



COSMOCERT A.E.

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CONFIDENTIALITY POLICY	CODE	VERSION	DATE OF EFFECT
	QMS.VV.PY.03	1	01/08/2023

Confidentiality Policy

Introduction

This Confidentiality Policy outlines the principles and practices that COSMOCERT, as a Verification body (VB), follows to protect the confidentiality of information obtained during the verification process. We are committed to safeguarding the sensitive information entrusted to us by our clients and other stakeholders. The verification body is responsible, through legally Agreements that signs with the clients, for the management of all information obtained or created during the performance of verification activities.

Scope

This policy applies to all employees, contractors, and subcontractors involved in verification activities for COSMOCERT. It covers all information obtained during the verification process, including:

- Client information (name, address, contact details).
- Organizational documents (policies, procedures, manuals).
- Data related to the verification scope (environmental data, financial data, operational data).
- Verification findings and reports.
- Internal documents and communications related to the verification process.

Confidentiality Principles

Confidential information obtained or created during verification activities is safeguarded and not inappropriately disclosed.

Confidentiality: All information obtained during the verification process will be treated as confidential and will not be disclosed to any third party without the client's written consent.

Limited Access: Access to confidential information will be restricted to personnel who have a legitimate need to know for verification purposes.

Data Security: We are implementing appropriate security measures (physical, electronic, and administrative) to protect confidential information from unauthorized access, disclosure, alteration, or destruction.

Retention and Disposal: Confidential information will be retained for a specified period, at least 5 years, as required by law or regulation or for legitimate business purposes. We will dispose of confidential information securely when it is no longer needed.

Exceptions to Confidentiality

We may disclose confidential information without the client's consent in the following limited circumstances:

- Legal Requirements: When required by law, regulation, or court order.
- Authorized by contractual arrangements.

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- Public Interest: To report suspected illegal activity or a serious threat to public health or safety.
- Accreditation Body: To fulfill reporting requirements to our accreditation body.

Except for information that the client makes publicly available, or when agreed between the verification body and the client, all other information is considered proprietary information and shall be regarded as confidential.

Information about the client obtained from sources other than the client (e.g. complainant, regulatory authority) considered confidential between the client and verification body. The provider (source) of this information shall be confidential to the VB and shall not be shared with the client, unless agreed by the source.

Client Notification

In any case where we are required to disclose confidential information without the client's consent, we will make reasonable efforts to notify the client in advance, unless prohibited by law.

Employee and Contractor Responsibilities

All employees, contractors, and subcontractors of COSMOCERT are required to:

- Read and understand this Confidentiality Policy.
- Sign a confidentiality agreement (declaration of Impartiality and Confidentiality) and a contract acknowledging their obligation to maintain confidentiality.
- Handle confidential information with care and only use it for authorized verification purposes.
- Report any suspected breaches of confidentiality to the designated management personnel.

Policy Review and Updates

This Confidentiality Policy will be reviewed and updated periodically to reflect changes in regulatory requirements, best practices, and the Verification body's business practices.

Conclusion

COSMOCERT is committed to maintaining the confidentiality of all information entrusted to us. By following this policy, we ensure that our clients can have confidence in the integrity and security of their sensitive data.

CEO of COSMOCERT

Konstantinos Diamantopoulos

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