European compliance alliance	**EUROPEAN COMPLIANCE ALLIANCE SRL** Certification Body — ISO/IEC 17021-1:2015	**POL-CONF-01** Confidentiality Policy
Section 6 — Public Information	**ISO 17021-1 Clause: 8.4.1**	**v1.0 | July 2025**

CONFIDENTIALITY STATEMENT

European Compliance Alliance SRL

European Compliance Alliance SRL is committed to maintaining the strict confidentiality of all information obtained in the course of its certification activities. This information will not be disclosed to third parties without the client's consent, except in the cases expressly provided for in this policy and in the individual confidentiality agreements (CON-CONF-01).

1. IDENTIFICATION DETAILS

Document type	Institutional confidentiality policy — describes ECA's commitment to protect its clients' information and the mechanisms to ensure it.
Reference clause	ISO/IEC 17021-1:2015 — Clause 8.4.1: The certification body shall be committed to the confidential management of the information obtained in its activities.
Scope	Applies to all information obtained in the course of certification activities: audit files, findings, nonconformities, certification decisions, client personnel data, client strategic information.
Persons bound by this policy	All ECA personnel (internal and external), auditors, technical experts, decision-makers, members of the Impartiality Committee and any person providing services to ECA.

2. INFORMATION CONSIDERED CONFIDENTIAL

Certification files	The entire content of client files: applications, audit plans, audit reports, findings, nonconformities, action plans, certification decisions.
Client strategic information	Internal processes, information assets, vulnerabilities detected, and the client's organisational structure revealed during the audit.
Client personnel data	Names, positions, emails and any data of the client's people contacted during the audit.
ECA internal deliberations	Positions of the Decision-maker before the final decision, audit team discussions, deliberations of the Impartiality Committee.
Client financial information	Client financial data learned during the certification process.

3. EXCEPTIONS — WHEN INFORMATION MAY BE DISCLOSED

Public directory information	ECA publishes minimum information about certifications in the directory DIR-CER-01: client name, standard, scope and status. This disclosure is required by the standard and does not require the client's consent.
Express consent of the client	If the client expressly authorises in writing the disclosure of specific information (e.g. to publicise its success story), ECA may disclose it.
Legal or judicial mandate	If a competent authority requires information by formal decision, ECA provides it. Where the law permits, it notifies the client beforehand (see PR-DIV-01).
Oversight by the accreditation body	The accreditation body has access to certification files in the context of accreditation assessments. This is a condition of the accreditation process which the client accepts when signing CON-01.
Investigation of complaints or appeals	The information needed to resolve a complaint or appeal may be shared internally within ECA with the persons involved in the resolution.

4. PROTECTION MECHANISMS

Individual confidentiality agreement	Every person with access to client information signs the CON-CONF-01 before having that access. The obligation extends for 5 years after the end of the relationship.
Access control to files	The Access Matrix (MAT-ACC-01) defines who may access which type of information. Access is restricted by role and by specific file.
Protection of digital documents	Digital files are password-protected. Access requires authentication. A record of access is kept.
Secure destruction of documents	Physical documents containing confidential information are securely destroyed (shredding) in accordance with PR-REG-01.

5. CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with this policy by any person bound by it results in: immediate termination of the employment or contractual relationship with ECA, a claim for damages under CON-CONF-01, notification to the accreditation body if the non-compliance affects the integrity of the accreditation process, and possible legal action.

6. VERSION CONTROL

Version	Date	Prepared by	Description
1.0	July 2025	EUROPEAN COMPLIANCE ALLIANCE S.R.L.	Initial creation of the Confidentiality Policy. Complements the individual CON-CONF-01.
Update in the event of regulatory or personnel changes.			

7. APPROVAL

Prepared by:	Date:
EUROPEAN COMPLIANCE ALLIANCE S.R.L.	**13-07-2026**