



Privacy Policy

This notice applies to all services delivered by Nicky Carnie (Cognition Coaching). Cognition Coaching considers Scottish law to be its lead supervisory authority. All significant decisions about data processing and policy implementation will be made using UK GDPR. This policy is set out to help you understand the types of data that we collect from you and or your business and how that data is used and managed.

Commitment

We are committed to protecting the privacy and security of your personal information, we continually monitor compliance through implementing policies & procedures to safeguard data and by setting regular reviews to manage these policies and procedures.

Data Controller

In accordance with ICO Requirements of Data Controllers Cognition Coaching is registered with the Information Commissioners office (ZA545723). As a consultant to other data controllers Cognition Coaching provides workshops & business support for employees and directors to understand and help with the self-development process.

Information we collect

We have a number of different approaches that collect information. We will collect some or all the categories listed. Where we provide services to that has individual responsibility to adhere to the requirements of GDPR the conditions listed in Article 9(2) of GDPR and will obtain explicit consent.

- Personal Information such as name, address, date of birth, gender, email
- Profiling data where you participate in interactive features of our service
- Sensitive & Special Category data (occasional)
- Operating Systems, IP address, Mobile & Desktop device identifiers
- Case Study information including media images around Services we have delivered

How we use your information

- To carry out our obligations arising from any contracts entered into by you or your organisation and us
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Case study information may be available on our website for marketing purposes
- Job Applications
- Validation of Identity
- Profiling we analyse your answers to questions to help create a profile of your how you communicate effectively and how others within your organisation might communicate best with you.
- Like many other websites we use cookies. 'Cookies' are small pieces of information sent by an Organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our websites.
- Job applications form part of our recruitment process to validate and evaluate and review potential and existing staff.



- Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Lawful Basis

We apply the GDPR principles to all personal & Sensitive data that we hold or process.

- 1) Processed lawfully, fairly and in a transparent manner in relation to individuals.
- 2) 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.
- 3) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 4) 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.
- 5) 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.
- 6) 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.

Sharing Information

- We will not sell or rent your information to third parties
- We will not share your information with third parties for marketing purposes
- We may be required to transfer your information to a third party as part of a sale of some or all of our business assets to third party as part of any business restructuring or reorganization.
- We may also be required to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Children

We do not anticipate providing services directly to children, however we do understand that if this change occurs, we will make provisions to verify age. We will also make further provisions to gain parental or guardian consent for data processing activity where required.



Data Breaches

Cognition Coaching will continue to look for new ways to protect data however in the event of a data breach. we will notify the ICO within 72 hours of becoming aware of the breach, where we don't yet have all the relevant details we will notify when we expect to have the results of the investigation. we have implemented the ICO guidance framework on managing a security breach. This framework includes the following

- *Containment and recovery
- * Assessing the risk/impact
- * Notification of Breaches
- * Evaluation & Response

International

All significant decisions about data processing and policy implementation will be made using UK GDPR. As part of the services offered to you the information which you provide to us will not be transferred to countries outside the UK or Europe our servers are Located inside the UK & Europe If we have a requirement to transfer your information outside of the UK or Europe in any way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the UK or EU , your information may be transferred outside the UK & EU in order to provide you with those services.

Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

Your right of access- You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

Your right to erasure- You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests.

Your right to data portability- This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

Please contact nicky@cognitioncoaching.co.uk you wish to make a request.

Further information around your rights can be found at <https://ico.org.uk/your-data-matters/>

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