

# TinQwise Policy



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## Roles & Definitions

## Validity and document management

Version	Date	Author	Description
01	9/3/2023	Emil de Valk and Reinoud van Dommelen	Document creation
02	2-11-2023	Reinoud van Dommelen	Annual review and policy update. Definitions, Reference Documents and consistency. Aligned more closely with ISO 27001:2023 norm and with contract agreements with TinQwise Staff.
03	11-12-2024	Emil de Valk	Annual review, update roles, policy versions and contract structure

This document is valid as of January 1, 2025.

The owner of this document is the C.O.O., who must check and, if necessary, update the document at least once a year.

TinQwise reserves the right to update this Policy to reflect changes in our practices and regulatory requirements. Data subjects will be informed of material changes. Previous versions of this procedure will be stored for a period of 5 years, unless specified otherwise by legal or contractual requirement.



You may not copy or transmit the contents of this document either electronically or in hard copies, nor may the document be altered in any manner. The latest version of this policy is available at <https://www.tinqwise.com/policies/roles-definitions>. If you are interested in using the contents of this document in any form, please contact TinQwise via [info@tinqwise.com](mailto:info@tinqwise.com) with details of your request.

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## 1. Relevant to

Management	Finance / Legal	HR	Office Management	Marketing, Sales and Account Management	Professional services	IT Support	Product & Engineering	DevOps	Support & Maintenance
X	X	X	X	X	X	X	X	X	X

## 2. Purpose

This document gives an overview of the Policy documents defined at TinQwise, lists all used definitions among those documents and lists the roles combined with the actual persons fulfilling those roles.

## 3. Roles, teams and individuals

- Chief Executive Officer (C.E.O.) – Theo Brejaart
- Chief Operations Officer (C.O.O.) – Emil de Valk
- Data Protection Officer (D.P.O.) – Emil de Valk
- Head of Financial (H.o.F.) – Robert van der Laan (also T.L.)
- Head of Engineering (H.o.E.) – Okke Formsma (also T.L.)
- Head of Marketing (H.o.M) – Niels Mol
- Head of Human Resources – Liza van Tol
- Management Team (M.T.) – C.E.O., C.O.O. and C.F.O.
- TinQwise Product Board / Resilience Governance Body – C.O.O., C.T.O. and H.o.E.
- Security Committee – C.O.O., D.P.O. and H.o.E.
- ISRMS Steering committee – members of the Management Team
- Team Leads (T.L.): Second level management reporting to M.T. – Various persons
- TinQwise Counsellor – Fred Anhaack (External - Peoplez) and Liza van Tol (Internal)
- Employee

## 4. Definitions

The following definitions are being used in the various Policy documents of TinQwise. Definitions are referred to only when using capitals as mentioned.

- **AVG** – The Dutch name for the General Data Protection Regulation (GDPR). GDPR is the legal framework that sets guidelines for the collection and processing of Personal Data from individuals who live and outside of the European Union (EU).
- **Architecture Design** – The overall design of the SAAS Application and the logical and physical interrelationships between its components. The architecture design specifies the hardware, software, access methods and protocols used throughout the system.
- **Asset** – Physical technology and licensed software (commercial off the shelf, internally or 3rd party developed) used for curation, creation, or consumption of digital content, network/internet communication, document production, or network and data centre infrastructure with expected lifetime of greater than one year.
- **Asset Inventory** – a comprehensive list of all the hardware, software, and digital assets owned and used by TinQwise. The purpose of asset inventory is to provide a complete and accurate account of all company assets, including their location, purpose, and other pertinent information.
- **Client (Customer)** – A company who has an agreement with TinQwise, to purchase services from TinQwise.
- **Cloud Service Provider** – The subcontractor that provides all services with regards to cloud, deployment, pipeline, load balancing and other services that are needed to run the SAAS Application of TinQwise. At this moment AWS Is the Cloud Service Provider for TinQwise.
- **Data Asset** – evident
- **(TinQwise) Data Privacy Policy** – The most accurate description of the policy within TinQwise on how TinQwise handles all data in a consistent and safe way. This includes the way the data is stored, who has access to the data, how data is retained and how data is deleted when obsolete.
- **(TinQwise) Data Processing Terms** – the document in which the terms are laid down about the way in which the role of processor and controller is fulfilled, within the meaning of the General Data Protection Regulation, which apply to and form an integral part of the agreements between TinQwise and its Client.
- **Domain** – evident
- **GDPR** – The General Data Protection Regulation (GDPR) is the legal framework that sets guidelines for the collection and processing of Personal Data from individuals who live and outside of the European Union (EU).
- **Incident Report** – evident
- **(TinQwise) Information Security Management System (ISMS)** – as described in TinQwise Policies
- **Information Security Objectives** – as described in TinQwise Policies
- **Information Security Policy** – as described in TinQwise Policies

- **IT Service Provider** – The subcontractor that provides basic IT infrastructure, hardware and software, such as office applications. At this moment OPEN-ICT () is the IT Service Provider for TinQwise.
- **(TinQwise) Platform** – The SAAS application, provided by TinQwise, to which a user has access, and in which, among other things, an (online) course can be played.
- **(TinQwise) License Terms** – the provisions in which the agreements are laid down about the licenses to Services of the Service Provider, which apply to and form an integral part of the agreement TinQwise and its Client.
- **Pentest** – an authorized simulated cyberattack on the SAAS Application, performed to evaluate the security of the system. The test is performed to identify weaknesses (also referred to as vulnerabilities), including the potential for unauthorized parties to gain access to the system's features and data, as well as strengths, [https://en.wikipedia.org/wiki/Penetration\\_test](https://en.wikipedia.org/wiki/Penetration_test) enabling a full risk assessment. For TinQwise this is done by Securify, an independent third-party specialist.
- **Personal Data** (personal information) – all information about an identified or identifiable natural person, which TinQwise (=processor) processes for the benefit of the Client (=controller) in the context of an Agreement between TinQwise and its Client.
- **Physical Asset** – evident
- **Risk Assessments** – evident
- **Risk Treatment Plan** – as described in TinQwise Policies
- **SAAS Application** – The software application with which the TinQwise provides the service to the Client. The software consists of an employee experience - in which users can communicate and access learning content. The SAAS application also has a management environment and a Content Builder in which an Administrator can develop content, which can be presented to the Users through the TinQwise Platform or any other learning platform.
- **Security Assessment** – an explicit study to locate security vulnerabilities in the SAAS Application, including but not limited to a Pentest.
- **Security Framework** – as described in TinQwise Policies
- **Security Incident** – as described in TinQwise Policies
- **Security Requirements Specification** – as described in TinQwise Policies
- **Sub-processor** – a subcontractor of TinQwise that, as a subcontractor, also processes the Personal Data.
- **System of Record** – Software system designed with the express intent of identifying, recording and tracking assets. System will be updated over the lifecycle of the asset and will report on disposition/location, responsible party, changes in disposition over time, and eventual disposal of assets individually and across TinQwise.
- **TinQwise** – TinQwise Holding BV and all its daughter companies.
- **(TinQwise) Staff** – All employees, contractors, consultants, temporary employees and other workers at TinQwise.

## 5. Policy Documents

Doc name	Content	Version	URL
000 Roles & Definitions	The definitions used and roles defined in all Policies. Also contains an overview of all documents	v2025.03	<a href="http://www.tinqwise.com/policies/roles-definitions">www.tinqwise.com/policies/roles-definitions</a>
001.1 Corporate Social Responsibility	Our approach to our commitment to integrity, honesty, fairness and being compliant to applicable laws all over the world.	v2025.03	<a href="http://www.tinqwise.com/policies/corporate-social-responsibility">www.tinqwise.com/policies/corporate-social-responsibility</a>
002.1 ISRMS Governance	An overview of our information security risk management system.	V2025.08	<a href="http://www.tinqwise.com/policies/isrms-governance">www.tinqwise.com/policies/isrms-governance</a>
003.1 Security Incident Management	Outline of the information security requirements and incident management. Rules and requirements to mitigate risks related to information security incidents.	V2025.06	<a href="http://www.tinqwise.com/policies/security-incident-management">www.tinqwise.com/policies/security-incident-management</a>
003.2 Data Privacy	Our approach to data privacy in TinQwise Platform, how we handle customer data and make sure it's secure.	V2025.09	<a href="http://www.tinqwise.com/policies/data-privacy">www.tinqwise.com/policies/data-privacy</a>
003.3 Secure Development	Defines internal rules for secure development of our software and systems.	V2025.07	<a href="http://www.tinqwise.com/policies/secure-development">www.tinqwise.com/policies/secure-development</a>
003.4 Change Management	Procedures around minimizing negative impact on services and users in case of changes.	V2025.06	<a href="http://www.tinqwise.com/policies/change-management">www.tinqwise.com/policies/change-management</a>
004.1 Access Control	Requirements and policies around access to customer information, platform and systems.	V2025.07	<a href="http://www.tinqwise.com/policies/access-control">www.tinqwise.com/policies/access-control</a>
004.2 Asset Management	Procedures around our software and hardware assets like laptops and servers.	V2025.07	<a href="http://www.tinqwise.com/policies/asset-management">www.tinqwise.com/policies/asset-management</a>

Doc name	Content	Version	URL
004.3 Operational Resilience & Disaster Recovery	Policy and procedures to provide continuous service through people, processes, and technology.	V2025.07	<a href="http://www.tinqwise.com/policies/operational-resilience-disaster-recovery">www.tinqwise.com/policies/operational-resilience-disaster-recovery</a>
005.1 Data Segregation & Retention	Detailed description of how we implement segregation and retention of data.	V2025.06	<a href="http://www.tinqwise.com/policies/data-segregation-retention">www.tinqwise.com/policies/data-segregation-retention</a>
005.2 Information classification policy	Detailed overview of how we classify information for the purpose of securing company and customer data safely.	V2025.02	<a href="http://www.tinqwise.com/policies/information-classification">www.tinqwise.com/policies/information-classification</a>
014.0 System Acquisition, Development & Maintenance Policy	System Acquisition, Development & Maintenance Policy	V2025.02	<a href="https://www.tinqwise.com/policies/system-acquisition-development-maintenance">https://www.tinqwise.com/policies/system-acquisition-development-maintenance</a>
014.1 Principles of Engineering	guidelines for engineering of TinQwise Platform software and systems	V2025.02	<a href="https://www.tinqwise.com/policies/principles-of-engineering">https://www.tinqwise.com/policies/principles-of-engineering</a>



## 6. Contract and Policy Structure

