

## Thrive Renewables Privacy Policy

Welcome to Thrive Renewables' Privacy Policy.

At Thrive, we're committed to acting responsibly towards and protecting your personal data. It is important to us that our shareholders, bondholders and other interested individuals can trust what we do with their personal data.

This Privacy Policy, including any other documents referred to in it, sets out the basis on which any personal data we collect from you, or that you provide, is collected, used and protected. For ease, we have separated this Privacy Policy into a number of sections which you can click through to get to the specific areas of interest:

[1. Who are Thrive Renewables plc](#)

[2. What personal data we collect and how we use it in relation to our shareholders and bondholders](#)

[3. What personal data we collect and how we use it in relation to people who attend our events](#)

[4. What personal data we collect and how we use it in relation to those who have asked to receive our News \(including our newsletter\)](#)

[5. What personal data we collect and how we use it in relation to applicants to our community benefit programme](#)

[6. What personal data we collect and how we use it in relation to people who raise a concern or complaint](#)

[7. What personal data we collect and how we use it in relation to people who take part in our surveys or enter one of our competitions or prize draws](#)

[8. What personal data we collect and how we use it in relation to people who apply to join our team](#)

[9. Cookies](#)

[10. Your duty to notify us of changes to your personal data](#)

[11. Disclosures of your personal data](#)

[12. International transfers](#)

[13. Data security](#)

[14. Data retention](#)

[15. Your legal rights](#)

[16. Updates to this Privacy Policy](#)

[17. Third party links and providers of the secondary market](#)

[18. How to contact us](#)

## 19. Contacting the Information Commissioner's Office

### **1. Who are Thrive Renewables**

Thrive Renewables plc ("Thrive") and its group companies aim to provide individuals with a rewarding connection with sustainable energy. We offer opportunities for individuals and businesses to invest in clean energy projects that deliver financial, environmental and social rewards. Thrive is a public company registered in England & Wales whose registered office is at Deanery Road, Bristol, BS1 5AS (registered number 2978651).

Unless otherwise expressly stated, Thrive is the "data controller" of the personal data which is collected received and/or processed by it and its group companies and which is referred to in this Privacy Policy.

Thrive Renewables (Buchan) Limited ("Thrive Renewables (Buchan)") is a subsidiary of Thrive Renewables plc, which has issued and manages a bond known as the Buchan bond, which applicants were entitled to subscribe for in May 2016. Thrive Renewables (Buchan) is the data controller of personal data which it receives in relation to the Buchan bond. Further information on how Thrive Renewables (Buchan) receives and uses personal data in relation to the Buchan Bond is provided at section 2.1 of this Privacy Policy.

This website and the products and services of Thrive and its group companies are not intended for children and we do not knowingly collect data from children.

Please take the time to read this Privacy Policy and any other privacy notice or information we provide to you on specific occasions when collecting or processing your personal data. If you have any questions about this Privacy Policy or our use of your personal data, you can contact us by email to: [info@thrivere Renewables.co.uk](mailto:info@thrivere Renewables.co.uk) or by telephoning 0117 428 1850.

### **2. What personal data we collect and how we use it in relation to our shareholders and bondholders**

#### **2.1 As part of a share issue or bond issue**

##### **a) What personal data is collected?**

During a share issue or bond issue, you may apply to become a shareholder or bondholder of Thrive Renewables plc or the relevant subsidiary offering the Bond (in this policy, shareholders and bondholders are referred to as "Investors"). You will need to fill out an application form which you can obtain through the promoter of our share issue or bond issue or our receiving agent. The application form will ask for your personal details including your name, contact information, date of birth, country of birth, nationality, bank account details and other relevant eligibility and anti-money laundering information.

##### **b) What is it used for?**

The information gathered through the application form is used to process your application. The lawful basis for processing any personal data comprising your application is to enable us to assess whether you satisfy the suitability criteria to become a shareholder or bondholder, before entering into a contract for the provision of shares and/or bonds in Thrive or the relevant subsidiary.

If your application is successful, the information you provide is used to include you within our list of Investors, to create and issue the legal documents which record your ownership of the shares or bonds, to perform our legal and contractual obligations to you as an Investor, to send you information about your investment and to provide you with any dividends or interest that become due. The lawful basis for this processing of your personal data is to enable us to perform our obligations at law and within the contract between us and you as one of our Investors.

As part of the application process, we will usually ask whether you'd like us to send you information about your current investment, new investment opportunities, events, renewables news and views (News). If we do not ask for your consent as part of the application process, we will assume that all successful applicants will want to receive News from us. You will be able to tell us, on the application form or at any time subsequently, that you do not wish to receive News from us. If we send any News to you as an Investor that is not required by law or the contract between us and you and which you have not expressly asked us to send, the lawful basis for this processing is legitimate interests. We believe our Investors will want to receive relevant information relating to Thrive and its group companies and their investment, as well as further investment opportunities. This enables us to keep our Investors fully informed and to deliver our business objectives. Where you have expressly consented to the receipt of such information, the lawful basis is consent.

### **c) Who is my personal data shared with and what do they use it for?**

We appoint a promoter to describe and promote each investment opportunity we make available, a receiving agent to receive and manage investment applications, a registrar to record successful applications, maintain our Investor database and administer our Investor communications and a company secretary to update relevant information which we are required to keep by law in relation to our Investors. The receiving agent that we appoint in relation to a share issue or bond issue is the data controller of personal data which you provide when you submit an application for shares or bonds. Please read section 15 in relation to personal data which is collected by the receiving agent. Thrive or Buchan is the data controller of personal data which Thrive, Buchan or their registrar receives from the receiving agent. In all other respects, each of these service providers referred to above will receive some or all of your personal data but they will only use it for the purposes described above.

Personal data regarding our Investors and their applications which is held by Thrive or one of its group companies may also be disclosed to or accessible by our third party IT providers as set in paragraph 11 of this policy.

## **2.2 In relation to the secondary market for investments**

### **a) What personal data is collected?**

Thrive and its group companies offer the ability to buy and sell shares and bonds, through secondary market providers. If you wish to apply to sell or purchase investments in Thrive and/or any of its group companies, you will be required to complete an application and suitability form which is made available through the provider of the secondary market and will require you to provide your name, contact details, date of birth, country of birth, nationality, marital status, bank account information as well as information required for suitability and anti money laundering purposes. The provider of the secondary market is the data controller of personal data which you provide to it if you wish to participate in the secondary market. Please read section 17 of this Privacy Policy in relation to personal data collected by the provider of the secondary market. Thrive or its relevant group company is the data controller of personal data which the secondary market provider provides to Thrive, its relevant group company or their registrar, as referred to in paragraph 2.2 (b) below.

### **b) Who is it shared with and what is it used for?**

The personal data gathered through the application and suitability form is used by the provider of the secondary market to create an account for each buyer and seller and to process trades between them.

If a buyer and seller are successfully matched, the provider of the secondary market will provide relevant information relating to them to Thrive's registrar. Our registrar will use information relating to: (a) buyers, as set out in paragraph 2.1 (b) above; and (b) sellers, to amend or delete their Investor record. Thrive is the data controller of the information which its registrar receives from the provider of the secondary market. The lawful basis for this processing of personal data by our registrar is to enable us to perform our obligations at law and within the contract between us and our Investors.

The provider of the secondary market sends Thrive or its relevant group company information on a monthly basis comprising: the names of all of those who have registered to buy or sell their investment through the secondary market including, in the case of successful buyers and sellers, the number of investments sold and the purchase price; and in the case of unsuccessful buyers and sellers, the number of investments they were looking to buy or sell and the proposed sale/purchase price. Thrive is the data controller of the information which it receives from the provider of the secondary market. The lawful basis for this processing of personal data is our legitimate interests. It is in our best interests to understand how our investments are being traded so that we can find ways to

enable our Investors to purchase and sell investments in Thrive and its group companies and to inform management decisions and future strategies.

Personal data regarding Investors which is held by Thrive or its relevant group company may also be disclosed to or accessible by our third party IT providers as set in paragraph 11 of this policy.

### **2.3 How is personal data about existing Investors used in relation to future investment opportunities?**

Our appointed promoter of any future investment opportunities will contact existing Investors of Thrive and its group companies to make them aware of the investment opportunity and to offer them the ability to make further investments in Thrive or its relevant group company. The lawful basis for this is to perform our legal obligations to our shareholders or, in the case of bondholders, is our legitimate interests. We believe our existing bondholders will be interested in similar investment opportunities issued by Thrive or one of its group companies. Where our Investors have expressly consented to the receipt of such information, the lawful basis is consent.

### **3. What personal data we collect and how we use it in relation to people who attend our events**

#### **a) What personal data is collected?**

If you register to attend one of our events through our website or through an event registration website operated on our behalf, you will need to provide your name, contact details and any special dietary or access requirements.

As part of the event sign up process you will also:

(a) be asked whether you wish to receive News from us. You can choose not to do so at the point at which you register for the event or at any time afterwards, by following the instructions on the event registration page or within the News; and

(b) be asked to confirm that you are happy for photographs of yourself and any others who are attending the event with you to have your/their photograph taken (either alone or with other attendees) and for those photographs to be published on the Thrive website and in other promotional and marketing materials that we issue.

#### **b) What is it used for?**

The personal data will be used by Thrive to send you reminders about the forthcoming event and to send you tickets. The lawful basis for this processing of personal data is to enable you to attend the event which you have expressed interest in. Thrive also uses this personal data to ensure that it is aware of and makes provision for the number of expected attendees. The lawful basis for this processing of personal data is legitimate interests- so that we can make our events safe and enjoyable for everyone attending.

If you have opted to receive News from us, we will use your personal data to send you that News. The lawful basis for this processing of personal data is the performance of a contract between us and you.

If you have expressly consented to us taking and publishing photographs of yourself and any others who attend the event with you, we may publish photographs on the Thrive website and in other of our promotional and marketing materials that we issue from time to time. The lawful basis for this processing of personal data is consent. We also publish on the Thrive website and in other of our promotional and marketing materials, photographs taken at previous events.

Where we did not ask for consent to those photographs being taken and published, the lawful basis for this processing of personal data is legitimate interests- so that we can promote and grow our business and enable us to make more investments in cleaner energy for the benefit of Thrive, its group companies, our Investors and the general public.

#### **c) Who is it shared with?**

If we use a third party event registration website provider, your personal data will only be shared with ourselves and the third party event registration website provider. We will each use it to enable you to attend the event(s) you have expressed an interest in.

Personal data regarding event attendees which is held by Thrive may also be disclosed to or accessible by our third party IT providers as set in paragraph 11 of this policy.

### **4. What personal data we collect and how we use it in relation to those who have asked to receive our News (including our newsletter)**

#### **a) What personal data is collected?**

If you actively register to receive our News from us, whether through our website, one of our event registration websites, one of our events, or otherwise, you will need to provide your name and email address. As noted above, we may also include you on our subscriber list through any application process for one or more of our investments, unless you tell us that you do not wish to receive News from us. This personal data is provided to and stored by Thrive and the service provider we use to send News to you.

#### **b) What is it used for?**

Your name and email address will be used by our service provider to send you News. The lawful basis for this processing of personal data is to perform a contract between you and us, where you have actively registered to receive News. Otherwise, the lawful basis for this processing of personal data is legitimate interests- so that we can send relevant information to people who we believe will be interested in it.

If we decide to conduct a further investment opportunity, the promoters of our investment will contact persons who receive News with information regarding the potential investment. The lawful basis for this processing of personal data is legitimate interests- so that we can provide information to people who we believe will be interested in potential investments in Thrive, which enables us to grow our business and invest more in cleaner energy for the benefit of ourselves, our investors and the general public. Where you have expressly requested that we send or consented to the receipt of such information, the lawful basis is consent.

**c) Who is it shared with?**

The personal data you provide when you register to receive News from us will not be shared with anyone other than ourselves, promoters of any future investment opportunities and the service provider we use to send News to you. We will each use it to enable you to receive the News that you have requested and as set out in paragraph 4 (b) above.

Personal data regarding recipients of News which is held by Thrive may also be disclosed to or accessible by our third party IT providers as set in paragraph 11 of this policy.

**5. What personal data we collect and how we use it in relation to applicants to our community benefit programme**

**a) What personal data is collected?**

If you apply on behalf of a community for our community benefit programme and you are an individual, you will need to complete an application form which will ask you to provide your name, address, telephone number, email address, information regarding the community benefit energy consumption, current fuel/energy prices and nature of the building/its use, and information regarding the bank account into which the benefit should be paid if your application is successful. If you are an organisation, you will need to complete an application form which will ask you to provide the name and contact details of your organisation, information regarding the community benefit that you provide (as set out above) and information regarding the bank account into which the benefit should be paid, if your application is successful.

**b) Who is it shared with and what is it used for?**

You will send the completed application form directly to our community benefit programme managers who will use it to assess whether or not your application passes the eligibility criteria and to contact you regarding any questions that they have and/or to inform you whether or not your community benefit application has been successful. The personal data you provide on the application form and subsequently to our programme managers in answering any questions that they have, is shared with us. The lawful basis for this processing of personal data is to enable us to assess whether the application is eligible for a community benefit and if so, for paying the community benefit in accordance with the contract between the successful applicant and us.



Personal data regarding community benefit applications which is held by Thrive may also be disclosed to or accessible by our third party IT providers as set in paragraph 11 of this policy.

## **6. What personal data we collect and how we use it in relation to people who raise a concern or complaint**

### **a) What personal data is collected?**

At Thrive, we pride ourselves on listening to the concerns and interests of the people who live near to our renewable energy assets and on the low number of concerns and complaints that we receive. We want our neighbouring communities to understand the renewable energy asset which is local to them. In the unlikely event that you wish to raise a concern or complaint about one

of our renewable energy assets, we will ask you for your name, address, contact details and details regarding the nature of your concern or complaint.

### **b) What is it used for?**

We will use this personal data to contact you regarding your concern or complaint and to work with you to ensure that we resolve it. The lawful basis for this processing of personal data is legitimate interests - so that we can listen to your concern or complaint and respond to it appropriately, which helps ensure the public have confidence that we operate our business in the best interests of ourselves, our investors and the general public.

### **c) Who is the personal data shared with and what do they use it for?**

Personal data regarding people who raise a concern or complaint which is held by Thrive may also be disclosed to any third parties we appoint to model and/or monitor how the renewable energy asset relates to your location and it may be disclosed to or accessible by our third party IT service providers as set in paragraph 11 of this policy.

## **7. What personal data we collect and how we use it in relation to people who take part in our surveys or enter one of our competitions or prize draws**

### **a) What personal data is collected?**

If you take part in one of our surveys or enter one of our competitions or prize draws, you may be asked for your name, address and contact details (including your telephone number and/or email address). Normally, our surveys can be completed anonymously so you do not have to provide any of your personal information if you do not wish to do so.

### **b) What is it used for?**

If you choose to provide your personal information in response to a survey, it will be used by Thrive (or, where Thrive has appointed a third party to administer and manage the survey, the third party) to analyse the views of the survey respondents. The lawful basis for this is legitimate interests- so that Thrive can



understand what interested parties think of how Thrive is operating its business and (where relevant) how it should continue to operate its business in the future.

The information you provide on entering one of our competitions or prize draws will be used by Thrive (or, where Thrive has appointed a third party to administer and manage the competition or prize draw, the third party) to administer and manage the competition or prize draw and as set out in the rules relating to that competition or prize draw, including to notify you if you have won a prize. The lawful basis for this processing of personal data is to perform a contract between you and us for your entry into the competition or prize draw and, where you have consented to the use of your personal data for other means (such as to publicise the winner) the lawful basis for this processing of personal data is consent.

**c) Who is the personal data shared with and what do they use it for?**

Thrive appoints third parties to administer and manage its surveys, competitions and prize draws. These third parties are only permitted to use your personal data to the extent necessary to administer and manage the surveys, competitions and prize draws. When the third party has completed its obligations in relation to a survey, competition or prize draw, it is required to delete your personal data (unless it is necessary to keep it to comply with a legal obligation).

Personal data regarding survey respondents or entrants to one of our competitions or prize draws which is held by Thrive may also be disclosed to or accessible by our third party IT providers as set in paragraph 11 of this policy.

**8. What personal data we collect and how we use it in relation to people who apply to join our team**

**a) What personal data is collected?**

If you apply to join our team, you will need to provide us with a copy of your CV and/or fill out an application form. The application form will ask for personal details such as your name, contact details, date of birth, gender, NI number, work history, salary expectations, qualifications, passport and visa details (and if appropriate, copies of right to work documentation) and references. We may also collect additional information from third parties including former employers, credit reference agencies and other background check agencies. Some of this information may comprise sensitive personal data, such as that relating to your diversity, health and details of any driving or criminal convictions but we will seek your consent before collecting this information.

**b) What is it used for?**

The information we collect as part of the application process is used by us to review your application, to enable us to comply with our legal obligations, to conduct a fair recruitment process and to make an informed decision about the right individual for the role we have available. The lawful basis for this processing of your information is consent where you have expressly consented to the processing. Otherwise, the lawful basis is to enable us to perform our legal or

contractual obligations, where appropriate, and in all other cases, for our legitimate interests- so that we can conduct a fair process and help us select the right candidate for us.

If your application is successful, the information you provide as part of the application process, and additional information that you share with us, will be processed in accordance.

### **c) Who is the personal data shared with and what do they use it for?**

As mentioned above, Thrive appoints third parties to conduct background checks on people who apply to join our team. Those third-party agencies only use it for the purpose of conducting the appropriate checks.

Personal data regarding applicants which is held by Thrive may also be disclosed to or accessible by our third-party IT providers as set in paragraph 11 of this policy.

## **9. Cookies**

This website uses cookies. You can set your browser to refuse all or some cookies or to alert you when websites set or access cookies. You can also disable cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly.

For more information about how we use cookies, please see our cookies policy <https://www.thriverenewables.co.uk/cookies>.

## **10. Your duty to notify us of changes to your personal data**

It is important that the personal data we and third parties who work on our behalf hold about you is accurate and up to date. If any of your personal data changes, please let us know.

## **11. Disclosures of your personal data**

We may share your personal data with the parties referred to above. In addition, we use third parties to provide us with IT services. Your personal data may be accessible by those third party IT service providers.

In the event that we sell, transfer or merge parts of our business or assets, the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties who process your personal data on our behalf to respect your privacy, to use it only for the purpose of providing their services to us in accordance with our specific instructions and to comply with the law in relation to their processing of your personal data.

We never have and never will sell any of your personal data to any third party. We will treat your personal data responsibly and we take the protection of your personal data seriously.

## **12. International transfers**

We do not transfer any of your personal data outside the EEA, but some of our third party service providers are based outside and/or use IT facilities (such as cloud storage facilities) based outside the EEA. Accordingly, their processing of your personal data on our behalf will involve a transfer of your personal data outside of the EEA.

Whenever one of our service providers transfer your personal data out of the EEA, we will require them to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The transfer is to a country that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- The transfer is made pursuant to a specific contract approved by the European Commission which gives personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- The transfer is to a service provider based in the US who is part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

### **13. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know it. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **14. Data retention**

#### **How long will you use my personal data for?**

We will keep your personal data for as long as you have your investment in us or for as long as we need to provide our other services to you. We may also retain your personal data after this period in order to meet our legal or regulatory requirements.

In some circumstances you can ask us to delete your personal data: see paragraph 15 below for further information.

Where reasonably practicable we may anonymise your personal data (so that it can no longer be associated with you) for research, statistical or audit purposes, in which case we may use this information indefinitely without further notice to you.

## 15. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are summarised below:

- **Request a copy** of all personal data we hold about you (commonly known as a "data subject access request");
- **Request correction** of any mistakes in the personal data that we hold about you;
- **Request erasure** of your personal data where there is no good reason for us continuing to process it. However, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and you feel that it impacts on your fundamental rights and freedoms. We will stop processing your personal data unless we determine that we have compelling legitimate grounds to process your personal data which override your rights and freedoms;
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the accuracy of your personal data; (b) where our use of your personal data is unlawful but you do not want us to erase it; (c) where you need us to hold your personal data even if we no longer require it, as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it;
- **Request transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated processing of personal data about you which we carry out based on your consent or where it is necessary to perform a contract with you;
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, if you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us by email to: [info@thriverenewables.co.uk](mailto:info@thriverenewables.co.uk) or by telephoning 0117 428 1850. You can do so free of charge in most circumstances (although you will be required to pay the cost of any telephone calls you make to us).

We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request, so as to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **16. Updates to this Privacy Policy**

This Privacy Policy was last updated in March 2019. We may issue further updates to this Privacy Policy from time to time. If we do, we will post the latest version on this website. If any changes are significant, we may (but are not required to) notify you for example by adding a statement to the homepage of our website or sending you a notice by email or letter.

Please check this website regularly to stay informed about how we use your information and the ways you can help us protect your privacy.

## **17. Third party links and providers of the secondary market**

This website may include links to third party websites. Such third party websites may collect personal data about you. We are not responsible for those third party websites and we do not control or influence what personal data they collect from you or how they use it. We encourage you to read the privacy notice of every website you visit, particularly before submitting any personal data to them.

The websites of the secondary market providers referred to in paragraph 2.2 are linked to from this website. Those providers may collect personal data from you through their website or by another means. The secondary market providers collect personal data from you as data controller. We do not control or influence what personal data they collect from you or how they use it. We encourage you to read the privacy notice of the secondary market providers before submitting any personal data to them.

## **18. How to contact us**

If you have any questions or concerns about the information within this Privacy Policy, you would like us to stop using your personal data, or you would like to exercise any of your legal rights set out above, please don't hesitate to contact us by email to: [info@thrivere Renewables.co.uk](mailto:info@thrivere Renewables.co.uk) or by telephoning 0117 428 1850.

## **19. Contacting the Information Commissioners Office**

We hope that you contact us first so that we can resolve any complaint or concern that you have. However, you have the right at any time to report a concern or raise a complaint with the Information Commissioner's Office. If you wish to do so, please go to <https://ico.org.uk/make-a-complaint/> or call them on 0303 123 1113.