

Privacy Notice

Thompson Safety & Risk Advisory

Revision 01 | Effective date: 1 July 2026

1. Who I am

Thompson Safety & Risk Advisory ("TSRA") is an independent safety and risk advisory practice run by me, Eric Thompson, as a sole trader (eenmanszaak) in the Netherlands. I provide strategic safety assurance, safety culture and leadership advisory, and executive coaching to organizations delivering complex capital projects, particularly in the data center and critical infrastructure sectors.

For the purposes of the EU General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (UAVG), I am the controller of the personal data described in this notice, except where section 3 says otherwise.

- **Business name:** Thompson Safety & Risk Advisory
- **Address:** Raamsteeg 24, 2011 BH Haarlem, the Netherlands
- **KvK number:** 42092680
- **Email:** ethompson@tsr-advisory.com
- **Phone:** +31 (0)6 15 01 65 11

I am not required to appoint a Data Protection Officer. Please send any privacy question or request directly to me at the email address above.

2. What personal data I process and why

My work is advisory and leadership-focused, so the personal data I handle is mostly business contact information and information about how projects and leadership teams operate. The table below sets out the main categories.

Whose data	What data	Why	Legal basis
Client contacts and their representatives	Name, job title, organization, business email, phone number, correspondence	Proposals, contracts, delivering engagements, invoicing, relationship management	Contract (Art. 6(1)(b)); legitimate interests (Art. 6(1)(f))
People involved in client projects (leaders, project teams, site staff)	Name, role, employer, interview and workshop notes, observations of decisions and behaviors, views shared with me, audit and assurance findings	Gap analyses, assurance reviews, culture and accountability mapping, training and reports for my client	Legitimate interests of my client and me in improving project safety (Art. 6(1)(f)); or my client's instructions where I act as processor
Coaching participants	Name, role, contact details, coaching session notes, development goals, debrief notes	Delivering one-to-one or small-group coaching	Contract (Art. 6(1)(b)); legitimate interests (Art. 6(1)(f))
Prospective clients and professional contacts	Name, job title, organization, business contact details, notes of our conversations	Business development, follow-up on conversations, maintaining my professional network	Legitimate interests (Art. 6(1)(f))

Whose data	What data	Why	Legal basis
Subcontractors, specialists and suppliers	Name, company, contact details, qualifications, payment details	Engaging specialist expertise, managing supplier contracts, payment	Contract (Art. 6(1)(b))
Website visitors and people who contact me	Details you submit (e.g. name, email, message); technical data such as IP address and browser type	Answering enquiries, operating and securing my website	Legitimate interests (Art. 6(1)(f))
All of the above, where relevant	Invoices, payment records and business correspondence	Bookkeeping, tax and other statutory obligations	Legal obligation (Art. 6(1)(c))

Where I rely on legitimate interests, I have balanced those interests against your rights and freedoms and limit what I collect to what the work actually requires. You have the right to object (see section 8).

3. When I act on a client's behalf

Some engagements involve personal data that my client controls, such as workforce records, incident reports or audit data from a live project. Where I handle that data only on my client's instructions, my client is the controller and I act as its processor. In those cases my client's own privacy notice applies, and our contract (including a data processing agreement where required) governs how I handle the data.

4. Sensitive information

I do not intentionally collect special categories of personal data (such as health information) or criminal-offence data. Safety work can involve incidents and injuries, so I ask clients to anonymize or minimize such information before sharing it with me. My reports focus on systems, governance and behaviors, not on identifying or assessing individuals. Where special-category data is unavoidable, I process it only as permitted by law and, where I act as processor, on my client's documented instructions.

5. Where your data comes from

I collect personal data directly from you (for example in meetings, interviews, coaching sessions, emails or my website contact form). I also receive it from my clients when they share project information with me, from professional contacts who introduce us, and from public sources such as company websites and professional networking profiles.

6. Who I share your data with

I do not sell personal data. I share it only where necessary, with:

- **IT and cloud service providers** that host my email, documents and communication tools (Microsoft 365), under data processing agreements;
- **My accountant, tax adviser, bank and insurers**, for administration, tax and professional liability purposes;
- **Specialists or subcontractors** I bring into an engagement, only with my client's agreement and under confidentiality obligations;
- **My client**, where you take part in an engagement, I deliver for them. I report findings at governance and leadership level and keep individual comments confidential unless agreed otherwise;
- **Public authorities**, such as the Belastingdienst, courts or regulators, where the law requires it.

7. International transfers

I store and process data primarily within the European Economic Area (EEA). Some of my service providers, or clients' parent companies, may be located outside the EEA (for example in the United States). Where personal data is transferred outside the EEA, I make sure appropriate safeguards are in place, such as a European Commission adequacy decision (including the EU-US Data Privacy Framework) or the European Commission's Standard Contractual Clauses.

8. Your rights

Under the GDPR you have the right to:

- **access** the personal data I hold about you and receive a copy;
- **rectify** data that is inaccurate or incomplete;
- **erase** your data in certain circumstances;
- **restrict** how I use your data in certain circumstances;
- **data portability**, i.e. receive data you provided to me in a structured, commonly used format;
- **object** to processing based on legitimate interests, and at any time to direct marketing;

To exercise any of these rights, email me at ethompson@tsr-advisory.com. I will respond within one month. I may ask you to confirm your identity before acting on a request.

I do not use automated decision-making or profiling that produces legal or similarly significant effects for you.

9. How long I keep your data

I keep personal data only for as long as necessary for the purposes described above, or as long as the law requires.

Type of data	How long I keep it
Contracts, invoices and financial records	7 years after the end of the financial year they relate to (Dutch fiscal retention obligation)
Engagement files, reports and working notes	Up to 7 years after the engagement ends, to deal with questions or claims, unless my contract with the client says otherwise
Coaching session notes	Up to 12 months after the coaching engagement ends
Prospective client and network contacts	Up to 2 years after our last contact, unless we start working together
Website enquiries	Up to 12 months after the enquiry has been dealt with

After these periods I securely delete or anonymize the data.

10. How I protect your data

I take appropriate technical and organizational measures to protect personal data. These include encrypted devices, multi-factor authentication on my business accounts, up-to-date security software, access restricted to me, and confidential handling of client and coaching information. Any subcontractor I involve is bound by confidentiality obligations.

11. Cookies

My website uses only cookies that are strictly necessary for it to function. I do not use analytics, advertising or tracking cookies.

12. Complaints

If you have a concern about how I handle your personal data, please contact me first so I can try to resolve it. You also have the right to lodge a complaint with the Dutch data protection authority, the **Autoriteit Persoonsgegevens** (www.autoriteitpersoonsgegevens.nl), or with the supervisory authority in the EU country where you live or work.

13. Changes to this notice

I may update this notice from time to time, for example when my services or legal requirements change. The current version is always available on my website www.tsr-advisory.com, and the revision number and effective date at the top show when it was last updated.