**Procedure for granting, maintaining, extending or reducing the scope of, for suspending, withdrawing, or refusing the GPRD-CARPA certification**

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1.0 Purpose
The purpose of this procedure is to describe a process for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing GDPR-CARPA certification.

2.0 Scope
This procedure applies to GDPR-CARPA certification scheme designed and published by the CNPD and implemented by the Certification Body of EY PFS SOLUTIONS S.À R.L.

3.0 Responsibility
3.1 The Certification Committee of the Certification Body of EY PFS SOLUTIONS S.À R.L., is responsible for the issue, review, and approval of the GDPR-CARPA certificate of conformity to the certified processing activity(ies). The Certification Committee is authorized to send suspension or withdrawal letters / e-Mails to the client for the GDPR-CARPA certified processing activity(ies). The Committee is supported by the certification personnel for all routine activities, such as Granting, Maintaining a list of the GDPR-CARPA certified processing activity(ies), recertifying the GDPR-CARPA certificate, extending or reducing the scope of GDPR-CARPA certification as well as suspending or withdrawing or refusing the GDPR-CARPA certification strictly followed by the GDPR-CARPA certification mechanism.

3.2 Certification Committee is responsible for Approval / Authorization of GDPR-CARPA certificate.

3.3 Management Representative is responsible to ensure that the list of the GDPR-CARPA certified processing activity(ies) are maintained up to date based on the GDPR-CARPA certificate issued to the Client strictly followed by the GDPR-CARPA certification mechanism.

4.0 Description of Activity
4.1 Receipt and Review of evaluation report
4.1.1 The evaluation team submits the evaluation documents/reports. This includes the checklists for the GDPR-CARPA certification as well as the draft of the ISAE 3000 Attestation Report (Type II, reasonable assurance).

4.1.2 All supporting documents of the ISAE 3000 Attestation Report, are initially reviewed by the Certification Engagement Manager for the completeness of the documents as well as the signature of the evaluation team.

4.1.3 Then the second review of the ISAE 3000 Attestation Report is performed by the respective Engagement Partner.

4.1.4 Then the third and final review of the ISAE 3000 Attestation Report is performed independently by an independent reviewer which has not been involved in the Evaluation activities of EY PFS SOLUTIONS S.À R.L. After which, the ISAE 3000 Attestation Report is signed by the respective Engagement Partner.

4.1.5 It’s the final decision on the GDPR-CARPA certification based on the ISAE 3000 Attestation Report, the decision is transferred to the Certification Committee, which may become subject to closure of the non-conformities/observations issued during the evaluation, if any.

4.2 Granting of GDPR-CARPA certificate for the processing activity(ies)
4.2.1 Upon receipt of corrective actions from the client against the non-conformities/observations, the same is reviewed by the Certification Engagement Manager. Based on the recommendation of the evaluation team, non-conformities/observations are closed. The evaluation report, the ISAE 3000 Attestation Report, along with the Corrective Actions and recommendation of evaluation, is put back
to the Certification Committee for its Review and Approval following the same procedures described in 4.1.4. and 4.1.5.

4.2.2 If no further major non-conformities/observations are noticed, the Certification Committee makes its final decision on the GDPR-CARPA certification based on the ISAE 3000 Attestation Report.

4.2.3 Based on the decision on granting of the GDPR-CARPA certificate by Certification Committee, Certification, EY PFS SOLUTIONS S.À R.L. prepares the GDPR-CARPA certificate of conformity with all the relevant information related to the certified processing activity(ies) - which is strictly followed by the GDPR-CARPA certification mechanism.

4.2.4 Upon completion of the GDPR-CARPA certificate of conformity, the same is given to the Executive Member of Board of Managers for final approval.

4.2.5 The GDPR-CARPA certificate of conformity (all the content as mentioned in clause no. 7.7 of the GDPR-CARPA Certification Manual) is issued to the client after approval from the Executive Member of Board of Managers.

4.3 Maintaining GDPR-CARPA certificate of conformity for the processing activity(ies)

4.3.1 For maintaining the GDPR-CARPA certification for the processing activity(ies), the periodic surveillance audit is conducted for the periodic evaluation. The periodic evaluation is conducted at least once in 12 months. During the periodic evaluation, the same method is followed and a defined checklist is followed for the periodic evaluation of the GDPR-CARPA certification for the processing activity(ies) - which is strictly followed by the GDPR-CARPA certification mechanism.

4.3.2 Based on the successful periodic evaluation, the GDPR-CARPA certification for that identified processing activity(ies) is recommended till the next periodic evaluation.

4.4 Extending the GDPR-CARPA certificate of conformity for the processing activity(ies)

4.5 Reducing the Scope of Accreditation

4.5.1 Reduction in the scope of the GDPR-CARPA certification implemented by the Certification Body of EY PFS SOLUTIONS S.À R.L. is possible in the below circumstances:

- Any of the processing activity(ies) from the present GDPR-CARPA certification may fail to comply with the relevant requirements set in the GDPR-CARPA certification mechanism,
- The client may require the withdrawal of the processing activity(ies) from the present GDPR-CARPA certificate of conformity voluntarily,
- In case any changes occur that have an impact on its GDPR-CARPA certification activities, especially those covered by the requirements set out in the GDPR-CARPA certification mechanism.
- Due to some other unavoidable circumstances.

4.5.2 Based on the above-mentioned points, the decision for the reduction is taken, and scope of the GDPR-CARPA certificate is reduced by removal of the processing activity(ies) (as identified), and the revised GDPR-CARPA certificate of conformity is sent to the Certification Committee for the review and approval with the reason for the reduction in the scope of accreditation. The GDPR-CARPA certificate of conformity is then issued.

4.6 Suspension and withdrawal or cancellation of the GDPR-CARPA certificate of conformity

4.6.1 The instruction given below covers suspension procedures through withdrawal or cancellation of the GDPR-CARPA certificate of conformity and the revision of the directory of the GDPR-CARPA
If the Certification Committee, decides to proceed, the Certified Client must reply to the Certification Body of EY PFS SOLUTIONS S.Â R.L. within fifteen days of receipt of the letter or official e-mail.

If the Certification Committee determines that the action or position contained in the Certified Client reply is satisfactory, the Certification Committee issues a letter stating this, and mails it to the Certified Client via registered mail or official e-mail.

If actions are required, due dates must be set, and Certification Committee must review the actions to ensure that they are effectively completed in order to prevent suspension or cancellation and met the requirements set in the GDPR-CARPA certification mechanism.

If the certified client does not reply in 30 days, or if the reply is not satisfactory, or if the actions required are not effectively completed in time, then the Certification Committee decides whether to suspend or cancel the certification.

If the decision is made to cancel certification, then the Executive Member of Board of Managers is responsible for suspending or canceling the certificate, informs the certified client by registered mail or official email, and publishes the cancellation, if necessary.

4.6.2 The following reasons are considered grounds for suspension or cancellation:

- Major non-conformance(s) or effective corrective action not implemented within a specified time period during the assessment, including surveillance assessment,
- Major non-conformities observed, which can lead to failure to the defined requirements of the GDPR-CARPA certification mechanism during the periodic assessment including monitoring compliance assessment,
- Improper use of the GDPR-CARPA certificate of conformity, symbol, or marks not remedied to the satisfaction of the GDPR-CARPA certification mechanism,
- Certified client ceases to supply quality services of the GDPR-CARPA Certified processing activity(ies) for an extended period of time.
- Certified client has persistently failed to meet GDPR-CARPA certification mechanism requirements for the operating effectiveness.
- Certified client fails to meet financial obligations to EY PFS SOLUTIONS S.Â R.L.
- Certified client makes a formal request to withdraw the GDPR-CARPA certification.
- Infringement by the certified client of any EY PFS SOLUTIONS S.Â R.L. contractual conditions.
- Existence of a serious second or third party complaints, which indicate that the quality of the certified processing activity(ies) is not being maintained by the client.
- Certified client refuses or does not cooperate on time in the periodic assessment as required by the GDPR-CARPA certification mechanism.
- In case any changes occur that have a major impact on its GDPR-CARPA certification activities, especially those covered by the requirements set out in the GDPR-CARPA certification mechanism (e.g., any changes in the legal framework, technical or organizational changes, etc.).
- Certified client is unable or unwilling to ensure conformance to the revisions of the GDPR-CARPA certification mechanism.
4.6.3 Once the decision on the suspension is taken, the decision on suspension will be communicated to client by e-mail or by letter and suspension period of maximum of 6 months will be imposed. In addition, the client will be informed to discontinue the use the GDPR-CARPA certificate of conformity or mark.

4.6.4 The name of client will be updated on the suspended client category on the Web Site of EY PFS SOLUTIONS S.À R.L. The client may approach to the Certification Body of EY PFS SOLUTIONS S.À R.L., for revocation of the suspension based on corrective actions taken. In any case, a minimum suspension of 3 months will be imposed.

4.6.5 Client may appeal against the decision on the suspension only one time. The Appeal will be treated as per the procedure for Complaints and Appeal mechanism. If the decision of Appeal confirms the continuation of the suspension, then no further Appeal shall be possible.

4.7 Conditions for suspension or cancellation of certified client

4.7.1 Subject to actions by the certified client, the following steps will be taken leading to possible suspension or cancellation of the GDPR-CARPA certification:

- Unless a reply is received to the letter accompanying notification within 15 days, the GDPR-CARPA certification will be suspended, and a notification of suspension may be published at the discretion of the Certification Body of EY PFS SOLUTIONS S.À R.L.

- The certified client's response to the accompanying letter will be reviewed, and the proceedings may be put on hold while clarification is sought.

- Where mutually agreed-upon corrective action is to be implemented, a time period for implementation will be specified and a review of the corrective action undertaken at the appointed time. This may be the subject of a special surveillance visit or of review of submitted objective evidence, at the discretion of the Certification Body of EY PFS SOLUTIONS S.À R.L. should the corrective action not be considered adequate or not be completed by the appointed time; the GDPR-CARPA certification will be automatically suspended.

- In the case of serious circumstances, the Certification Body of EY PFS SOLUTIONS S.À R.L. may invoke suspension during the period pending the implementation of corrective action.

- Where suspension has been invoked, unless otherwise specified, the certified client must advise the Certification Body of EY PFS SOLUTIONS S.À R.L. regularly on the progress of corrective action. Failure to meet this requirement will result in the cancellation of the certified client's GDPR-CARPA certification.

- After the implementation of corrective actions has been assessed successfully, the GDPR-CARPA certification will be resumed. The period of the GDPR-CARPA certification will not be revised to cover the period of suspension.

- The cancellation of the GDPR-CARPA certification will be invoked where, following the suspension of the GDPR-CARPA certification, the certified client fails to respond to the Certification Body of EY PFS SOLUTIONS S.À R.L. communications within the 15 days grace period or fails to implement successfully corrective action within the appointed time period.

- In extreme circumstances, the Certification Body of EY PFS SOLUTIONS S.À R.L. may invoke the cancellation of the GDPR-CARPA certification with immediate effect without recourse to initial GDPR-CARPA certification suspension.

- Use of GDPR-CARPA certification documents, symbols, or marks by the certified client following the GDPR-CARPA certification cancellation may result in legal action being taken against the...
certified client.

- Re-approval after the GDPR-CARPA certification cancellation will be on the same basis and follow the same process as that of the initial application for a new certified client.

- The GDPR-CARPA re-certification will be published as a separate list and will be available at the Certification Body of EY PFS SOLUTIONS S.À R.L.’s office and made available upon request.

- The certified client has the right to appeal any decisions of the Certification Body of EY PFS SOLUTIONS S.À R.L. and a copy of the appeals procedures will be made available upon request.

- EY PFS SOLUTIONS S.À R.L. shall remove the companies from the register where the GDPR-CARPA certificate of conformity has been cancelled. During the suspension, suspension remark shall be placed in the register of certified clients.

4.8 Refusing GDPR-CARPA certification

4.8.1 Refusal of the GDPR-CARPA certification is done in the following circumstances:

- Client fails to submit the corrective actions within 30 days’ time frame from the date of the evaluation,

- Corrective actions have been assessed as not satisfactory,

- Client fails to pay the required fees in the given time frame,

- Client provided falsified evidence, omission to provide proactively information having a significant impact on the certification evaluation.

- Client fails to inform on time about any significant changes having a potential significant impact on its GDPR-CARPA certification / activities.

4.8.2 All the above reasons will lead to the refusal/cancellation of the GDPR-CARPA certification even after completion of the evaluation.

4.8.3 A statement for the refusal of the GDPR-CARPA certificate of conformity is given to the client in the writing.

4.8.4 Client is requested to reply in writing against the show cause notice.

4.8.5 The details of refusal of the GDPR-CARPA certificate of conformity are maintained in the client file.

4.8.6 The list of the refusal of the GDPR-CARPA certificate of conformity will be maintained at EY PFS SOLUTIONS S.À R.L.

5.0 Reference

5.1 The GDPR-CARPA certification mechanism

6.0 Enclosure Nil

7.0 Formats / Exhibits

7.1 F/OPN/01 Evaluation plan

7.2 F/OPN/02 Evaluation report

7.3 F/OPN/03 Non-conformity report

7.4 F/OPN/04/XX Conformity evaluation checklists