

# **Website Privacy Policy**

#### Introduction

Welcome to Optimal Family Wellness! www.optimalfamilywellness.com is owned and operated by JMR Works Pty Ltd T/as Optimal Family Wellness, ABN: 52106393051. If you have any questions or need further information, please contact:

Allison Riehs

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Email: allison@optimalfamilywellness.com

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This document sets out our Privacy Policy. It describes how we collect and manage your personal information when you interact with this site. JMR Works Pty Ltd takes this responsibility very seriously. If you have any questions or concerns about how your personal information is being handled, please do not hesitate to contact us.

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

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

#### **Personal Information**

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

• your name, role, occupation, address, email, mobile or phone number

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- Information about your interests, requirements and products or services you may be interested in
- your opinion about future topics, products or services that may interest you
- information about you collected at workshops, during consultations and at promotional events
- information that allows me to tailor my content to your needs when you sign up for one of my webinars or promotional events

# **Collection and Use**

We may collect your personal information by various means including:

- an opt-in form for our mailing list
- question/inquiry/contact form
- when you email us
- newsletter subscription
- sign up for seminar / webinar / events
- in person at seminar / webinar / events
- requests for testimonials
- client engagement (when you purchase from us or become our client
- cookies
- From a third party if you have been referred to us or entry into a competition run by others where we supply a prize.

#### We use this information to:

- provide you with relevant news and updates about my / our services
- to respond to your enquiries
- to provide specific services to you at your request
- to monitor visitor and client satisfaction
- to help other people understand our services better
- to provide more relevant information
- improve this website and the services and products we provide
- to provide news about our product and services

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Please be assured that we treat your personal information seriously and will only use it 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. You will always have the option to opt out of any email or marketing material.

#### **Sensitive Information**

We understand that some personal information is particularly sensitive.

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

- through our intake form in Simple Clinic when you book an appointment]
- in a zoom or skype consultation
- when you send me information in an email
- by telephone or a face to face consultation

The reason we collect this information is to provide you with services you request such as Naturopathic consultations and treatment plans. In order to provide you with the most appropriate treatment that is both safe and effective require a comprehensive understanding of your health history, past & present medications, symptoms and family health history.

We are committed to securely storing and handling your sensitive information.

- Sensitive information is stored in a locked filing cabinet and on a password protected computer.
- Some of your personal and sensitive information may be stored with SimpleClinic Online. This information may include your personal details, health history, consultation notes, test results, prescriptions and treatment plans. SimpleClinic is an Australian owned practice management system for Naturopathic Practitioners and Complementary Health Care Providers. They comply with the Australian Privacy Act and take the protection of your information very seriously. They have a stringent security system, including password protected access to their platform restricted to registered subscribers, AES-246 or 256 bit SSL encryption of all sensitive information, access logging, and firewall and

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IP traffic monitoring for suspicious or malicious traffic. If you would like to know more, please contact us at allison@optimalfamilywellness.com for a copy of SimpleClinic's Privacy Policy.

- Only the therapist responsible for your treatment and authorised team members may access sensitive material.
- Some sensitive information may be stored securely online, or in the cloud through Google Drive. You can find out more about their security provisions here: https://policies.google.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/deleted after 7 years.

#### **Professional Considerations**

We are subject to the following regulations regarding the collection of personal information:

 As a naturopath, I have professional regulations that require us to practice strict client confidentiality. I take this responsibility very seriously and will always strive to promote your best interests.

You may choose not to provide us with your personal information. However,

- if you choose not to be completely honest with us, I may not be able to provide you with the services that you request.
- 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.

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# **Use of Personal Information**

Reasons why we may disclose your personal information include:

- to provide you with the services you have requested
- to send you products that you have purchased
- when using support services like a virtual assistant
- to other health professionals that are involved in your care.

In order to do this, we may share some relevant personal information - on a strictly need to know basis - with:

- our virtual assistant (VA)
- employee
- Australia Post or courier companies
- Other health professionals that you have told us are involved in your care
- Third party providers who assist with: business consultant or coach, our email marketing provider, auditing, accountant, legal, website, technology services, CRM (customer relations management)

We will also disclose your information if required by law to do so or in circumstances permitted by the *Privacy Act* – for example, where we have reasonable grounds to suspect that unlawful activity, or misconduct of a serious nature, that relates to our 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 personal information, please do not hesitate to get in touch with us to discuss this personally.

We will use all reasonable means to protect the confidentiality of your personal information while in our possession or control. We will not knowingly share any of your personal information with any third party other than the service providers who assist us in providing the information and/or services we are providing to you. To the extent that we do share your personal information with a service provider, we would only do so if that party has agreed to comply

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with our privacy standards as described in this privacy policy. However, some of our service providers may be overseas and may not be subject to Australian Privacy Laws or compliant with GDPR. Please contact us if you have any concerns about the potential disclosure of your information.

# **Security**

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

We manage risks to your personal information by:

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

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

- Mailchimp <a href="https://mailchimp.com/about/security/">https://mailchimp.com/about/security/</a>
- Google Drive <a href="https://www.google.com/drive/terms-of-service/">https://www.google.com/drive/terms-of-service/</a>
- Dropbox <a href="https://www.dropbox.com/security">https://www.dropbox.com/security</a>

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

- Facebook and other social media forms
- Google Analytics
- personal contact

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

#### **Access to Information**

You can contact us to access, correct or update your personal information at any time. Unless we are subject to a confidentiality obligation or some other

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restriction on giving access to the information which permits us to refuse you access under the *Privacy Act*, and we believe there is a valid reason for doing so, we will endeavour to make your information available you within 30 days.

Please begin the process by sending an email requesting access to your information to me at <u>allison@optimalfamilywellness.com</u> and I will endeavour to respond within 7 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 us by sending an email outlining your concerns to me at <a href="mailto:allison@optimalfamilywellness.com">allison@optimalfamilywellness.com</a> and I will endeavour to respond within 48 hours.

If you are not satisfied with our 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 we decide to change our Privacy Policy, we will post a copy of the revised policy on our website.

#### **Notification of Breach**

If we have reason to suspect that a serious data breach has occurred and that this may result in harm or loss to you, we will immediately assess the situation and take appropriate remedial action. If we still believe that you are at risk, we 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.