## Privacy Policy: crazytruth.org and Amy Mulroy, MD, PA

Last updated: April 5, 2020

Crazytruth.org (henceforth referred to as "Website "we," or "us"; a service offered by Amy Mulroy, MD, PA (the "Company") respects your privacy and is committed to protecting it through this Privacy Policy.

This Privacy Policy governs your access to and use of <u>https://www.crazytruth.org</u> including any content, functionality and services offered on or through <u>https://www.crazytruth.org</u> (the "**Website**"), whether as a guest or a registered user.

When accessing the Website, we will learn certain information about you, both automatically and through voluntary actions you may take, during your visit. This policy applies to information we collect on the Website and in email, text, or other electronic messages between you and the Website.

Please read the Privacy Policy carefully before you start to use the Website. **By** using the Website or by clicking to accept or agree to the Terms of Use when this option is made available to you, you accept and agree to be bound and abide by the Privacy Policy. If you do not want to agree to the Privacy Policy, you must not access or use the Website.

#### What is this Privacy Policy for?

This privacy policy is served by crazytruth.org for the website https://www.crazytruth.org and governs the privacy of its users who choose to use it, whether as a guest or registered user.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore the way this website processes, stores and protects user data and information will also be detailed within this policy. This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to US laws and requirements for user privacy.

Please read the Privacy Policy carefully before you start to use the Website. By using the Website or by clicking to accept or agree to the Terms of Use, Privacy Policy and/or Cookie Policy when this option is made available to you, you accept and agree to be abide by such policy or policies. If you do not agree, you must not access or use the Website.

If you have any questions about this privacy policy, you can contact us at amy@crazyturth.org

## Minors Under The Age Of 18

Our Website is not intended for anyone under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect personal information from anyone under 18. If you are under 18, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal information from a someone under 18 without verification of parental or legal guardian consent, we will delete that information. If you believe we might have any information from or about someone under 18, please contact us at amy@crazytruth.org.

## Information we collect about you

When you access the Website, crazytruth.org will learn certain information about you during your visit.

Information You Provide To Us.

You provide us information when you use our website, for example, when you contact us through email or contact forms to enquire about our services, to ask a question or leave a comment, fill out a survey, book an appointment through our online booking system, review/sign (including electronic signature) a proposal or contract for work, make a payment through our online accounting system, contact us through social media platforms such as but not limited to Facebook or

Twitter of Instagram, or if you register to receive our newsletter. The personal information we collect might include your name, address, email address, IP address, and information regarding what web pages are accessed and when. In certain forms, depending on the nature of services pursued by you, we may collect personal information about the type or nature of personal conditions that you are seeking resources or services. This is mainly for the purposes of accessing and providing you with relevant content and/or services.

#### Location Identification

The Website makes reasonable efforts to comply with various laws governing different locations or countries. To achieve this purpose, if you are seeking content or services beyond what is available freely on our website and decide to contact us to pursue such content or resources via phone, email and /or contact or other form/s on our website, we ask you to help us identify and provide your location or country (our email service provider may or may not have automatic access or capabilities to infer your location information from other details you input into the forms, and hence, we will rely on you to specifically provide such information). You have a right to not provide such information, however in the absence of your location disclosure, we may not be able to make an accurate estimation of your geography and therefore cannot best guarantee compliance with your /any specific country's governing laws or availability of content.

If you inform us via phone, email or enter a specific country as your location and / or country in any of our website's forms, it will be deemed that you are located in the same country.

You can choose not to provide any information requested or required by crazytruth.org in its contact forms and/or website but this may affect the quality of the full user experience offered to you by crazytruth.org and / or its website. Alternatively, you may contact us at amy@crazytruth.org to make a request for modification of personal information required. However, the Website cannot makes any guarantees about the approval of any and all such requests.

Information We Collect Through Automatic Data Collection Technology.

In order for us to better understand how our website is being used, what content is most popular and what countries our visitors come from, we use automatic data collection technologies including **GoDaddy** and <u>Google Analytics</u> that collect non-personal information about you as you navigate through our Website. Among other things, these technologies may track your IP address or location, your traffic pattern through our website, your operating system, computer or browser type any communications between your computer and our Website.

The information we collect automatically is used for statistical data and will not include personal information. To the extent that you voluntarily provide personal information to us, our systems may associate the automatically collected information with your personal information.

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or until such time as you request that we delete your information.

## **Use of Cookies And Pixels**

Similar to other commercial websites, our website utilizes a standard technology called "cookies" and server logs to collect information about how our site is used. Information gathered through cookies and server logs may include the date and time of visits, the pages viewed, time spent at our site, and the websites visited just before and just after our website, as well as your IP address.

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Most web browsers can be set to disable the use of cookies. However, if you disable cookies, you may not be able to access features on our website correctly or at all. The Website reserves the right to use technological equivalents of cookies, including social media pixels. These pixels allow social media sites to track visitors to outside websites so as to tailor advertising messages users see while visiting that social media website. The Website reserves the right to use these pixels in compliance with the policies of the various social media sites.

Third Party Use Of Cookies: Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

By agreeing to accept our use of cookies, pixels and web beacons as described in this policy and / or by accepting our Cookie Notification/s, you are giving us, and third parties we partner with, permission to place, store, and access some or all the cookies described below on your computer. If you choose to decline a Cookie Notification message, no cookies will be placed on your computer, and the data will not be tracked.

## Email

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received online, mail, and telephone. This also applies when you register for our website, sign up through any of our forms using your email address or make a purchase on this site. Please note, however, that email is not recognized as a fully secure medium of

communication. For this reason, we suggest that you do not send your private information to us by email. However, doing so is allowed, but at your own risk. For further information see the email policies below.

## **Email Policies**

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and will not disclose your email address to any third parties except as allowed in the section titled Disclosure of Your Information.

We will maintain the information you send via e-mail in accordance with applicable federal law.

In compliance with the CAN-SPAM Act, all e-mails sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. Users who no longer wish to receive our content, newsletter or promotional materials may anytime opt-out of receiving these communications by clicking on the unsubscribe link in any e-mail.

Email marketing campaigns published by this website or its owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity [this is by no far a comprehensive list]. This information is used to refine future email campaigns and supply the user with more relevant content based around their activity. To find out more about the types of tracking associated with our email campaigns.

## How And Why We Collect Information

The Website collects your information in order to record and support your participation in the activities you select. If you register to download a book, content or resources, sign up for our newsletter, and/or purchase a product from us, we collect your information. We use this information to track your preferences and to keep you informed about the content, products and services you have selected to receive and any related products and/or services. As a visitor to this Website, you can engage in most activities without providing any personal

information. It is only when you seek to download resources and/or register for services that you are required to provide information.

If you opt to receive any free resources, participate in any free training programs, register for a webinar, register for a live event, register for a seminar, or purchase any products sold by crazytruth.org on this Website, we will automatically enroll you to receive our free email newsletter and/or promotional content at a future date. If you do not wish to receive such communications, you can unsubscribe anytime. We include an "unsubscribe" link at the bottom of every email we send. If you ever have trouble unsubscribing, you can send an email to amy@crazytruth.org requesting to unsubscribe from future emails.

## How Do We Use the Information That You Provide to Us?

We use personal information for purposes of presenting our Website and its contents to you, providing you with information, providing you with offers for products and services, providing you with information about your subscriptions and products, to improve our overall performance, notify you of changes to our terms, policies or services, for carrying out any contract between you and the Website, administering our business activities, providing customer service, and making available other items and services to our customers and prospective customers. From time-to-time, we may use the information you provide to us to display advertisements to you that are tailored to your personal characteristics, interests, and activities.

#### **Disclosure Of Your Information**

As a general rule, 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 pass your information to our third party service providers, agents, subcontractors and other associated organizations for the purposes of completing tasks and providing services to you on our behalf (for example to process payments or send the email content or newsletter). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service. We can provide information on which services have access to your data in their role as data processor for the Website upon request. For example, if you make a credit or debit card purchase from us, your card information is not held by us, it is collected by our third party payment processors <u>Stripe</u> and /or <u>Paypal</u>, who specialize in the secure online capture and processing of credit/debit card transactions and are fully PCI-DSS compliant (compliance policy linked: <u>Stripe</u>, <u>Paypal</u>).

We may disclose your personal information to a third party, including a lawyer or collection agency, when necessary to enforce our terms of service or any other agreement between you and the Website, protect our legal rights or when such disclosure is deemed required by an applicable law, court or other governmental entity.

All personal information disclosed within programs, sessions and the records, if any, pertaining to those sessions, are confidential and will not be revealed to anyone without your written permission, except where disclosure is required by law. Examples of such instances would include, but not be limited to, an event in which the Website believes there is imminent danger to the life and physical safety of the client or others, the Website may need to disclose select information in order to make appropriate and potentially life-saving interventions, that may include, but are not limited to, disclosures to law enforcement, medical and other emergency services.

Business Transfers: Circumstances may arise where, whether for strategic or other business reasons, we may sell, transfer or otherwise disclose some or all of our assets, including your information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy. It's our practice to seek appropriate protection for your information in those types of transactions.

# Security precautions

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with a minimum 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear next to the web address.

Non-sensitive details (eg name, email address) are transmitted over the Internet, and although this website and any other systems we use for data capture use SSL protection, we cannot guarantee that the data will be 100% secure when it is

transmitted. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us through enquiry forms, registration forms, or email enquiries, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

## External website links / Endorsements

Although this website strives to only include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website. The fact that we link to a website or display a third-party content or product should not always be deemed (unless specified) an endorsement, authorization or representation of our affiliation with any of those third parties, nor is it an endorsement of their privacy or information security policies or practices. The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned. The Website provides this information as a reference for users. It is your responsibility to conduct your own investigation and make your own determination about any such product, service, coach, consultant, and/or expert.

# Third-Party / Affiliate Products and Our Site

Our Site may at present or in the future use the information you provide to us to recommend to you offers to products and services provided by third parties in exchange for a commission to be paid to us by such third parties. Should you opt to take part in such promotions, the third parties will receive your information.

As a policy, the Website will only affiliate with products, services, coaches, consultants, and other experts that we believe will provide value to our customers and followers. **The Website will expressly inform you when one of the links constitutes an affiliate link**. However, you acknowledge that it remains your personal responsibility to investigate whether any affiliate offers are right for you. You will not rely on any recommendation, reference, or information provided by the Website but will instead conduct your own investigation and will rely upon your investigation to decide whether to purchase the affiliate product or service.

## Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate in such as but not limited to Facebook, Instagram, and twitter, are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively. Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by email or phone.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

# Visitors' GDPR Rights

If you are within the European Union, you are entitled to certain information and have certain rights under the General Data Protection Regulation. Those rights include:

We will retain any information you choose to provide to us until the earlier of: (a) you asking us to delete the information, (b) our decision to cease using our existing data providers, or (c) the Website decides that the value in retaining the data is outweighed by the costs of retaining it.

You have the right to request access to your data that the Website stores and the rights to either rectify or erase your personal data. You have the right to seek restrictions on the processing of your data. You have the right to object to the processing of your data and the right to the portability of your data.

To the extent that you provided consent to the Website's processing of your personal data, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent.

You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the General Data Protection Regulation.

We require only the information that is reasonably required to enter into a contract with you. We will not require you to provide consent for any unnecessary processing as a condition of entering into a contract with us.

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our data processors' servers are located in a country outside of the EU. These countries may or may not have similar data protection laws to the EU. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this 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 EU, your information may be transferred outside the EU in order to provide you with those services.

The Website's GDPR representative is Amy Mulroy who can be reached at amy@crazytruth.org

## **Policy Changes**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### **Contact Us**

The Website welcomes your questions or comments regarding the Privacy Policy at amy@crazytruth.org.