



Website Privacy Policy

Introduction

Hi there! This website, www.samanthagemmell.com is owned and operated by Samantha Gemmell (ABN: 46 307 231 471). If you have any questions or need further information, please contact me at:

hi@samanthagemmell.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:

- **Contact details** – including your name and email address when you opt into my email
- **Interests & preferences** – including your opinion about future topics, products or services that may interest you

- **Internet** – data gathered by Google Analytics such as pages browsed to improve the usability and appeal of the website. This can be opted out of using a browser extension such as <https://tools.google.com/dlpage/gaoptout>
- **Any other information you disclose via email or contact forms**

Collection and Use

I may collect your personal information by various means including:

- Direct emails from you
- Contact form
- An opt-in form for my mailing lists
- My website automatically collecting information about you and your activities on the site
- Directly when you become a client
- Recording of sessions via Zoom – zoom.us/privacy

I use this information to:

- Provide you with relevant news, articles and updates about my services
- Improve this website and the services I provide
- Offer you the best service I can

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

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:

- In a Zoom consultation
- When you send me information in an email

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 best care possible.

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

- Your medical history
- Your birth date
- Your business details

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

Sensitive information is stored on a password protected computer. Only I may access sensitive material. Some sensitive information 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/privacy>

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

As a health professional, I have a number of regulations I choose to abide by, including:

- Maintaining confidentiality except with explicit consent, when required by law or there is serious risk to the client or another person
- Provision of records to the client and their practitioners if requested

You may choose not to provide me with your personal information. However, if you do not provide us with accurate personal information, I may not be able to provide you with the best service possible.

Introduction Use of Personal Information

Reasons why I may disclose your personal information include:

- To provide you with the services you have requested

In order to do this, I may share some relevant personal information - on a strictly need to know basis – with third parties such as email marketing providers, website professionals and legal professionals

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 our privacy standards as described in this privacy 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 will 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

As mentioned above, your personal information may also be stored with a third-party provider, where it will be managed under their security policy:

- Mailchimp - <https://mailchimp.com/about/security/>

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

- Facebook
- Google Analytics
- 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 hi@samanthagemmell.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 hi@samanthagemmell.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.