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| Document ID: AQS106 | AUS-QUAL Certification Management System Confidentiality | Page: 1 of 3 |
| Document type: Procedure | | Issue Number: 6 |
| Prepared by: MOB | | Date: 12/12/2013 |

Key Words: Conflict of interest, Disclosure of information, Proprietary, Company, Client, Privacy

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| <p>PURPOSE: To specify how the company will maintain confidentiality in respect of all commercial and proprietary information that is not otherwise defined as public knowledge.</p> | <p>SCOPE: All Company information, application information, audit reports and other documents that are acquired or maintained as part of the AUS-QUAL certification process. This procedure shall apply to all personnel associated with AUS-QUAL, or performing work for AUS-QUAL in any capacity.</p> |
| <p>RESPONSIBILITY: The Certification Systems Manager is responsible for ensuring that this procedure accessible and understood by staff and contractors. The Managing Director is responsible for confidentiality issues.</p> | <p>SUPPORTING DOCUMENTS & REFERENCES:</p> <ul style="list-style-type: none"> • ISO 17021 • ISO/IEC 17065:2012 • JAS-ANZ Procedure 7 – Confidentiality and Conflict of Interest • Client Register / Database • AQS022 Confidentiality Policy • AQS103 Document Control • AQS107 Conflict of Interest • Form AQS910 Statement of Confidentiality • Form AQC901 Code of Conduct |

PROCEDURE

DISCLOSURE OF INFORMATION

AUS-QUAL personnel including contractors may acquire, or have access to commercially confidential information such as audit reports, company procedures, product specifications and other customer information.

1. All information, documentation, and knowledge obtained or provided in the course of the certification process and subsequent activities shall be treated as strictly confidential. This includes all information identified above and in the scope of this standard operating procedure plus any other document that is not specifically defined as being public knowledge.
2. An exception to the restrictions outlined in clause 1 (above) may be authorised by the Managing Director after written approval is obtained from the organisation concerned. When approval is given, the Managing Director shall stipulate the specific terms and conditions of the disclosure.
3. Information which is acknowledged public information may be disclosed without reference to the Managing Director. Information which is known to be (or suspected of being) available publicly through unofficial sources shall remain confidential within the AUS-QUAL certification system.
4. A register of certified client organisations shall be kept as a publicly available document and is therefore not subject to the requirements of this standard operating procedure. In the event that certification of a client organisation is terminated, or rights to use the quality mark are suspended, AUS-QUAL may publicise that the client organisation concerned is no longer authorised to use the certificate or mark in accordance with the licence agreement.
5. Where disclosure of confidential information is required by law, the Managing Director shall

REFERENCES

*ISO 17021
ISO/IEC
17065:2012
JAS-ANZ
Procedure 7*

*Client Register /
Database*

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approve such disclosure as is necessary to fulfil legal requirements and shall assume responsibility for any such disclosure. The Managing Director shall ensure that the client concerned is notified of the information provided and that a record of such notification is maintained. If possible, this notification will be provided prior to the disclosure of the information.

- Details of applicants for certification shall be treated as confidential until certification is granted. If an applicant withdraws an application for certification, details of the applicant shall remain confidential.

If required to release confidential information AUS-QUAL shall notify the client verbally and through written notification unless prohibited by law.

- In case of doubt, prior clearance for the disclosure of information shall be obtained from the Managing Director.

RESTRICTIONS ON ACCESS TO INFORMATION

- The Managing Director of AUS-QUAL shall ensure that access to confidential information is restricted to the individuals nominated below. Such individuals must sign either a "Statement of Confidentiality", and/or a "Code of Conduct" (which includes a confidentiality clause), depending on their role within AUS-QUAL. The signed document(s) shall be filed on each individual's personal file.

Nominated individuals not directly involved in certification activities shall be required to sign a "Statement of Confidentiality". They are as follows:

- AUS-QUAL Board Members
- AUS-QUAL Advisory Committee members.
- AUS-QUAL Staff

Nominated individuals directly involved with certification activities shall be required to sign a "Code of Conduct". They are as follows:

- AUS-QUAL Auditors and Contractors.
- Technical Experts providing assistance with the Audit process.
- Contractors performing work for AUS-QUAL.
- External auditors and accreditation bodies that must have access to client files in order for AUS-QUAL to comply with the requirements of accreditation.

- Where confidential documents are to be distributed outside of the central office they will be handled and dispatched as follows:

- sealed in an AUS-QUAL envelope
- marked "Commercial-in-Confidence"
"To be opened by Addressee only"
- delivered by Express Mail, by document courier, or by other secure means.

- Established secure e-mail links can be used to deliver confidential information. Recipients of the information shall be required to confirm receipt of the information by reply e-mail as required under controlled document issue procedures.

- Transmission of confidential information by facsimile or other electronic communication (other than secure e-mail) is to be avoided wherever possible. However, if fax or electronic transfer is the only practical means of transfer, telephone contact with the receiving party shall be established prior to transmission and contact maintained until the transmission has been completed successfully. Confidential information or documents shall not be left unattended on a scanner or fax machine.

*Form AQS110
Statement of
Confidentiality*

*Form AQC901
Code of Conduct*

*AQS103
Document Control*

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STORAGE

1. Confidential documents (or copies thereof) may be required to be held in storage from time to time. The Certification Systems Manager shall ensure that all such documents are adequately secured on the premises or at an off-site storage where they are protected from damage, deterioration and unauthorised viewing and/or copying.
2. Where confidential documents are to be destroyed, the Certification Systems Manager shall ensure that the documents are disposed of in a method that will ensure that they can not be retrieved for viewing and/or copying. In most cases paper documents will be shredded.
3. Electronic copies of confidential documents shall be held on a secure file server on the AUS-QUAL computer system. The folders housing confidential AUS-QUAL documents shall be secured by password and accessible only by authorised personnel.
4. Where copies of confidential documents have to be stored on individual computers eg Auditor's lap-top computers, all necessary precautions shall be taken to safeguard the confidentiality of the documents concerned.
5. A record shall be maintained of the locations of all confidential records and other documents (electronic and hard copy) held on behalf of client organisations.
6. When a document is to be destroyed or returned to a client organisation, all copies of the document shall be accounted for. Electronic copies shall be deleted and surplus hard copies shall be destroyed as outlined above under Storage, Clause 2.

*Quality Records
Chart*