

# Privacy Policy for Sandy Vaile

Sandy Vaile (the “Organisation”) is committed to protecting the privacy of its users and customers in line with the Australian Privacy Act 1988, and international privacy legislation, with the objective of fostering transparent information handling practices and business accountability.

## 1. DEFINITIONS

- a. Communications – May include email, automated and electronic notifications, phone calls, regular mail, newsletters, and text messages.
- b. Non-Personal Information - Includes information that cannot reasonably be used to identify an individual, e.g. anonymised data, website usage data, general demographic information, referring/exit website URLs, platform types, your device type, the time and date of access, navigation pathways, preferences generated based on the way you use the Organisation’s website sites.
- c. Organisation - Refers to the business registered as Sandy Vaile, it’s directors and employees, and the terms “we,” “us,” and “our” in this policy.
- d. Personal Information - Includes information or an opinion about an individual that can be reasonably used to identify them (directly or indirectly), e.g. name, address, email, purchase details identification number, preferences you submit, location, login information, time zone, online identifier, and Product/Service reviews.
- e. Product/Service - Refers to the Organisation’s goods and services, which can be accessed via the Organisation’s website, or through unaffiliated sites, e.g. Amazon.
- f. Sensitive Information - Refers to information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions and offences, information about your health and genetic and biometric data, or your opinions about these things.
- g. Third Party(ies) – Refers to the vendors, websites, applications, programs, products, and services provided by organisations that are not controlled by the Organisation, but are utilised in order to provide professional products and services. The Organisation may have a direct business relationship with these companies, or an association through general use.
- h. User - Any person (also referred to as “You” and “Your”) who accesses or uses the products, services, websites, applications, partner or unaffiliated sites associated with the Organisation. By using or purchasing the Products/Services, you represent that you are a consenting adult.

## 2. SCOPE OF THIS POLICY

This Privacy Policy applies solely to information collected by the Organisation as part of legitimate business activities, and is designed to help you understand what information we gather, how we use it, what we do to protect it, and to assist you in making informed decisions when using our products, services and websites.

Unless otherwise indicated below, this Privacy Policy applies to all of the Organisation's products, services, websites ([www.sandyvaile.com](http://www.sandyvaile.com) and Thinkific), applications, and data the Organisation may collect from Third Party.

We will only use your Personal Information for the purposes it was collected for, for reasonable business use, and to comply with legal requirements.

This Privacy Policy does not apply to your use of Third Party websites and application, whether or not they were accessed via our websites.

### **3. CONSENT**

Each time you voluntarily provide information to access or use the Products/Services, create an account, or subscribe to our newsletter, you agree that you are consenting to receive communications from the Organisation in relation to those Products/Services.

By accessing the Organisation's Products/Services or website, you accept our Privacy Policy, and consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

In addition, by using our Products/Services via Third Party sites, you are accepting the policies and privacy practices of those sites/companies.

### **4. INFORMATION WE COLLECT**

The Organisation may collect both Non-Personal Information and Personal Information about you, to ensure the efficient operation of the business, to administer and protect our business interests maintenance of our Products/Services, to provide you with relevant information about our business activities, Products/Services, and marketing, to respond to your enquiries and communications, to ensure your security whilst using our websites, to back-up records and information, and to analyse general statistics to enable business growth, efficiency and marketing strategies. We may also collect Personal Information that is publicly available.

We use this information in order to provide the Products/Services and sites, as part of legitimate business activities, to ensure relevant content and marketing is provided to you, to ensure the security and maintenance of our websites.

Information may be stored in digital or hardcopy format.

#### **4.1. Personal Information**

Personal Information is used to enable business transactions as requested by you, including a purchasing contract, to provide relevant content and marketing to you, to maintain records as required to comply with Australian law, to operate a legitimate business, to notify you of changes to this Privacy Policy, and to establish, pursue or defend legal claims.

The Organisation collects Personal Information you when it is provided by you, e.g. when subscribing to a newsletter, completing a contact form, purchasing a Product/Service, or participating in market research. When you provide us with Personal Information, you consent to us collecting and using it for the purpose it was collected, or a reasonably compatible purpose.

The Organisation may receive Personal Information from Third Parties, in relation to your use of their sites, programs, products or services.

#### **4.2. Non-Personal Information**

Non-Personal Information enables the Organisation to record User preferences and optimise the User experience when utilising our Products/Services and websites. It is collected on an individual and aggregate basis, to improve our Products/Services, customize the user experience, and to understand the effectiveness of our marketing activities.

This Privacy Policy does not limit in any way the Organisation's use or disclosure of Non-Personal Information, and we reserve the right to use and disclose such data to our partners, advertisers and other Third Parties at our sole discretion.

Non-Personal Information is collected automatically when you access or use its website, social media or Third Party sites, via web browsers. We track this information using both persistent and session cookies, or small text files, which include an anonymous unique identifier.

Cookies are sent to a User's browser and stored on the User's computer hard drive. If you choose to disable cookies, some parts of our Products/Services or websites may not work properly.

#### **4.3. Sensitive Information**

The Organisation does not collect any Sensitive Information about you.

#### **4.4. Third Parties**

The Organisation's websites and social media sites may contain links to Third Party websites, plug-ins, and applications. Although we impel Third Parties to comply with international privacy legislation, we are not responsible for the content or privacy practices of those sites. We encourage Users to read the privacy policies of other sites before using them.

Examples of Third Party sites the Organisation is not responsible for:

- Social media platforms like Facebook, Twitter, Instagram, Pintrest, and Linked In.
- YouTube where training and information videos are stored and displayed.
- Sellers of the Organisations Products/Services like Amazon, Apple, Simon & Schuster US.
- Institutions utilised to process payment for Products/Services, including banks, Paypal, and Swipe.
- Third Party applications.
- Search engines like Google and Chrome.
- Government bodies and other authorities.

Third Parties who provide products or services to the Organisation, which enable us to provide you with requested Products/Services, will only collect, use and disclose your information to the extent necessary to allow them to provide the product or services to the Organisation. They may have their own privacy policies, which we recommend you read in order to understand how they will handle your Personal Information.

Examples of Third Parties who may provide product or services to the Organisation are:

- Mail Chimp to administer newsletters.
- Thinkific training platform.
- Weebly website host.
- Professional advisers.
- Third Parties to whom we sell, transfer or merge part of our business or assets with.

## **5. COMMUNICATIONS**

Communications that you send to the Organisation, no matter how they are sent, may be retained for legitimate business record keeping.

The Organisation may use the Personal Information you have provided, to send you administrative and/or promotional communications. We may communicate with you by email, phone, text, messaging, social media, or regular mail, according to your preferences and business practicalities.

### **5.1. Administrative Communications**

You will not be able to opt-out of administrative communications like:

- Business announcements, e.g. changes to this Privacy Policy, contact details, or interruption to services.
- Information about Products/Services you have purchased or subscribed to, e.g. new features, amendments, purchase details.
- Responses to your enquiries.
- Contacting you in order to manage your accounts and subscriptions.

### **5.2. Promotional Communications**

The Organisation is entitled to send you promotional communications if you have made a purchase, asked for information about our Products/Services, or subscribed to any of our newsletters or groups operated by us.

Promotional communications may include:

- Opt-in confirmations for newsletter subscriptions.
- Products/Services information, e.g. new or changed Products/Services.
- Offers, e.g. sales, discounts, bundles, competitions, and give-aways.
- Information about complimentary products or services that you may be interested in.
- Invitations to participate in marketing surveys, join groups operated by the Organisation, or take action on social media.

You may opt-out of communications you have subscribed to, by choosing the “unsubscribe” link at the bottom of emails, or requesting to be removed from the mailing/marketing list in writing. (See the “Contact Us” section of this policy.) Opting-out does not affect your Personal Information collected and used by the Organisation, as a result of other transactions, e.g. purchases, business communications, registrations or guarantees.

## **6. SHARING INFORMATION**

The Organisation will not sell, trade or rent your Personal Information.

The Organisation may share your Personal Information with Third Parties who provide products or services to enable the Organisation to operate effectively, and to provide you with the Products/Services requested by you.

We require those Third Parties to utilise your Personal Information in line with the “Third Parties” section of this policy, which includes complying with international privacy legislation.

In addition, we may disclose your Personal Information if required to do so by law.

### **6.1. Request To Transfer Personal Information**

You have the right to request the transfer of your Personal Information to a Third Party, and will not be charged for this service. However, we may charge a reasonable fee or refuse to comply with your request, if your request is clearly unfounded, repetitive or excessive.

We may need to request specific information from you in order to confirm your identity and ensure your right to access the Personal Information, to ensure it is not disclosed to an unauthorised person.

Where you have requested a data transfer, but the Organisation cannot confirm that the Third Party is compliant, your explicit consent may be required.

We try to respond to legitimate requests within one month; however, it may take longer if your request is particularly complex, you have made a number of requests, or we need to request information from a Third Party.

## **7. INFORMATION SECURITY**

You are responsible for keeping any login passwords associated with the Organisation’s Products/Services secure. The Organisation allows access to your Personal Information by our employees and business partners who have a legitimate need to access it.

Your Personal Information is stored in a manner that reasonably protects it from misuse, loss, unauthorised access, modification or disclosure. However, these measures do not guarantee that your Personal Information will not be accessed, disclosed, altered or destroyed by breach of such precautions. By using our Products/Services and websites, you acknowledge that you understand and agree to assume these risks.

If your Personal Information is breached, we will take reasonable measures to re-secure or retrieve the information, to notify you within a reasonable timeframe, and report the breach to the relevant authority within three days of the breach being noticed.

## **8. INFORMATION RETENTION**

The Organisation will only retain Personal Information for as long as necessary to fulfil the purposes we collected it for, and for legal compliance.

When your Personal Information is no longer needed for the purpose it was collected for, and after retention periods required by law, e.g. taxation reporting, the Organisation will take

reasonable steps to destroy or permanently anonymise it. Anonymised data may be held and utilised for statistical purposes indefinitely, without further notice to you.

## 9. MERGER OR ACQUISITION

In the event the Organisation undergoes a business transaction such as a merger, acquisition, or sale of all or a portion of our assets, your Personal Information may be among the transferred assets. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and any acquirer may continue to process your Personal Information as set forth in this Privacy Policy.

## 10. YOUR RIGHTS

You have the right to:

- Ask who your Personal Information is disclosed to.
- Request a copy of your Personal Information, which is held by the Organisation.
- Request the correction, restriction or transfer (also see the “Request To Transfer Personal Information” section of this policy) of your Personal Information, which is held by the Organisation.
- Ask us to delete your Personal Information, excepting records that must be maintained for legal compliance, or that are anonymised.
- Withdraw your consent for the Organisation to collect, store, use or disclose your Personal Information (excepting records that must be maintained for legal compliance), to unsubscribe from newsletter subscriptions, and to prevent us from contacting you for marketing purposes.

The Organisation will respond to such requests without undue delay, and within one month.

If you wish to exercise any of these rights, refer to the “Contact Us” section of this Privacy Policy. We will take reasonable steps to action your requests in a timely manner.

### 6.2. Complaints

If you are not happy with any aspect of how we collect or use your Personal Information, please contact us, so we can attempt to resolve the issue. You also have the right to complain to the Office of the Australian Information Commissioner ([enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)), or equivalent in the country you reside.

## 11. CHANGES TO THIS POLICY

The Organisation reserves the right to change this Privacy Policy at any time. Changes become effective once posted on our website here: <http://www.sandyvaile.com/contact.html>

While the Organisation will take reasonable steps to notify current Users of its newsletters, Products/Services of changes, via this website and newsletter, it is your sole responsibility to check this website from time to time to view any such changes.

Your continued use of the Organisations Products/Services and websites will constitute your acceptance of the changed Privacy Policy. If you do not agree to the changes, you must cease access to the Organisation's websites.

## **12. CONTACT US**

If you have any questions regarding this Privacy Policy, the practices of the Organisation, or wish to withdraw your consent for the continued collection, use or disclosure of your Personal Information, please contact: Sandy Vaile via the contact form at <http://www.sandyvaile.com/contact.html>

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