



## Privacy Policy

All client records and information is treated confidentially and in accordance with legal and ethical requirements.

In accordance with the Australian Privacy Principles 2014 (Privacy Act 1988), the Personally Controlled Electronic Health Records Act 2012 and the Freedom of Information Act 1982, individuals have a right of access to health information held about themselves. Requests for access to client health information can be made by completing the Release of Information Form that will be made available by making a request for this using the 'Contact Us' section of this website. Evidence of identity of the person will be required.

We will not use or share your information with anyone except as described in this Privacy Policy. The use of information collected through use of our services shall be limited to the purposes under this Privacy Policy, and also our Terms of Use if you're a client or customer.

Organisations that guide our policies and Code of Ethics:

- a) Australian Privacy Principles
- b) Australian Natural Therapists Associations (ANTA) – Clinical Nutritionist
- c) Psychotherapy and Counselling Federation of Australia

Please read this Privacy Policy carefully. We reserve the right to change this Privacy Policy at any time without notice. In the event of a change to policy that affects how data is collected, stored or distributed, you will be notified via email if this affects any or all of your information in any way.

Use of any personal information or contribution that you provide to us, or which is collected by us on or through email or in person is governed by this Privacy Policy. By using our services, you consent to this Privacy Policy, whether or not you have read it.

## Information We May Collect

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, phone number. Users may, however, visit our Site anonymously. We



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will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

We collect personal information from you so that we can provide you with a comprehensive experience when using our services. During the initial stage of booking a consultation, we will collect the information necessary for us to fulfill our obligation to you. We may collect:

- a) A name, date of birth, email address, address, phone number – you would be affirmatively consenting to this by providing this information to us in our contact forms, via email or other communication means.
- b) Billing information including name, address and credit card information so that we can process payment to deliver products or services to you under our contractual obligation.
- c) A name and an email address if you complete our contact form with a question. We may send you emails if we believe we have a legitimate interest to contact you based on your contact or question.
- d) During consultations or services provided, we may collect personal information and data that you provide verbally or via other means of communication. By using our services, you consent that this information is freely provided by you and is for the purpose of fulfilling our obligation of service to you as a practitioner. This information may include your personal health and wellbeing history, health and wellbeing goals, health and dietary information, general feeling and emotions you have verbally provided as a record of your account of events.
- e) We may store or seek information regarding personal pathology or other medical information or results from health care providers with your consent. Please note that the information above (“Personal Data”) that you are giving to us is voluntarily, and by providing this information to us you are giving consent for us to use, collect and process this Personal Data. We will hold and store all client information collected for the minimum term outlined legally in accordance with policy and procedures of our registered membership organisation and Australian Practice Law.

### **How Information is Collected and Stored:**

- a) Information may be collected via personal communication when seeking the use of our services via email or other forms of communication.
- b) Information may be collected verbally in the form of your account of events or personal information.



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c) All information will be held in using secure filing databases such as Cliniko which holds and stores information on clients and client information securely.  
d) Any paper-based client records i.e. pathology results or referral letters are stored electronically through secure databases and the soft-copies returned directly to the client or destroyed securely in accordance with policy, procedures and law.

c) the purposes for which the entity collects, holds, uses and discloses personal information; (d) how an individual may access personal information about the individual that is held by the entity and seek the correction of such information; (e) how an individual may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds the entity, and how the entity will deal with such a complaint; (f) whether the entity is likely to disclose personal information to overseas recipients; (g) if the entity is likely to disclose personal information to overseas recipients—the countries in which such recipients are likely to be located if it is practicable to specify those countries in the policy.

## **What We Do with Information We Collect**

### **1. Contact You**

We may contact you with information that you provide to us based on these lawful grounds for processing:

- a) Consent. We may contact you if you give us your clear, unambiguous, affirmative consent to contact you.
- b) Contract. We will contact you under our contractual obligation to deliver goods or services you purchase from us.
- c) Legitimate Interest. We may contact you if we feel you have a legitimate interest in hearing from us. You will always have the option to opt out of being contacted via email.

### **2. Process Payments**

We will use the Personal Data you give to us to process your payment for the purchase of goods or services under a contract.

### **3. Form Treatment Plan and Treatment Decisions**

Information you provide assists to form the basis of treatment plan which is provided to you electronically after services provided.

## **Social Media Viewing of Information**

Note that whenever you voluntarily make your Personal Data available for viewing by others online through this Website or its content, it may be seen, collected and used by others, and therefore, we cannot be responsible for any unauthorised or improper use of the information that you voluntarily share (i.e.,



sharing a comment on a blog post, posting in a Facebook group that we manage, sharing details on a group coaching call, etc.).

## **Submission, Storage, Sharing and Transferring of Personal Data**

Personal Data that you provide to us is stored internally only or through a data management system. Your Personal Data will only be accessed by those who help to obtain, manage or store that information, or who have a legitimate need to know such Personal Data (i.e., employees of our company, organisations for the purpose of auditing our company processes).

## **Retaining Data**

We retain your Personal Data for the minimum amount of time necessary to provide you with the information and / or services that you requested from us in accordance with Australian legal obligations and organisation member policy and procedure. We may include certain Personal Data for longer periods of time if necessary for legal, contractual and accounting obligations.

## **Confidentiality**

We aim to keep the Personal Data that you share with us confidential. Please note that we may disclose such information if required to do so by law or in the good-faith belief that:

- (1) such action is necessary to protect and defend our rights or property or those of our users or licensees
- (2) to act as immediately necessary in order to protect the personal safety or rights of our users or the public
- (3) to investigate or respond to any real or perceived violation of this Privacy Policy or of our Disclaimer, Terms and Conditions, or any other Terms of Use or agreement with us.

## **How You Can Access and Request and Update to Information**

You have the right to:

1. Request information about how your Personal Data is being used and request a copy of what Personal Data we use.
2. Withdraw your consent at any time to the processing of your Personal Data. Please note if consent is withdrawn, this will pertain to any current or future information and past information that may have formed the basis of a treatment



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plan or prescriptive advice may be required legally to be stored in accordance with law for a period of time untouched.

3. Lodge a complaint with a supervisory authority if you feel we are using your Personal Data unlawfully. The supervisory authority for Clinical Nutrition is the Australian Natural Therapy Association.

4. Receive Personal Data portability and transference to another controller i.e. other health care practitioner or nutritionist without our hinderance upon your written request.

## **Security**

We take commercially reasonable steps to protect the Personal Data by using practitioner databases to provide you with security from misuse, disclosure or unauthorised access. That being said, we cannot guarantee your Personal Data will always be secure due to technology or security breaches. Should there be a data breach of which we are aware, we will inform you immediately.

## **Complaints of Breach of Privacy Policy**

Holistical You encourage clients to consult directly with the company in the first instance to in the hopes of resolving any matters of complaint. All complaints are taken seriously and an attempt to resolve the issue with transparency will be attempted in the first instance.

If after contacting Holistical You, you wish to lodge a complaint about breach of Privacy Principles, you should forward your complaint to the authorising body: Australian Natural Therapists Association

<https://www.australiannaturaltherapistsassociation.com.au/about/contact/>

## **Anti-Spam Policy**

We will not sell, rent or share your email address. We will not email you irrelevant or inappropriate email communications.

## **Disclosing to Overseas Entities**

We are not likely to disclose or share any information to overseas entities unless otherwise by your consent to a health care professional or other entity you have requested directly via written communication.

## **Third Party Websites**



**[www.holisticalyou.com.au](http://www.holisticalyou.com.au)**

We may link to other websites on our Website. We have no responsibility or liability for the content and activities of any other individual, company or entity whose website or materials may be linked to our Website or its content, and thus we cannot be held liable for the privacy of the information on their website or that you voluntarily share with their website. Please review their privacy policies for guidelines as to how they respectively store, use and protect the privacy of your Personal Data.

### **Children's Online Privacy Protection Act Compliance**

Collection of information from anyone under 18 years of age is made in compliance with COPPA (Children's Online Privacy Protection Act) and the GDPR (General Data Protection Regulation of the EU).

### **Notification of Changes**

We may use your Personal Data, such as your contact information, to inform you of changes to the Website or its content, or, if requested, to send you additional information about us. We reserve the right, at our sole discretion, to change, modify or otherwise alter our Website, its content and this Privacy Policy at any time. Such changes and/or modifications shall become effective immediately upon posting our updated Privacy Policy. Please review this Privacy Policy periodically. Continued use of any of information obtained through or on the Website or its content following the posting of changes and/or modifications constituted acceptance of the revised Privacy Policy. Should there be a material change to our Privacy Policy, we will contact you via email or by a prominent note on our Website.

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