# CLIENT PRIVACY, DATA AND INFORMATION PROTECTION POLICY

APPROVED BY CEO
DAS CERTIFICATION PRIVATE LIMITED
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# DAS Certification Private Limited

## Client Privacy, Data and Information Protection Policy

*Prepared in accordance with ISO/IEC 17021-1:2015, Clause 8, including confidentiality requirements*

Applicable to: all DAS personnel, auditors, inspectors, trainers, calibration staff, reviewers, certification decision makers, committee members and external resources acting on behalf of DAS.

### 1. Policy Statement

DAS Certification Private Limited is committed to maintaining the confidentiality, privacy, integrity and protection of all client data, records and information obtained or generated during the delivery of third-party certification, inspection, training and calibration services. As an accredited certification body under ISO/IEC 17021-1:2015 by PNAC, DAS has established appropriate controls to ensure that client information is protected against unauthorized access, disclosure, alteration, misuse, loss or damage.
DAS recognizes that client information received during application review, audit planning, audit execution, inspection, calibration, training, certification decision-making, complaints, appeals and surveillance activities is confidential and is used only for the intended professional and accreditation-related purposes.

### 2. Purpose

The purpose of this policy is to define DAS Certification Private Limited's arrangements for protecting client privacy, data and information in accordance with ISO/IEC 17021-1:2015 Clause 8, applicable accreditation requirements, contractual obligations and relevant legal and regulatory requirements.
This policy ensures that all information held by DAS is handled in a secure, responsible and impartial manner.

### 3. Scope

This policy applies to all confidential information received, collected, generated, reviewed, stored, transmitted or retained by DAS in relation to its certification, inspection, training and calibration activities.
This includes information handled by DAS employees, auditors, technical experts, inspectors, trainers, calibration personnel, reviewers, certification decision makers, committee members, subcontractors and any other persons acting on behalf of DAS.

### 4. Types of Protected Client Information

- Client applications, quotations, contracts and service agreements.
- Audit plans, audit reports, inspection reports, calibration records and technical findings.
- Management system documentation, procedures, policies, manuals and internal records.
- Client business information, processes, products, services, sites and operational details.
- Legal, regulatory, financial, commercial and contractual information.
- Personnel records, training records and competence-related information shared by clients.
- Nonconformities, corrective actions, complaints, appeals and related evidence.
- Certification status information before formal publication or authorization.
- Any information identified by the client as confidential.
- Any other information obtained during service delivery that is not publicly available.

### 5. Confidentiality Commitment

DAS has ensured that all personnel and external resources involved in certification, inspection, training and calibration activities are bound by confidentiality requirements. Confidentiality obligations are established through employment contracts, auditor agreements, expert agreements, committee member undertakings, subcontractor agreements and other relevant declarations.
Personnel working for or on behalf of DAS are required to protect client information before, during and after completion of the assigned activity. Confidentiality obligations remain applicable even after termination of employment, contract or assignment.

## 6. Access Control and Need-to-Know Principle

Access to client information is controlled and limited to authorized persons who require the information for legitimate business, technical, audit, inspection, calibration, training, review, decision-making, accreditation or legal purposes.

DAS has implemented the need-to-know principle to ensure that client information is not shared internally or externally unless required for the performance of assigned responsibilities.

## 7. Use of Client Information

Client information is used only for the purpose for which it was obtained, including application review, audit planning, audit execution, report preparation, technical review, certification decision, surveillance, recertification, accreditation assessment, complaint handling, appeal handling and record maintenance.

Client information is not used for personal gain, commercial exploitation, marketing misuse or any activity that may compromise impartiality, confidentiality or professional integrity.

## 8. Disclosure of Client Information

DAS does not disclose confidential client information to any third party without the prior written consent of the client, except where disclosure is required by law, regulatory authority, accreditation body or contractual obligation.

Where DAS is legally required or authorized by contractual arrangements to disclose confidential information, the client is informed in advance of the information to be disclosed, unless prohibited by law.

Information provided to PNAC or any other relevant accreditation body during accreditation assessment, witness audit, office assessment or complaint investigation is controlled and treated as part of DAS's accreditation obligations.

## 9. Publicly Available Information

DAS may make publicly available information related to certification status as required by ISO/IEC 17021-1:2015. Such information may include the name of certified client, applicable standard, scope of certification, certification status, certificate number, issue date, expiry date, suspension or withdrawal status, where applicable.

Only authorized and verified certification information is released publicly. Confidential audit details, client records, internal documents and technical findings are not disclosed publicly.

## 10. Data Security and Record Protection

DAS has established controls for secure handling, storage, retention and disposal of client records. Client information is protected in both hard copy and electronic form.

- Secure filing and restricted access to physical records.
- Password protection and controlled access to electronic records.
- Use of official DAS communication channels for transmission of client information.
- Backup and protection of important electronic data.
- Prevention of unauthorized copying, removal or sharing of client documents.
- Secure disposal of obsolete, expired or no longer required confidential records.
- Controlled access to audit packs, reports, certificates and decision records.

## 11. Responsibilities of Personnel

All DAS personnel and external resources are responsible for maintaining confidentiality and protecting client information. They are required to:

- Handle client information with care and professional responsibility.
- Use client information only for authorized purposes.
- Avoid unauthorized disclosure, discussion or sharing of client information.
- Protect documents, records, laptops, email accounts and storage devices.
- Immediately report any suspected breach, loss, misuse or unauthorized access.
- Return or securely dispose of client information after completion of assignments, where required.
- Maintain impartiality and avoid conflict of interest in handling client information.

## 12. Confidentiality During Audit, Inspection, Training and Calibration Activities

Auditors, inspectors, trainers and calibration personnel representing DAS are required to maintain confidentiality during all client interactions. Information observed, reviewed or collected during site visits, remote audits, interviews, document reviews, inspections, calibration activities or training assignments is treated as confidential.

Client photographs, videos, screenshots, documents or records are not taken, copied, transmitted or retained unless required for objective evidence and authorized under DAS procedures and client requirements.

## 13. Information Shared with Committees and Decision Makers

Information provided to impartiality committees, technical reviewers, certification decision makers or other authorized persons is limited to the extent necessary for review, evaluation, impartiality oversight and decision-making.

All such persons are required to maintain confidentiality and protect client information from unauthorized disclosure.

## 14. Breach of Confidentiality or Data Protection Incident

Any actual or suspected breach of client confidentiality, data loss, unauthorized access, accidental disclosure or misuse of information is immediately reported to DAS management.

DAS investigates such incidents, determines the cause, takes appropriate correction and corrective action, informs affected parties where necessary, and maintains records of the incident and action taken.

Disciplinary or contractual action may be taken against any person who violates confidentiality requirements.

## 15. Record Retention and Disposal

Client records are retained in accordance with DAS documented procedures, accreditation requirements, contractual requirements and applicable legal obligations. Records are protected throughout the retention period.

At the end of the retention period, records are securely disposed of in a manner that prevents unauthorized access, reconstruction or misuse.

## 16. Client Rights and Confidence

DAS respects the client's right to privacy and protection of confidential information. Clients may raise concerns regarding handling, use or disclosure of their information through DAS's complaint and appeal process.

DAS ensures that confidence in certification, inspection, training and calibration services is maintained through transparent, impartial and secure handling of client information.

## 17. Monitoring and Review

This policy is reviewed periodically as part of DAS management system review, internal audit, accreditation assessment preparation and continual improvement activities. Updates are made where required due to changes in ISO/IEC 17021-1:2015 requirements, PNAC accreditation requirements, legal obligations, technology, operational risks or client expectations.

## 18. Approval and Implementation

This policy has been approved by the top management of DAS Certification Private Limited and is applicable to all DAS personnel, auditors, inspectors, trainers, calibration staff, reviewers, decision makers, committee members and external resources working on behalf of DAS.

All concerned personnel have been made aware of this policy and are required to comply with its requirements.

## 19. Approval

*Prepared By:*
MR
18 June, 2026

*Reviewed & Approved by:*
Chief Executive Officer
18 June, 2026