



**Thrive Advisory  
Privacy Policy**

**September 2022**



Thrive Advisory Group Pty Ltd (collectively “Thrive Advisory”, “Thrive”, “we,” or “our”) take data privacy and protection seriously. Trust is the keystone of our relationships with our Clients, including individual executives and teams we coach and support, the enterprises we advise and the broader population who may be interested in our work and research. Thrive respects your privacy and we are committed to the security and protection of personal data. As such, we constantly strive to maintain a compliant and consistent approach to privacy and data protection.

This Privacy Policy (“Policy”) will inform you as to how we look after your personal data when you partner with us, or when you visit our website, and tell you about your privacy rights. It explains who we are, how we collect, share and use personal information, how to contact us and how you can exercise your privacy rights.

This Policy covers personal information we collect (capitalised terms are defined under Overview, Key Terms):

- in connection with our executive assessment, leadership advisory, executive coaching (including executive wellbeing coaching), team effectiveness, CEO succession, Board effectiveness evaluation and other leadership Services (the “Services”), whether we are in the process of assessing you as a current or future employee of a Client, developing you as a leader or team, retaining you as a Vendor, staff member, or affiliate, or engaging with you as a 360 Referee in relation to one of our Client executives; and
- when you visit our website ([www.thriveadvisory.com](http://www.thriveadvisory.com)) and in the usual course of our business, such as in connection with our Client or research events and marketing activities.

Thrive has appointed a Privacy Officer who is responsible for overseeing policies, procedures and questions in relation to this Privacy Policy.

If you have any questions about this Privacy Policy, including any requests to exercise your privacy rights (which we set out in detail for your reference below), please contact the Privacy Officer using the contact details provided under the Section headed “To Contact the Privacy Officer” on page twelve of this document.

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## Overview

### **About Us**

Thrive Advisory is a boutique leadership advisory firm committed to helping leaders, teams and organisations strive and thrive!

Through an integrated focus on people, performance and wellbeing, Thrive partners with Directors, CEOs and senior leadership teams to enhance leadership capability and organisational culture, reduce psychosocial risks, unlock potential and accelerate *sustainable* growth.

Thrive Advisory is headquartered in Australia and specialises in the following areas:

- Organisational effectiveness discovery (surveys, interviews, focus groups)
- Psychosocial risk assessment
- Customised advisory support and action planning
- M&A culture and leadership due diligence and integration advisory
- CEO succession and C-suite talent pipeline planning
- Board advisory (Director capability frameworks, director selection and Board effectiveness reviews)
- Bespoke leadership capability frameworks
- Pre-hire assessment and selection
- High-potential talent cohort development programs
- Diversity, equity and inclusion advisory
- Team discovery effectiveness discovery (customised surveys and interviews)
- Team effectiveness offsite facilitation
- C-suite team advisory support (purpose, values, commitments)
- Team-level executive wellbeing
- Immersive experiences
- Executive development programs
- 360° feedback and personality psychometrics
- Board mentoring
- Executive coaching
- Onboarding and transition support
- Executive wellbeing

### **Key Terms**

In this Policy, the following terms have the meanings set forth below:

- **“Client”** means any of our clients and their employees (including **“executives”**) engaged in Services who are looking to assess, develop or coach executives, teams and Board directors to whom we provide the Services.
- **“Prospective Client”** means an individual representing a client who Thrive are in discussions with regarding a potential contractual relationship.
- **“360 Referee”** means any individual who provides employment or personal references for a particular executive, typically for role assessment/succession and development feedback.

- **“Services”** means the provision of any consulting, coaching, advisory or support provided by Thrive Advisory verbally or in writing, all research services and intellectual property creation, the provision of any deliverables Thrive is requested to do by a Client, executive or prospective Client, verbally and in written form including emails, or specified in a Contract, Statement of Work, Letter of Engagement or equivalent documents where Thrive is retained or requested to deliver consulting support. Examples of Thrive Advisory Services are provided in the aforementioned bullets describing Thrive’s speciality areas (Page 4).
- **“Vendor”** means any entity other than Thrive Advisory that provides products or Services to Thrive Advisory pursuant to a contract with Thrive Advisory.

## **Our Privacy Obligations**

Thrive Advisory is governed by the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth). The APPs regulate how personal information is handled by Thrive Advisory.

“Personal information” means information or an opinion about an identified individual, or an individual who is reasonably identifiable. Thrive Advisory’s Privacy Policy applies to personal information collected and/or held by Thrive.

We will review this policy regularly, and we may update it from time to time.

### ***The Types of Personal Information We Collect and Hold***

We collect personal information about our clients and participants in Thrive Advisory’s executive leadership programs and assessment practice as part of our routine activities.

We also collect personal information about our staff, contractors and suppliers, as well as the contact details of individuals who work for contractors and suppliers and other types of professional associates and personal contacts.

### ***How We Collect Personal Information***

#### **Information That You Specifically Give Us**

We may ask you to provide us with certain types of personal information if you wish to obtain a particular service or product from us. This might happen over the telephone, through our website, by filling in a paper form, or meeting with us face-to-face. We will give you a Collection Notice at the time to explain how we will use the personal information we are asking for. The notice may be written or verbal.

You might also provide your personal information to us, without us directly asking for it, for example if you engage with us on social media.

#### **Clients or Prospective Clients**

We need to collect and use information about you or individuals at your organisation in the course of responding to requests for information on our Services or providing the Services to you. We generally only need to have your contact details or the details of individual contact(s) at your organisation (such as name, telephone number, email address, and job title) to ensure that our relationship runs smoothly. We also hold information relayed by email to keep a record of our contact with you. We may also hold extra information about you that someone in your organisation has chosen to tell us.

## Executives

If you are an Executive, you may provide personal information to us, for example, when you contact us to seek executive coaching support, or communicate with us in any way in connection with the Services. Further, as described below, we may obtain information about you from other sources.

You are not obligated to provide any information or participate in any of the Services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily. If however, you are unwilling to provide us with certain requested information, please understand that this may limit our ability to consider you in connection with the Services.

## Vendors

***Information Vendors provide to us:*** We need a small amount of information from our Vendors to ensure we can provide Client Services smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the Services you provide (if this is part of the contractual arrangements between us).

## Website

Certain parts of our website may ask you to provide personal information voluntarily. For example, we may ask you to provide your contact details (like your name, email address, and phone number) to complete surveys, subscribe to marketing communications (like newsletters), submit enquiries and/or otherwise communicate or interact with us.

We may also collect personal information from you offline, such as when you attend one of our client events. You are not obligated to provide Thrive Advisory any information or participate in any of the Services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily.

## ***Information That We Collect From Others***

Our Clients may provide us with personal information about certain executives in connection with our Services (for example, they may provide us with a list of executives they would like us to assess through the Services for a CEO succession process). At times, we process this personal information as a processor on our Client's behalf. We use that information to provide the Services to our Client and as instructed by our Client. Under these circumstances, it is our Client, as the controller, that controls what personal information about you we collect and how we use it. If you have privacy-related questions or concerns about a Client's privacy practices or the choices a Client has made to share your information with us or any other third-party, you should reach out to the Client or review their privacy policies. We are not responsible for the privacy or security practices of our Clients, which may differ from those set forth in this Policy.

## Executives

We may also hold extra information about you that someone in your organisation has chosen to tell us. If you submit any personal Information about other people to us, or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

## 360 Referees

To understand the context of your relationship with an executive, we may also process certain professional details (such as your job title, occupation, academic and professional qualifications, and employment history) and your connection to the executive (such your relationship to, experience with, and opinions about the

relevant executive). We generally ask the executive to provide us with much of this information, but we may supplement it with information we collect about you from publicly available sources (such as LinkedIn) or by asking you directly.

### **Vendors, Affiliates or Staff**

If you apply for a job or contract with us, we will collect personal information about you from your referees. With your consent we may also use a third-party service to ensure your employment, educational and identity records are valid. We may also check some details about our suppliers from publicly available sources, such as the Australian Business Register and ASIC databases.

### **Information That We Generate Ourselves**

We maintain records of the interactions we have with Clients, including the products and Services we have provided to you or that you have enquired about, feedback provided, or complaints made.

When you visit our website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Such automatically collected information may include your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location) and/or other technical information. We may also collect information about how your device has interacted with our website, including the pages or content accessed and links clicked.

When you participate in a Thrive Advisory program or activity, such as during an executive coaching, mentoring session, or team effectiveness program, the facilitator or coaches present may take notes in observation of activities, behaviours and interactions with others throughout the session.

### ***The Types of Personal Information We Collect***

In the course of our work, we may collect the following types of personal information about Clients (terms are defined under, Key Terms) dependant on the nature of our relationship and Services requested, including:

<b>Identity Data:</b>	Includes details like your first name, maiden name, last name, corporate identifier, username or similar identifier, civil/marital status, title, date of birth, gender, photograph and national origin.
<b>Contact Data:</b>	This includes details like your name, postal address, email address and telephone numbers. If you make any payments to us, this will also include your billing address.
<b>Response Data:</b>	Including information obtained in the completion of leadership assessment processes or psychometric tools recommended by us. This will include the details given in your responses and may include special categories of personal data.
<b>Executive History or Resumé Information:</b>	Including your contact details, employment history, educational history and professional qualifications, as well as languages and other skills and activities.
<b>Lifestyle Preferences and Personality Profile Data:</b>	Including individual personality, preferences, intellectual capacity, behaviour, executive competencies, and/or character traits, community involvement and memberships, hobbies and social activities.

<b>Health, Diversity, and Criminal Conviction Data:</b>	Where appropriate, and in accordance with local law, we may also collect information related to your health, diversity information (including racial or ethnic origin, religious or other similar beliefs, and physical and/or mental health, including disability-related information), and/or details of any criminal convictions. Health information is typically collected in the context of wellbeing coaching and diversity and criminal conviction information is typically collected when requested by Clients in the context of assessment for roles/succession Services.
<b>Financial Data:</b>	If you make any payments to us, this will include details like your bank account and payment card details.
<b>Transaction Data:</b>	If you make any payments to us, this will include details about those payments and any other transactions that you have with us.
<b>Technical Data and Usage Data:</b>	Including information about how you use our website (i.e., clickthrough rates and time spent on different parts of the website). Please refer to section on data collected via website.
<b>Marketing and Communications Data:</b>	This includes your preferences in receiving marketing from us and our third parties and your communication preferences.
<b>Other information:</b>	Such as your performance history and any other relevant information you may choose to share with us. We may also keep a record of our contact history with you.

### ***Links To Other Sites***

On our website, or through our assessment activities, we may provide links to third-party websites. These linked sites are not under our control and we cannot accept responsibility for the conduct of companies linked to our website. Before providing your personal information via any other website, we advise you to examine the terms and conditions of using that website and its privacy policy.

### ***How We Use Personal Information***

We may use your personal information for the following purposes:

- to provide the service or product you have requested
- to provide technical or other support to you
- to answer your enquiry about our Services, or to respond to a complaint
- to manage our employment or business relationship with you
- to promote our other programs, products or Services which may be of interest to you (unless you have opted out from such communications)
- to comply with legal and regulatory obligations
- if otherwise permitted or required by law, or
- for other purposes with your consent, unless you withdraw your consent.



## Client And Prospective Client Data

We typically use Client data for the following purposes:

To provide the Services to your organisation; to manage our relationship and account with you and your organisation; and/or for our other business purposes such as data analysis, identifying usage trends, creating anonymised data sets for research, statistics and analytics purposes, creating knowledge pieces (like white papers), determining the effectiveness of our Services, and/or to enhance, customise, and improve our features, products, and Services.

To send you information (such as reports, promotions, research, white papers, and event invitations) that we think you may find interesting (in each case, where this is in accordance with your marketing preferences).

## Executive Data

**Executive Assessment and Leadership Advisory Activities:** to provide our Clients with the Services, including assessing executive suitability for roles with a Client; sending your information to our Clients; and/or verifying the details you have provided, such as through psychometric evaluations or by requesting information from third parties (e.g., 360 Referees).

From time to time, we may invite executives to participate voluntarily and anonymously in research endeavours and run aggregate analytics for the purpose of creating knowledge pieces (such as white papers), determining the effectiveness of our Services, and/or to enhance, customise and improve our features, products and Services.

We may also send you information (such as reports, promotions, research, white papers, events and general information about, relevant industry sectors for example), that we think you may find interesting (in each case, in accordance with your marketing preferences).

## 360 Referee Data

We use referee data to obtain your opinion regarding executives in the course of providing the Services to our Clients. In addition, we may use your details to contact you in relation to any of our Services that we think may be of interest to you as a potential Client.

## Vendor Data

**We typically use Vendor Data:** to store (and update when necessary) your details in our database, so that we can contact you in relation to our agreements, to obtain support and Services from you, to perform certain legal obligations, to help us target appropriate marketing campaigns and to help us establish, exercise, or defend legal claims.

## Website

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Please note that third parties (including providers of external services like web traffic analysis services for example), may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. Our third-party website host service states it uses this information to monitor and analyse the performance, operation and effectiveness of the platform and ensure it is secure and safe to use.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

**Social Media Widgets:** Thrive Advisory may use social media features, such as social media widgets that link to a social media website or allow you to share website content. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social media features, such as widgets, are either hosted by a third-party or hosted directly on our website. Your interactions with these features are governed by the Privacy Policy of the company providing it.

## When We Disclose Personal Information

Thrive Advisory will only use your personal data when the law allows us to. Most commonly, we may share your personal information with the following types of third parties for the purposes described in this Policy:

- In the case of executives and 360 Referees, we may share your information with Clients who will need to process your information for the purposes we have described in this Policy. 360 Referee data is analysed and shared in an aggregate, de-identified manner.
- We may share your information with any competent law enforcement body, regulatory or government agency, court, or other third-party, where we believe disclosure is necessary as a matter of applicable law or regulation, to exercise, establish, or defend our legal rights, or to protect your vital interests or those of any other person.
- We may share your information with third-party service providers (our Vendors) who perform functions on our behalf (including external consultants, business associates and professional advisers, such as lawyers, auditors, accountants, technical support providers, and outsourced IT and document storage providers).
- We may share your information with a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Policy. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- We may share your information with our marketing partners to send emails on our behalf.
- if necessary to provide the service or product you have requested
- if otherwise permitted or required by law; or
- for other purposes with your consent.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the section headed "To contact our Privacy Officer" on page twelve of this Policy.

## Our Third-Party Service Providers

The personal information of Clients, staff, Vendors and other contacts may be held on our behalf outside Australia, including 'in the cloud', by our third-party service providers. Our third-party service providers are bound by contract to only use your personal information on our behalf, under our instructions. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Our third-party service providers are:

Third-Party	Location of servers	Privacy Policy link
EEK & Sense	<b>London, UK.</b>	<a href="https://www.glwswellbeing.com/EEK-and-SENSE-Privacy-Policy-23-Oct-2019.pdf">https://www.glwswellbeing.com/EEK-and-SENSE-Privacy-Policy-23-Oct-2019.pdf</a>
MailChimp	United States	<a href="https://mailchimp.com/legal/">https://mailchimp.com/legal/</a>
Microsoft 365	Sydney and Melbourne, Australia	<a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>
Peter Berry Consulting	Europe & US	<a href="https://www.peterberry.com.au/privacypolicy/">https://www.peterberry.com.au/privacypolicy/</a>
Qualtrics	US	<a href="https://www.qualtrics.com/support/survey-platform/getting-started/data-protection-privacy/">https://www.qualtrics.com/support/survey-platform/getting-started/data-protection-privacy/</a>
SHL	Australia (Primary) Ireland (back-up for SHL's disaster recovery process)	<a href="https://www.shl.com/legal/privacy/data-privacy-pledge/">https://www.shl.com/legal/privacy/data-privacy-pledge/</a>
Symphony	Los Angeles, U.S	<a href="https://www.activejava.com/misc/privacypolicy.html">https://www.activejava.com/misc/privacypolicy.html</a>
Xero	US based server providers, AWS	<a href="https://www.xero.com/uk/legal/privacy/">https://www.xero.com/uk/legal/privacy/</a>

## Security Of Your Personal Information

We will take reasonable security measures to protect personal information from loss, unauthorised access, use, modification or disclosure. Internet transmission measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and to help ensure that your data is safe, secure, and only available to you and to those with authorised access.

We have put in place procedures and a Privacy Officer to deal with any suspected personal data breach. Should a breach be identified, we will notify Clients, comply with our contractual obligations, and will notify any applicable regulator of a breach where we are legally required to do so.

If you have any questions about the security of your personal information, you may contact us using the contact details provided under the section headed "To Contact Our Privacy Officer" page twelve of this Policy.

We will take reasonable steps to ensure personal information is stored securely, not kept longer than necessary, and disposed of appropriately.

We will retain information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with the Services or to comply with applicable legal, tax, or accounting requirements). We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

If you have any questions about how long we retain your personal information or wish to have your personal information deleted, you may contact us using the contact details provided under the Section headed “To Contact Our Privacy Officer.”

## Accessing Or Correcting Your Personal Information

You have the right to request access to the personal information Thrive Advisory holds about you. Unless an exception applies, we must allow you to see the personal information we hold about you within a reasonable time period and without unreasonable expense.

You also have the right to request the correction of the personal information we hold about you. We will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up to date. Unless an exception applies, we must update, correct, amend or delete the personal information we hold about you within a reasonable time period. We do not charge for making corrections.

To seek access to, or correction of, your personal information, please contact our Privacy Officer.

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the section headed “To Contact Our Privacy Officer.”

Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you withdraw your consent, you will not be able to participate in Thrive’s executive assessment, development or coaching projects, or similar “Services”.

## To Contact Our Privacy Officer

If you have an enquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

### Privacy Officer

**Email:** [info@thriveadvisory.com](mailto:info@thriveadvisory.com)

**Mail:** Level 36, Governor Philip Tower, Sydney NSW 2000, Australia.

We will endeavour to resolve complaints quickly and informally, however if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our Privacy Officer by mail, or email, as above. We will acknowledge your formal complaint within 10 working days.

If we do not resolve your privacy complaint to your satisfaction, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) by calling them on 1300 363 992, making a complaint online at [www.oaic.gov.au](http://www.oaic.gov.au), or writing to them at OAIC, GPO Box 5218, Sydney NSW 2001.



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