



THRIVE HR – PRIVACY NOTICE (CLIENTS & CONTRACTORS)

Thrive HR Consultancy Services (“Thrive HR”, “we”, “us”, “our”) is committed to protecting personal data and respecting privacy. This privacy notice explains how we collect, use, store and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies to:

- clients and client contacts
- prospective clients
- contractors and consultants engaged by Thrive HR

DATA CONTROLLER DETAILS

Sharon Buckingham

Thrive HR Consultancy Services

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DATA PROTECTION PRINCIPLES

We will:

- process data lawfully, fairly and transparently
- collect data only for specified, legitimate purposes
- ensure data is accurate and up to date
- keep data only as long as necessary



- protect data against loss, misuse or unauthorised access

TYPES OF PERSONAL DATA WE PROCESS

Depending on your relationship with us, we may process:

- name, address, date of birth and contact details
- business contact details and correspondence
- bank and payment details
- engagement and contractual information
- CCTV or building access records (where applicable)
- notes and records created during consultancy or engagement

HOW WE COLLECT PERSONAL DATA

Data is collected directly from you, from your organisation, or from third parties such as introducers. Data is stored securely within Thrive HR's systems.

WHY WE PROCESS PERSONAL DATA (LAWFUL BASIS)

We process data to:

- perform contracts
- meet legal obligations
- pursue legitimate business interests
- protect vital interests
- comply with public interest duties
- rely on consent where required



LEGITIMATE INTERESTS INCLUDE:

- providing HR consultancy services
- managing client and contractor relationships
- processing payments
- preventing fraud
- maintaining secure systems
- preparing documentation efficiently

USE OF ARTIFICIAL INTELLIGENCE (AI) TOOLS

We may use AI-enabled tools to assist with drafting documents and administrative tasks.

- AI is supportive only
- No decisions are made solely by AI
- Outputs are reviewed by a human
- Personal data is minimised and processed securely

SPECIAL CATEGORY DATA

We process special category data only where lawful, necessary and proportionate, relying on consent, legal obligations or public interest where applicable.

CRIMINAL CONVICTION DATA

Processed only where legally permitted and necessary for engagement.



SHARING YOUR DATA

Data may be shared with trusted service providers, regulators, or advisers. We do not sell personal data.

INTERNATIONAL TRANSFERS

We do not routinely transfer data outside the UK. Safeguards apply where required.

DATA RETENTION

Data is retained only as long as necessary in line with business and legal requirements.

AUTOMATED DECISION MAKING

No decisions are made solely by automated means.

YOUR RIGHTS

You have rights including access, rectification, erasure, restriction, objection and portability.

COMPLAINTS

You may complain to the Information Commissioner's Office (ICO).

DATA PROTECTION OFFICER

Sharon Buckingham

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