IMO Control Private Limited

IMO IN I 1.6 Policy on Information Management and Data Protection

a) IMO Control Private Limited (the Company) considers all the information obtained during the performance of its audit and certification activities to be confidential unless already made publicly available by the concerned operators or agreed for disclosure by them. Certain data may, however, have to be disclosed to the accreditation bodies or other authorities.

b) All the personnel of the Company, including all committee members, have signed a written agreement to keep all information gained in the course of the audit and certification activities strictly confidential. The agreement prohibits the use and disclosure of certification information and data by the personnel of the Company for at least three years after the termination of employment or the provision of services.

c) The access to documents, in paper and/or electronic files, by its personnel is restricted by the Company based on their responsibilities and tasks. Further, access to the data of the Company is restricted to all service providers. They too are required to sign confidentiality agreements with the Company.

d) Whenever any computers/hard drives are decommissioned for any reason, all the hard drives will undergo permanent data erasure before such equipment is moved out of the Company's premises.

e) When instructed by an operator, the concerned audit reports and certification documents will be submitted to the specified recipients.

f) The following are exempted from confidentiality restrictions:
- Listing the details of the certified operations, including public reports/summaries, listing suspended and withdrawn certifications in a public register or database as required by competent authorities, accreditation bodies and scheme owners. Public summaries may include a description of nonconformities, etc.
- Annual reports about certified operators and products to the accreditation bodies and authorities, with the required information in the specified presentation.
- All information and data from certification processes to the scheme owners, concerned competent authorities, accreditation bodies and owners of standards in accordance with the Regulations and norms under which the Company is accredited.
- Information to any assessing body that a scheme owner has authorised
- The exchange of information with any other certification body, in case an operator or any sub units of an operator are audited by the concerned certification body.
- In the event that, during the course of any audit, the Company discovers evidence of potential criminal or illegal activity or any other information required to be disclosed to a judicial, governmental or regulatory body, the Company reserves the right to disclose such information to a judicial, governmental or regulatory body.

- The Company may disclose confidential information if there is a challenge to any certification claim made by the Company or the integrity or reputation of the system.
- As per NOP requirements, the results of testing for residues of pesticides or other prohibited substances in products certified according to NOP by the Company in the current year, as well as the preceding year, will be made available to any member of the public upon request.

g) Each operator and each employee of the Company has a right to request access to their individual records and files maintained by the Company. However, the management of the Company reserves its right not to release the requested information when prohibited by law or when it is confidential information obtained from third parties regarding the concerned operator or employee. The right of an operator or an employee to request access to their own files with the Company is informed to them in the respective contract or agreement.

h) The Company will immediately report to the concerned authorities any violations of confidentiality and any intentional or unintentional disclosure or dissemination of confidential certification data and information. In the event of a data breach involving personal data, the Company will comply with all applicable personal data protection regulations.

i) Under exceptional circumstances, operators can request the Company not to publish specific information if its publication poses proven threats to the health and safety of their owners or employees. In such cases, the Company will agree with these operators on alternative contact and organizational information that is directly linked to the concerned operator.

j) The Company will retain records related to all certification processes for the periods required by the concerned authorities.

k) The Company will make available upon request, the following:
- information about (or reference to) the certification scheme(s), including evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification;
- a description of the means by which the Company obtains financial support and general information on the fees charged to applicants and to certified operators
- a description of the rights and duties of applicants and operators, including requirements, restrictions or limitations on the use of the Company's name and certification mark and on the ways of referring to the certification granted;
- information about procedures for handling complaints and appeals.