Website Privacy Policy

Welcome! The websites [www.healthwithoutshame.com](http://www.healthwithoutshame.com) and www.suzanneculberg.com are owned and operated by me - Suzanne Culberg, ABN 51423252821. If you have any questions or need further information, please contact me at info@suzanneculberg.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 - Collection and Use

If you engage with me via this website, or choose to become my client I may ask to collect personal information from you, including:

* your name and email address when you opt into my email,
* further contact details such as your phone number and home address if you choose to work with me,
* information about your interests & preferences, such as your opinion about future topics, products or services that may interest you, diets that you have tried before, your exercise habits, and your thoughts and beliefs about reaching your goal weight,
* information that allows me to tailor my content to your needs when you sign up for one of my webinars or promotional events,
* information that is gathered by Google Analytics, such as your IP address, and information about your browsing history to help me improve the usability and appeal of my website,
* information that you share with me during target market research, such as where you hang out online, what websites, FB groups and social media platforms you enjoy, and how you found out about me, and
* information that you choose to share when you make a comment on my blog posts.

I may collect this information when you:

* answer a question or fill in an inquiry or contact form,
* email me, message or text me, or book a call with me,
* participate in a membership call,
* subscribe to my newsletter or request me to send you an opt-in,
* sign up to attend a seminar, webinar or event that I am presenting,
* respond to my request for a testimonial,
* become a client or purchase a product or service from me, or
* you are referred to me by PH360.

I use this information to:

* respond to your enquiries,
* provide you with services that you have requested,
* monitor visitor and client satisfaction,
* ensure that the information I provide is relevant and useful,
* provide you with relevant news and updates about my services,
* help other people understand my services better,
* improve this website and the services I provide, and
* share useful information relevant to a weight release journey with you.

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 or client data management purposes, because you have given me permission to do so, although I 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:

* face to face during online calls in our zoom consultations,
* when you send me information in an email, text message or as a Facebook message, or
* if you choose to share information with me in my Facebook group or on membership calls (although please take care for your own safety and wellbeing, and consider carefully what sensitive information you choose to share in a group environment.)

The reason why I collect this information is:

* so that I can provide you with the services you have contracted for,
* to ensure that I am providing you with the most appropriate services,
* to answer any questions you have about my services or your weight release journey, and
* to give me background context so that I can better assist you.

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

* your date or birth,
* your health and medical history,
* details about your family and relationships,
* information about your lifestyle, including exercise, eating and sleeping habits,
* your goals and dreams, and what you feel is stopping you from achieving them, and
* your attitudes, self-esteem, fears, doubts and worries.

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

* All sensitive information, such as my consultation notes, are stored on a password protected computer to which only I have access, or in Google Drive. You can find out more about Google Drive’s commitment to security here: https://policies.google.com/privacy
* I do not take any handwritten notes from which you could be identified in any way.
* I do not record our zoom consultations.
* Anything you choose to share in the FB membership group is saved in that membership group. I do not share any of your posts outside the group, and the rules of the group emphasise the need for confidentiality and respect for the privacy of members.
* Membership calls are recorded, and are saved to my password protected Dropbox account. The link is only made accessible to other members, and all members are instructed not to share it.

I do not collect sensitive information from children under the age of 18.

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 provide you with the services that you request. This includes providing me with misleading information about your habits or lifestyle choices. Our consultations are a judgment free zone. I will not criticise your choices or think less of you because of them, but if you are not completely honest with me then I can’t support you in being honest with yourself or help you to achieve your goals.

# Sharing your Information

Reasons why I may disclose your personal information include:

* where the disclosure is necessary to carry out your instructions to me,
* to provide you with goods or services that you have requested,
* where it is necessary for the administration of my business, and
* with your permission, such as where you have provided me with a testimonial.

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

* my virtual assistant (VA),
* my email marketing provider,
* my accountant or bookkeeper,
* my lawyer,
* my business consultant or coach,
* my website maintenance team,
* those assisting me with technology services, or
* Australia Post or courier companies.

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/or 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 my privacy standards as described in this privacy policy or who has publicly stated their commitment to protecting your privacy. However, some of my service providers may be overseas and may not be subject to Australian Privacy Laws or compliant with GDPR. This includes Gmail and Google Drive, Dropbox, Outlook, Active Campaign and Kartra. 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 all files and consultation notes 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/our 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:

* Gmail and Google Drive: https://policies.google.com/privacy
* Dropbox: https://www.dropbox.com/privacy
* Outlook: https://privacy.microsoft.com/en-ca/privacystatement
* Active Campaign: https://www.activecampaign.com/privacy-policy
* Kartra: https://home.kartra.com/privacypolicy
* Zapier: https://zapier.com/privacy/

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

* Facebook groups,
* Google Analytics, and
* personal contact.

If you do not wish this to occur, please contact me.

# 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 info@suzanneculberg.com and I will endeavour to respond within 7 days].

# **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 info@suzanneculberg.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.