Data Protection Policy

Date last reviewed: 8th May 2026

Date next review due: 8th May 2027

Definitions

GDPR: the General Data Protection Regulation (retained EU law as amended).

DUAA: the Data (Use and Access) Act 2025, which amends the UK GDPR and the Data Protection Act 2018 (DPA 2018) and came into force in stages between June 2025 and June 2026.

DPA: the Data Protection Act 2018.

Information Commissioner's Office: the UK's data protection supervisory authority.

Register of Systems: a register of all systems or contexts in which personal data is processed by Thread Ahead.

1. Data protection principles

Thread Ahead is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

a. processed lawfully, fairly and in a transparent manner in relation to individuals;
b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to

the purposes for which they are processed, are erased or rectified without delay;

e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

a. This policy applies to all personal data processed by Thread Ahead.
b. Thread Ahead's CEO will take responsibility for Thread Ahead's ongoing compliance with this policy.
c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

a. To ensure its processing of data is lawful, fair and transparent, Thread Ahead shall maintain a Register of Systems.
b. The Register of Systems shall be reviewed at least annually.
c. Individuals have the right to access their personal data and any such requests made to Thread Ahead shall be dealt with in a timely manner. When responding to data subject access requests (DSARs), Thread Ahead will conduct reasonable and proportionate searches, having regard to its own size and resources, as clarified by the DUAA. Thread Ahead may contact the individual to clarify the scope of a request where this would help provide a more useful response, but will not use this to delay or avoid compliance.

d. Individuals have the following rights in relation to their personal data: the right to rectification; the right to erasure; the right to restriction of processing; the right to data portability; and the right to object to processing. Individuals also have the right to complain directly to Thread Ahead if they believe that Thread Ahead has infringed data protection legislation in relation to their personal data. Thread Ahead's complaints procedure is set out in Section 10 of this policy. Individuals retain the right to escalate a complaint to the Information Commission at any time.

4. Lawful purposes

a. All data processed by Thread Ahead must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information). The DUAA introduces a seventh lawful basis — recognised legitimate interests (RLI) — for processing that is necessary to fulfil one of a defined list of purposes set out in Schedule 4 of the DUAA (as inserted into Article 6(1) UK GDPR). Where Thread Ahead relies on RLI, no balancing test against the interests of the individual is required, but the processing must still be necessary and transparency obligations apply.
b. Thread Ahead shall note the appropriate lawful basis in the Register of Systems.
c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Thread Ahead's systems.

5. Data minimisation

a. Thread Ahead shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

a. Thread Ahead shall take reasonable steps to ensure personal data is accurate.
b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

a. To ensure that personal data is kept for no longer than necessary, Thread Ahead has in place a Data Retention Policy, which covers all areas in which personal data is processed. This process will be reviewed annually.
b. The Data Retention Policy considers what data should/must be retained, for how long, and why.

8. Security

a. Thread Ahead shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
c. When personal data is deleted, this should be done safely such that the data is irrecoverable.
d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data,

Thread Ahead shall promptly assess the risk to people's rights and freedoms and, if appropriate, report this breach to the ICO (more information on the ICO website).

Thread Ahead is aware that the DUAA has aligned fines under the Privacy and Electronic Communications Regulations (PECR) with those under the UK GDPR, raising the maximum penalty to £17.5 million or 4% of global annual turnover, whichever is higher. Thread Ahead will ensure that any electronic marketing activities or use of cookies comply with PECR accordingly.

10. Data protection complaints procedure

Under Section 164A of the Data Protection Act 2018 (as inserted by Section 103 of the DUAA), which takes effect on 19 June 2026:

a. Thread Ahead is committed to handling data protection complaints promptly, fairly and transparently.
b. Any individual who believes that Thread Ahead has infringed data protection legislation in relation to their personal data may make a complaint directly to Thread Ahead. Complaints may be submitted by email, post, or via any contact method listed on Thread Ahead's website.
c. Thread Ahead will acknowledge receipt of a complaint within 30 days.
d. Thread Ahead will investigate the complaint without undue delay, keeping the complainant informed of progress where appropriate.e. Thread Ahead will communicate the outcome of the complaint clearly, including informing the complainant of their right to escalate the complaint to the Information Commission if they remain dissatisfied.
e. Thread Ahead will maintain a register of data protection complaints received, including the nature of each complaint and its outcome, which may be made available to the Information Commission on request.

11. Automated decision-making

Under Articles 22A–22D of the DUAA:

a. Where Thread Ahead uses automated processing of personal data to make a decision that produces a legal effect or a similarly significant effect for an

individual (a 'significant decision'), Thread Ahead will implement appropriate safeguards.

b. These safeguards include: providing individuals with meaningful information about the basis and logic of the decision; enabling individuals to request human review of the decision; and enabling individuals to contest the decision.
c. Where a significant decision involves the processing of special category personal data, Thread Ahead will ensure that an additional condition under UK GDPR Schedule 1 applies (such as explicit consent) before carrying out such processing.
d. Thread Ahead will keep its use of automated decision-making under review and will update this section as guidance from the Information Commission develops.

12. International data transfers

Under the DUAA's framework for international transfers:

a. Where Thread Ahead transfers personal data to a country outside the UK, it will do so only where:
    i. the Secretary of State has determined that the destination country meets the data protection test (the new term replacing 'adequacy decision' under the DUAA);
    ii. (ii) appropriate safeguards are in place (such as UK International Data Transfer Agreements);
    iii. or (iii) a specific derogation applies.

b. Thread Ahead will document all international transfers in its Register of Systems.

13. Review

This policy will be reviewed at least every year.