

Thrive Technology Ltd (trading as Thrive) (we) are committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy (together with our Terms of Use) (<https://thrivetech.co/terms-and-conditions>) applies to your use of: (i) our software platform “Thrive” (our “App”) hosted on AWS, once you have opted in to our Privacy Policy and our Terms and Conditions or the use of our website, www.thrivetech.co, (collectively, the “Thrive Platforms”), and any of the services accessible through the Thrive Platforms, (“Services”).

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of applicable data protection laws (including the EU General Data Protection Regulation 2016/679 – “GDPR”) (“**Data Protection Laws**”), the data controller is Thrive Technology Ltd (trading as Thrive). We are registered in England and Wales under company number 12538188 and have our registered office 20-22 Wenlock Road, Islington, London, N1 7GU. The third-party employers that we provide your data to may also be data controllers for the purpose of the Data Protection Laws and at that stage use of your personal data will be governed by the privacy policy of the individual third party employer.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us (Submitted Information):** you may give us information about you by filling in forms on the Thrive Platforms, or by corresponding with us (for example, by e-mail or chat). This includes information you provide when you register to use our App, website, Intercom, share data via an App’s social media functions, enter a competition, promotion or survey and when you report a problem with an App. The information you give us may include:
 - Name
 - Address (including post code)
 - E-mail address
 - Phone number
 - Nationality
 - Gender
 - Ethnicity
 - Date of birth
 - Preferred work location
 - Education Stage
 - Disabilities (if any)
 - Are you the first in your family to go to university
 - Sexual orientation
 - The postcodes you have lived in between the ages of 11-16
 - Extra-Curricular activities

- Skills
- Whether you attended a state school
- Languages spoken
- Whether you require a work visa
- Work experience
- GCSEs
- High school qualification and results
- Degree subject studied
- Degree result
- University attended
- Education stage and timing
- Your interests
- Behavioural traits (personality and ability assessment data) as measured by psychometric testing
- Your username and password
- **Information we collect about you and your device:** Each time you use the Thrive Platforms we may automatically collect the following information:
 - Technical information, including the type of mobile or laptop device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use and time zone setting. (Device Information);
 - Details of your use of the Thrive Platforms including, but not limited to, traffic data and location data, (Log Information).
- If you contact us, we may keep a record of that correspondence.
- **Uses made of the information:** We use information held about you in the following ways:
 - Submitted Information: we may use the Submitted Information to identify your suitability for a job role and provide that information to one or more employers through the Thrive Platforms (or other form of digital communication). On progressing through the employer selection process, you may be taken to the Employer's web portal and asked to complete the Employer's application process. At that stage, you will be subject to the Employer's own privacy policy and may be required to submit further personal information as part of the Employer's application process.
 - We may also provide your Personality and Ability assessment results to other employers that you have not yet been in contact with for the purposes of them inviting you into an interview as part of the services we provide.
 - We may engage a third party to provide this service and you acknowledge and consent to such third party accessing your data solely for the purposes of auto-populating application forms.
 - We will use Device Information and Log Information for our understanding of how you use the Thrive Platforms, to ensure that it is optimised for your use and that we are targeting the right users.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined. We may also share your information with specific

Universities (both individual and aggregate) to help them understand student development areas and employability. Other than Universities and employers who are hiring, carrying out market or employer branding research and / or testing for job suitability via the Thrive Platforms, we do not disclose information about identifiable individuals to other third parties, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 50 men have used the Thrive Platforms on any given day, with specific psychometric results, including trends and patterns). We may make use of the personal data we have collected from you to enable us to comply with our third parties' wishes by displaying their information to that target audience.

Why we collect your personal data

Your personal data is collected primarily so that you can effectively use the Thrive Platforms and the associated Services. In using the Thrive Platforms you may be required to provide your explicit consent to the following use of your personal data:

- Contact by us for the administration of the services provided by the Thrive Platforms, to invite you to events and to provide you with information regarding Thrive and its associated Services;
- The provision of your personal data, (which may include some or all of the Submitted Information and/or your contact details), to third party employers and Universities who are assessing job suitability, employability or hiring via the Thrive Platforms;
- To aggregate your personal data with others personal data into a non – identifiable form in order to carry our analysis of our users for internal business purposes.

Disclosure of your information

We may disclose some or all the Submitted Information and/or your contact details that we collect from you when you register or use the Thrive Platforms to the third-party employers and Universities, to allow them to contact you directly in respect of job opportunities and your assessment results.

We may disclose your Submitted Information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Thrive Technology Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - Enforce or apply our Terms of Use and any other agreements or to investigate potential breaches; or
 - Protect the rights, property or safety of Thrive Technology Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Thrive offers different services to different third party employers and as a consequence, the type of personal information we share about you with such third party employers and / or Universities will differ, depending on our contractual arrangements. There are 3 levels of disclosure with third party employers or Universities:

1. We may share all or some of your Submitted Information with the third party employer and/or University;
2. We may share your contact details with the third party employer and / or University; or
3. We may not share any personal information with the third party employer or University and instead may send a notification (or other digital communication) to allow you to correspond with the third party employer or University directly (in which case any personal information you submit will be subject to the third party University's and / or employer's privacy notices, policies and procedures).

Our contractual arrangements and the requirements of third party employers and Universities are changing all the time, and the nature of our service is for your benefit, to allow you to make the most of the Thrive Platforms. If you would like specific information about which category of disclosure particular third party employers fall into, please contact us using the contact details below.

Where we store your personal data

The data that we collect from you is transferred to, and stored at, a destination within the European Economic Area (EEA). It is processed by staff operating inside the EEA. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Thrive Platforms, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Thrive Platforms; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We may collect and store personal data on your Device using application data caches and browser web storage (including HTML 5) and other technology.

Certain Services may include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

Your rights

In accordance with applicable Data Protection Laws, you have the right to access your personal data, the right to rectification, a right to restrict our processing activities of your data and a right of erasure.

You have the right to ask us not to process your personal data for any marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You will be required to provide your consent to the processing of your Submitted Information by checking certain boxes in the Thrive Platforms. You can contact us at software-tech@thrivetech.co for further information.

The Thrive Platforms may, from time to time, contain links to and from the websites of our partner networks, third party employers, Universities, advertisers and affiliates (including, but not limited to, websites on which the Thrive Platforms or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

Access to information

The applicable Data Protection Laws give you the right to access information held about you. Your right of access can be exercised in accordance with such Data Protection Laws. You will not have to pay a fee to access your personal data (or exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

You can exercise the right at any time by contacting us at software-tech@thrivetech.co.

Changes to privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or when you next start the Thrive Platforms including where we are required to obtain either revised or additional consent from you with regards to the collection, transfer and processing of your personal data. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Thrive Platforms or the Services.

Company Information

Thrive Technology Limited

20-22 Wenlock Road, Islington, London, N1 7GU
Company No. 12538188
ICO Registration Number: ZA092318

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to software-tech@thrivetech.co.

Thrive Technology Limited (Trading as Thrive), June 2020