

Thurston Group Privacy Policy

How Thurston Group collects, uses and protects personal data.

1. Who We Are

Thurston Group Limited (“Thurston Group”, “we”, “us”, “our”) is a UK-based manufacturer of modular and portable buildings operating across multiple production facilities in Yorkshire.

For the purposes of UK data protection law, Thurston Group Limited is the **Data Controller** of the personal data described in this policy.

If you have any questions about this policy or how we handle your data, please contact:

Email:

dataprotectionofficer@thurstongroup.co.uk

Post:

Thurston Group Limited
Quarry Hill Industrial Estate
Wakefield, West Yorkshire
WF4 6AJ

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO):

<https://ico.org.uk>

2. Scope of Data Processing

We process personal data in the following contexts:

- Visitors to our website
- Customers and prospective customers
- Supplier contacts and contractors
- Job applicants
- Employees and freelance specialists
- Visitors to our premises

Where we act strictly on the documented instructions of a client (for example within certain project-based arrangements), we may act as a Data Processor. In such circumstances, processing is governed by contractual terms with that client.

Rev 1	MKT/POL/0001	Issue Date: 15/05/2026	Page 1 of 8
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3. The Types of Personal Data We Collect

We collect only personal data that is necessary for legitimate business purposes.

Website Visitors

- Name
- Email address
- Telephone number
- Company name
- IP address
- Browser/device information
- Website usage data
- Marketing preferences (where provided)

Customers and Prospects

- Business contact details
- Job title
- Project information
- Contractual correspondence
- Billing information (where relevant)

Suppliers and Contractors

- Contact details
- Company information
- Payment and financial details
- Compliance documentation

Employees and Applicants

- CV and employment history
- Identity documentation
- Bank details and payroll information
- Pension information
- Health information (where required by law)
- DBS checks (where applicable)
- Emergency contact details

CCTV

We operate CCTV systems at our Wakefield and Ottringham sites for the purposes of:

- Health and safety

- Site security
- Prevention and detection of crime

Recordings are retained for a limited period unless required for investigation or legal proceedings.

4. How We Collect Information

We collect personal data:

- Directly from you (e.g. via enquiry forms, contracts, recruitment applications)
- Through our website
- From publicly available sources (e.g. company websites, professional networking platforms)
- From third-party recruitment platforms (where applicable)
- Through CCTV systems at our premises

5. Lawful Basis for Processing

We process personal data in accordance with UK GDPR and the Data Protection Act 2018 under the following lawful bases:

- **Contract (Article 6(1)(b))** – to fulfil contractual obligations or pre-contract steps
- **Legal obligation (Article 6(1)(c))** – to comply with regulatory requirements
- **Legitimate interests (Article 6(1)(f))** – to support business operations, relationship management and relevant B2B marketing
- **Consent (Article 6(1)(a))** – where required, including for certain marketing activities and cookies

Special Category Data

Where we process special category data (such as health information), this is carried out in accordance with Article 9(2)(b) UK GDPR where processing is necessary for carrying out obligations in the field of employment, social security and social protection law.

Criminal Offence Data

Where roles require DBS checks:

- Processing is secure and restricted
- Data is retained only as necessary

Rev 1	MKT/POL/0001	Issue Date: 15/05/2026	Page 3 of 8
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- We do not maintain a central register of convictions

Processing is carried out in accordance with Article 10 UK GDPR.

6. Marketing Communications

We do not engage in unsolicited mass marketing.

Where individuals choose to subscribe to updates via our website, we will process their contact details to send information about:

- Company news
- Project announcements
- Industry insights
- Relevant services

We will only send marketing communications where:

- You have provided your consent; or
- We are otherwise permitted to do so under applicable law.

You may withdraw your consent at any time by:

- Clicking the unsubscribe link in any email; or
- Contacting us at marketing@thurstongroup.co.uk

We do not sell personal data.

7. Cookies and Website Tracking

Our website uses cookies and similar technologies to improve functionality and understand how visitors use our site.

Cookies may include:

- **Essential cookies** – necessary for website operation
- **Analytics cookies** – to help us understand usage and improve performance
- **Marketing cookies** – where applicable, to support relevant communications

Non-essential cookies are only deployed after you provide consent via our cookie management banner.

You can manage or withdraw your cookie preferences at any time via the cookie settings tool on our website.

Further details are provided in our Cookie Policy.

[\[Link to separate Cookie Policy\]](#)

8. How We Use Your Information

We use personal data to:

- Respond to enquiries
- Deliver contractual services
- manage supplier, subcontractor and partner relationships
- Administer recruitment and employment
- Meet legal and regulatory obligations
- Improve our website and digital services
- Protect our premises, staff and assets

Recruitment Processes

Shortlisting is carried out by relevant hiring managers and authorised personnel using the information provided.

If you are unsuccessful, we may retain your details for up to 12 months and may contact you regarding future opportunities, unless you request otherwise.

We may also use personal data to prevent fraud, manage risk, and maintain operational integrity.

Contractors

We process personal data relating to contractors and freelance specialists in order to:

- Manage contractual relationships
- Deliver services
- Meet legal and regulatory obligations

Contractor data is handled with the same level of security and confidentiality as employee data.

Criminal Offence Data

Where required for specific roles, we process criminal offence data (e.g. DBS checks) in accordance with Article 10 UK GDPR.

Such data is:

- Accessed only by authorised personnel
- Retained only as long as necessary
- Not held in a centralised register

9. Data Sharing and Third Parties

We may share personal data with carefully selected third-party service providers where necessary, including:

- IT and website hosting providers
- Cloud service providers
- Payroll and accounting providers
- Recruitment platforms
- Health & Safety systems
- Professional advisers (legal, financial, auditors)
- Security and CCTV providers

All third-party processors are required to:

- Act only on our instructions
- Maintain appropriate security measures
- Comply with data protection law

We do not allow third parties to use personal data for their own marketing purposes.

10. International Data Transfers

We primarily store and process personal data within the UK and EEA.

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, such as:

- UK adequacy regulations
- The UK International Data Transfer Agreement (IDTA)
- Standard Contractual Clauses where appropriate

11. Data Security

We are committed to protecting personal information from unauthorised access, disclosure, alteration or destruction.

We implement appropriate technical and organisational measures, including:

- Role-based access controls
- Secure IT infrastructure
- Network security protections
- Encryption where appropriate
- Secure physical storage
- Confidentiality obligations for staff
- Controlled site access

Access to personal data is restricted to individuals with a legitimate business need.

12. Data Retention

We retain personal data only for as long as necessary.

Indicative retention periods include:

- General enquiries: up to 24 months
- Customer and supplier records: duration of contract + 6 years
- Unsuccessful job applicants: up to 12 months
- Employee records: employment duration + 6 years
- CCTV footage: limited retention period unless required for investigation

Retention periods are reviewed periodically.

13. Your Rights

Under UK data protection law, you have the right to:

Rev 1	MKT/POL/0001	Issue Date: 15/05/2026	Page 7 of 8
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- Access your personal data
- Request rectification of inaccurate data
- Request erasure (in certain circumstances)
- Request restriction of processing
- Object to processing
- Request data portability (where applicable)
- Withdraw consent where processing relies on consent

Requests should be sent to:

dataprotectionofficer@thurstongroup.co.uk

We aim to respond within one calendar month.

If you are dissatisfied with our response, you may complain to the Information Commissioner's Office.

14. Updating Your Information

It is important that the personal data we hold about you is accurate and up to date.

You can request to update, correct or amend your personal information at any time by contacting:

HR@thurstongroup.co.uk

15. Changes to This Policy

We may update this policy from time to time. The latest version will always be available on our website.

Thurston Group Limited - Privacy Policy Statement