

Privacy Policy

Last update: 20th of December 2022

This website is owned and operated by Kate L Keast as THRIVE FROM INSIDE NUTRITION [ABN 94714577646] and is available at: https://thrivefrominside.com.au/ and may be available through other addresses or channels.

If you have any questions or need further information, please contact:

Kate Keast at

Email: <u>hello@thrivefrominside.com</u>

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 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:

<u>Contact Details</u> such as your name and email address, address, age, relationship or marital status, occupation, mobile or phone number, the country and state that you live or any other information you choose to disclose via email, on forms or similar while we work together.

<u>Interests & Preferences</u> including your opinion about future topics, products or services that may interest you and your lifestyle.

<u>Interaction</u> includes information that allows me to tailor my content to your needs when you sign up for one of my discovery calls, consultations, webinars, workshops or promotional events.

<u>Internet:</u> I may collect 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.

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
- through the contact form, question or enquiry links
- by signing up to join a discovery call, consultations, webinar, workshops or promotional event either in person or online
- request to see testimonials
- when you become a client or customer and use our services or products
- undertaking a search or investigation, for social media or marketing
- when client referrals are received
- automatically, through the use of cookies

I use this information to:

- respond to your enquiries
- provide you with relevant news and updates about my services and products
- improve this website and the services and products I provide
- monitor visitor and customer satisfaction
- To improve upon what people understand and expect from my services
- To improve my products and services
- To assist to provide more relevant information

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 intake form using my booking and client platforms when you book an appointment
- by completing my client or workshop intake forms
- in a zoom consultation, face to face or over the telephone.
- when you send me information in an email
- from other medical practitioners or your doctor, health fund with your prior consent

The reason why I collect this 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

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

- your birth date
- gender
- contact details
- your medical history
- family medical history
- personal images you supply
- relationship or marital status
- details of dependants
- ethnicity
- symptoms, diagnosis and recommended treatment

- business information
- Medicare or private health fund details
- pathology or medical results
- your financial data
- information about your lifestyle, including diet and other related health or wellbeing information needed to assist me to deliver the requested service

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

Sensitive information is stored on a password protected computer. Only I the practitioner responsible for your treatment and authorised appropriate team members may access sensitive material. Some sensitive information may be stored securely online, or in the cloud through my client management software. You can find out more about their security provisions in the section on Security below.

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

Collection from Minors

- 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.

Destruction Policy

All archived sensitive information is securely destroyed after 7 years.

<u>Limitations</u>

You may choose not to provide me with your sensitive information. However, if you choose not to provide such information, which is accurate, honest and true I am limited as a practitioner to offer you individualised support and therefore 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 practitioner 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 or send you products that you have purchased.

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

Who disclosures are made to:

- My virtual assistant (VA), employees or treatment team members
- Communicate with referring medical practitioners or health providers
- Any emergency workers, such as paramedics or police officers, hospital staff
- External laboratories requesting analysis
- Accounts and billing, including Medicare and private health insurance companies
- Australia Post or courier companies
- My email marketing provider
- My insurer
- Third parties who from time to time assist managing our business with; archiving, audits, accounts and financial advice, legal team, website, business or technology teams.

Additional third parties may also include: parents, children and other relatives, guardians or a patient's power of attorney under Enduring Power of Attorney. To comply we require your written consent detailing that it is relevant and has reasonable grounds for your information to be shared amongst any such third parties. You can also request for us not to disclose your information to such third parties.

Legal Disclosure

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 someone is engaging in unlawful activity, or misconduct of a serious nature, that relates to my functions or activities, 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.

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 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. Please contact me if you have any concerns about the potential disclosure of your information.

Security

Policy Statement

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
- ensuring that only key personnel have access to sensitive information
- releasing information to service providers on a strictly need-to-know basis

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:

Third Party Storage

- Acuity https://help.acuityscheduling.com/hc/en-us/articles/219149587-Security-Privacy-Compliance
- Microsoft https://privacy.microsoft.com/en-gb/privacy
- Dropbox https://www.dropbox.com/security
- Facebook ads https://www.facebook.com/business/m/privacy-and-data
- Google Workspace https://workspace.google.com/intl/en_au/security/

- Mailchimp https://mailchimp.com/about/security/
- Mailgun- https://www.mailgun.com/legal/privacy-policy/
- Simple Clinic https://docs.simpleclinic.net/patient-privacy-policy/
- Squarespace https://www.squarespace.com/privacy
- Xero- https://www.xero.com/au/legal/privacy/
- Ezidebit- https://www.ezidebit.com/en-au/privacy-statement
- 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:

Combining Information

- Facebook
- Google Analytics
- LinkedIn
- Instagram
- your 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:

<u>Cookies</u> Our website uses "cookies", which are pieces of data that are stored on your hard drive containing details about your use of our website. Cookies do not provide us with information about you that can be used to identify you, rather, they anonymously track usage of our website, so that we can enhance users' experience of our website. You may elect to reject cookies and still use our website, however in doing so, you may be unable to access certain pages.

<u>Google Analytics</u> 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

<u>Access Procedure</u> 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 within 30 days.

Complaints

<u>Complaints Procedure</u> 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 hello@thrivefrominside.com.

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

Complaint to External Body

The Office of the Australian Information Commissioner using the information available at http://www.oaic.gov.au/privacy/privacy-complaints.

or

The Queensland Health Ombudsman at https://www.oho.qld.gov.au/make-a-complaint.

Notification of Change

Notification of Procedure

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.