



BBB NATIONAL PROGRAMS ORGANIZATIONAL APEC CBPR AND PRP CONFLICT OF INTEREST EMPLOYEE POLICY SUPPLEMENT

I. **Purpose**

The purpose of this policy is to ensure that BBB National Programs, Inc. (“BBB National Programs”) will be free of any actual or potential conflicts of interests in the performance of its duties as an Accountability Agent under the APEC Cross Border Privacy Rules (CBPR) and Privacy Recognition for Processors (PRP) Systems and is supplemental to the BBB National Programs Employee Conflict Of Interest Policy.

II. **Scope**

This policy applies to any BBB National Programs employee (“Certification Employee”) who certifies or performs certification-related activities for an applicant or participant organization under the CBPR and/or PRP systems. For purposes of this policy, a conflict of interest is any circumstance where an employee has an interest that compromises or reasonably could be seen to compromise the Certification Employee’s professional judgment, objectivity, or integrity when performing any tasks related to an applicant or participant organization’s certification and ongoing participation in the CBPR and/or PRP systems.

III. **Procedural Safeguards**

At no time may a Certification Employee have a direct or indirect affiliation with any applicant organization or participant organization that would prejudice the ability of the employee to render a fair decision with respect to the organization’s certification and ongoing participation in the CBPR and/or PRP systems.

Outside of the functions described in paragraphs 5-14 of the Accountability Agent APEC Recognition Application, at no time will any Director or Officer of BBB National Programs direct a Certification Employee to engage in:

- consulting or technical services related to the development or implementation of participant organization’s or applicant organization’s data privacy practices and procedures;
- consulting or technical services related to the development of participant organization’s or applicant organization’s privacy policy or statement;
- consulting or technical services related to participant organization’s or applicant organization’s security safeguards; or
- sales activities related to an applicant or participant organization.

IV. **Reporting and Review of Potential or Actual Conflicts of Interest and Recusal Process**

If an actual or potential conflict of interest is identified that cannot be otherwise mitigated, the Certification Employee must recuse themselves from any involvement in the certification process of the identified applicant or participant at which time the Certification Employee’s work will be reassigned to another team member. All mitigated conflicts will be reported to the Joint Oversight Panel along with an explanation of the specific mitigation procedures (e.g., employee recusal and reassignment) used to ensure that BBB National Programs remains free of actual or potential conflicts of interest arising from the engagement.