



1. Purpose

This procedure describes the measures taken by TUV USA, Inc. to ensure that relevant client information is treated a confidential at all levels of the organization, including sub-contractors.

2. Scope

This procedure applies to all TUV USA, Inc. employees, agents, committees and subcontractors and their respective activities involved with TUV USA clients.

3. References

ISO 17021 “Conformity assessment — Requirements for bodies providing audit and certification of management systems;

ISO 19011 “Guidelines for auditing management systems”

4. Responsibilities

The TUV USA, Inc. Managing Director or designee is responsible for establishing and maintaining facilities to ensure confidentiality.

All TUV USA, Inc. personnel and subcontract personnel are accountable for confidentiality requirements of client information. All levels of personnel and committees are included in arrangements to assure confidentiality.

Subcontractors are responsible for handling client information with professional secrecy at the client facilities and other environments in which client documents and information are maintained, such as home offices or TUV USA, Inc. offices.

5. Procedure

TUV USA, Inc. personnel are exposed to a significant amount of proprietary information regarding client products, facilities, organization, and procedures.

Ensuring that this information is kept confidential is a major concern to TUV USA, Inc. Measures to preserve confidentiality are implemented in informing personnel and in the administrative and procedural structures of the certification systems. The following measures are implemented:

- The employment agreement signed by each employee contains a declaration of confidentiality of third party and company information;
- Subcontracted auditors are required to sign a Confidentiality Agreement that indicates that they will hold all client information in the strictest confidentiality;
- The members of the Committee for Safeguarding Impartiality signing a confidentiality agreement;

Prepared by: R. de Souza	Reviewed by: J Espinal	Authorised by: R. Thomsen	Document GOP017	Date: 03/16/2016	Revision: 0
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- Confidential treatment of client processes and procedures is discussed with client management in the opening and closing meetings;
- Special arrangements regarding confidentiality may be submitted by the client;
- Clients are informed that certification files held by TUV USA, Inc. are subject to review by industry accreditation agencies and regulatory authorities.

Note: During oversight audits (e.g. Accreditation Bodies, Regulatory Authorities, etc.) TUV USA shall not provide access to records of their competitors.

6. Documents and Records

- GOP100F002 Independent Contractor Agreement
- GOP100F003 Subcontractor Confidentiality
- GOP100F004 Secondary Employment Medical
- GOP100F006 Independent Contractor Agreement for Inspection
- GOP100F007 Secondary Employment Agreement Certification
- F-029 Audit Declaration;
- P11F040 enclosure 3, Declaration of Independence
- Terms of Employment TUV USA Inc.

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