



POLICY FOR
INCLUDING PRIVATE
OR INTERNAL DATA
IN
CHEMFORWARD
v 2.0

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Overview

At ChemFORWARD, part of the Continual Improvement Technical Challenge (Challenge) process is to accommodate new information and data that were not yet available at the time of the initial assessment. This includes information in scientific articles that were not yet published or private/internal data, i.e. data from studies that were commissioned by private organizations and not publicly available. For more information, review the document titled: “ChemFORWARD Challenge and Continuous Improvement Process” under “Our Approach” on the ChemFORWARD website [HERE](#).

Any chemical manufacturer who commissions CHAs in ChemFORWARD is expected to provide access to private/internal data prior to CHA drafting be reviewed and incorporated into the assessment.

Private/internal data must meet the following requirements to be accepted for use by ChemFORWARD.

1. The private/internal data will be transparent and accessible to both the CHA Assessor and the Verifier. If necessary, ChemFORWARD will facilitate the establishment of an appropriate NDA between the interested parties.
2. The private/internal data and conclusions will be summarized by the Assessor and reviewed by the Verifier. This study summary will be included within the original data summary in the backend of ChemFORWARD, which is accessible to the Assessor, Verifier, and select ChemFORWARD personnel, but NOT available to ChemFORWARD platform users.
3. The private/internal data can be treated as confidential at the discretion of the data provider. But these data will be used to generate results for relevant physical properties or hazard classifications.
4. The private/internal data will be reviewed only by ChemForward technical staff, Assessors, and Verifiers. Hazard classification results and associated rationales will be accessible to all subscribers.
5. Private/internal data providers will be allowed to review the classification results and rationales before the CHA is released to subscribers to ensure that appropriate confidentiality requirements are met.

6. Any disagreements with verified CHA hazard classifications may be challenged via the document, “ChemFORWARD Continual Improvement Technical ChallengeProcess,” available under “Our Approach” on the ChemFORWARD website [HERE](#).