

# PRIVACY POLICY

**Effective Date:** 24 January 2025

## 1. INTRODUCTION

NeuroThrive People Solutions & Coaching (the "Company") is committed to maintaining robust privacy protections for its users by ensuring that your personal data is handled in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Privacy Policy explains how we collect, use, and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

For the purposes of this policy, "Site" refers to the Company's website, which can be accessed at <https://neurothrivepeoplesolutions.co.uk> or <https://neurothrivecoaching.co.uk>.

"Service" refers to the Company's services accessed via the Site, in which users can access HR Consultancy, Neurodiversity workplace support or Neurodiversity Coaching.

The terms "we", "us" and "our" refer to the Company.

"You" refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use, and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

## 2. DATA WE COLLECT

The Company may collect and process "Non-Personal Information" and "Personal Information" in the categories described below.

### ***Usage Data***

We will process information about your use of our website and services ("usage data"). The usage data may include:

1. the browser types and versions used
2. the operating system used by accessing the system
3. the website from which an accessing system reaches our website (so-called referrers)
4. the sub-websites
5. the date and time (so-called timestamp) of access to the Internet site
6. an Internet protocol address (IP address)
7. the Internet service provider (ISP) of the accessing system
8. the geographical location of the user
9. the page views and site navigation paths
10. the pattern of the users' use of the service with regards to timing and frequency
11. Any other similar data and information that may be used in the event of attacks on our information technology systems.

The source of the usage data is Google Analytics. The usage data collected is needed to

1. deliver the content of our website correctly
2. optimise the content of our website as well as any advertisement
3. ensure the long-term viability of our information technology systems and website technology
4. provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack

In order to process this information, we have obtained the user's consent and our legitimate interests in monitoring and improving our website and services.

### ***Notification Data***

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). Email notifications and/or newsletters may only be received by the user if the user has a valid email address and the user registers to receive such information.

When registering, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the user at the time of the registration, as well as the date and time of the registration. The purpose of the collection of this data is to legally protect the Company by ensuring understanding of the possible misuse of the email address of a user at a later date. The personal information collected as part of registration will only be used to send our email notifications and/or newsletter.

The subscription may be terminated by the user at any time, a corresponding link for unsubscribing is found in each email notification and/or newsletter.

### ***Enquiry data, correspondence data and customer relationship data***

The Company may process information contained in any enquiry you submit to us regarding our services and products ("enquiry data"). If a user contacts us via email, contact form or booking form, the personal information transmitted by the user is automatically stored.

The personal information may include:

1. the user's contact information
2. the user's name
3. the name of the user's employer
4. the user's job title or role
5. the metadata associated with the communication
6. and information contained in communications between the user and NeuroThrive People Solutions & Coaching.

Such personal data is transmitted on a voluntary basis by a user to NeuroThrive People Solutions & Coaching are stored for the purpose of processing or contacting the user, managing our relationship with customers, keeping records of communication with the user, and promoting our products and services to customers.

### **3. HOW WE USE AND SHARE INFORMATION**

#### ***Personal Information***

Except as otherwise stated in this Privacy Policy, we do not sell, trade or rent your personal data to third parties without your consent. However, we do share Personal Information with vendors who are performing services for the Company, such as:

- website hosting
- email communication

In general, the Personal Information you provide to us is used to help communicate with you. For example:

- to respond to enquiries or requests submitted through our contact or booking form
- to provide with information or services that you request from us
- solicit feedback from users
- inform users about promotional offers.

#### ***Non-Personal Information***

In general, we use Non-Personal Information to help us improve the Service and customise the user experience. We also aggregate Non-Personal Information in order to track trends and analyse use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

#### ***Legal purpose of the processing of personal data***

The Company may process any of your Personal Information identified in this privacy policy where necessary for the establishment, exercise or defence of legal claims, both in court proceedings and in an administrative or out-of-court procedure. The legal basis for this processing is the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may also process any of your personal information identified in this privacy policy where necessary for the purposes of obtaining professional advice. The legal basis for this processing is the proper protection for our business against risks.

### **4. RETENTION AND DELETING YOUR PERSONAL DATA**

The personal data that we process for any purpose or purposes will not be kept for longer than is necessary for the expressed purpose. We will retain your personal data only for as long as necessary to fulfil the purposes for which we collected it, including to comply with legal, accounting, or reporting requirements.

## 5. YOUR DATA PROTECTION RIGHTS (GDPR and UK GDPR)

If you are a resident of the EEA or the UK, you have the following data protection rights:

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

- **Access:** Request access to your personal data.
- **Correction:** Request corrections to incomplete or inaccurate data.
- **Erasure:** Request deletion of your data ("right to be forgotten").
- **Objection:** Object to the processing of your data for certain purposes.
- **Data Portability:** Request transfer of your data to you or another party.
- **Withdrawal of Consent:** Withdraw your consent at any time.

To exercise any of these rights, please contact us using the details below.

## 6. DATA SECURITY

We take appropriate measures to protect your personal data from unauthorised access, loss, or misuse. However, no system can guarantee complete security.

## 7. THIRD-PARTY LINKS

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of these external sites, and we encourage you to review their privacy policies.

## 8. UPDATES TO THIS POLICY

We may update this privacy policy from time to time. Any changes will be posted on this page, and we encourage you to review it periodically. We may notify you of significant changes to this policy by email or by placing a prominent notice on our site. Significant changes will go into effect 30 days following such notification.

## 9. CONTACT US

This website is owned and operated by NeuroThrive People Solutions & Coaching. If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to: [maria@neurothrivepeoplesolutions.co.uk](mailto:maria@neurothrivepeoplesolutions.co.uk).