CLIENT TRANSITION PLAN

ISO/IEC 27701:2025

1 Purpose

To establish the transition arrangements to be applied by Kompleye for organizations certified to ISO/IEC 27701 under previous certification arrangements and for organizations seeking certification to ISO/IEC 27701:2025.

2 Scope

This plan applies to:

- Organizations currently certified to ISO/IEC 27701.
- Organizations with certification activities in progress.
- Organizations applying for certification to ISO/IEC 27701:2025.
- Organizations transferring certification to Kompleye where ISO/IEC 27701 certification is included within scope.

3 Background

ISO/IEC 27701:2025 was published in October 2025 and replaces the previous edition of ISO/IEC 27701:2019.

The revised edition introduces significant changes to the Privacy Information Management System (PIMS), including:

- Recognition of ISO/IEC 27701 as an independent management system standard rather than a privacy extension dependent on ISO/IEC 27001 certification.
- Updates to privacy governance requirements and management system expectations.
- Clarification and revision of PII Controller and PII Processor requirements.
- Updates to privacy controls and associated implementation guidance.
- Revisions to documented information requirements, including the PIMS Statement of Applicability.
- Alignment with current privacy management, risk management and accountability practices.

Organizations currently certified to ISO/IEC 27701, organizations undergoing certification activities, and organizations seeking certification to ISO/IEC 27701:2025 may be affected by these changes and may need to review and update elements of their Privacy Information Management System to ensure conformity with ISO/IEC 27701:2025.

This document establishes the transition arrangements that Kompleye will apply to organizations affected by the transition to ISO/IEC 27701:2025.

4 Transition Arrangements

Client Status	Transition Arrangement
Existing ISO/IEC 27701 certified client	Transition may be completed during a scheduled surveillance audit, recertification audit, or special transition audit.
Certification activity currently in progress	Certification activities may be completed under ISO/IEC 27701:2025 based on the stage of the certification process and applicable transition arrangements.
New applicant	Certification activities will be conducted against ISO/IEC 27701:2025.
Transfer applicant	Certification activities will be reviewed using the applicable transfer and transition arrangements.

The transition route will be determined individually for each client.

5 Transition Timeline

Activity	Date
Kompleye accreditation transition to revised certification arrangements	No later than 31 October 2026
Initial certification audits under ISO/IEC 27701:2025	From the effective date of Kompleye's accreditation transition approval: October 29, 2026
Completion of transition for all certified clients	No later than 31 October 2028

6 Client Preparation

Prior to the transition activity, clients should:

- Review the requirements of ISO/IEC 27701:2025.
- Identify changes affecting the Privacy Information Management System.
- Update documented information where required.
- Update privacy risk assessment and privacy risk treatment information where required.
- Complete an internal audit against the revised requirements.
- Complete a management review.
- Implement and verify applicable corrective actions.

7 Certification Document Updates

Following successful completion of the transition, certification documents will be updated to reflect:

- Certification to ISO/IEC 27701:2025.
- Applicable PII Controller role.
- Applicable PII Processor role.
- Categories of PII Principals included within scope.
- Approved PIMS Statement of Applicability information.

The certification document will continue to reflect only the approved certification scope and certification decision.

8 Failure to Complete Transition

Organizations that do not successfully complete the transition to ISO/IEC 27701:2025 before the applicable transition deadline may no longer be eligible to maintain accredited certification under previous ISO/IEC 27701 certification arrangements.

Failure to complete the transition before the applicable transition deadline may affect the organization's certification status in accordance with applicable certification.

9 Contact Information

For questions regarding this transition plan, transition scheduling, certification activities, or certification status, please contact:

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