

PRIVACY POLICY

BACKGROUND:

I, Atul Nayak PhD, understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of all of my client(s) and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law of England and Wales.

1. Trading Information

Atul Nayak PhD is a sole proprietor in Career DTR Coaching & Product Innovation Consultancy as a profession. Correspondence address: Dr A. Nayak, Icon Offices, Office No. 15, 321-323 High Road, Chadwell Heath, Essex, RM6 6AX.

2. What Does This Notice Cover?

This Privacy Information explains how I use personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data is covered more in depth in Part 5 on page 1.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which I will always work to uphold:

- a) The right to be informed about my collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 11, page 4.
- b) The right to access the personal data I hold about you. Part 10, page 4, will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 11, page 4, to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I hold. Please contact me using the details in Part 11, page 4, to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to me using your personal data for a particular purpose or purposes.

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 11, page 4.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data I hold about you changes, please keep me informed as long as I have that data. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. I would welcome the opportunity to resolve your concerns myself, however, so please contact me first, using the details in Part 11, page 4.

5. What Personal Data Do You Collect and How?

Depending upon your use of My work, survey or questionnaire, I may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. I am not authorised to collect any personal data relating to children including data relating to any criminal convictions and/or offences.

DATA COLLECTED	HOW I COLLECT THE DATA
Identity Information such as name, age, gender, date of birth, occupation, innovation, careers, character profile and relevant technical parameters.	Responses to questions or questionnaire during the known specialist service provision as logged securely on file with essential data protection including anti virus on my business laptop.
Contact information including email address, telephone / mobile number, town/city, county, country, postcode.	Responses to contact information logged securely as outlined above.
Business or employment information including business name, occupation, duration for DTR coaching. Specialist innovation parameters pertaining to the individual or small groups of upto five for consultancy.	Same as outlined in the above table cell.
Payment information including debit / credit card details, authorised funds transfer, direct debit or any authorised e-payment merchant facilities.	Authorised and secure third party merchant service(s) for all payment card or online payments. Atul Nayak PhD never stores encrypted client bank information that can potentially be decrypted.
Profile building information such as a customer database and CRM.	All client databases and CRM data securely recorded, kept on file and password protection.
Data acquired from any relevant third party(s) when client permission is granted.	Trusted third party merchant services with the same security data protection protocol used.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, I must always have a lawful basis for using my client personal data. The following table describes how I may use your personal data, and my lawful bases for doing so:

WHAT I DO AS A COMPANY?	WHAT DATA I USE?	MY LAWFUL BASIS
Administering my specialist sole proprietorship.	Client demographics, specialist service requirements, contact information. Hence specific relevant fields in managing data.	Keeping in touch with new and existing clients requiring my bespoke services. Also demographics for research e.g., town/city, occupation.
Supplying my services.	All relevant resources in data management regarding Career DTR coaching and Innovation Consultancy.	To serve my clients intellectually, professionally and loyally with my expertise.
Managing all payments for my services.	Record showing all types of payment including any payment delays and non payment.	To acknowledge creditors and to chase up debtors professionally.
Personalising and tailoring my services.	Relevant client progression review including feedback / testimonials.	Measure of praise, successes, constructive criticisms and further improvements.
Communicating freely and professionally (oral and written).	Email, CRM / database, mobile, written reports, address.	Essential professional communication with new and existing clients. Also any reliable stakeholders.
Supplying information by email or post that you have opted-in-to (Opt out feature already known).	Clientele and third party assistance including anything to do with knowledge sharing when relevant and beneficial.	Up to date with current information that supports my business including relevant private research and promotes intellectual correspondence.

With your permission and where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email or telephone or post with information, news, and offers on my services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with my obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. I will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish me to explain how the new purpose is compatible with the original, please contact me using the details in Part 11, page 4. If I need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, I will inform you and explain the legal basis which allows me to do so. In circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

TYPE OF DATA	DURATION OF STORAGE
Identity Information such as name, age, gender, date of birth, occupation, innovation areas, creativity, career areas, general health, character profile.	Full names of clients for either specialist service are kept for upto 10 years with respect to professional relations / loyalty. The rest of the data stated is kept lifelong regarding professional and official R&D.
Contact information including email address, telephone / mobile number, town / city, county, country, postcode.	Email address except postcodes, and telephone / mobile number updated and kept for upto 10 years as stated in the above cell. Other data including postcodes kept lifelong as stated above.
Business or employment information including business name, occupation, length of employment. Specialist innovation parameters pertaining to the individual or groups of upto 5 clients.	Client names kept for upto 10 years as stated above. Other data kept lifelong for R&D as stated previously.
Payment information including debit / credit card details, authorised funds transfer, direct debit or any authorised e-payment merchant facilities.	All encrypted bank information are never stored by Atul Nayak PhD. This includes bank account, sort code and IBAN. Client payment name and address in invoice kept for 5 years and client name on receipt kept for 5 years.
Profile building information such as a customer database and CRM.	Client names kept for upto 10 years or longer as stated in the first cell unless they opt out.
Data acquired from any relevant third party(s) when client permission is granted.	This will be from the third party(s) privacy policy.

8. How and Where Do You Store or Transfer My Personal Data?

I will only store or transfer, when required, your personal data directly to my business laptop and trusted third party sources within the UK such as secure cloud storage of data. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law. The security of your personal data is essential to me, and to protect your data, I take a number of important measures, including the following:

(1) limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

(2) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where I am legally required to do so;

(3) notification of the local police including relevant departments in the event of theft, vandalism or cyber-attack e.g. malware or ransomware, despite taking normal precautions.

9. Do You Share My Personal Data?

I will not share any of your personal data with any third parties for any purposes, including without your consent, subject to the following exceptions. If I merge, collaborate, partner or sell parts of my business in the future, your personal data may be transferred to a known third party with your consent. Your data will remain in my custody for the stated duration if you do not provide consent. Any new partner, collaborator or owner of my business may continue to use your personal data in the same way(s) that I have used it, as specified in this Privacy Policy.

In limited but rare circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority. I may share your personal data with other companies in my group for marketing purposes only if your consent is given.

I may contract with the following third parties to supply relevant products and / or services. Still prior notification will be given initially by email.

KNOWN RECIPIENT	ACTIVITY CARRIED OUT	NICHE / SECTOR	COUNTRY / LOCATION
Banks regulated by the FCA regarding payment (data processor). Currently, Starling Bank Ltd.	Card payment processing.	Financial including Limited companies	United Kingdom.
Stripe Inc.	Online payment processing and application programming interfaces.	Financial and SaaS	USA and Republic of Ireland.

If any of your personal data is shared with a third party, as described above, I will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, my obligations, and the third party's obligations under the law, as described above in Part 8, pages 3 to 4.

10. How Can I Access My Personal Data?

If you want to know what personal data, I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request". All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11, page 4. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests including third party ones with costs added) a fee will be charged to cover my administrative costs including that of any third party.

I will respond to your subject access request within (14) fourteen days and, in any case, not more than (1) one month of receiving it. This also depends on third parties involved because their managers need to respond to your claim. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In rare cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

11. How Do I Contact You?

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (Subject line: For the attention of Atul Nayak PhD).

Name: Atul Nayak PhD

Email address: professional@atulnayakphd.com

Mobile number: +44 (0) 7851085854.

Postal Address: Icon Office, Office No. 15, 321-323 High Road, Chadwell Heath, Essex, RM6 6AX.

12. Changes to this Privacy Notice

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any important changes will be made available directly to you via email. This Privacy Notice was last updated on 18th October 2022.