

## Confidentiality Policy

ICA Audit is committed to ensuring that the confidentiality of all information related to its clients and personnel is protected across its certification activities. This applies to all levels of the organisation, including the CAB team, audit team members, and committees.

Information obtained from sources other than the client, for example, a complaint regarding a client, shall be treated as confidential.

To maintain confidentiality, ICA Audit have the following measures in place:

- An information transfer process, requiring password protection of all confidential information communicated externally.
- A document classification process, requiring the labelling of all confidential information.
- Strict access control rights across all personnel and client records.
- Legally enforceable agreements with all personnel operating under ICA Audit's control.

In circumstances where ICA Audit are required to disclose information publicly, the following shall apply:


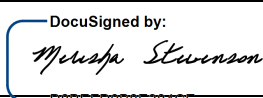
- If any information related to the client is to be placed in the public domain, the client shall be informed in writing.
- No information shall be disclosed to a 3<sup>rd</sup> party, except where required by ISO 17021-1:2015 or by our UKAS accreditation.
- If we are required by law to disclose information, we shall inform the client or individual concerned, except where this is prohibited by law.

All information held by ICA Audit shall be processed in compliance with all relevant legislation and regulations, such as the Data Protection Act 2018 or the General Data Protection Regulations (GDPR) 2016.

### Version History

| Date of Release           | Summary of Changes  |
|---------------------------|---|
| 06/04/21                  | Document reviewed in line with change of management.                                      |
| June 30, 2021   09:18 BST | Policy rewritten to give more specific detail of how ICA Audit maintains confidentiality. |

### Approval

| Document Updated By   | Document Approved By   |
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| Date: June 28, 2021   10:58 BST   | Date: June 30, 2021   09:18 BST  |