

# Northbridge Systems Data Protection Policy

## 1. Purpose

Northbridge Systems ("Northbridge" or the "Company") maintains this Data Protection Policy to describe how we handle customer and employee data. The goal is to provide reasonable safeguards without slowing down business operations.

## 2. Scope

This policy applies to all Northbridge employees, contractors, and vendors who have access to company systems that store or process personal or confidential information.

## 3. Roles and Responsibilities

- The **IT team** is generally responsible for keeping systems secure.
- Individual departments decide how to store and retain their own data.
- There is no formally appointed Data Protection Officer; questions can be raised to any manager.

## 4. Data Classification

Northbridge recognizes the following informal data categories:

- **Public** – Information that can be shared externally.
- **Internal** – Information meant for use inside Northbridge.
- **Sensitive** – Anything that might be considered private.

## 5. Data Collection and Processing

We collect data from customers, website visitors, and employees to provide services and improve our products. Data may be used for analytics, marketing, and reporting as needed.

## 6. Data Retention

Each department determines how long to keep the data it owns. Old records are occasionally cleaned up when storage becomes expensive, but there is no enterprise-wide retention schedule.

## **7. Security Controls**

Northbridge implements common-sense security practices, including:

- Passwords on important systems.
- Firewalls and antivirus where appropriate.
- Occasional security training when new threats are identified.

## **8. Data Subject Rights**

Individuals who contact Northbridge about their data will be handled on a case-by-case basis.

## **9. Data Breach Response**

If a serious incident is suspected, employees should notify their manager. Management will decide next steps and whether to communicate externally.

## **10. Policy Review**

This policy will be reviewed "from time to time" and updated as needed.