ASF-GOV-004

Confidentiality Policy

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Approved by	Prof. Giorgi Pkhakadze, MD, MPH, PhD — President, Accréditation Sans Frontières
Legal basis	GDPR (EU) 2016/679 · French Law No. 78-17 (Loi Informatique et Libertés)
Next review	November 2031

Version History

Version	Date	Description	Approved by
V0.1	2026-10-24	Initial draft	—
V1.0	2026-11-07	Legal review (GDPR/French law)	ASF President
V2.0	2026-11-20	Final approved	Prof. G. Pkhakadze, ASF President

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1. Scope and Purpose

1.1 This policy establishes requirements for the protection of confidential information obtained by Accréditation Sans Frontières (ASF) and by all individuals acting on ASF's behalf in the course of accreditation activities, including standards development, surveys, decision-making, and post-accreditation monitoring.

1.2 This policy applies to: ASF's President, Board members, Standards Development Committee members, all surveyors, Accreditation Decision Committee members, all staff, advisers, and any contracted parties who have access to confidential information.

2. Confidential Information — What Is Covered

2.1 The following information is confidential and must be protected in accordance with this policy:

- **a)** all information provided by an applicant or accredited organisation during the application, assessment, or monitoring process
- **b)** full survey reports, including assessor observations, scoring, and nonconformity details
- **c)** detailed findings and corrective action plans
- **d)** any organisational data, documents, or communications shared with ASF in the course of accreditation activities
- **e)** discussions and deliberations of the Accreditation Decision Committee
- **f)** personal data of staff, patients, or other individuals encountered during survey activities

3. Public Information — What May Be Disclosed

3.1 The following information is publicly available through the ASF accreditation register at france-asf.fr:

- **a)** the accreditation status of an organisation (accredited, deferred, suspended, withdrawn, or denied)
- **b)** the approved scope of accreditation
- **c)** the valid-from and valid-until dates of the current accreditation
- **d)** the ASF certificate number

3.2 No other information from the accreditation process is made public without the written consent of the accredited or applicant organisation.

4. Data Protection

4.1 All personal data processed in the course of ASF accreditation activities is processed in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and French Law No. 78-17 (Loi Informatique et Libertés, as amended).

4.2 Personal data is collected and processed only to the extent necessary for the conduct of accreditation activities. Data is not used for any other purpose without the explicit consent of the data subject.

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4.3 Access to confidential information is restricted to individuals who require it for the legitimate purposes of their role. Access controls and secure storage are maintained.

4.4 Confidential documents and data are retained for a minimum of seven years from the date of the accreditation decision to which they relate, and thereafter securely destroyed.

5. Third-Party Disclosure

5.1 Confidential information obtained in the course of ASF accreditation activities shall not be disclosed to any third party without the written consent of the organisation to which the information relates, except:

- **a)** where disclosure is required by applicable law or regulation
- **b)** where disclosure is required by a court order or regulatory authority
- **c)** where disclosure is necessary to prevent an imminent risk to patient safety

5.2 Where disclosure is required under paragraph 5.1, ASF shall notify the organisation concerned as soon as practicable, unless prohibited from doing so by law.

6. Post-Engagement Obligations

6.1 Confidentiality obligations survive the termination of any individual's engagement with ASF. Former surveyors, staff, and advisers remain bound by this policy in relation to confidential information obtained during their engagement.

6.2 On cessation of engagement, all confidential materials and data in the possession of departing individuals must be returned to ASF or securely destroyed.

7. Breach of Confidentiality

7.1 Any suspected breach of confidentiality must be reported to the ASF President without delay.

7.2 ASF will investigate all reported breaches and take appropriate corrective action. Where a breach involves personal data, ASF will comply with applicable GDPR notification requirements.

7.3 A breach of this policy by an individual acting on behalf of ASF may result in suspension or termination of engagement and, where applicable, referral to professional regulatory bodies.

Approved by

Name and title	Signature	Date
Prof. Giorgi Pkhakadze, MD, MPH, PhD President, Accréditation Sans Frontières		2026-11-20

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