



— Heart and Soul Transformations —

Privacy Policy

Introduction

Welcome! This website - www.vanessasumner.com - is owned and operated by me, Vanessa Sumner, under the registered business name, Heart and Soul Transformations (ABN: 60 027 135 305).

If you have any questions or need further information, please contact me via email: vanessa@vanessasumner.com.

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).

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

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 contact details, such as your name and email address when you opt into my newsletter,
- the country that you live in,

- your interests & preferences by way of an occasional survey, or a poll in my membership group,
- your opinion about future topics, products or services that may interest you,
- information that allows me to tailor my content to your needs when you sign up for one of my webinars or promotional events, and
- I may collect your IP address, and information about your browsing history to help me improve the usability and appeal of my website. This may include how you came to my site, the pages you visited and any products you have purchased, as well as general information about your browser and device.

Collection and Use

I may collect your personal information by various means including:

- an opt-in form for my mailing list,
- cookies,
- when you email me,
- when you fill in an intake form to purchase my services,
- when you sign up to attend, or attend a seminar, webinar or other event, either in person or online,
- when you respond to a request for a testimonial,
- when I research your web presence,
- when you become my client or purchase from me, and
- when my website automatically collects analytical information about you and your activities on my site.

I use this information to:

- provide you with relevant news and updates about my services,
- improve this website and the services I provide,

- respond to your enquiries and provide you with specific services at your request,
- monitor the satisfaction of my website visitors and clients,
- to help other people understand my services better,
- to provide more relevant information in my articles and videos, and
- to provide news about my products and services.

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, or
- if I believe that I can demonstrate a legitimate interest in using your data for marketing purposes, although I will not initiate contact without your express consent and will always give you a choice to opt out.

Sensitive Information

I understand that some personal information is particularly sensitive.

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

- by sending you a Health and Wellbeing intake form,
- 1:1 through Zoom or Skype, or
- when you send me information in an email (please do not use Facebook messenger for sensitive information, or
- when you share in my closed Facebook membership group (remembering that other members will also see your post, so please consider this before sharing very sensitive information.)

The reason why I collect this information is:

- so that I can provide you with the services you have requested, because it allows me to see where your physical, emotional, mental and spiritual health is, to assess what priority areas we need to cover in our session, and
- 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 medical and health history,
- your emotional and spiritual wellbeing,
- an overview of your current circumstances, and
- some details about your family and living arrangements.

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

Sensitive information is stored as:

- handwritten session notes in a locked filing cabinet in my office,
- electronic files on a password protected computer,
- audio file backups on a secure external drive, and
- emails on password protected mobile devices.

Only I may access sensitive material, although it may be shared with my VA on a strictly need to know basis.

Some sensitive information contained in session audios may be stored securely online, or in the cloud through DropBox. You can find out more about their security provisions here: <https://www.dropbox.com/security>.

Sensitive information may be collected from children under the age of 18 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 after 7 years.

Professional Considerations

You may choose not to provide me with your personal information. However, if you choose not to be completely honest with me, I may not be able to fully provide you with the services that you request.

Use of Personal Information

Reasons why I may disclose your personal information include:

- where disclosure is required to carry out your instructions,
- to provide you with the services you have requested,
- to send you products that you have purchased,
- when using support services, such as a VA, or
- with your permission when making a referral to another practitioner.

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

- my virtual assistant (VA),
- Australia Post, or courier companies I may use,
- my email provider and email marketing provider, and
- third party providers including:
 - services who assist me with archiving,
 - my accountant,
 - my lawyer,
 - my business consultant or mentor,
 - my website technician, and
 - technology services.

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 unlawful activity, or misconduct of a serious nature, that relates to my 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 me to discuss this personally.

I will use all reasonable means to protect the confidentiality of your personal information while in my possession or control. I will not knowingly share any of your personal information with any third party other than the service providers who assist me in providing the information and services I am providing to you. To the extent that I do share your personal information with a service provider, I would only do so if that party has agreed to comply with our privacy standards as described in this privacy policy, or where I have confirmed that they have a similar policy. However, some of my service providers may be overseas and may not be subject to Australian Privacy Laws or compliant with GDPR. Please contact me if you have any concerns about the potential disclosure of your information.

Security

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

I manage risks to your personal information by:

- storing files securely,
- ensuring that only I have access to sensitive information,
- releasing information to service providers on a strictly need-to-know basis, and
- conducting regular audits of my 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:

- Dropbox – <https://www.dropbox.com/security>
- Mailchimp – <https://mailchimp.com/about/security/>
- Outlook Express – <https://privacy.microsoft.com/en-gb/privacystatement>
- Skype – <https://support.skype.com/en/skype/all/privacy-security/>
- Woocommerce – <https://woocommerce.com/gdpr/>
- Zoom – <https://zoom.us/docs/doc/Zoom-Security-White-Paper.pdf>

Access to Information

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 you within 30 days.

Please begin the process by sending an email requesting access to your information to me at vanessa@vanessasumner.com and I will endeavour to respond within 48 hours.

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 me by sending an email outlining your concerns to me at vanessa@vanessasumner.com and I will endeavour to respond within 48 hours.

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>.

Notification of Change

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.

Thank you for taking the time to read this Privacy Policy. I look forward to supporting you on your Journey.

Gratitude, Grace and Love - Vanessa Sumner.