



Privacy Policy

This is the Privacy Policy (Version 4.2) of Janaya Karloci Naturopath Pty Ltd, ABN 70 672 198 042. If you have any questions or need further information, please email Janaya Karloci: wellness@janayakarlocinaturopath.com.au.

I am committed to protecting your privacy, whether you are a contact, customer, supplier, contractor, or employee of mine.

This document describes how I collect and manage your personal and sensitive information when you interact with my business. I take this responsibility very seriously. If you have any questions or concerns about how your personal or sensitive information is being handled, please do not hesitate to contact me.

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

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, email address, mailing address, phone number and month of birth.
- the country that you live in.
- your opinion about future topics, products or services that may interest you.
- information relating to your personal circumstances relevant to my work and the ways I might support you.
- information that allows me to tailor my content to your needs when you sign up for one of my mailing lists, blogs, newsletters, free information, webinars, discounts, waitlists, or promotional events.
- your IP address, and information about your browsing history to help me improve the usability and appeal of my website (more information about this is found in the section on Cookies below).

- if you are an employee or contractor or propose working with me in that capacity, provide information about your qualifications, skills, and work experience.
- if you are a supplier or prospective supplier, information about your business skills, services, products, and prices.

I may collect and use your personal information to:

- respond to your enquiries.
- provide you with my products or services at your request.
- monitor or improve the use and satisfaction of my website, products, or services.
- share the latest news and developments relevant to my work.
- let you know about my expertise and products or services that may be of interest to you.
- order pathology reports
- order supplements

If you do not provide me with information when requested to do so, I may not be able to carry out your instructions or achieve the purpose for which the information has been sought. I rely on you to ensure the information you provide is accurate and complete.

I may, from time to time, send you my blog, newsletters, educational information, invitations, discounts, and updates about my services. I will only do so if you have requested to receive such communications through a single opt-in process. You can opt out of receiving any further such communications by clicking the “unsubscribe” option at the bottom of any marketing e-mail received from me.

Collection of Personal Information

Where practicable I will only collect personal information about you directly from you or sources managed by you. However, I may obtain personal information from a third party in some circumstances. If this information is obtained contrary to this Privacy Policy and the Privacy Act, I will destroy or de-identify such information within a reasonable period.

I may collect your personal information by various means including when:

- you contact me with a question, comment, or inquiry.

- you subscribe or sign up to my mailing list, waitlist, blog and/or newsletter.
- you attend a webinar, seminar, podcast, or event where I host or present.
- you correspond with me on a social media platform such as Facebook, LinkedIn, Instagram, or similar sites.
- you opt-in to receive a free or paid resource from me.
- you book a consultation or purchase a product or service from me.
- you complete my intake form.
- you share general information relating to your business or personal life.
- you provide me with a testimonial.
- I visit your website or social media profiles in preparation for working with you.
- my website automatically collects information about you and your activities on my site (including analytics and cookies; more information on this is set out below).
- a third-party supplies information to me, such as when you are referred or introduced to me by a mutual acquaintance.

I will only collect your 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 you request.
- if I am legally required to collect it.
- if collecting the information is necessary to preserve life or keep someone safe from harm.
- for necessary administrative processes if you become my client.
- if I believe 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 information is particularly sensitive and that you are trusting me to keep this information confidential.

The sensitive information I collect from you should you choose to work with me may include:

- your birth date
- your health information

- your personal and family medical history, including information about you and your family's past and current health, your pregnancies and birthing history, sexual history, STIs, any abuse or traumatic events that may be relevant and mental health.
- your financial data
- information about your diet, lifestyle, and relationships.

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

- through my intake form via "[My Appointments](#)" in preparation for your appointment with me.
- when you tell me in a consultation, in person, in a telehealth video consultation via "[My Appointments](#)" or "[Heidi Health](#)" or over the phone.
- when you send me information in an email (please note that email may not be sufficiently secure – if the information is extremely sensitive, ask me about alternative ways to share it with me).

The reason why I collect your sensitive information is:

- so that I can provide you with the services you have requested from me.
- to ensure that I am providing you with the most appropriate services.
- To ensure that I am recommending you the most appropriate products.\

Collection of Information from People Under 18

- All information collected from people under the age of 18 is classified as sensitive information.
- Where a client is under 18, I obtain written consent from a parent or legal guardian before care begins. I also seek the young person's own agreement to take part, in a way appropriate to their age and understanding.
- A parent or guardian is welcome to be present for all or part of a consultation. Depending on the young person's age and maturity, and with parental agreement, part of a consultation may be held with the young person alone so they can speak freely about their own health. What is discussed will be shared with their parent or guardian unless the young person asks otherwise and I consider it appropriate and safe to do so. I explain these arrangements to both the young person and their parent or guardian at the outset.

- Where a young person is able to understand the information and decisions involved, they may exercise their own privacy rights, including access to their records.
- A parent or legal guardian may also request access to a young person's records. Where the young person has that same understanding, I will discuss the request with them before releasing anything. I may decline a request, in whole or in part, where I believe disclosure would not be in the young person's interests or would put their wellbeing at risk. Requests are otherwise handled as set out in the Access to Information section below.
- All information collected from people under 18 is stored securely in accordance with this privacy policy.

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

- Sensitive information is stored on a password-protected computer and in password-protected devices with a high level of cybersecurity.
- Only I can access your sensitive information on a need-to-know basis.
- Your sensitive information may be stored securely online or in the cloud through the following platforms:
 - **My Appointments** — used for appointment booking, telehealth consultations and intake forms. Privacy policy: myappointments.app/privacy-policy
 - **Heidi Health** — used as the primary clinical documentation platform for storing clinical notes, session summaries, treatment plans and referral letters. Heidi Health is an Australian-founded platform with all data locally hosted in Australia. Compliant with Australian Privacy Principles (Privacy Act 1988). Certified to ISO 27001, ISO 42001 and SOC2 standards. Audio transcripts are not stored after transcription. Your data is never used to train AI models. Only your practitioner can access your session information. Privacy policy: heidihealth.com.au/privacy
- You can find out more about the security provisions of both platforms in the Security section below.

Use of Artificial Intelligence (AI)

As part of my commitment to providing comprehensive care, I use AI tools to support clinical documentation, research and treatment planning. I use two categories of AI tool, each with different data handling:

Heidi Health (heidihealth.com) — used as the primary clinical documentation platform. Heidi Health processes identified client information as part of the secure clinical record system. All data is locally hosted in Australia. Audio is not retained after transcription. Full compliance details are provided in the Security section below and in the client consent form.

Claude AI (Anthropic — claude.ai) — used for research assistance, clinical reasoning support and document preparation. When Claude is used, all personal identifying information is removed before entry. You are referred to by a client code only. Claude is used as a temporary working space and outputs are deleted after each session. Claude is never the sole basis for any clinical decision.

All clinical decisions are made solely by me as your practitioner based on my naturopathic training and experience. Full details of AI use in this practice are set out in the JKN AI Use Policy, available on request.

Disclosure of Information

I may disclose your information if required under the following circumstances:

- to provide you with the services you have requested.
- to send you products that you have purchased.
- to carry out your instructions, such as corresponding with someone else on your behalf
- to request pathology tests
- to recommend and/or order supplementation
- where I use support services to assist me in my business, such as a Virtual Assistant.
- to engage in professional discussions with other health practitioners for guidance, supervision or mentoring and for research, although any information I share under these circumstances is de-identified to preserve client confidentiality.
- to refer you to other service providers at your request

Who disclosures are made to

You consent to me sharing relevant information, on a strictly need-to-know basis, with:

- people you authorise me to correspond with, as reasonably required to carry out your instructions.
- my subcontractors.
- third-party providers who assist with
 - accounting
 - administration
 - archiving
 - auditing
 - business consulting
 - marketing
 - research and treatment planning resources
 - legal or financial advice
 - professional advice/supervision/mentoring
 - website maintenance
 - technological services
 - ordering products

LEGAL DISCLOSURE

I will also disclose your information if required by law in response to a subpoena, discovery request or a court order, in compliance with mandatory reporting obligations, or in circumstances permitted by the *Privacy Act* – for example, where I have reasonable grounds to suspect that someone is engaging in unlawful activity, or misconduct of a serious nature, that relates to my work with you. I may also make a disclosure to an appropriate authority if I have serious concerns about your health, safety or wellbeing.

DISCLOSURE OVERSEAS

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 with necessary business activities or the services I am providing to you. To the extent that I do share your information with third-party service providers, I only do so if I am satisfied that the service provider has a suitably protective privacy policy of their own, or they have signed a confidentiality agreement with me. Some of my service providers may be overseas and may

not be subject to Australian Privacy Laws. You can find further information under the Security section below.

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

Security

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

I manage risks to your information by:

- storing files securely on a password-protected computer.
- ensuring that only I 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. The following security policies may apply during our work together:

- My Appointments - <https://myappointments.app/privacy-policy/>
- Microsoft 365 [Microsoft Privacy Statement – Microsoft privacy](#)
- Heidi Health — <https://heidihealth.com.au/privacy> Clinical documentation platform. Australian data hosting. ISO 27001, ISO 42001 and SOC2 certified. Audio not retained. Data never used to train AI models. APP compliant.
- Flodesk - <https://help.flodesk.com/en/articles/3390453-data-processing-addendum>
- Go Daddy - <https://www.godaddy.com/en-au/legal/agreements/data-protection-security-standards>
- Facebook ads - <https://www.facebook.com/business/m/privacy-and-data>
- Stripe - <https://stripe.com/docs/security>
- Xero - <https://www.xero.com/au/security/>
- Vital.ly – https://www.vital.ly/q/privacy_policy
- Natural Script <https://naturalscript.com.au/privacy>
- Lateral Payment Solutions Pty Ltd (latpay) – <https://www.latpay.com/privacy-policy/>

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

- Facebook
- Instagram
- LinkedIn

If you are communicating with me via electronic means such as email, "[My Appointments](#)", Facebook, Instagram, LinkedIn or texting I may not have full control over the transmission or storage, or any personal information disclosed (although I try to employ best practice cybersecurity standards at all times). You agree that by participating in such forms of communication, you understand and accept that there is an inherent risk of disclosure or loss of your personal information for which I cannot be held responsible. If you are concerned about transferring particularly sensitive information, please ask me about alternative options that may be more secure.

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 session cookies used for optimising the speed and performance of the website as well as analytical cookies to track how my website is used.

I also 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 anytime. 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 to you within 30 days.

Retention and Destruction of Records

I retain your health records for as long as required by law, and for as long as they are needed for the purposes described in this policy.

Health records are generally kept for a minimum of seven years from the date of your last consultation or service.

Where you were under the age of 18 at the time of your last consultation, your records are kept until you turn 25 years of age.

Records may be retained for longer where required by law, where they are relevant to an actual or anticipated legal proceeding, or where you have asked me to keep them.

Once records are no longer required, I destroy or permanently de-identify them by secure means. Paper records are shredded. Electronic records are permanently deleted from all systems and backups where technically possible.

You may ask me at any time how long your records will be held.

Complaints

If a breach of this Privacy Policy occurs, or if you wish to request a change to your personal information, you may contact me by sending an email outlining your concerns to me at wellness@janayakarlocinaturopath.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 New South Wales using the information available at <https://www.ombo.nsw.gov.au/Making-a-complaint>

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.

Notification of Change

When I update my Privacy Policy, I will post a copy of the revised policy on my website.

V4.2 | August 2026 |

- Added Heidi Health as clinical documentation platform to the sensitive information storage section, AI tools paragraph and third-party security list. Updated AI tools description to reflect two-tool framework (Heidi Health for identified clinical records, Claude AI for de-identified research support).
- Replaced "Collection of Information from Minors" with expanded "Collection of Information from People Under 18" section, covering parental consent, the young person's own agreement, arrangements for consultations held with the young person alone, and the young person's privacy rights. Added parental access provisions and a new Retention and Destruction of Records section. Aligned with ANTA Practitioner Guidelines July 2025. | Janaya Karloci

Thank you.

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