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## Thrive Centre customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

## Contact details

### Telephone

01582 383 777

### Email

admin@thrivecentre.co.uk

## What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery**:

* Names and contact details
* Addresses
* Date of birth
* Payment details (including card or bank information for transfers and direct debits)
* Health information (including dietary requirements, allergies and health conditions)
* Health and safety information
* Photographs or video recordings
* Records of meetings and decisions
* Identification documents
* Information relating to compliments or complaints
* Information relating to sponsorship

We also collect or use the following information to **provide services and goods, including delivery**:

* Racial or ethnic origin
* Religious or philosophical beliefs
* Biometric information (where used to identify someone)
* Health information
* Sexual orientation information

We collect or use the following information for **research or archiving purposes**:

* Names and contact details
* Addresses
* Recorded images, such as photos or videos
* Personal information used for administration of research
* Personal information used for the purpose of research
* Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

* Name
* Contact information
* Identification documents
* Financial transaction information
* Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
* Health and safety information

We also collect or use the following information to **comply with legal requirements**:

* Racial or ethnic origin
* Religious or philosophical beliefs
* Biometric information (where used to identify someone)
* Health information

We collect or use the following information for **recruitment purposes**:

* Contact details (eg name, address, telephone number or personal email address)
* Date of birth
* National Insurance number
* Copies of passports or other photo ID
* Employment history (eg job application, employment references or secondary employment)
* Education history (eg qualifications)
* Right to work information
* Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect or use the following information for **recruitment purposes**:

* Racial or ethnic origin
* Religious or philosophical beliefs
* Trade union membership
* Biometric information (where used to identify someone)
* Health information

## Lawful bases

Our lawful bases for collecting or using personal information to **provide services and goods** are:

* Consent
* Contract
* Legal obligation
* Legitimate interest:
  + provide tailored service for each of our clients
  + Ensure that we are meeting their needs and maintain a person centered approach.
* Vital interests

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

* Consent
* Legal obligation
* Legitimate interest:
  + We maintain records in archive to stay in touch with client in the event that a new service or product is developed that may benefit the client and/or family.
* Vital interests

Our lawful bases for collecting or using personal information for **legal requirements** are:

* Consent
* Contract
* Legitimate interest:
  + Compliance with Legal Obligations and Operational Efficiency
  + Providing Safe and Effective Care
* Vital interests

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

* Consent
* Contract
* Legal obligation
* Legitimate interest:
  + Purpose: We collect personal data to assess the suitability of candidates for employment roles, manage applications, and facilitate the recruitment process.
  + Scope: This includes evaluating qualifications, conducting interviews, and performing reference checks.

## Where we get personal information from

* People directly
* Health care providers
* Legal and judicial sector organisations
* Schools, colleges, universities or other education organisations
* Previous employers

## How long we keep information

**Thrive Centre Retention Schedule**

At Thrive Centre, we are committed to managing personal data responsibly and in compliance with legal requirements. This retention schedule outlines how long we retain various types of information and the rationale behind these periods.

|  |  |  |
| --- | --- | --- |
| **Type of Information** | **Retention Period** | **Rationale** |
| **Employee Records** |  |  |
| - Employment Contracts | Duration of employment + 6 years | Legal compliance and potential disputes |
| - Payroll Records | 6 years | Tax and accounting regulations |
| - Performance Reviews | Duration of employment + 3 years | Employment management and reference |
| - Training Records | Duration of employment + 3 years | Legal compliance and future training needs |
| - Disciplinary Records | Duration of employment + 6 years | Legal compliance and future employment decisions |
| **Recruitment Records** |  |  |
| - Application Forms | Duration of recruitment process + 6 months | GDPR compliance and potential disputes |
| - Interview Notes | Duration of recruitment process + 6 months | GDPR compliance and potential disputes |
| - Unsuccessful Applications | 6 months | GDPR compliance and future opportunities |
| **Client Records** |  |  |
| - Personal Care Plans | Duration of service provision + 6 years | Legal compliance and future care needs |
| - Medical Records | Duration of service provision + 6 years | Legal compliance and future care needs |
| - Incident Reports | Duration of service provision + 6 years | Legal compliance and potential disputes |
| **Financial Records** |  |  |
| - Invoices and Receipts | 6 years | Tax and accounting regulations |
| - Expense Reports | 6 years | Tax and accounting regulations |
| **General Records** |  |  |
| - Legal Documents | Permanent | Legal compliance and organizational history |
| - Meeting Minutes | 6 years | Legal compliance and organizational reference |
| - Contracts with Suppliers | Duration of contract + 6 years | Legal compliance and potential disputes |
| - Data Protection Impact Assessments | 3 years | GDPR compliance |

**Review and Disposal**

All records will be reviewed regularly to ensure they are up-to-date and disposed of securely once they are no longer needed in accordance with this retention schedule. Records containing personal or sensitive information will be destroyed in a manner that ensures the data cannot be reconstructed or retrieved.

**Contact Information**

For further details or questions regarding our data retention practices, please contact our Data Protection Officer (DPO).

## Who we share information with

### Others we share personal information with

* Health care providers
* Organisations we need to share information with for safeguarding reasons
* Professional or legal advisors
* Relevant regulatory authorities
* External auditors or inspectors
* Professional consultants
* Organisations we’re legally obliged to share personal information with
* Emergency services (where necessary)
* Publicly on our website, social media or other marketing and information media (where appropriate)
* Previous employers

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal data.

**Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don’t usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

### How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

**The ICO’s address:**

Information Commissioner’s Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/)

## Last updated – 01.07.2024