to release confidential information to a third party, KQC will, unless regulated by law, notify the Client or individual concerned of the information provided.

7. Records

Records in relation to the management of Confidentiality are maintained for a minimum of 7 years, in accordance with P023 Control of Records Policy.

Revision Log		
Version #	**Description of Change**	**Release Date**
1.0	First issue	28th March 2024
1.1	Updated for readability	9th May 2024
1.2	Updated with job titles and KQC document references	10th February 2025
1.3	Unchanged confirmed as current.	13th August 2025.

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