

# OUR PRIVACY PROMISE

This privacy statement contains information about how we obtain and store information about you.

True North (Scotland) Ltd. is dedicated to safeguarding your privacy online. We will only collect, store and use your personal information for specific purposes as outlined below in accordance with GDPR. We use your personal information to support and develop our connection with you. We will never sell your personal data to 3rd parties. You may contact us at any time with any privacy queries or concerns and to see the personal data you have given us and request modification.

Personal data means any information relating to an identified or identifiable natural person. This can include names, addresses, email addresses, job title, company, mobile numbers, Financial Data (i.e. bank account / payment card details), Transactional Data (details about payments made and products / services purchased), Technical Data (IP addresses, login data etc), Usage Data (i.e. information about how an individual uses the website, products and services) and Marketing and Communication Data.

In general terms, we collect and use personal information to:

- deliver our services and meet our legal responsibilities
- verify your identity where this is required
- contact you by post, email or telephone
- understand your needs and how they may be met
- maintain our records
- process financial transactions
- prevent and detect crime, fraud or corruption

We store data for as long as projects are in progress and customers remain active clients. Email addresses provided via the contact form are stored until consent is withdrawn, re-consent is requested every two years. Information required for tax and legal requirements are held for seven years in accordance with the law.

We will use your client on-boarding information and client file information for communicating with you in the course of our engagement, as necessary, to perform our duties under a contract with you, or with a view to entering into a contract with you, to provide you with services. This includes taking your instructions, providing advice and invoicing our fees and disbursements. We may also need to disclose some personal data to meet our statutory obligations under the Lobbying (Scotland) Act 2016 and Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 in performing the contract we have entered into with you.

We use your client file information to provide advice to you. For clients, our lawful basis for this is that it is necessary in order to perform the contract that we have with you.

We use your relationship information to manage and strengthen our relationship with you, this includes linking the work that we do across different practice areas and offices to ensure that you receive a seamless, relevant and streamlined service at all times. Our lawful basis for this is in order to pursue our legitimate interests in creating deep and lasting relationships with our clients.

We hold your social media information in the course of operating our social media accounts on Twitter, Facebook, LinkedIn, Medium, and Instagram. Our lawful basis for this is that it is necessary in order to pursue our legitimate interest in maintaining a visible, engaging and relevant social media presence.

We may occasionally share your data with third parties, including third-party service providers, partner firms, or clients. We require all third parties to respect the security of your data and to treat it in accordance with the law.

Third-party service providers require access to your personal data in the course of providing their services to us. We engage third parties to provide the following services: IT support, customer relationship management systems, document management systems, design services, printing and reprographics support, event hosting services, email marketing management systems, survey and polling services, media monitoring, parliamentary monitoring, audiovisual support, client reviews, and market insight services. All third parties are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow third parties to use your personal data for their own purposes. We only permit them to access your personal

data for specific purposes and in accordance with our instructions.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

## Your rights

Under data protection law you have the following rights in respect of the personal data about you that we process:

- Access to your information – You have the right to request a copy of the personal information about you that we hold.
- Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.
- Deletion of your information – You have the right to ask us to delete personal information about you where:
  - You consider that we no longer require the information for the purposes for which it was obtained
  - We are using that information with your consent and you have withdrawn your consent
  - You have validly objected to our use of your personal information
  - Our use of your personal information is contrary to law or our other legal obligations.

## Objecting to how we use your information

You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or for our legitimate interests or those of a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

## Restricting how we use your information

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

## Withdrawing consent using your information

Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

## Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the originator website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

## Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement can be obtained by using the printer icon or by emailing us at [makechange happen@truenorth.scot](mailto:makechange happen@truenorth.scot) with your address.

This privacy statement was last updated on 14 June 2022.

## Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office:

- Online: <https://ico.org.uk/global/contact-us/email/>
- By phone: 0303 123 1113
- By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## Legal information

True North (Scotland) Ltd. (incorporation no: SC682469), has its registered office at 4 Bon Accord Square, Aberdeen AB11 6DJ, Scotland, UK. Our ICO registration no is: ZB340276.

## Further information

If you have questions about your personal data or our privacy policy, please contact us at [makechangeappen@truenorth.scot](mailto:makechangeappen@truenorth.scot) or on 01224 605100.

## Cookies policy

Our Cookies Policy was last updated on June 30.

This Cookies Policy explains what Cookies are and how We use them. You should read this policy so You can understand what type of cookies We use, or the information We collect using Cookies and how that information is used. This Cookies Policy was generated by TermsFeed Cookies Policy Generator.

Cookies do not typically contain any information that personally identifies a user, but personal information that We store about You may be linked to the information stored in and obtained from Cookies. For further information on how We use, store and keep Your personal data secure, see Our Privacy Policy.

We do not store sensitive personal information, such as mailing addresses, account passwords, etc. in the Cookies we use.

## Interpretation and Definitions

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Cookies Policy:

- "Company" (referred to as either "the Company", "We", "Us" or "Our" in this Cookies Policy) refers to True North (Scotland) Ltd.
- "Cookies" means small files that are placed on Your computer, mobile device or any other device by a website, containing details of your browsing history on that website among its many uses.
- "Website" refers to [Truenorth.scot](https://truenorth.scot/), accessible from [<https://truenorth.scot/>]
- "You" means the individual accessing or using the Website, or a company, or any legal entity on behalf of which such individual is accessing or using the Website, as applicable.

## The use of the Cookies

### Type of Cookies We Use

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser.

We use both session and persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

**Purpose:** These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

**Purpose:** These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

**Purpose:** These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third-Parties

**Purpose:** These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new advertisements, pages, features or new functionality of the Website to see how our users react to them.

## **Your Choices Regarding Cookies**

If You prefer to avoid the use of Cookies on the Website, first You must disable the use of Cookies in your browser and then delete the Cookies saved in your browser associated with this website. You may use this option for preventing the use of Cookies at any time.

If You do not accept Our Cookies, You may experience some inconvenience in your use of the Website and some features may not function properly.

If You'd like to delete Cookies or instruct your web browser to delete or refuse Cookies, please visit the help pages of your web browser.

For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>.

For the Internet Explorer web browser, please visit this page from Microsoft: <http://support.microsoft.com/kb/278835>

For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

For the Safari web browser, please visit this page from Apple: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For any other web browser, please visit your web browser's official web pages.

## Contact Us

If you have any questions about this Cookies Policy, You can contact us:

- By visiting this page on our website: <https://www.truenorth.scot>
- By sending us an email: [makechange happen@truenorth.scot](mailto:makechange happen@truenorth.scot)