



*Guiding you in the right direction!*

# **Records Management, Privacy and Data Policy**

**True North Service  
Management Solutions Ltd**

## Table of Contents

1	Introduction .....	3
2	Records Management, Privacy and Data Policy .....	4
2.1	Overview.....	4
2.2	Purpose .....	4
2.3	Definitions.....	4
2.4	Information Collection and Use.....	5
2.5	Scope .....	8
2.6	Responsibilities.....	8
2.7	Policy Compliance .....	8
2.8	Enforcement.....	8
2.9	Monitoring Policy .....	8
2.10	Reviewing Policy .....	8
2.11	Policy Amendments .....	8
2.12	Additional Information .....	8
3	Implementation of the Policy .....	9

## 1 Introduction

True North Service Management Solutions Ltd (known as the Company) is committed to implementing and enforcing effective systems to ensure security. Therefore, it is the Company's policy to conduct all aspects of safety in its business at all times.

## 2 Records Management, Privacy and Data Policy

### 2.1 Overview

Records management is vital to the delivery of our services in an orderly, efficient, and accountable manner. Effective records management will help ensure that we have the right information at the right time to make the right decisions.

This document informs you of our policies regarding the collection, use, and disclosure of personal data when you use our service and the choices you have associated with that data.

We use your data to provide and improve the service. By using our services, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <http://truenorthsm.com/terms.html>

### 2.2 Purpose

By adopting this policy we aim to ensure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed to:

- To help us maintain our business
- To help us make informed decisions
- To provide and maintain our services
- To notify you about changes to our services
- To provide customer support
- To detect, prevent and address technical issues

### 2.3 Definitions

“Data Subject” means any individual that has Personal Information Processed.

“Data Protection Legislation” means the EU Data Protection Directive 95/46/EC, the GDPR, together with all applicable legislation relating to data protection and privacy including all local laws and regulations which amend or replace them, as well as any national implementing laws in any Member State of the European Union or, to the extent applicable, in any other country, as amended, repealed, consolidated or replaced from time to time.

“Personal Information” (or Personal Data) means any data relating to an identified or identifiable individual where such data is provided to us or collected in connection with provision of the Service under the Agreement and is protected similarly as personal data or personally identifiable information under applicable Data Protection Law.

“GDPR” means the General Data Protection 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.

“Data Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

“Processing” means any operation or set of operations performed on Personal Information, encompassing the collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of Personal Information.

“Data Processor” (or Service Provider) means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

## 2.4 Information Collection and Use

### Processing

In order to provide a service to you, we capture the following personally identifiable information that can be used to contact or identify you (“Personal Information”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

### Data Controller

True North Service Management Solutions Ltd is the Data Controller

### Data Processor (Service Providers)

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

#### Microsoft

We use Microsoft EWS for our Email System, Teams for our internal/external messaging and collaboration, Sharepoint and OneDrive for our documentation management system, storage and collaboration.

The data stored in Microsoft is covered by GDPR. For more information on the privacy practices of Microsoft, please visit the Microsoft Privacy Terms web page: <https://privacy.microsoft.com/en-gb/>

#### Intuit

We use QuickBooks Online (“QBO”) for Quotations, Purchasing, Invoicing, Expenses and Payroll.

The data stored in QBO is covered by GDPR. For more information on the privacy practices of QBO, please visit the QBO Privacy Terms web page: <https://quickbooks.intuit.com/eu/privacy-policy/>

#### HubSpot

We use HubSpot for our Sales & Marketing information.

The data stored in HubSpot is covered by GDPR. For more information on the privacy practices of Salesforce, please visit the HubSpot Privacy Terms web page: <https://legal.hubspot.com/privacy-policy>

#### 4me Service

We use the 4me Service and use this for our support and projects.

The data stored in 4me is covered by GDPR. For more information on the privacy practices of 4me, please visit the 4me Privacy Terms web page: <https://www.4me.com/privacy/>

## **Links To Other Sites**

Our websites may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

Our website does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **Data Retention**

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

## **Transferring Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## Disclosure Of Data

### Disclosure for Law Enforcement

Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Legal Requirements

The Company may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of the Company
- To prevent or investigate possible wrongdoing in connection with the service
- To protect the personal safety of users of the service or the public
- To protect against legal liability

## Data Security

The security of your data is important to us, and we have a number of security policies implemented, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Your Rights

The Company aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you

You have the right to data portability for the information you provide to the Company. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it.

Individuals have the right to access their personal data and supplementary information known as a 'Subject Access Request'. The fee of £30 per request is based on the administrative cost of providing the information. Information will be provided without delay and at the latest within one month of receipt.

The above administrative fee would apply if it is manifestly unfounded or excessive, or an individual requests further copies of their data and/or wish to have physical copies of such information.

Please note that we may ask you to verify your identity before responding to such requests.

## 2.5 Scope

This policy applies to all staff who interact, utilise, or manage contractors who use our information resources.

## 2.6 Responsibilities

All staff, contractors, consultants and third parties - everyone who receives, creates, maintains or has access to our documents and records is responsible for ensuring that they act in accordance with our records management policy, standards guidance and procedures.

The Data Protection Officer (DPO) is responsible for educating the company and its employees about compliance.

## 2.7 Policy Compliance

Employees must adhere to the outlined protocol above.

## 2.8 Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

## 2.9 Monitoring Policy

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective the Company has been.

## 2.10 Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

## 2.11 Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training will be considered.

## 2.12 Additional Information

If you require any additional information or clarification regarding this policy, please contact your manager. In the unlikely event where you are unhappy with any decision made, you should use the Company's formal Grievance Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.

If you have any questions about this Privacy Policy, please contact us:

- By email: [dpo@truenorthsm.com](mailto:dpo@truenorthsm.com)
- By phone number: +44 (0)121 663 1763
- By mail: 27 Foredrove Lane, Solihull, B92 9NZ, United Kingdom



### 3 Implementation of the Policy

This Policy was approved and authorised by:

Name: Richard Rowe  
Position: Managing Director  
Date: 17 February 2020

Signature:



---