



General Secretariat

Decision n°02/2026 of 2 June 2026

Additional accreditation requirements of the Belgian supervisory authority with regard to ISO/IEC 17065 and in compliance with Article 43(1), letter b), and Article 43(3) of Regulation (EU) 2016/679 (DOS-2021-06063)

The Belgian Data Protection Authority (*Autorité de protection des données / Gegevensbeschermingsautoriteit / Datenschutzbehörde*, hereinafter Belgian SA) adopts the following decision on the additional accreditation requirements with respect to ISO/IEC 17065 Conformity assessment – Requirements for bodies certifying products, processes and services (hereinafter ISO 17065) and in accordance with Articles 43(1)(b) and 43(3) GDPR.

The points below (aside from section 9) refer to ISO 17065 section headings and set out the additional requirements for the relevant ISO 17065 section numbers.

0. Prefix

According to Article 18 of the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data¹ (hereinafter Belgian Data Protection Act), the certification bodies are accredited by the national accreditation body designated by the Regulation 765/2018 in accordance with ISO 17065 and the additional requirements established by the supervisory authority. The national accreditation body in Belgium is the Belgian Accreditation Body² (hereinafter BELAC).

The terms of cooperation between the SA and BELAC are set out in a cooperation agreement (not yet available). The cooperation agreement sets out roles and responsibilities as well as the operational procedures in relation to accreditation and certification as provided in Article 42 and 43 GDPR. The terms of cooperation shall be published on both the Belgian SA's and BELAC's website.

¹ Loi du 30 juillet 2018 relative à la protection des personnes physiques à l'égard des traitements de données à caractère personnel/ wet van 30 juli 2018 betreffende de bescherming van natuurlijke personen met betrekking tot de verwerking van persoonsgegevens, *M.B.*, 5 September 2018, p. 68616.

² The Belgian Accreditation Body falls under the remit of the Federal Public Service Economy, SMEs, Middle Classes, and Energy. For more information, see <https://economie.fgov.be/en/themes/quality-and-safety/accreditation>.

This document stipulates that the certification body must notify and inform the Belgian SA at several stages of the certification process. The absence of reaction from the Belgian SA to such notifications shall not be construed as a tacit approval of the certification by the Belgian SA and is without prejudice of the tasks and powers of the authority under Articles 57 and 58 GDPR.

1. Scope

This document contains additional requirements to ISO 17065 for assessing the competence, consistent operation and impartiality of GDPR certification bodies.

The scope of ISO 17065 shall be applied in accordance with the GDPR. The EDPB guidelines on accreditation³ (hereinafter guidelines on accreditation) and certification⁴ (hereinafter guidelines on certification) provide further information.

The scope of a certification mechanism (for example, certification of cloud service processing operations) shall be taken into account in the assessment by BELAC during the accreditation process, particularly with respect to criteria, expertise and evaluation methodology.

The broad scope of ISO 17065 covering products, processes and services shall not lower or override the requirements of the GDPR. Whilst a governance system, for example a privacy information management system, can form part of a certification mechanism, it cannot be the only element of a certification mechanism, as the certification must include processing of personal data. Pursuant to Article 42(1) GDPR, GDPR certification can only be awarded in relation to controller and processor's personal data processing operations.

2. Normative Reference

The GDPR has precedence over ISO 17065. If the additional requirements or the certification mechanism make reference to other ISO standards, they shall be interpreted in line with the requirements set out in the GDPR.

3. Terms and Definitions

The terms and definitions of the EDPB guidelines on accreditation and certification shall apply and have precedence over ISO definitions. For ease of reference the main definitions used in this document are listed below.

³ Guidelines 4/2018 on the accreditation of certification bodies under Article 43 of the General Data Protection Regulation (2016/679)

⁴ Guidelines 1/2018 on certification and identifying certification criteria in accordance with Articles 42 and 43 of the Regulation

Accreditation: an attestation by a national accreditation body, that a certification body is qualified to carry out certification pursuant to Article 42 and 43 GDPR, taking into account ISO 17065 and the additional requirements established by the supervisory authority and or by the EDPB. For further information on the interpretation of accreditation for the purposes of Article 43 GDPR, see section 3 of the guidelines on accreditation.

General Data Protection Regulation (GDPR): Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

Belgian Data Protection Legislation: Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data and the laws containing provisions relating to the protection of personal data.

ISO 17065: ISO/IEC 17065 Conformity assessment – Requirements for bodies certifying products, processes and services.

Applicant: the organisation that has applied to have its processing operations certified.

Certification: the assessment and impartial, third-party attestation that the fulfilment of certification criteria has been demonstrated in respect of a controller or processor's processing operations.

Certification body: third party conformity assessment body operating certification schemes.

Certification criteria: the criteria against which an applicant's processing operations are measured for a given certification scheme.

Certification scheme: a certification system related to data processing operations to which the same specified requirements, specific rules and procedures apply. It includes the certification criteria and assessment methodology.

Certification mechanism: an approved certification scheme which is available to the applicant. It is a service provided by a certification body based on approved criteria and assessment methodology. It is the system by which data processing operations of a controller or processor becomes certified.

Client⁵: the organisation that has been certified (previously the applicant).

Belgian SA: The Belgian Data Protection Authority (*Autorité de protection des données / Gegevensbeschermingsautoriteit / Datenschutzbehörde*).

National accreditation body: the sole body in a Member State named in accordance with Regulation (EC) No 765/2008 of the European Parliament and the Council that performs accreditation with authority derived from the State. In Belgium, the National accreditation body is the Belgian Accreditation Body (BELAC).

Target of evaluation (ToE): the object of certification. In the case of GDPR certification this will be the relevant processing operations that the controller or processor is applying to have evaluated and certified.

4. General Requirements for Accreditation

4.1. Legal and contractual matters

4.1.1. Legal responsibility

A certification body shall be able to demonstrate (at all times) to BELAC that they have up to date procedures that demonstrate compliance with the legal responsibilities set out in the terms of accreditation, including the additional requirements in respect of the application of the GDPR.

The certification body shall be able to demonstrate that its procedures and measures specifically for controlling and handling of applicant personal data as part of the certification process are compliant with the GDPR and the Belgian Data Protection Legislation. As such, it shall provide evidence of compliance as required during the accreditation process.

This shall include the certification body confirming to BELAC that they are not – and have not previously been – the subject of any investigation or regulatory action by the Belgian SA, which may mean they do not meet this requirement and therefore might prevent their accreditation. Before proceeding with the accreditation process, BELAC will contact the Belgian SA in order to verify this information. .

The certification body shall inform BELAC immediately of any infringements of GDPR or the Belgian Data Protection Legislation that have been established by the Belgian SA or competent judicial authorities.

Prior to issuing or renewing a certification, the certification body shall be required to inform the Belgian SA pursuant to Article 43 (1) GDPR.

⁵ Whenever the term “client” is used in the International Standard (ISO/IEC 17065), it applies to both the “applicant” and the “client”, unless otherwise specified.

The Belgian SA may decide to add further requirements and procedures to check certification bodies GDPR compliance prior to accreditation.

4.1.2. Certification agreement (“CA”)

The certification body shall demonstrate in addition to the requirements of ISO 17065 that its certification agreements:

1. require the applicant to always comply with both the general certification requirements within the meaning of 4.1.2.2 (a) ISO 17065 and the criteria approved by the Belgian SA as per Article 43(2)(b) GDPR or the EDPB in accordance with Article 42(5) GDPR;
2. require the applicant to allow full transparency to the Belgian SA with respect to the certification procedure including contractually confidential materials whether contractual or otherwise, related to data protection compliance pursuant to Articles 42(7) and 58(1)(c) GDPR;
3. do not reduce the responsibility of the applicant for compliance with the GDPR and is without prejudice to the tasks and powers of the Belgian SA in line with Article 42(5) GDPR;
4. require the applicant to provide the certification body with all information and access to its processing activities which are necessary to conduct the certification procedure pursuant to Article 42(6) GDPR;
5. require the applicant to comply with applicable deadlines and procedures. The certification agreement must stipulate that deadlines and procedures resulting, for example, from the certification program or other regulations must be observed and adhered to;
6. with respect to ISO 17065 section 4.1.2.2 (c)(1) set out the rules of validity, renewal, and withdrawal pursuant to Articles 42(7) and 43(4) GDPR including rules setting appropriate intervals for re-evaluation or review (regularity) in line with Article 42(7) GDPR and section 7.9 of these additional requirements;
7. require the applicant to allow the certification body to disclose to the Belgian SA all information necessary for granting certification pursuant to Articles 42(8) and 43(5) GDPR;
8. include rules on the necessary precautions for the investigation of complaints within the meaning of ISO 17065 section 4.1.2.2 (c)(2), additionally, lit. j, shall also contain explicit statements on the structure and the procedure for complaint management in accordance with Article 43(2)(d) GDPR;
9. require in addition to the minimum requirements referred to in ISO 17065 section 4.1.2.2, if the consequences of withdrawal or suspension of accreditation for the certification body impact on the clients, that the consequences for the clients are addressed. The clients are informed of the consequences, the impact they have on them and the potential next steps that may be taken ;
10. require the applicant to inform the certification body in the event of significant changes in its factual or legal situation and in its processing operations concerned by the certification;
11. includes binding evaluation methods with respect to the ToE.

4.1.3. Use of data protection seals and marks

Certificates, seals and marks shall only be used in compliance with Article 42 and 43 GDPR and the guidelines on accreditation and certification.

4.2. Management of impartiality

BELAC shall ensure that in addition to the requirements of ISO 17065, in particular section 4.2, that the certification body:

- a. complies with the additional requirements of the Belgian SA (pursuant to Article 43(1)(b) GDPR) as set out in this document;
- b. in line with Article 43 (2)(a) GDPR, provides separate evidence of its independence. This applies in particular to evidence concerning the financing of the certification body in so far as it concerns the assurance of impartiality;
- c. has demonstrated that its tasks and obligations do not lead to a conflict of interest pursuant to Article 43 (2)(e) GDPR;
- d. has established clear rules to manage identified conflicts of interests;
- e. has no relevant connection with the applicant it assesses. For example:
 1. Any type of economic relation between the certification body and the client, depending on its features, may affect the impartiality of the certification body's certification activities.
 2. The certification body may not belong to the same company group/legal entity as the client it assesses.
 3. The certification body may not be controlled in any way by the client it assesses.
 4. The certification body may not be in a controller/processor relationship with the client it assesses.
 5. The certification body and the client it assesses may not be in a contractual relationship.

4.3. Liability and financing

In addition to the requirements set out in ISO 17065, BELAC shall ensure on a regular basis that the certification body has appropriate measures (e.g., insurance or reserves) to cover its liabilities in the geographical regions in which it operates.

4.4. Non-discriminatory conditions

Requirements of section 4.4 of ISO 17065 shall apply.

4.5. Confidentiality

Requirements of section 4.5 of ISO 17065 shall apply.

4.6. Publicly available information

In addition to the requirements set out in ISO 17065 section 4.6, BELAC shall require from the certification body that:

1. all versions (current and previous) of the approved criteria used within the meaning of Article 42 (5) GDPR are published and easily publicly available as well as all certification procedures, generally stating the respective period of validity;
2. information about complaints handling procedures and appeals are published and easily publicly available pursuant to Article 43(2)(d) GDPR.

5. Structural Requirements⁶

5.1. Organisational structure and top management

Requirements of section 5.1 of ISO 17065 shall apply.

5.2. Mechanisms for safeguarding impartiality

Requirements of section 5.2 of ISO 17065 shall apply.

6. Resource requirements

6.1. Certification body personnel

In addition to the requirements set out in section 6 of ISO 17065, BELAC shall ensure for each certification body that its personnel:

1. has demonstrated appropriate and ongoing expertise (knowledge and experience) regarding data protection pursuant to Article 43 (1) GDPR;
2. has independence and ongoing expertise regarding the object of certification pursuant to Article 43 (2)(a) GDPR and does not have a conflict of interest pursuant to Article 43 (2)(e) GDPR;
3. undertakes to respect the criteria referred to in Article 42 (5) pursuant to Article 43 (2)(b) GDPR,
4. has relevant and appropriate knowledge about and experience in applying data protection legislation, with evaluators having a more specialist expertise and professional experience in

⁶ Article 43(4) GDPR (“proper” assessment).

technical procedures (e.g. audits and certifications), while decision-makers have a more general and comprehensive expertise and professional experience in data protection;

5. has relevant and appropriate knowledge about and experience in technical and organisational data protection measures as relevant;
6. is able to demonstrate experience in the fields mentioned in these additional requirements, specifically:

For personnel with technical expertise:

- Have obtained a qualification in a relevant area of technical expertise to at least EQF⁷ level 6 or a recognised protected title (e.g., Dipl. Ing.) in the relevant regulated profession or have significant professional experience.
- *Personnel responsible for certification decisions* require significant professional experience in data protection law, including identifying and implementing data protection measures, or access to someone with that expertise, and an appropriate professional/degree level qualification.
- *Personnel responsible for evaluations* require relevant and recent professional experience and knowledge in technical data protection and experience in comparable procedures (e.g., certifications/audits), and appropriate professional qualifications where relevant.

Personnel shall demonstrate they maintain domain specific knowledge in technical and audit skills through continuous professional development.

For personnel with legal expertise:

- Legal studies at an EU or state-recognised university for at least eight semesters including the academic degree Master (LL.M.) or equivalent, or significant professional experience.
- *Personnel responsible for certification decisions* shall demonstrate significant professional experience in data protection law, including identifying and implementing data protection measures.
- *Personnel responsible for evaluations* must demonstrate at least two years of professional experience in data protection law and knowledge and experience in technical data protection and comparable procedures (e.g., certifications/audits).

Personnel shall demonstrate they maintain domain specific knowledge in technical and audit skills through continuous professional development.

If evaluation activities are outsourced to external bodies, those bodies shall be subject to the same conditions as the certification body. In particular, these data protection-specific requirements must be observed by the subcontracted body.

⁷ See qualification framework comparison tool at <https://ec.europa.eu/ploteus/en/compare>.

6.2. Resources for evaluation

Requirements of section 6.2 of ISO 17065 shall apply.

7. Process Requirements⁸

7.1. General

BELAC shall in addition to the requirements set out in ISO17065 section 7.1 be required to ensure the following:

1. certification bodies comply with the additional requirements of the Belgian SA (pursuant to Article 43(1)(b) GDPR) when submitting the application in order that tasks and obligations do not lead to a conflict of interests pursuant to Article 43(2)(e).
2. the relevant competent supervisory authorities is notified pursuant to Article 43(1) GDPR, before a certification body starts operating an approved European Data Protection Seal in a new Member State from a satellite office.
3. certification bodies have procedures in place to notify the Belgian SA immediately prior to issuing/renewing/withdrawing certifications and provide the reasons for taking such actions. This includes providing the Belgian SA with a copy of the executive summary of the evaluation report referenced in section 7.8 of this document.
4. the certification body is required to carry out an investigation where the client or the Belgian SA notifies them of any significant and relevant investigation or regulatory action by the Belgian SA in relation to the scope of the certification and the ToE that brings into question the client's data protection compliance. The certification body will undertake the appropriate investigation and make an assessment on whether the client still conforms to the certification criteria and provide the Belgian SA with a report advising of the outcome.

7.2. Application

In addition to item 7.2 of ISO 17065 the certification body shall require that the application:

1. contains a detailed description of the ToE. This also includes interfaces and transfers to other systems and organisations, protocols and other assurances;
2. specifies whether processors are used, or joint controllers are involved in the processing, and when processors or joint controllers are the applicant, that their responsibilities and tasks shall be

⁸ Article 43(2)(c),(d) GDPR.

described, and the application shall contain the relevant controller/processor and/or joint controller contract(s);

3. discloses any Belgian SA investigation or regulatory action to which the applicant or its joint-controllers and processors is subject.

The certification body shall be required to inform the Belgian SA when it receives an application.

7.3. Application review

In addition to item 7.3 of ISO 17065, it is required that:

1. binding evaluation methods with respect to the ToE are laid down in the certification agreement;
2. the assessment in 7.3.1 (e) of ISO 17065 whether there is sufficient expertise takes into account both technical and legal expertise in data protection to an appropriate extent.

7.4. Evaluation

In addition to the requirements of section 7.4 of ISO 17065, certification mechanisms shall describe sufficient evaluation methods for assessing the compliance of the processing operation(s) with the certification criteria, including for example where applicable:

1. a method for assessing the necessity and proportionality of processing operations in relation to their purpose and the rights of data subjects concerned;
2. a method for evaluating the coverage, composition and assessment of all risks considered by controller and processor with regard to the legal consequences pursuant to Articles 30, 32, 35 and 36 GDPR, and with regard to the definition of technical and organisational measures pursuant to Articles 24, 25 and 32 GDPR, insofar as the aforementioned Articles apply to the ToE; and
3. a method for assessing the remedies, including guarantees, safeguards and procedures to ensure the protection of personal data in the context of the processing to be attributed to the ToE and to demonstrate that the legal requirements as set out in the adopted criteria are met ; and
4. documentation of methods and findings.

The certification body shall be required to ensure that these evaluation methods are standardized and applied consistently. This means that comparable evaluation methods are used for comparable ToEs. Any deviation from this procedure shall be justified by the certification body.

In addition to item 7.4.2 of ISO 17065 the evaluation may be carried out by subcontractors who have been recognised by the certification body, using the same personnel requirements as those contained in section

6.1 of this document. The certification body will retain the responsibility for the decision-making, even if it uses subcontractors. External actors shall not be involved in the decision-making process.

In addition to item 7.4.5 of ISO 17065, it shall be provided that data protection certification, which relates to the same ToE, may be taken into account as part of a new evaluation. However, the certificate alone will not be sufficient evidence and the certification body shall be obliged to check the compliance with the criteria in respect of the ToE. The complete evaluation report and other relevant information enabling an evaluation of the data protection certification and its results shall be considered in order to make an informed decision.

In cases where data protection certification is taken into account as part of a new evaluation, the scope of said certification shall also be assessed in detail in respect of its compliance with the relevant certification criteria.

In addition to item 7.4.6 of ISO 17065, it shall be required that the certification body sets out in detail in its certification scheme how the information required in item 7.4.6 of ISO 17065 informs the certification applicant about nonconformities with the scheme. In this context, at least the nature and timing of such information shall be defined.

In addition to item 7.4.9 of ISO 17065, it shall be required that evaluation documentation be made fully accessible to the Belgian SA upon request.

7.5. Review

In addition to item 7.5 of ISO17065 procedures for the granting, regular review and revocation of the respective certifications pursuant to Article 43(2) and 43(3) are required.

7.6. Certification decision

In addition to item 7.6.1 of ISO 17065, the certification body shall be required to set out in detail in its procedures how its independence and responsibility with regard to individual certification decisions are ensured.

In addition to the requirements of ISO 17065, immediately prior to issuing or renewing certification, the certification body shall be required to submit the draft approval, including the executive summary of the evaluation report to the Belgian SA. The executive summary will clearly describe how the criteria are met thus providing the reasons for granting or maintaining the certification. The aim of this requirement is to

increase transparency and does not entail a supervision of the draft approval by the Belgian SA. It is without prejudice to the power of the Belgian SA pursuant to Article 58(2)(h) GDPR.

In addition to the check carried out at the application stage, prior to issuing certification, the certification body shall be required to confirm with the applicant that they are not the subject of any investigation or regulatory action by any Belgian SA, supervisory authorities within other sectors or competent judicial authorities in relation to the ToE which might prevent certification being issued. The Belgian SA will confirm that this is the case prior to the certification body issuing or renewing certification.

If it is discovered that the applicant has not disclosed such action to the certification body, this may result in the certification not being issued.

7.7. Certification documentation

In addition to item 7.7.1(e) of ISO 17065 and in accordance with Article 42(7) GDPR, it shall be required that the period of validity of certifications shall not exceed three years.

In addition to item 7.7.1(e) of ISO 17065, it shall be required that the period of the intended monitoring within the meaning of section 7.9 will also be documented.

In addition to item 7.7.1(f) of ISO 17065, the certification body shall be required to name the ToE in the certification documentation (stating the version status or similar characteristics, if applicable).

On issuing the certificate, the certification body shall be required to provide the Belgian SA with a copy of the certification documentation referred to in 7.7.1 of ISO 17065.

7.8. Directory of certified products

In addition to the requirements of ISO 17065 section 7.8, the certification body shall be required to keep the information on certified processing operations available internally and make that information publicly accessible.

The certification body will provide to the public an executive summary of the evaluation report. The aim of this executive summary is to help with transparency around what has been certified and how it was assessed. It will explain such things as:

- a) the scope of the certification and a meaningful description of the ToE,
- b) the respective certification criteria (including version or functional status),

- c) the evaluation methods and tests conducted and
- d) the result(s).

In addition to item 7.8 of ISO 17065 and pursuant to Article 43(5) GDPR, the certification body shall inform the Belgian SA in writing of the reasons for granting or revoking the requested certification.

7.9. Surveillance

In addition to items 7.9.1, 7.9.2 and 7.9.3 of ISO 17065, and according to Article 43 (2)(c) GDPR, it shall be required that regular monitoring measures are obligatory to maintain certification during the monitoring period. Such measures shall be risk based and proportionate and the maximum period between surveillance activities shall not exceed 12 months.

7.10. Changes affecting certification

In addition to items 7.10.1 and 7.10.2 of ISO 17065, changes affecting certification to be considered by the certification body shall include:

- any personal data breach or infringement of GDPR or the Belgian Data Protection Legislation reported by the client or the Belgian SA or competent judicial authorities in relation to the subject matter of certification;
- changes in the state of art technology (in so far as it is relevant for the subject matter of certification);
- amendments to data protection legislation;
- the adoption of delegated acts of the European Commission in accordance with Articles 43 (8) and 43 (9) GDPR;
- decisions, opinions, guidelines, recommendations, best practices or other documents adopted by the EDPB ; and
- court decisions related to data protection.

The change in procedures to be implemented by the certification body shall include such things as: transition periods, approvals process with the Belgian SA, reassessment of the relevant ToE and appropriate measures to revoke the certification if the certified processing operation is no longer in compliance with the updated criteria.

7.11. Termination, reduction, suspension or withdrawal of certification

In addition to item 7.11.1 of ISO 17065 and section 7.1(3) of this document, the certification body shall be required to immediately inform the Belgian SA and BELAC, where relevant, in writing about measures taken and about continuation, restrictions, suspension and withdrawal of certification.

According to Article 58(2)(h) GDPR, the certification body shall be required to accept decisions and orders from the Belgian SA to withdraw or not to issue certification to a client if the requirements for certification are not or no longer met.

7.12. Records

In addition to the requirements of ISO 17065, the certification body is required to keep all documentation complete, comprehensible, up-to-date and fit to audit.

7.13. Complaints and appeals⁹

In addition to item 7.13.1 of ISO 17065, the certification body shall define,

- a) who can file complaints or objections;
- b) who processes them on the part of the certification body;
- c) which verifications take place in this context; and
- d) the possibilities for consultation of interested parties.

In addition to item 7.13.2 of ISO17065, the certification body shall define,

- a) how and to whom such confirmation must be given;
- b) the time limits for this; and
- c) which processes are to be initiated afterwards.

Certification bodies shall be required to make their complaints handling procedures are published and easily publicly available and easily accessible to data subjects.

The certification body shall be required to inform complainants of the progress and the outcome of the complaint within a reasonable period.

In addition to item 7.13.1 of ISO 17065, the certification body must define how separation between certification activities and the handling of appeals and complaints is ensured.

8. Management system requirements

⁹ Article 43(2)(d) GDPR.

A general requirement of the management system according to chapter 8 of ISO 17065 is that the implementation of all requirements from the previous chapters within the scope of the application of the certification mechanism by the accredited certification body is documented, evaluated, controlled and monitored independently.

The basic principle of management is to define a system according to which its goals are set effectively and efficiently, specifically: the implementation of the certification services - by means of suitable specifications. This requires transparency and verifiability of the implementation of the accreditation requirements by the certification body and its permanent compliance.

To this end, the management system must specify a methodology for achieving and controlling these requirements in compliance with data protection regulations and for continuously checking them with the accredited body itself.

In addition to the requirements of ISO 17065, management principles and their documented implementation must be transparent and be disclosed by the accredited certification body at the request of the Belgian SA at any time during an investigation in the form of data protection audits pursuant to Article 58 (1)(b) GDPR or a review of the certifications issued in accordance with Article 42 (7) pursuant to Article 58 (1)(c) GDPR.

In particular, the accredited certification body must make public permanently and continuously which certifications were carried out on which basis (or certification mechanisms or schemes), how long the certifications are valid under which framework and conditions (recital 100 of the GDPR).

The procedures in the event of suspension or withdrawal of the accreditation shall be integrated into the management system of the certification body, including notification to their clients and applicants.

A complaints handling process with the necessary levels of independence shall be established by the certification body as an integral part of the management system, which shall in particular implement the requirements of items 4.1.2.2(c), 4.1.2.2(j), 4.6(d) and 7.13 of ISO 17065.

8.1. General management system requirements

Requirements of section 8.1 of ISO 17065 shall apply.

8.2. Management system documentation

Requirements of section 8.2 of ISO 17065 shall apply.

8.3. Control of documents

Requirements of section 8.3 of ISO 17065 shall apply.

8.4. Control of records

Requirements of section 8.4 of ISO 17065 shall apply.

8.5. Management review

Requirements of section 8.5 of ISO 17065 shall apply.

8.6. Internal audits

Requirements of section 8.6 of ISO 17065 shall apply.

8.7. Corrective actions

Requirements of section 8.7 of ISO 17065 shall apply.

8.8. Preventive actions

Requirements of section 8.8 of ISO 17065 shall apply.

9. Further additional requirements

9.1. Updating of evaluation methods

The certification body shall establish procedures to guide the updating of evaluation methods for application in the context of the evaluation under ISO 17065 section 7.4 and this document. The update must take place in the course of changes in the legal framework, the relevant risk(s), the state of the art and the implementation costs of technical and organisational measures.

9.2. Maintaining expertise

Certification bodies shall establish procedures to ensure the training of their employees with a view to updating their skills, taking into account the developments listed in point 9.1. of this document.

9.3. Responsibilities and competencies

9.3.1. Communication between Certification Body and its clients

Procedures shall be in place for implementing appropriate procedures and communication structures between the certification body and its client. This shall include:

1. Maintaining documentation of tasks and responsibilities by the accredited certification body, for the purpose of:
 - a) responding to information requests; or
 - b) to enable contact in the event of a complaint about a certification.
2. Maintaining an application process for the purpose of:
 - a) Information on the status of an application;
 - b) Evaluations by the Belgian SA with respect to decisions by the Belgian SA.

9.3.2. Communication between Certification Body, the Belgian SA and BELAC

The certification body shall have a procedure in place to communicate to the Belgian SA and BELAC without delay of substantial changes that may affect its ability to conform with the accreditation requirements. Such substantial changes may include:

- a change in its legal, commercial, organizational or ownership status;
- a change in the organisation's senior management and key staff;
- a change in its financial resources.

9.3.3. Documentation of evaluation activities

Systems shall be in place for implementing appropriate procedures and communication structures between the certification body and the Belgian SA. This shall include a reporting framework to inform the Belgian SA:

- of details of applicant on receipt of application to enable the Belgian SA to check its records for the applicant's compliance history as per section 7.6 of this document;
- of the reasons for granting/withdrawing certification pursuant to Article 43.5 GDPR immediately prior to issuing, renewing, suspending or withdrawing certifications as per section 7.1(3) of this document.

9.3.4. Management of complaint handling

A complaint handling procedure shall be established as an integral part of the management system, which shall in particular implement the requirements of items 4.1.2.2(c), 4.1.2.2(j), 4.6(d) and 7.13 of ISO 17065.

Relevant complaints and objections shall be shared with the Belgian SA.

9.3.5. Management of withdrawal

The procedures in the event of suspension or withdrawal of the accreditation shall be integrated into the management system of the certification body including notification of clients.