TECHNICAL CIRCULAR

Ref. DC2025SPM074 **Milan**, 09-06-2025

To all accredited and applicant Certification Bodies PRD scheme
To the associations of Conformity Assessment Bodies
To the Assessors/Experts of DC Department
Their offices

SUBJECT: Technical Circular DC No. 21/2025 - Provisions regarding the initiation of accreditation, within the PRD framework, of the Interprivacy certification scheme™/®

Foreword

The Interprivacy™/® certification scheme is based on the accreditation standard UNI CEI EN ISO/IEC 17065 and has been designed to assess conformity with the obligations set out in the main data protection regulations[1].

The owner of the scheme (the so-called Scheme Owner) is the European Centre for Certification and Privacy (ECCP)[2], based in Luxembourg and Switzerland, and an associate member of IAF. The Interprivacy scheme has, in fact, been approved at the IAF level as a subscope under UNI CEI EN ISO/IEC 17065 accreditation[3]. Therefore, Certification Bodies that obtain accreditation, by submitting an application to Accredia, will be authorised to apply the IAF mark on their accredited certificates.

This international certification scheme, which is not a certification mechanism under art. 42 of the General Data Protection Regulation (GDPR), is specifically geared toward the management of data processing outside Europe and applies primarily to companies operating outside Europe. The scheme aims to assess the conformity of services, products, and other data processing activities with the primary international data protection obligations set out in European and international standards, such as: Convention 108+, the Malabo Convention, the General Data Protection Regulation (EU) 2016/679, the framework of the Global CBPR Forum, the EU-U.S. Data Privacy Framework (DPF), and the ASEAN data protection framework.

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[1] https://www.interprivacy.org/index_it.html
[2] https://www.europrivacy.org
[3] https://iaf.nu/en/endorsed-schemes/

The European and international framework and presentation of the scheme

The scheme was developed as part of the European research project in cooperation with European and non-European Authorities, as well as the Council of Europe; it is aligned with the Privacy Symposium resolution calling on data protection Authorities to adopt international certification mechanisms.

Interprivacy certification enables identification and reduction of legal and financial risks, certification, enhancement and simplification of compliance management, and, finally, facilitation of international data transfers. Interprivacy's innovative hybrid certification model combines the benefits of a universal certification scheme (list of core principles) with complementary domain and technology-specific criteria used for data processing, including emerging technologies such as *Artificial Intelligence, Internet of Things and Blockchain.*

Certification rules

Please refer to the provisions outlined in the regulations of the Interprivacy™/® proprietary scheme. All provisions are to be considered binding for the management of individual certification processes. Reference is made to the information available on the dedicated website portal. As required by the scheme, the Certification Applicant (referred to as '*applicant*') is obligated to designate a Data Protection Officer responsible for monitoring the compliance of the data processing activities to be certified and for maintaining a record of the data processing activities.
However, the scope of the Interprivacy certification is subject to certain restrictions: ECCP keeps a list of application domains excluded from the scope of Interprivacy certification, such as the processing of genetic data, which is subject to specific obligations that can vary considerably according to the regulations in force in different countries.

The Scheme Owner is obliged to communicate updates to the scheme as well as the evaluation criteria to Certification Bodies and certified clients, making them available through the dedicated web platform.
With regard to auditors, they must demonstrate their knowledge of the scheme through online courses and a dedicated exam on the Europrivacy Online Academy platform. The audit team is subject to the impartiality rules defined in Section 7 of the Interprivacy Certification Scheme's Specifications and General Requirements, as well as the requirements for personnel and resource management (Section 8).

ACCREDIA database of issued certifications

As is well known, Certification Bodies are required to transmit to ACCREDIA-DC, via the web service – SIAC, data relating to individuals holding certifications issued by them, in accordance with the procedures defined by ACCREDIA-DC and its Regulations (RG01 §1.10.7). For this scheme, a specific code will therefore be activated for the upload.

Accreditation rules

The requirements of UNI CEI EN ISO/IEC 17065 apply, along with the additional provisions outlined in the Interprivacy scheme in paragraph 2.3.3.

A	Certification Body already accredited for the UNI CEI EN ISO/IEC 17065:2012	• Document review of 1 man-day; • 1 (one) witness assessment of a duration sufficient to cover the analysis of the key elements of the audit process conducted by the CAB, with the duration being assessed based on the information provided in the programme and the assessment plan prepared by the CAB. ACCREDIA reserves the right to assess on a case-by-case basis the adequacy of the sample (for long-duration audits), as well as the suitability of the organisations and Audit Teams proposed for accreditation.
B	Certification Body not yet accredited for UNI CEI EN ISO/IEC 17065:2012 but accredited for other accreditation schemes (Level 3)	• Document review of 1 man-day; • Assessment at the Certification Body's offices lasting 3 man-days; • 1 (one) witness assessment of a duration sufficient to cover the analysis of the key elements of the audit process conducted by the CAB, with the duration being assessed based on the information provided in the programme and the assessment plan prepared by the CAB. ACCREDIA reserves the right to assess on a case-by-case basis the adequacy of the sample (for long-duration audits), as well as the suitability of the organisations and Audit Teams proposed for accreditation.
C	Non-accredited Certification Body	• Documentary review of 1 man-day to be carried out, if possible, partially in synchronous remote mode; • Assessment at the Certification Body's offices lasting 4 man-days; • 1 (one) witness assessment of a duration sufficient to cover the analysis of the key elements of the audit process conducted by the CAB, with the duration being assessed based on the information provided in the programme and the assessment plan prepared by the CAB. ACCREDIA reserves the right to assess on a case-by-case basis the adequacy of the sample (for long-duration audits), as well as the suitability of the organisations and Audit Teams proposed for accreditation.
Maintenance of Accreditation	It is reminded that ACCREDIA-DC must, in any case, conduct an annual assessment at the offices of the Certification Bodies to assess compliance with UNI CEI EN ISO/IEC 17065. Regarding vertical sampling criteria and witness assessments, the following minimum criteria apply.	

	No. Certificates issued	No. Assessments in the accreditation cycle
	≤50	1 Office Assessment 1 Witness Assessment
	>50, ≤100	2 Office Assessments 1 Witness Assessment
	>100	3 Office Assessments 3 Witness Assessment

Documentation to be submitted to ACCREDIA-DC for the document review

In addition to what is listed in the accreditation application DA-01, the submission of the following is required:

a. Checklists, audit report templates, guidelines/instructions prepared by the Certification Body for the Assessment Team;

b. Qualification criteria and curricula of the personnel responsible for contract review, auditors, and decision-makers, along with their qualification records;

c. Procedures applicable to the commercial process for defining audit timelines, as well as procedures for managing the certification case.

Best regards.

Dott. Emanuele Riva
Director Department
Certification and Inspection

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