

Privacy Policy

Last updated: October 21, 2026

1 Who I am

I am Artur Poluektov, an independent strategic advisor based in Portugal (European Union). I am the controller of the personal data described in this Privacy Policy.

This Policy explains how I collect, use and protect your personal data when you visit my website, contact me or use my services. My contact details are in section 12.

2 What personal data I collect

I collect only the data I need to communicate with you and provide my services. This may include:

- Name and email address
- Company name, company website and your role
- What you are working through, and what you are interested in (a Clarity Call, speaking, mentoring or something else)
- Timeline and whether a budget is set, if you choose to share them
- How you heard about me, if you choose to share it
- Booking information, when you schedule a call
- Website usage data

I do not ask for sensitive personal data. Please do not send it to me.

3 How I collect data

I collect data when you:

- Fill in the contact form on my website
- Book a Clarity Call through my scheduling tool
- Subscribe to my newsletter on Substack
- Browse the website
- Email me or message me directly

4 How I use your data

I use your personal data only to:

- Respond to your inquiries
- Schedule and hold calls and meetings
- Prepare for a conversation with you
- Deliver services you have asked for
- Share the writing and updates you subscribed to
- Understand how the website is used, and improve it

I do not sell your data. I do not use it for unsolicited marketing.

5 Legal basis for processing (GDPR)

Under the GDPR, I process your data on these grounds:

- Consent, when you submit a form or subscribe
- Legitimate interest, to communicate professionally and improve my services
- Contractual necessity, when data is needed to deliver agreed services

You can withdraw your consent at any time.

6 Third-party services

Some data is processed by third-party services that I use to run my work:

- Google Analytics for website usage and performance
- Cal.com for scheduling calls
- Substack for newsletter subscriptions and distribution
- Website hosting and form providers for running the site and receiving your messages

These providers process data under their own privacy policies and data processing agreements.

7 Transfers outside the EU

Some of these providers are based outside the European Union. When your data is transferred, I rely on the safeguards the GDPR requires, such as Standard Contractual Clauses.

8 Data retention

I keep personal data only for as long as I need it to:

- Communicate with you
- Deliver services
- Meet legal, accounting or regulatory obligations

You can ask me to delete your data at any time, unless the law requires me to keep it.

9 Your rights

Under the GDPR, you have the right to:

- Access your personal data
- Ask me to correct inaccurate data
- Ask me to delete your data
- Restrict or object to processing
- Receive your data in a portable format
- Withdraw consent at any time
- Lodge a complaint with a supervisory authority

In Portugal, the supervisory authority is the CNPD (Comissão Nacional de Proteção de Dados).

10 Data security

I take reasonable technical and organizational measures to protect your data against unauthorized access, loss and misuse.

11 Changes to this Policy

I may update this Policy from time to time. The latest version is always published on this website, with the date at the top.

12 Contact

To use any of your rights, or to ask a question about this Policy: art.cpm@gmail.com