

COMPLIANCE WORKING RECORD

UK restricted-transfer route and TRA review record

UK Addendum route ready for contract completion. 1 action-required and 0 unresolved findings.

Document control

Field	Value
Organisation	Northfield Services Ltd
Document type	International transfer working record
Document reference	TRA-2026-005
Jurisdiction	United Kingdom
Version	2026.08.07
Status	Ready for review
Classification	Compliance working record
Prepared by	Privacy and Procurement Lead
Prepared on	21 August 2026
Rule pack	2026.08.07
Sources reviewed	7 August 2026
Generated	21 August 2026

Recorded matter

Field	Value
Organisation	Northfield Services Ltd
Reference	TRA-2026-005
Owner	Privacy and Procurement Lead
Summary	Customer-support ticket data will be made available by a UK controller to a separately incorporated US service provider for hosted support operations.
Jurisdiction	United Kingdom

Decision

UK Addendum route ready for contract completion

An appropriate safeguard and transfer risk assessment are recorded.

- Complete and execute the official ICO document.
- Retain the TRA and monitor material changes.

Restricted-transfer test

Check	Answer	Record status	Evidence
UK GDPR applies to the processing	yes	recorded	The UK controller determines the purposes and means of processing.
The organisation initiates a transfer outside the UK	yes	recorded	The controller enables remote access from the US support environment.
The recipient is a separate legal entity	yes	recorded	The recipient is a separately incorporated company.

Transfer route

Check	Answer	Record status	Evidence
A current UK adequacy regulation covers the destination and transfer	no	Action required	No current adequacy route is recorded for this recipient and transfer.
EU SCCs are already used for the same transfer	yes	recorded	The parties use the 2021 EU SCCs for the same processing and data flow.
A permitted appropriate safeguard is selected	yes	recorded	The UK Addendum is selected, subject to final approval.

Data protection test

Check	Answer	Record status	Evidence
Transfer risk assessment completed	yes	recorded	The ICO data protection test records access powers, remedies and transfer circumstances.

Check	Answer	Record status	Evidence
Necessary supplementary measures are recorded	yes	recorded	Encryption, access approval, minimisation and logging are recorded.

Completion record

Check	Answer	Record status	Evidence
Parties, data, purpose, security and onward-transfer details recorded	yes	recorded	Parties, roles, data, purpose, retention, security and sub-processors are recorded.

Approval record

Decision owner	Decision	Date	Signature
Privacy and Procurement Lead	To be approved	To be completed	To be completed

Assumptions

- The organisation and responsible owner supplied the recorded facts for reference TRA-2026-005.
- No answer has been inferred from a blank or uncertain response.

Limitations

- This pack does not reproduce, alter or execute the official ICO IDTA or Addendum. Obtain the current official document from the ICO.
- This tool does not decide whether an Article 49 exception applies or whether a safeguard is enforceable.
- The organisation must verify current adequacy scope and monitor changes affecting the transfer.

Official sources

Source	Provision	Date	Link
Information Commissioner's Office: Are we making a restricted transfer?	Restricted-transfer three-step test	7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/a-guide-to-international-transfers/are-we-making-a-restricted-transfer/
Information Commissioner's Office: What are the rules on appropriate safeguards?	UK GDPR Article 46 safeguards and data protection test	7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/appropriate-safeguards/what-are-the-rules-on-appropriate-safeguards/
Information Commissioner's Office: What are standard data protection clauses (the UK IDTA and the Addendum)?	IDTA and Addendum completion guidance	7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/appropriate-safeguards/what-are-standard-data-protection-clauses-the-uk-idta-and-the-addendum/
Information Commissioner's Office: Completing a transfer risk assessment	Transfer risk assessment and data protection test	7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/completing-a-transfer-risk-assessment/
Information Commissioner's Office: Is the restricted transfer covered by adequacy regulations?	UK adequacy regulations	7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/adequacy-regulations/is-the-restricted-transfer-covered-by-adequacy-regulations/