Privacy Notice

Last updated: 3 November 2026

Who I am

Paula Donnan Advisory provides career consultancy, coaching, strengths-based development and organisational development services.

Paula Donnan Advisory is operated by Paula Donnan as a sole trader. For the personal information covered by this notice, Paula Donnan is the data controller unless I am processing employee information solely on the instructions of an organisational client.

You can contact me at:

Paula Donnan Advisory
Forsyth House
Belfast
United Kingdom

Email: **info@pauladonnanadvisory.com**
Telephone: **+44 7749 104 388**

What this notice covers

This notice explains how I collect, use, store and protect personal information when you:

- Visit my website.
- Contact me about a service.
- Book or purchase a service or digital product.
- Attend a consultation, coaching session or workshop.
- Complete a questionnaire or assessment.
- Subscribe to my newsletter.
- Participate in a Strengthscope® assessment.
- Commission organisational or workforce development support.
- Are referred to me by an employer or another organisation.
- Are included in information supplied for a Workforce Potential Review.

Information I may collect

Depending on the service, I may collect:

Contact and identity information

This may include your name, email address, telephone number, job title, organisation and location.

Booking, purchase and payment information

This may include the service booked, appointment information, billing details, payment status and transaction records.

Payments are processed through third-party payment providers. I do not normally receive or retain complete payment-card information.

Career and professional information

This may include:

- Employment history.
- Qualifications and training.
- Career goals.
- CVs and application documents.
- Job-search information.
- Interview preparation materials.
- Professional strengths.
- Workplace experiences.
- Development priorities.
- Notes and actions agreed during sessions.

Coaching and consultation records

I may keep relevant session notes, agreed actions, correspondence and documents needed to provide the service.

These records are intended to support the work we have agreed. They are not medical or clinical records.

Strengthscope® information

Where you purchase a Strengthscope® service, I may receive your assessment results, reports and feedback provided through the Strengthscope® platform.

The relevant Strengthscope® provider may process your information under its own privacy terms.

Organisational and workforce review information

An employer or manager may provide information about a team or individual employees as part of an organisational service.

This may include:

- An employee identifier or initials.
- Job role and length of service.
- Responsibilities and working arrangements.
- Observed strengths and contributions.
- Workload or role-clarity concerns.
- Development needs.
- Manager observations and supporting examples.
- Support already provided.

Employers and managers are asked not to include employee names, medical information, diagnoses, protected characteristics or unrelated personal details unless there is a clear and lawful reason for doing so.

Marketing information

This may include your newsletter subscription, marketing preferences and your interaction with emails I send.

Website and technical information

My website and its service providers may collect information such as:

- IP address.
- Browser and device information.
- Website pages visited.
- Referral source.
- Cookie preferences.
- Basic website usage and security information.

Further information about cookies should be provided through the website cookie banner and cookie settings.

How I receive information

I may receive personal information:

- Directly from you.
- Through my website, booking forms or questionnaires.
- Through email, telephone calls or online meetings.
- From an employer or organisation commissioning a service.

- From a manager completing a workforce review.
- Through the Strengthscope® platform.
- From a referral partner where you have agreed to the referral.
- From publicly available professional sources when relevant to work you have requested.

If an organisation provides information about its employees, that organisation remains responsible for ensuring it has a lawful reason to collect and share the information.

Why I use personal information

I may use personal information to:

- Respond to enquiries.
- Assess whether a service is suitable.
- Arrange appointments and initial briefings.
- Deliver coaching, consultancy, assessments and workshops.
- Prepare agreed reports, recommendations and development plans.
- Provide Strengthscope® assessments and debriefs.
- Process purchases and payments.
- Maintain financial and business records.
- Communicate about an active service.
- Manage cancellations, complaints or contractual issues.
- Protect the security of my website and business systems.
- Improve my services.
- Send newsletters or relevant marketing where permitted.
- Meet legal, tax and regulatory obligations.

My lawful bases

The lawful basis used depends on why the information is needed.

Contract

I may process information when it is necessary to:

- Respond to a request before you purchase a service.
- Book and deliver an agreed service.
- Provide a product or assessment.
- Process a payment.
- Communicate about the service.

Legal obligation

I may retain information where necessary to meet legal, accounting, tax or regulatory requirements.

Legitimate interests

I may process limited information where this is necessary for the reasonable operation of my business, including:

- Responding to business enquiries.
- Maintaining appropriate service records.
- Protecting my systems and website.
- Preventing fraud or misuse.
- Managing complaints or legal claims.
- Improving how services are delivered.
- Communicating with relevant organisational contacts where appropriate.

I consider whether these interests are proportionate and whether they could unfairly affect the person whose information is involved.

Consent

I may rely on consent for:

- Newsletter subscriptions.
- Certain forms of direct marketing.
- Testimonials where specific permission has been requested.
- Optional uses of information that are not necessary to deliver a service.

You can withdraw consent at any time by contacting me or using the unsubscribe option in a marketing email.

Individual client services

When you contact or work with Paula Donnan Advisory as an individual client, I may collect and use information needed to provide the service you request.

Depending on the service, this may include:

- Your contact and booking information.
- Employment and education history.
- CVs, cover letters and job applications.
- Career goals and role preferences.
- Interview preparation materials.

- Workplace experiences and development priorities.
- Strengthscope® assessment information.
- Notes, actions and documents created during coaching or consultation.
- Relevant email correspondence and feedback.

I use this information to:

- Respond to your enquiry.
- Assess whether a service is suitable.
- Prepare for and deliver your sessions.
- Provide agreed documents, assessments or recommendations.
- Maintain appropriate records of the service.
- Communicate with you about appointments, actions and follow-up support.
- Meet financial, insurance and legal responsibilities.

The usual lawful basis is contract, or taking steps at your request before entering into a contract. I may also rely on legitimate interests to maintain proportionate business records, manage concerns and protect my legal position.

Your coaching and consultation information is treated as confidential. I will not normally share the content of your sessions with an employer, family member or another person without your permission.

I may disclose information where required by law or where there is a serious and immediate concern about someone's safety. Where appropriate and lawful, I will discuss this with you before making a disclosure.

Please avoid sending medical records or other sensitive personal information unless it is necessary for the service and has been discussed with me in advance.

Workforce Potential Reviews

For a Workforce Potential Review, the organisational client normally decides why employee information is being collected and how the review will be used. The organisation is therefore normally the data controller for that employee information.

Paula Donnan Advisory may act as a data processor when handling the information solely to provide the commissioned review under the organisation's instructions.

The organisation is responsible for:

- Having an appropriate lawful basis.

- Informing affected employees about the review.
- Providing relevant and accurate information.
- Avoiding unnecessary personal or sensitive information.
- Responding to employee data-protection requests.
- Using the findings fairly and appropriately.
- Following its own HR and employment procedures.

The review is intended to support development and management conversations. It should not be used as the sole basis for disciplinary, redundancy, pay, promotion or dismissal decisions.

When information is entered into a digital or AI-assisted tool for analysis, it should be anonymised or minimised wherever possible. AI-assisted tools may help organise or summarise information, but they do not make final decisions. All findings and recommendations are reviewed using human professional judgement.

Sensitive information

I do not normally need medical information, diagnoses, information about protected characteristics or other special category information to provide my services.

Please do not provide this information unless it is genuinely necessary and has been discussed in advance.

If sensitive information is received unexpectedly, I may ask for it to be removed, replaced with less detailed information or handled through an alternative process.

Who I may share information with

I do not sell personal information.

Where necessary, information may be shared with:

- Wix and providers supporting my website, forms, bookings and online store.
- Payment-processing providers.
- Email, newsletter and cloud-storage providers.
- Online meeting providers.
- The Strengthscope® assessment platform and relevant service providers.
- Professional advisers, such as an accountant, insurer or legal adviser.
- Technology providers used to support administration or analysis.
- Government, regulatory or law-enforcement bodies where required by law.
- An organisational client where this forms part of the agreed service.

Where an employer sponsors coaching or development support, I will explain what information may be shared with the employer. Individual session content will not normally be shared unless this has been agreed, the individual gives permission or disclosure is required by law.

I expect service providers processing information on my behalf to apply appropriate privacy and security protections.

International transfers

Some technology and service providers may process information outside the United Kingdom.

Where this happens, I will use providers that apply an appropriate transfer mechanism or other safeguards recognised under UK data-protection law.

Information about a specific provider's international processing arrangements may also be available in that provider's privacy notice.

How long I keep information

I keep personal information only for as long as it is reasonably needed.

My usual retention periods are:

- Enquiries that do not lead to a service: up to 12 months.
- Active client records and relevant correspondence: for the duration of the service.
- Coaching and consultancy records: normally up to six years after the service ends where needed for contractual, insurance or legal purposes.
- Financial and transaction records: normally six years, in line with accounting and tax requirements.
- Identifiable Workforce Potential Review forms and working records: normally up to 12 months after the final report, unless a shorter period is agreed with the organisation.
- Final organisational reports: normally up to six years where needed as a contractual business record.
- Newsletter information: until you unsubscribe or the information is no longer needed for the mailing list.
- Strengthscope® reports and supporting records: for the period needed to provide the assessment and any agreed follow-up, after which their continued retention will be reviewed.
- Website and cookie information: according to the periods shown in the website cookie settings or the relevant provider's notice.

I may retain anonymised information that no longer identifies anyone for service evaluation, business planning or research.

How I protect information

I take reasonable steps to protect personal information, including:

- Limiting access to information.
- Using password-protected systems and devices.
- Applying available security settings.
- Keeping information relevant and proportionate.
- Using employee identifiers rather than names where possible.
- Reviewing and deleting records that are no longer needed.
- Using reputable service providers.

No online system can guarantee complete security. If a personal-data breach occurs, I will assess it and take any notification or remedial action required by law.

Your rights

Depending on the circumstances and lawful basis used, you may have the right to:

- Ask for a copy of your personal information.
- Ask for inaccurate information to be corrected.
- Ask for information to be deleted.
- Ask for the use of information to be restricted.
- Object to certain uses of your information.
- Receive certain information in a portable format.
- Withdraw consent where consent is the lawful basis.
- Object to direct marketing at any time.
- Raise a concern about how your information is being used.

These rights are not absolute in every situation. I may need to retain certain information for legal, contractual or regulatory reasons.

To make a request, email **info@pauladonnanadvisory.com**.

I may need to confirm your identity before responding.

Automated decision-making

Paula Donnan Advisory does not make decisions that have legal or similarly significant effects based solely on automated processing.

Digital and AI-assisted tools may be used to support organisation, drafting or analysis. Final assessments and recommendations are reviewed by Paula Donnan.

Marketing

I will only send marketing where I have an appropriate legal basis.

You can unsubscribe at any time by:

- Selecting the unsubscribe link in an email.
- Contacting **info@pauladonnanadvisory.com**.

Withdrawing from marketing will not affect essential communications about a service you have purchased or requested.

Complaints

If you have a concern about how I have used your information, please contact me first at:

info@pauladonnanadvisory.com

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

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: **www.ico.org.uk**

Changes to this notice

I may update this privacy notice when my services, systems or legal obligations change.

The latest version will be published on my website with the date of the most recent update.