

WEBSITE PRIVACY POLICY

Introduction

Hi there! This website, lisascarfonaturopath.com, is owned and operated by Lisa Scarfo ABN: 36 548 151 703. If you have any questions or need further information, please contact:

Lisa Scarfo

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Mobile ph.: 0421 706 494

Email: lisa@thechiropracticdomain.com.au

This document sets out my Privacy Policy. It describes how I collect and manage your personal information when you interact with this site. I take this responsibility very seriously. If you have any questions or concerns about how your personal information is being handled, please do not he sitate to contact me.

I comply with the Australian Privacy Principles set out in the *Privacy Act* 1988 (Cth) (Privacy Act).

I choose to voluntarily comply with the Australian Privacy Principles set out in the *Privacy Act* 1988 (Cth) (Privacy Act).

I understand that visitors from the EU may access this site, so I also aim to comply with the General Data Protection Regulations (GDPR).

Personal Information

If you engage with me via this website, or choose to become my client I may ask to collect the following kinds of personal information from you, including:

- · your name and email address
- the country that you live in
- your opinion about future topics, products or services that may interest you
- information that allows me to tailor my content to your needs when you sign up for one of my webinars or promotional events
- with your consent, I may collect your IP address, and information about your browsing history to help me improve the usability and appeal of my website

Collection and Use

I may collect your personal information by various means including:

- an opt-in form for my mailing list
- when you email me]
- automatically, using cookies

I use this information to:

- respond to your enquiries
- provide you with relevant news and updates about my services
- improve this website and the services I provide

I will only collect your personal information:

- with your full awareness and consent, such as when you email me, tick a checkbox, or fill in a form to provide me with information
- if I need it to provide you with information or services that you request
- if I am legally required to collect it
- for necessary administrative processes if you become my client
- if I believe that I can demonstrate a legitimate interest in using your data for marketing purposes, although I will always give you a choice to opt out

Sensitive Information

I understand that some personal information is particularly sensitive, and that you are trusting me to keep this information confidential.

I will only collect sensitive information by methods that are reasonably secure, such as:

- through my online intake form in PracSuite when you book an appointment.
- in a zoom consultation or face to face.
- when you send me information in an email.

The reason why I collect this information is:

- so that I can provide you with the services you have contracted for
- to ensure that I am providing you with the most appropriate services

The sensitive information I ask you to provide for this purpose may include:

- your medical history
- your date of birth

I am committed to securely storing and handling your sensitive information.

- Sensitive information is stored in a locked filing cabinet and on a password protected computer.
- Only I as the therapist responsible for your treatment or our reception staff who are authorised team members may access sensitive material.
- Some sensitive information may be stored securely online, or in the cloud through our Software program called PracSuite. You can find out more about their security provisions here: https://pracsuite.com/privacy

Sensitive information may be collected from children under the age of 18 under the following circumstances:

- in the presence of their parents
- with their parent or guardian's full consent

All information collected from minors is securely stored in accordance with this privacy policy.

All archived sensitive information is securely destroyed after 7 years.

You may choose not to provide me with your sensitive information. However,

- if you choose not to be completely honest with me, I may not be able to provide you with the services that you request.
- as a Naturopath I am legally required to identify my clients by collecting their name and address, and failure to provide this information means I cannot offer my services to you.

Disclosure of Information

Reasons why I may disclose your information include:

- to provide you with the services you have requested
- to send you products that you have purchased

To do this, I may share some relevant information - on a strictly need to know basis - with:

- my virtual assistant (VA) or reception staff
- Australia Post or courier companies

I will also disclose your information if required by law to do so or in circumstances permitted by the *Privacy Act* – for example, where I have reasonable grounds to suspect that unlawful activity, or misconduct of a serious nature, that relates to my functions or activities has been, is being or may be engaged in, and in response to a subpoena, discovery request or a court order.

If you have any concerns regarding the disclosure of your information in this context, please do not hesitate to get in touch with me to discuss this personally.

I will use all reasonable means to protect the confidentiality of your information while in my possession or control. I will not knowingly share any of your information with any third party other than the service providers who assist me in providing the information and/or services I am providing to you. To the extent that I do share your information with a service provider, I would only do so if that party has agreed to comply with our privacy standards or I am satisfied that the service provider has a suitably protective policy of their own. Some of my service providers may be overseas and may not be subject to Australian Privacy Laws or compliant with GDPR. Please contact me if you have any concerns about the potential disclosure of your information. Please also see the section on Security below.

Security

I take reasonable physical, technical, and administrative safeguards to protect your information from misuse, interference, loss, and unauthorised access, modification, and disclosure.

I manage risks to your information by:

- storing files securely
- ensuring that only I or key personnel have access to sensitive information
- releasing information to service providers on a strictly need-to-know basis
- conducting regular audits of my security systems

As mentioned above, your information may also be stored with a third-party provider, where it will be managed under their security policy:

- PracSuite https://pracsuite.com/privacy
- Dropbox https://www.dropbox.com/security
- Facebook ads https://www.facebook.com/business/m/privacy-and-data
- GSuite https://storage.googleapis.com/gfw-touched-accounts-pdfs/google-cloud-security-and-compliance-whitepaper.pdf
- Mailchimp https://mailchimp.com/about/security/
- Squarespace https://www.squarespace.com/privacy
- Zoom https://zoom.us/docs/en-us/privacy-and-security.html

From time to time, I may combine information provided by you with information gathered from:

- Facebook
- LinkedIn
- vour website
- personal contact

If you do not wish this to occur, please contact me.

Cookies and Google Analytics

Cookies are small text files that are commonly used by websites to improve a user's experience, collect statistics or marketing information, and provide access to secure areas.

You can choose to configure your browser settings not to accept cookies, but this may interfere with the functioning of this website.

My website uses the following cookies:

| COOKIE NAME | DOMAIN | DURATION | DESCRIPTION |
|----------------|------------------------------|------------|---|
| SS_CVT | www.lisascarfonaturopath.com | 30 minutes | A Square Space Cookie: Identifies unique visitors and tracks a visitor's sessions on a site |
| SS_CVR | www.lisascarfonaturopath.com | 2 years | A Square Space Cookie: Identifies unique visitors and tracks a visitor's sessions on a site |
| CRUMB | www.lisascarfonaturopath.com | Session | Prevents cross-site request forgery (CSRF) |

I use Squarespace to host my website. Squarespace collects information about your use of my website so that I can get information about how my website is being used and improve its functionality. You can find out more about the information Squarespace collects here: https://support.squarespace.com/hc/en-us/articles/360001264507#csrf

I use Google Analytics to collect information about your use of my website so that I can get strategic information about how my website is being used and improve its functionality. You can find out more about the information Google collects and how it is used here: https://support.google.com/analytics/answer/6004245

Google also provides an add-on for your browser that you can use to opt-out and prevent your data being used by Google Analytics. You can access that add-on here: https://tools.google.com/dlpage/gaoptout

Access to Information

You can contact me to access, correct or update your personal information at any time. Unless I am subject to a confidentiality obligation or some other restriction on giving access to the information which permits me to refuse you access under the *Privacy Act*, and I believe there is a valid reason for doing so, I will endeavour to make your information available you within 30 days.

Complaints

If a breach of this Privacy Policy occurs, or if you wish to a request a change to your personal information, you may contact me by sending an email outlining your concerns to me at lisa@thechiropracticdomain.com.au.

If you are not satisfied with my response to your complaint, you may seek a review by contacting:

- the Office of the Australian Information Commissioner using the information available at http://www.oaic.gov.au/privacy/privacy-complaints.
- the health ombudsman in your state or territory.

Notification of Change

If I decide to change my Privacy Policy, I will post a copy of the revised policy on my website.

Notification of Breach

If I have reason to suspect that a serious data breach has occurred and that this may result in harm or loss to you, I will immediately assess the situation and take appropriate remedial action. If I still believe that you are at risk, I will notify the Office of the Information Commissioner and either notify you directly, or if that is not possible, publicise a notification of the breach on this website.