

# PRIVACY NOTICE

## BACKGROUND

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

### 1. INFORMATION ABOUT THE FOUNDER / SPECIALIST PROPRIETORSHIP.

Atul Nayak PhD (Career DTR Coach & Product Innovation Consultant). Office Address: Icon Offices (Office 15), 321-323 High Road, Chadwell Heath, Essex, RM6 6AX, UK.

### 2. WHAT DOES THIS COVER?

This Privacy Information explains how I use clientele / personal data: how it is collected, stored, and processed. It also explains your rights under the law regarding clientele / personal data.

### 3. CAN YOU BRIEFLY EXPLAIN CLIENTELE / PERSONAL DATA?

Databases are essential in all types of businesses no matter the size. Clientele / 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'. Clientele / Personal data is, in simpler terms, any information about you that enables you to be identified. Clientele / Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as electronic location data, passport number and other online identifiers.

### 4. WHAT RIGHTS DOES ONE HAVE?

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 clientele 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.
- b) The right to access clientele / personal data I hold about you. Part 10 will tell you how to do this.
- c) The right to have clientele / personal data rectified if any of your data is inaccurate or incomplete. Please contact me using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any clientele / personal data in Atul Nayak PhD's possession. Please contact me using the details in Part 11 to find to find out more.
- e) The right to restrict (i.e. prevent) the processing of clientele / personal data.
- f) The right to object to me using clientele / personal data for a specific purpose(s).
- g) The right to withdraw consent. This means that, if I am relying on your consent as the legal basis for using clientele / personal data, you are free to withdraw that consent at anytime.
- h) The right to data portability. This means that, if clientele / personal data provided to me directly; I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that data to reuse with another service or business in many cases.
- i) Rights relating to automated decision making and profiling. I do not use your clientele / personal data in this way.

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

It is important that your clientele / personal data is kept accurate and up-to-date. If any data I hold about you may potentially change, then do keep me informed as long as I have that data. Further information about your rights can be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about clientele / personal data use, you have the right to lodge a complaint with the Information Commissioner's Office. I would prefer to resolve your concerns myself, however, so please contact me first, the details in Part 11.

#### 5. WHAT CLIENTELE / PERSONAL DATA DO YOU COLLECT AND HOW?

Depending upon your use of Atul Nayak PhD's work, survey or questionnaire, I may handle some or all of the clientele / personal data set out in the table below, including the methods outlined. Any data pertaining to minors and children including data relating to criminal convictions and/or offences are not in Dr Nayak's custody. This applies to any of the fields outlined in this table.

DATE COLLECTED	HOW IS IT COLLECTED?
Identity information including name, gender, date of birth, occupation, interests, career details, health, character profile.	Responses from questions or questionnaire during coaching or consultancy interactions logged securely on file and password protected. Written records are securely scanned and the hard-copy immediately shredded after handling.
Contact information including email address, mobile number, telephone number, 1 <sup>st</sup> line of address, town/city, post code.	Responses to contact information logged securely on file via a password protected system. Written records are securely scanned and the hard-copy immediately shredded when adopted.
Business information including business name, occupation, length of employment, type of business.	Same as above.
Physical cash payments with issued invoice and payment received registered.	Cash checked, counted and placed in a secure wallet for accounts. Invoice retained for merchant accounts and securely stored via password protection.
Payment information including bank card details, bank account for e-payment or funds transfer.	Reliable and secure third party merchant service as relevant. Basic information on encryption levels knowns.
Profile information including customer database, CRM.	All customer profile and CRM data securely recorded and retained on file.
Data from known third parties including merchant services.	Reliable and third party merchant services with security protocol used.

#### 6. HOW WILL YOU USE CLIENTELE / PERSONAL DATA?

Under the Data Protection Legislation, I possess a lawful basis for using clientele / personal data. The following table describes how I may use all data, and my lawful bases for doing so:

WHAT ATUL NAYAK PhD DOES?	WHAT DATA ATUL NAYAK PhD USES?	MY LAWFUL BASIS
Business administration.	Prospect, clientele demographics, contact information, responses to queries.	Keeping in touch with prospects / clientele. Demographics for research e.g., town/city.
Supplying my services to you.	Specialist questionnaires and resources relevant to CDTRC and PIC.	To serve my prospects / clientele with my expertise.
Managing payments for my services.	Record indicating client's invoices / dues. Known payment made.	To chase up debtors professionally
Personalising and tailoring my services for you.	Relevant administrative review and testimonials.	Measure of successes and further improvements.
Communicating with you.	Email, internet, known third party software and mobile phone.	As absolutely necessary in running a successful business.

Supplying you with information by email or post that you have opted-in-to (you may opt-out at any time by email or unsubscribe feature.	Clientele including prospects may keep me informed about information I may have not come across.	Up to date with current information that supports private research and promotes further intellectual discussions.
---	--	---

With your permission and where permitted by law, Atul Nayak PhD may also use clientele / personal data for marketing purposes, which may include contacting you by email or phone or post with information, news, and offers on Atul Nayak PhD services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with 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 clientele / personal data with third parties for marketing purposes and you will be able to opt out at any time. I will only use clientele / 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 such data for that purpose. If I do use clientele / 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.

If I need to use your clientele / 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 some circumstances, where permitted or required by law, I may process clientele / 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 CLIENTELE / PERSONAL DATA?

Atul Nayak PhD will not store clientele / personal data for any longer than is necessary in light of the reason(s) for which it was first collected. All data will therefore be kept for the following periods:

TYPE OF DATA	DURATION OF STORAGE
Identity Information including name, gender, date of birth, occupation, career, interests, health, character profile.	Records on prospects are kept for upto 2 years. Records on clients are kept for 10 years for professional relations. The rest of the data stated is kept lifelong for R&D.
Contact information including email address, mobile number, telephone number, 1 <sup>st</sup> line of address, town / city, postcode.	Records on prospects and clientele updated and kept for 10 years for professional relations. Other data kept lifelong for R&D.
Business or employment information including type of business, business name, occupation, length of employment.	Records are kept for upto 20 years for professional relations. Other data kept lifelong for R&D.
Payment information including bank card details, bank account for e-payment or funds transfer.	Secure card payment details never kept by me. Other payment details such as Account No and Sort Code destroyed after payment received. Individual's payment name and address in invoice and receipt.
Profile information including customer database and CRM.	Individuals names kept for upto 20 years or longer for professionals relations.

#### 8. HOW AND WHERE ARE CLIENTELE / PERSONAL DATA STORED OR TRANSFERRED?

Atul Nayak PhD will only store or transfer clientele / personal data to secure third parties by valid permission, within the UK. This means that it will be protected under the Data Protection Legislation. I will store or transfer some clientele / personal data within the European Economic Area (the "EEA"). All EU member states, plus Norway, Iceland, and Liechtenstein. This means that clientele / personal data will be protected under the Data Pro-

tection Legislation, GDPR, and/or to equivalent standards by law. The security of clientele / personal data is essential to me, and to protect your data, Atul Nayak PhD has a number of important measures, including the following:

- limiting access to all data pertaining 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;
- 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;
- notification to local police in the event of theft, vandalism or cyber-attack e.g. malware or ramsonware, despite taking normal precautions;

9. HOW DO YOU SHARE CLIENTELE / PERSONAL DATA?

Atul Nayak PhD will not share any clientele / personal data with any third parties for any purposes, subject to authorised based exceptions. If I sell, transfer, or merge parts of my business or assets, all your data may be transferred to a third party. Any new owner of my business may continue to use all your data in the same way(s) that I have used it, as specified in this Privacy Policy. In rare or limited circumstances, I may be legally required to share certain clientele / personal data if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Atul Nayak PhD may share clientele / personal data with other companies in my group for marketing purposes if your consent is given. I will only contract with the following third parties to supply products and services. At present, the table below is deliberately left blank for the moment until the time arises to insert specific fields.

RECIPIENT	ACTIVITY CARRIED OUT	SECTOR	LOCATION
<<Insert type of recipient and (optionally) name (also state whether recipient is a data controller or a data processor)>>	<<Insert simple description of activity or activities carried out>>.	<<Insert business or industry sector and sub-sector (where applicable)>>.	<<Insert country and (optionally) address or other contact details>>.

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

10.HOW CAN ONE ACCESS THEIR CLIENTELE / PERSONAL DATA?

If you want to know what clientele / personal data, I have about you, you can ask me for details on it and for a copy of it (where any such data is held. This is known as a “subject access request” (SAR). All SARs should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a SAR Form is available for you to use.

There is not normally any charge for a SAR. If your request is excessive (for example, if you make repetitive requests) a fee will be charged to cover my time and administrative costs in responding. I will respond to your SAR within 21 days and, in any case, not more than 1 month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time.

11.HOW CAN ONE CONTACT YOU?

To contact me about anything to do with your personal data and data protection, including to make a SAR, please use the following details (for the attention of Atul Nayak PhD):

Email: professional@atulnayakphd.com

Mobile phone: + 44 (0)7851085854

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

## 12.CHANGES TO PRIVACY NOTICE

This Privacy Notice may change depending to changes according to the law of England and Wales. This may be necessary, for example, if the law changes, or if I change my business in a way that affects clientele / personal data protection. Any changes will be made available directly to you via email and/or post. This Privacy Notice was last updated on 19<sup>th</sup> May 2023.