

## CONFIDENTIALITY

ERM Certification and Verification Services (ERM CVS) is the ERM Group's global provider of independent certification, verification, assurance and training services. We believe in the principle of openness, whilst respecting the strict confidentiality of information derived from our clients.

We recognise that it is necessary for us to gain privileged access to information needed to carry out our assessments adequately and that it is essential we keep confidential any proprietary information about our clients.

Mechanisms have been established to safeguard the confidentiality of the information created or obtained during our certification, validation & verification, and training activities at all levels of our organisation, including our Management, external bodies or individual assessors or trainers acting on our behalf.

The key principles which underpin our mechanisms for safeguarding confidential information are:

- All personnel involved in our certification, validation & verification and training activities (including contractors or other external organisations or individuals acting on our behalf) shall keep confidential all information obtained or created during our assessments, training delivery or other activities.
- All client information, except for information that is made publicly available by our clients, shall be considered confidential.
- When we intend to place client information in the public domain, we will inform the client in advance of our intentions.
- We will not disclose confidential information about a particular client or individual without the consent of the client or individual concerned.
- Where we are required by law to release confidential information to a third party, unless regulated by law, we will notify the client or individual concerned in advance of the information provided.
- Information about a client from sources other than the client (such as regulators and complainants) will be treated as confidential in line with our policy on confidentiality.
- We have in place arrangements, equipment and facilities to ensure that all client information (eg documents, data and records in electronic or hard copy form) remains secure and accessible only by authorised persons at all times.
- Where we need to make confidential information available to other parties such as an accreditation body, we will inform affected clients of this action.
- Where a Certification or Verification scheme requires us to publish certain information, we will publish information in accordance with the scheme owner's requirements, which the customer accepts as a requirement of the scheme.