Recover & Thrive Privacy Policy

UK GDPR Privacy Notice

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1. Introduction

Recover & Thrive Ltd respects your privacy and is committed to protecting your personal information.

This Privacy Notice explains:

- what personal information we collect;
- how and why we use it;
- who we may share it with;
- how long we keep it;
- how we protect it; and
- the rights available to you.

This notice applies to the Recover & Thrive website, digital health platform, beta-testing programme, customer-support services and related communications.

The platform is currently operating as a controlled beta service. Some functions described as future services are not currently active. We will update this notice before materially different processing begins.

For UK data-protection purposes, Recover & Thrive Ltd is the **data controller** for the personal information described in this notice.

2. Who we are

Recover & Thrive Ltd is a company registered in England and Wales under company number **17097446**.

Registered office:
52 Middle Furlong
Didcot
OX11 7SL
United Kingdom

Privacy contact: support@recoverandthrive.com

ICO registration reference: ZC196237

Dr Ruth Allan, Founder and Chief Executive Officer, is responsible for organisational oversight of data protection.

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Unless Recover & Thrive has formally appointed a statutory Data Protection Officer in accordance with applicable law, references to the “privacy contact” or “data-protection lead” should not be interpreted as confirmation that a statutory Data Protection Officer has been appointed.

3. Who this notice applies to

This notice may apply to:

- patients and platform account holders;
- investors, partners and people who book a demo or conversation;
- beta participants;
- carers invited by a patient;
- Health Contributors invited to contribute information;
- website visitors;
- people who contact customer support;
- prospective users;
- professional advisers, suppliers and business contacts; and
- future users such as clinicians, performance specialists, parents, researchers or partner organisations when the relevant functionality becomes active.

During the current beta, access is restricted to adults aged 18 or over unless Recover & Thrive expressly confirms otherwise in writing.

Parent-managed child accounts, clinician portals, researcher access, automated wearable integrations, health service supplier integrations and AI-assisted services are not part of the current beta unless separately activated following an updated privacy and risk assessment.

4. Personal information we collect

The information we collect depends on how you interact with us.

4.1 Identity and contact information

This may include:

- Name;
- Email address;
- Username;
- Date of birth where required;
- Country of residence;
- Organisation and job title (for business contacts);
- Communication preferences; and
- Information provided when you contact us.

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4.2 Account and authentication information

This may include:

- login credentials;
- account preferences;
- security settings;
- authentication history;
- account status;
- permission settings; and
- audit records.

Passwords should be stored in a protected form and are not intended to be accessible to Recover & Thrive personnel in readable form.

4.3 Health and wellbeing information

Where you choose to use the health-record functions, we may process information concerning your physical or mental health, including:

- symptoms;
- diagnoses;
- medical conditions;
- medications and supplements;
- allergies;
- laboratory results;
- blood-test information;
- wellbeing and recovery measures;
- health questionnaires;
- check-in scores;
- sleep, exercise and nutrition information;
- cognitive or mood-tracking information;
- health observations; and
- other health information you choose to provide.

Health information is **special category personal data** and receives additional protection under data-protection law.

4.4 Uploaded documents

You may choose to upload:

- medical letters;
- laboratory reports;
- blood-test results;
- imaging reports;

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- clinical correspondence;
- PDF files;
- photographs or image files; and
- other documents relevant to your recovery or health record.

You should avoid uploading information about another person unless you have an appropriate reason and authority to do so.

4.5 Sharing, permission and contribution information

This may include:

- Invitations sent to Carers or Health Contributors;
- Access permissions;
- Contribution permissions;
- Sharing history;
- Permission changes;
- Consent records;
- Time and date information; and
- Audit trails.

4.6 Technical and usage information

This may include:

- IP address;
- Browser type;
- Device information;
- Operating system;
- Login events;
- Security logs;
- Error logs;
- Session information;
- Platform activity;
- Information needed to maintain service performance and security;
- Website analytics information (pages visited, referral source); and
- TestFlight information (device, app version, crash reports).

4.7 Feedback and support information

During the beta, we may collect:

- Product feedback;
- Survey responses;
- Usability comments;
- Support requests;

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- Bug reports; and
- Correspondence with our team.

Please avoid including unnecessary health information in general support messages.

5. How we collect your information

We may collect personal information:

- Directly from you when you create or use an account;
- When you complete questionnaires or enter health information;
- When you upload documents;
- When you manage sharing permissions;
- When you contact us;
- When you participate in beta feedback;
- Automatically through security and technical logging;
- Website forms, booking tools and beta registration;
- Apple TestFlight acceptance;
- Analytics services (only if you have agreed to cookies), and video and booking tools when you use them; and
- From an authorised Health Contributor where you have invited them to contribute information.

During the current beta, we do not routinely collect health information directly from NHS systems, wearable devices, researchers, marketplace providers or external clinical systems.

We may also collect your contact details when you subscribe to updates, download resources, register for events, submit an enquiry through our website or otherwise request information about our services.

6. How and why we use your information

Purpose	Categories of personal information	UK GDPR lawful basis
Creating and managing your account	Identity, contact and account information	Performance of a contract
Providing the health-management platform	Account, health, uploaded and permission information	Performance of a contract
Processing health information you choose to provide	Health and uploaded information	Explicit consent under Article 9(2)(a), alongside an applicable Article 6 basis
Enabling patient-controlled sharing	Permission, identity and health information	Performance of a contract

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Purpose	Categories of personal information	UK GDPR lawful basis
Enabling authorised contributions	Identity, contribution and audit information	Performance of a contract and, for health information, explicit consent where applicable
Responding to support enquiries	Contact, account and correspondence information	Performance of a contract and legitimate interests
Operating and improving the beta	Usage information, feedback and limited account information	Legitimate interests
Protecting the platform and preventing misuse	Technical, security, authentication and audit information	Legitimate interests
Meeting legal and regulatory duties	Relevant personal information	Legal obligation
Sending optional marketing	Contact and preference information	Consent where required
Sending newsletters	Name, email address, newsletter preferences, records of consent (where required), and engagement information (such as email opens or link clicks where tracking is enabled).	Consent / PECR where required
Responding to enquiries and managing contact and relationship records (ActiveCampaign)	Name, email address, telephone number (if provided), organisation and role (if applicable), the content of your enquiry, enquiry and booking history, communication history, services of interest, notes needed to manage our relationship with you, and communication preferences.	Legitimate interests. Explicit consent for any health information you choose to include in an enquiry.
Booking demonstrations and conversations (Calendly)	Name, email address, organisation, the details you give when booking, booking date and time, and meeting information.	Legitimate interests (responding to your request)
Inviting beta participants to the app (Apple TestFlight)	Name, the email address you use for TestFlight, and device, app version, installation and testing information.	Performance of a contract (your participation in the beta programme)
Website analytics (Google Analytics and Google Tag Manager)	IP address, device and browser information, pages visited, how you reached our website, and how you use it.	Consent, for non-essential analytics cookies
Hosting and operating our website (Framer and Cloudflare)	Technical and security information needed to deliver and protect our website, such as IP address and browser information.	Legitimate interests

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Purpose	Categories of personal information	UK GDPR lawful basis
Playing how-to videos on our website (YouTube)	Information collected by YouTube when a video loads or plays, such as IP address, device information and viewing activity.	Consent, where cookies are used; otherwise legitimate interests (delivering the video you asked to play)
Delivering consultations and meetings	Contact details, meeting participation, notes taken during consultations or meetings, and, where enabled, AI-generated meeting summaries or action items.	Contract / Legitimate interests (depending on the meeting)

Where we rely on legitimate interests, those interests include operating, protecting, improving and administering the platform. We assess whether those interests are overridden by your rights and interests.

7. Special category health information and consent

We rely primarily on your **explicit consent** to process health information during the beta.

Before you provide health information, you should be given clear information about the relevant processing and an opportunity to provide explicit consent.

We record consent decisions within the platform.

You may withdraw consent at any time. Withdrawal will not make earlier processing unlawful, but it may mean that we can no longer provide functions that require the processing of your health information.

Some information may still need to be retained where another lawful basis applies, including security, legal-claim or regulatory requirements.

8. The current beta programme

The beta is intended to test:

- account creation and authentication;
- manual health and wellbeing recording;
- health questionnaires and check-ins;
- secure document upload;
- patient-controlled sharing;
- Health Contributor submissions;
- permission management;
- audit logging;
- service usability;
- security; and
- platform performance.

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The beta service may change as testing progresses. Features may be modified, suspended or removed.

Beta participants should retain their own copies of important medical documents. Recover & Thrive is not intended to replace your official medical record or the records maintained by a healthcare provider.

8.1 Beta feedback

We may use feedback to:

- identify faults;
- improve privacy controls;
- improve accessibility;
- refine user guidance;
- assess how users understand permissions; and
- prepare for wider release.

Where possible, feedback used for product development will be separated from unnecessary health information.

8.2 End of the beta

At the end of the beta, we may offer you the opportunity to:

- continue using an updated version of the service;
- migrate eligible information to the production platform; or
- close your account and request deletion, subject to applicable retention requirements.

We will provide further information before any migration or materially different use takes place.

9. Patient-controlled sharing

You can choose whether to share information with another authorised person.

Depending on the available functionality, you may be able to:

- invite a Carer;
- permit someone to view selected information;
- permit a Health Contributor to add information;
- limit the scope of access;
- change permissions; and
- withdraw access.

Viewing permission and contribution permission may be managed separately.

A Health Contributor may be permitted to submit information without receiving access to your existing health record. Health Contributors can only add information where permission has been granted.

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Contribution permission does not automatically provide permission to view existing health records. This separation helps protect privacy by ensuring individuals only have the minimum access necessary.

When access is withdrawn, future access through the platform is stopped. Withdrawal cannot necessarily retrieve copies that an authorised recipient lawfully downloaded, printed or otherwise retained before access ended.

Recipients remain responsible for information they hold outside the Recover & Thrive platform.

10. Accuracy and contributed information

You are responsible for checking information that you enter or upload.

Where another authorised person contributes information:

- the contribution may be attributed to that person;
- the date and time may be recorded;
- the contribution may form part of your health timeline;
- you may be able to review or annotate it; and
- correction or removal options may depend on the nature of the record and applicable audit requirements.

We may preserve limited audit information relating to changes or deletion where this is necessary for security, accountability or dispute resolution.

The platform does not independently verify every health entry and should not be treated as a substitute for professional medical assessment.

11. Future functionality

The following services are not currently active within the beta unless expressly confirmed otherwise:

- parent-managed child accounts;
- clinician platform access;
- performance-specialist access;
- NHS system integrations;
- automated wearable integrations;
- AI-assisted recommendations;
- automated clinical decision support;
- researcher access;
- commercial marketplaces; and
- partner marketing based on health information.

Before any of these functions materially process personal information, we will assess the legal basis, risks, safeguards and transparency requirements and update this notice where necessary.

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We will not use beta health data for unrelated research, advertising or commercial profiling without an appropriate lawful basis and further information.

When Recover & Thrive introduces services for children, family accounts or delegated account management, we will complete additional legal, safeguarding and privacy assessments before those services become available.

12. Automated decision-making and artificial intelligence

The current beta does not use solely automated decision-making that produces legal or similarly significant effects.

The current beta does not use artificial intelligence to diagnose conditions or generate automated clinical decisions.

Where AI-assisted functionality is introduced in the future, we will explain:

- What the system does;
- What information it uses;
- The role of human review;
- The limitations of the system;
- The relevant lawful basis; and
- The choices and rights available to users.

We will not use your personal information to train general-purpose artificial intelligence models without providing further information and identifying an appropriate lawful basis.

In addition to AI features within our platform, we may also use AI-assisted productivity tools provided by trusted suppliers (for example, AI-generated meeting notes in Google Meet) to support administration, record keeping and service delivery. These tools are used with appropriate safeguards and human oversight.

We may also use AI-assisted tools to edit or caption our own training and guidance videos. We do not use these tools on recordings that contain participants' personal information.

13. Research

Personal information collected during the beta is not made available to researchers as part of the current service.

Future research may involve:

- anonymised data that no longer identifies individuals;
- pseudonymised data subject to additional safeguards; or
- identifiable information where a clear lawful basis, governance process and participant information apply.

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Where explicit consent is required for a research activity, it will be obtained separately from consent to use the core platform.

14. Who we share information with

We may share personal information with carefully selected service providers that support:

- Cloud hosting;
- Database services;
- Document storage;
- Business email;
- Authentication;
- Security monitoring;
- Technical support;
- Platform development;
- Website hosting and publishing;
- Video hosting;
- Appointment scheduling;
- Website analytics;
- Distribution of the beta app;
- Communications; and
- Professional advice.

These providers act as processors where they process information on our documented instructions.

Some providers, including Google (YouTube and Google Analytics), Apple (TestFlight) and Calendly, may also act as independent controllers for information they collect through their own services or cookies. Their own privacy notices apply to that information.

We may also disclose information:

- To professional advisers who owe duties of confidentiality;
- Where required by law;
- In response to a lawful request from a regulator or public authority;
- To investigate fraud, abuse or security incidents;
- To protect the rights or safety of users or others; or
- As part of a corporate transaction, subject to appropriate safeguards.

We do not sell personal information, including personal health information. We do not allow third-party advertisers to use beta health data for behavioural advertising.

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15. Our main service providers

Service provider	Purpose
Supabase	Database hosting, authentication and secure storage
Google Workspace	Email, document management and business administration
ActiveCampaign	Contact records, website and enquiry forms, email communications, newsletters, communication preferences and follow-up of bookings
Google Analytics and Google Tag Manager (Google)	Website analytics, only where you have agreed to analytics cookies, and management of website tags
Cloudflare	Security and content delivery
Calendly	Booking demonstrations and conversations. Booking details may be passed to ActiveCampaign.
Framer	Website hosting and publishing
Google (YouTube)	Hosting the how-to videos shown on our website
Apple (TestFlight)	Distributing the beta version of the app to participants
HubSpot (legacy)	Customer relationship management, contact records, enquiries, newsletters and marketing communications during our transition to ActiveCampaign.
Descript	Editing training videos
Google reCAPTCHA	Preventing spam and automated submissions on website forms
Lovable	Application development and integration services used to build and connect parts of the platform

The exact role, data location and transfer arrangements for each provider are maintained in our supplier records and reviewed periodically.

Where other suppliers are introduced, we will carry out appropriate due diligence and contractual review. We maintain written Data Processing Agreements with our processors where required and undertake due diligence before appointing new providers.

16. International transfers

We seek to store and process personal information in the United Kingdom or in jurisdictions recognised as providing an adequate level of protection.

Some of our providers, including Google, Apple, Calendly and ActiveCampaign, or their sub-processors, may process information outside the United Kingdom. Where they do, we rely on the safeguards described below.

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Where a restricted international transfer takes place, we will use an appropriate transfer mechanism where required, such as:

- UK adequacy regulations;
- the UK International Data Transfer Agreement;
- the UK Addendum to approved contractual clauses; or
- another lawful transfer mechanism.

Some providers may use carefully selected sub-processors. Where restricted transfers occur, we ensure appropriate safeguards are in place before personal information is transferred. We also assess relevant technical, contractual and destination-country risks where required.

17. How long we keep information

We retain personal information only for as long as reasonably necessary for the purpose for which it was collected, including legal, security and regulatory requirements.

Information	Typical retention
Account information	While your account is open. After closure, scheduled for deletion or anonymisation within 30 days.
Health records	While your account is open and the information is needed to provide the service. After closure, deleted within 30 days, apart from the limited records described below.
Support enquiries	12 months after the enquiry is closed
Enquiries, bookings and business contacts	24 months after our last contact with you, unless you ask us to delete them sooner
Marketing contacts	Until you unsubscribe or ask us to delete your details. We keep a minimal record of your opt-out so that we do not contact you again.
Audit and security logs	12 months
Consent and compliance records	For as long as needed to show we have a lawful basis, and for 6 years afterwards

Backups may continue to hold deleted information for a limited period before scheduled overwrite.

When an account is closed, active account information will normally be deleted or anonymised within the periods shown above.

A request for deletion does not always require immediate or complete removal of every record. We may retain limited information where necessary to:

- comply with law;
- establish, exercise or defend legal claims;
- investigate security incidents;

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- prevent fraud or misuse;
- maintain essential audit trails; or
- complete deletion from backups through the normal backup cycle.

18. Security

We use technical and organisational measures designed to protect personal information.

These may include:

- encryption in transit;
- encryption at rest;
- role-based access controls;
- least-privilege access;
- separation of viewing and contribution permissions;
- secure authentication;
- audit logging;
- access monitoring;
- backup and recovery arrangements;
- vulnerability management;
- software patching;
- supplier due diligence;
- incident-response procedures; and
- secure-development practices.

No digital service can guarantee absolute security. Users should use a strong, unique password, protect their devices and notify us promptly if they suspect unauthorised account access.

19. Your data-protection rights

Depending on the circumstances, you may have the right to:

- request access to your personal information;
- request correction of inaccurate or incomplete information;
- request deletion of your information;
- request restriction of processing;
- object to processing based on legitimate interests;
- receive certain information in a portable format;
- withdraw consent;
- complain to the Information Commissioner's Office; and
- ask for information about safeguards used for international transfers.

You also have the right not to be subject to a decision based solely on automated processing where Article 22 UK GDPR applies. These rights are not absolute and may be subject to legal conditions or exemptions.

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To exercise a right, contact: **support@recoverandthrive.com**

We may need to verify your identity before acting on a request.

We normally respond within one month, although the period may be extended where permitted for a complex request.

20. Marketing communications

We may send service communications necessary to administer your account, such as:

- security notices;
- account messages;
- beta updates;
- changes to terms;
- important privacy information; and
- service interruption notices.

These are not the same as optional marketing. We will only send optional electronic marketing where permitted by law. You can withdraw marketing consent or unsubscribe at any time.

We use ActiveCampaign to manage contact records, enquiries, communication preferences and email communications. We are currently transitioning our contact management and communications from HubSpot to ActiveCampaign and, during this transition, personal information may be processed in both systems.

If you subscribe to updates, download resources, register for an event, make an enquiry, participate in our services or otherwise communicate with us, your contact details and relevant communication records may be stored and processed in these systems for these purposes.

If you book a demonstration or conversation with us, we will use your details to arrange and follow up that booking. We will only add you to our marketing list if you have told us that you would like to receive updates.

We may use these systems to send both service communications and optional marketing communications. Receiving a service communication does not mean that you have been subscribed to marketing. We will only use your information for electronic marketing where permitted by law, and we maintain appropriate records of marketing preferences and opt-outs.

You can unsubscribe from marketing communications at any time by using the unsubscribe link in our emails or contacting us directly.

Withdrawing from marketing will not stop essential service communications.

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21. Cookies and similar technologies

Our website uses cookies and similar technologies to operate and secure the site, to understand how it is used, and to load content from other services, such as our booking calendar and videos.

We only set analytics cookies if you agree to them. You can change or withdraw your choice at any time using “Manage cookie preferences” in the footer of our website.

The cookies we use, and why, are listed in our Cookie Policy: https://recoverandthrive.com/cookie-policy

Content from other providers, such as YouTube and Calendly, may set cookies of its own when you play a video or use the booking tool. Those providers’ own policies apply to that content.

22. Children

The current beta is intended for adults aged 18 and over. Recover & Thrive does not currently offer parent-managed child accounts as part of the standard beta service.

Before services for children are introduced, we will undertake further legal, privacy, safeguarding and technical assessment. This will include:

- age-assurance arrangements;
- parental-responsibility checks where appropriate;
- assessment of the child’s capacity and rights;
- age-appropriate privacy information;
- high-privacy default settings;
- access and transition arrangements; and
- review of the UK Children’s Code where applicable.

Age 13 should not be treated as an automatic transfer of all health-record control from a parent to a child. Capacity, parental responsibility, the nature of the service and the relevant lawful basis must be assessed in context.

23. Third-party services and external sharing

Where you choose to export or send information to another organisation, that organisation may become an independent controller of the copy it receives.

Its own privacy notice and security practices will apply.

Ending an integration or withdrawing platform access will stop future sharing through Recover & Thrive, but it may not delete information already retained by an external recipient.

Recover & Thrive remains responsible for transfers and disclosures that it controls. We do not exclude legal responsibility where the law does not allow us to do so.

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Where you choose to share or export information, the receiving organisation becomes responsible for its own copy of that information.

If you follow or contact us on LinkedIn, Facebook, Instagram or YouTube, those platforms are responsible for the personal information they collect about you. Please read their privacy notices. Please do not share personal health information in public comments or messages on those platforms.

24. Business changes

If Recover & Thrive is reorganised, sold, merged or transfers part of its business, personal information may be disclosed to relevant advisers, prospective purchasers or successor organisations.

Any such disclosure will be limited to what is necessary and subject to appropriate confidentiality, security and data-protection safeguards.

25. Changes to this notice

We may update this Privacy Notice to reflect:

- changes to the platform;
- new processing activities;
- changes to suppliers;
- legal or regulatory developments;
- new user roles; or
- improvements arising from beta feedback.

Where changes are material, we will take reasonable steps to bring them to your attention before they take effect.

The latest version will show its effective date.

26. Contact us

Questions, concerns or rights requests should be sent to:

Recover & Thrive Ltd
52 Middle Furlong
Didcot
OX11 7SL
United Kingdom

Email: support@recoverandthrive.com

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27. Complaints

Please contact us first so that we have an opportunity to investigate and resolve your concern.

You also have the right to complain to the Information Commissioner's Office.

You may contact the ICO through its official website or by using the contact details published by the ICO.

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Appendix A — Current beta scope

The current beta may process information for:

- adult patient accounts;
- identity and authentication;
- manual health and wellbeing entries;
- uploaded health documents;
- patient-controlled permissions;
- carer access where enabled;
- Health Contributor submissions where enabled;
- beta invitations and app distribution through Apple TestFlight;
- website enquiries and booking records;
- support;
- beta feedback;
- security monitoring;
- audit logging; and
- service performance.

The following are excluded unless separately confirmed:

- children's accounts;
- clinician portal access;
- performance-specialist access;
- NHS integrations;
- wearable integrations;
- research access;
- AI-generated health recommendations;
- automated clinical decision-making;
- commercial marketplaces; and
- health-based advertising.

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Appendix B — Terminology

Patient: The individual whose personal health record is held within the platform.

Carer: A person authorised by the patient to access information according to the permissions granted.

Health Contributor: A person invited to add information to a patient's record. Contribution permission does not automatically include viewing permission.

Data controller: The organisation that determines why and how personal information is processed.

Data processor: An organisation that processes personal information on behalf of a controller.

Special category data: Personal information receiving additional legal protection, including information concerning health.

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