

NSURE PRIVATE LIMITED

CONFIDENTIALITY POLICY

Protection of Information Obtained During Certification Activities

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Approved By	General Manager, Nsure Private Limited
Availability	Publicly available at www.nsure.com.mv/policies
Compliance References	ISO/IEC 17065:2012 Clauses 4.5.1, 4.5.2, 4.5.3 & 4.5.4; GSTC Accreditation Manual v5.0

1. PURPOSE

This Policy establishes the obligations of Nsure Private Limited (hereinafter "Nsure") and all of its personnel with respect to the confidentiality of information obtained, processed, or generated in the course of certification activities. It ensures that all persons and bodies involved in Nsure's certification programme are bound by legally enforceable confidentiality commitments, and that information obtained from clients, applicants, and third parties is protected at all times.

2. SCOPE

This Policy applies to all information obtained in connection with Nsure's GSTC certification activities, including but not limited to:

- Information provided by applicants during the application process;
- Documents, records, data, and evidence reviewed during audit activities;
- Information disclosed during interviews with client personnel, stakeholders, or third parties;
- Findings, nonconformities, and observations documented in audit reports;
- Certification decisions and the reasoning supporting them;
- Complaints and appeals submitted by or about clients; and
- Any other information that is not in the public domain and that is obtained in the course of Nsure's certification activities.

This Policy applies to all Nsure personnel, including the General Manager, employed staff, and internal auditors, regardless of their employment status or the nature of their role.

3. DEFINITIONS

Term	Definition
Confidential Information	All information obtained by Nsure or its personnel in the course of certification activities that is not already in the public domain and that relates to a client, applicant, or third party.
Personnel	All individuals acting on behalf of Nsure in connection with certification activities, including the General Manager, employed staff, and internal auditors.
Client	Any organisation that has applied for, holds, or has held GSTC certification issued by Nsure.
Third Party Information	Information about a client or applicant obtained from a source other than the client itself, including but not limited to information from stakeholder interviews, site observations, or public complaints.
Legally Required Disclosure	Disclosure of confidential information required by the laws of the Republic of Maldives, a court order, or a regulatory authority with jurisdiction over Nsure.

4. CONFIDENTIALITY OBLIGATIONS

4.1 Nsure's Organisational Obligations (ISO 17065 Clause 4.5.1)

Nsure shall:

- Treat all Confidential Information as strictly confidential and shall not disclose it to any third party without the prior written consent of the client or applicant, except in the circumstances described in Section 4.3 of this Policy;
- Implement appropriate organisational and procedural controls to prevent unauthorised access to, or disclosure of, Confidential Information;
- Ensure that all personnel are aware of their confidentiality obligations before undertaking any certification activity; and
- Maintain Confidential Information securely throughout its retention period and dispose of it securely upon expiry of that period, in accordance with NSR-PROC-010 (Records Management Procedure).

4.2 Personnel Obligations (ISO 17065 Clause 4.5.1)

All Nsure personnel are bound by confidentiality obligations through their individual employment contracts, which contain confidentiality and non-disclosure clauses as standard terms of employment.

Enforcement Mechanism: Personnel

All Nsure employees, including the General Manager and all internal auditors, are employed under written employment contracts that contain binding confidentiality and non-disclosure provisions.

These contracts constitute legally enforceable confidentiality commitments in accordance with the laws of the Republic of Maldives.

Nsure confirms that no certification work shall be assigned to any person who has not executed a written employment contract containing confidentiality obligations.

Evidence: Employment contracts on file with the General Manager. Available for review by GSTC assessors on request under confidentiality provisions of the accreditation process.

In addition to contractual obligations, all personnel shall:

- Not discuss, share, or disclose Confidential Information with any person who does not have a legitimate need to know it in connection with Nsure's certification activities;
- Not remove Confidential Information from Nsure's secure systems or premises without authorisation from the General Manager;
- Not retain copies of client documents, audit records, or other Confidential Information beyond what is required for their certification role;
- Report any actual or suspected breach of confidentiality to the General Manager immediately; and
- Comply with this Policy at all times, including after the termination of their employment or engagement with Nsure.

4.3 Permitted Disclosures and Legally Required Disclosure (ISO 17065 Clauses 4.5.1 & 4.5.2)

Nsure may disclose Confidential Information without the prior consent of the client only in the following circumstances:

Permitted Disclosure	Conditions	Client Notification Required?
Information already in the public domain	The information must have been made public by the client itself, not by Nsure.	No
GSTC oversight and accreditation activities	The GSTC, as Nsure's accreditation body, has the right to review Nsure's certification records as part of its oversight activities. Clients acknowledge this in the Certification Agreement (NSR-CERT-AGR-001, Clause 9.1).	No acknowledged in Certification Agreement
Legally required disclosure	Where Nsure is required by Maldivian law, a court order, or a regulatory authority with jurisdiction to disclose Confidential Information.	Yes Nsure shall notify the client in advance unless prohibited by the relevant law or court order (see Section 4.4 below).
Complaint or appeal resolution	Where disclosure is necessary to investigate and respond to a formal complaint or appeal, and both parties have agreed to such disclosure.	Yes prior agreement required

Public certification database	Nsure maintains a publicly accessible database of certified clients. The information published is limited to: client name, certification scope, reference standard, and certification validity dates. This is disclosed to clients in the Certification Agreement.	No disclosed in Certification Agreement Clause 12
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4.4 Procedure for Legally Required Disclosure (ISO 17065 Clause 4.5.2)

Where Nsure is required by law, court order, or regulatory authority to disclose Confidential Information, the General Manager shall:

- Verify the legal basis and authority for the disclosure requirement before taking any action;
- Unless prohibited by the relevant law, court order, or authority, notify the affected client in writing as soon as practicable and prior to making the disclosure, providing the client with:
 - The nature of the disclosure requirement;
 - The specific information required to be disclosed;
 - The identity of the body requiring disclosure; and
 - The proposed date of disclosure.
- Document the disclosure requirement, the notification to the client (where applicable), and the information disclosed, in the Confidential Disclosure Register (NSR-FORM-011); and
- Seek legal advice from a Maldivian legal practitioner if there is any uncertainty regarding the scope or legality of the disclosure requirement.

4.5 Third Party Information (ISO 17065 Clause 4.5.3)

Information obtained from third parties including information provided during stakeholder interviews, community consultations, or site inspections shall be treated with the same level of confidentiality as information obtained directly from the client.

Where information is obtained from a third party, Nsure shall:

- Inform the third party, prior to obtaining the information, that it will be treated as confidential;
- Not disclose the identity of a third party who provided information, to the client or any other party, without the express consent of that third party; and
- Use third party information only for the purpose for which it was obtained namely, to inform the audit findings and for no other purpose.

Auditors shall note in their audit reports that third party information was obtained, without identifying the source, where such information is used to support a finding.

4.6 No Outsourced Auditors Simplified Control Environment

Nsure confirms that it does not engage external or freelance auditors for GSTC certification activities. All audit and certification work is conducted exclusively by Nsure's own employed personnel. As a result, ISO/IEC 17065:2012 Clause 4.5.4 which requires outsourced bodies to be bound by confidentiality commitments is addressed by the employment contract mechanism described in Section 4.2, which applies to all personnel.

Should Nsure's personnel structure change in the future to include contract or outsourced auditors, this Policy shall be updated to include a specific Non-Disclosure Agreement requirement for such persons, and the document control procedure (NSR-PROC-009) shall be activated to manage the revision.

5. INFORMATION SECURITY CONTROLS

Nsure shall implement the following minimum controls to protect Confidential Information:

Control Category	Control Description
Access control	Certification records and client documents are accessible only to Nsure personnel with a legitimate need in connection with their certification role. Access rights are managed by the General Manager.
Digital security	Electronic certification records are stored on password-protected systems. Client documents received electronically are stored in a designated secure folder accessible only to authorised personnel.
Physical security	Printed certification documents and client files are stored in locked filing at Nsure's registered office. Access is restricted to authorised personnel.
Data transmission	Client documents and audit reports are transmitted electronically using professional email systems. Sensitive documents are transmitted as password-protected files where practicable.
Retention and disposal	Confidential Information is retained for the periods specified in NSR-PROC-010 (Records Management Procedure) and disposed of securely upon expiry electronic files are permanently deleted and physical documents are shredded.
Breach response	Any actual or suspected breach of confidentiality is reported to the General Manager immediately. The General Manager investigates, takes corrective action, and notifies affected clients where required. All breaches are recorded in NSR-FORM-011.

6. MONITORING AND REVIEW

The General Manager shall review compliance with this Policy annually as part of the management review process (NSR-PROC-008). The review shall consider:

- Whether any breaches of confidentiality occurred during the year and how they were resolved;
- Whether any legally required disclosures were made and whether the notification procedure was followed;
- Whether information security controls remain adequate; and
- Whether any changes to Nsure's operations or applicable law require updates to this Policy.

7. RELATED DOCUMENTS

Document Reference	Title
NSR-CERT-AGR-001	GSTC Certification Agreement Template (Clause 9 Confidentiality)
NSR-PROC-009	Document Control Procedure
NSR-PROC-010	Records Management Procedure
NSR-FORM-011	Confidential Disclosure Register

ISO/IEC 17065:2012	Clauses 4.5.1–4.5.4
GSTC Accreditation Manual v5.0	Applicable confidentiality requirements
Employment Contracts	Nsure standard employment contract confidentiality provisions (on file with General Manager)

Policy Approval and Authorisation

Name: Babli Jahau Title: General Manager, Nsure Private Limited Signature:  Date: 01/09/2026	<i>This Policy is issued under the authority of the General Manager of Nsure Private Limited. It is binding on all personnel and is publicly accessible on the Nsure website. It shall be reviewed annually and updated as necessary.</i>
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8. REVISION HISTORY

Version	Date	Author	Description
1.0	01/09/2026	General Manager	Initial issue for GSTC accreditation application