# PRIVACY POLICY

LYNETTE FAY CANNON trading as SOUL SOURCE WISDOM (ABN 45 583 604 752) (Soul Source Wisdom, I, me, my) is committed to protecting the privacy of your personal information collected including when you access Soul Source Wisdom's website, membership to Materials and Services, through Soul Source Wisdom's business operations or directly from you.

Please read this Privacy Policy carefully and if you have any questions, contact Soul Source Wisdom as set out below.

By providing me with your personal information, you acknowledge that you have read and accepted this Privacy Policy and consent to the collection, storage, use and disclosure of your personal information as outlined below.

## 1. TYPES OF PERSONAL INFORMATION

I collect the following types of personal information:

- 1.1. identity and contact information, including your name, email addresses, billing and delivery addresses, telephone numbers;
- 1.2. profile data including your passwords, preferences, interests, purchases, survey responses;
- 1.3. social media information;
- 1.4. technical data (including your internet protocol address, login data, browser type and version, time and zone setting and location, browser plug-in types and versions, operating system and platform, other technology on your devices that you use to access my website, membership to Materials and Services);
- 1.5. usage data (including information about how you use my website, membership to Materials and Services);
- 1.6. marketing and communications data.

# 2. HOW I COLLECT PERSONAL INFORMATION

- 2.1. I collect your personal information when you make an enquiry with me (for example, by telephone, email, contact form) or when you sign up for membership to Materials and Services from me.
- 2.2. I use lawful and fair means to collect your personal information in the following ways:
  - 2.2.1. you provide it to me;
  - 2.2.2. you authorise third parties to provide it to me;
  - 2.2.3. other parties provide it to me either voluntarily or pursuant to compulsory processes I conduct on your behalf.
- 2.3. Third parties may also use cookies, web beacons and similar technology to collect or receive information from my website or from you and from elsewhere on the internet and use that information to provide measurement services and targeted advertising (such as the Facebook pixel, Google Analytics and AdWords). If I receive your personal information from third parties, I will protect it as set out in this Privacy Policy.
- 2.4. I will destroy or de-identify information where I form the opinion that your personal information has been provided to me unlawfully or unfairly.

## WHY I COLLECT, STORE, USE AND DISCLOSE PERSONAL INFORMATION

- 3.1. I will collect, hold, use and disclose your personal information as is reasonably necessary for me to perform my core functions and activities including:
  - 3.1.1. to contact and communicate with you;

- 3.1.2. to provide membership to Materials and Services to you;
- 3.1.3. to maintain a database of clients, subscribers or similar;
- 3.1.4. to market to you and others, including remarketing (this may involve the use of a Facebook pixel or similar technology to allow me to display my advertising to you elsewhere on the internet, for example, on Google or Facebook);
- 3.1.5. for internal record keeping;
- 3.1.6. for statistical purposes;
- 3.1.7. as required by law or a court order.
- 3.2. If I disclose your personal information to third parties for these purposes, I will do my best to ensure that their privacy policy adheres to similar standards of privacy protection and/or request that the third party follow this Privacy Policy regarding handling of your personal information. I will also ensure that your personal information I disclose is accurate, up-to-date, complete and relevant.
- 3.3. I will not use or disclose your personal information for the purpose of direct marketing unless you have consented to the use or disclosure of your information for that purpose.
- 3.4. I will not disclose your personal information for any purpose other than the purpose for which it was collected without your consent, unless I am required to do so by law or court order.

## 4. USE OF COOKIES

A cookie is a small text file that is placed on your computer to help me remember your preferences, like your login information or location. I use cookies to make it easier and faster for you to use my website. I also use cookies for security purposes to protect you online. Third party vendors and I may also use cookies to display advertisements to you elsewhere on the internet.

#### 5. LINKS TO OTHER SITES

To help you find more information, I may include links to other helpful websites, plug-ins or applications to which you may be directed from my website. This Privacy Policy only applies to information that I collect on my website. Clicking on those links or enabling those connections may allow third parties to collect or share personal information about you. I ask that you read the privacy policy/notice on other websites you visit. I do not accept responsibility or liability for the privacy practices of such third parties and you use them at your own risk.

# 6. HOW YOU CAN ACCESS AND CORRECT YOUR PERSONAL INFORMATION

- 6.1. **Access:** You can request details of your personal information that I hold. I will respond to any request to access information within a reasonable time.
- 6.2. **Correction:** If you believe your personal information that I hold is inaccurate, out of date, incomplete, irrelevant or misleading, please contact Soul Source Wisdom as set out below. I may require evidence that your personal information is required to be corrected. I will then correct that information and notify you of the correction, unless it is impracticable or unlawful to do so.
- 6.3. **Deletion:** If you want me to delete your personal information that I hold or not collect information from you for a specific purpose, please contact me as set out below. If I agree to delete your personal information, because of backups and records of deletions, I cannot guarantee the complete deletion of your personal information without retaining some residual information.
- 6.4. I will respond to any request to access, correct or delete information within a reasonable time.

## 7. HOW I MAINTAIN THE SECURITY OF YOUR INFORMATION

- 7.1. I commit to ensuring your personal information is stored securely and protected from misuse, interference, loss and unauthorised access, modification or disclosure. I undertake the following precautions to protect your personal information:
  - 7.1.1. My website contains pages encrypted with SSL (Secure Sockets Layer) to ensure the safety of any data that is submitted through use of my website.

- 7.1.2. I limit access to your personal information to a "need-to-know" basis.
- 7.1.3. I protect devices I use to collect, store, use and disclose your personal information with industry-standard anti-virus software.
- 7.1.4. My devices are protected by password and are stored in secure premises.
- 7.1.5. Data is securely stored on cloud servers.
- 7.1.6. My email data is encrypted.
- 7.1.7. All hard copies of your personal information are kept in secure storage with access by authorised persons only.
- 7.1.8. If I no longer need your personal information, I will take reasonable steps to delete or de-identify the information.
- 7.2. While I take commercially reasonable measures to maintain a secure website and business, electronic communications and databases are subject to errors, tampering and break-ins, and thus I cannot guarantee or warrant that such events will not take place. I will not be liable to you for any such occurrences. If a data breach occurs involving your personal information and the breach is likely to cause harm to you, I will notify you as soon as possible after the occurrence.

# 8. DO YOU LIVE IN THE UNITED KINGDOM (UK) OR EUROPEAN ECONOMIC AREA (EEA)?

I am committed to looking after my clients in the UK and EEA. I will comply with the UK and EEA General Data Protection Regulation (GDPR) for the protection of your personal data.

#### 9. WHAT IS PROCESSING?

Processing is any operation performed on personal data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### 10. WHO IS A CONTROLLER?

I am the controller who determines how and why your personal data is processed.

## 11. MY COMMITMENT

The personal data I collect is:

- 11.1. processed lawfully, fairly and transparently;
- 11.2. collected for the specified, explicit and legitimate purposes including creating my mailing list, direct marketing, taking payment and getting my Materials and Services to you;
- 11.3. adequate, relevant and limited to what is necessary for my purposes;
- 11.4. accurate, and where necessary, kept up to date (we will take every reasonable step to ensure that inaccurate personal data is erased or rectified without delay);
- 11.5. not stored than for longer than is necessary; and
- 11.6. processed in a manner that ensures appropriate security of the personal data.

## 12. YOUR CONSENT

- 12.1. I seek your consent to processing your personal data for the purpose of creating your membership, my mailing list, marketing, taking payment and distribution of Materials and Services to you.
- 12.2. You give me consent to process your personal data. You can withdraw that consent at any time by sending an email to lynette@soulsourcewisdom.com. If you ask me, I will stop using your personal data.

## 13. HOW SOUL SOURCE WISDOM WILL WORK WITH YOUR PERSONAL DATA

13.1. Who is the controller of your personal data? Soul Source Wisdom. Privacy contact: Lynette Fay Cannon.

- 13.2. Who is the processer of your personal data? Soul Source Wisdom, MemberSpace and Stripe.
- 13.3. What are the purposes for processing your personal data? Creating membership, mailing list, direct marketing, taking payment and getting my Materials and Services to you.
- 13.4. What is the legal basis for processing the personal data? Where I have collected data from you for direct marketing purposes, the legal basis is your freely given, informed and explicit consent, which you have given by accepting this Privacy Policy knowing that you can withdraw it at any time. I have contracted with MemberSpace for membership to my Materials and Services. I have contracted with Stripe to take payment for my Services. If I have collected data from you other than pursuant to an engagement or your consent, I have collected that data to facilitate pursuing my legitimate business interests.
- 13.5. **Will your personal data be transferred to facilities in a third country** Yes MemberSpace and Stripe collect and store your personal data on servers in the United States of America.
- 13.6. **How long will your personal data be stored?** I, MemberSpace and Stripe store all order and client information for as long as is necessary for our legitimate business purposes including to deliver my Materials and Services, contact you for marketing purposes and facilitate your use of my website and purchasing system.

#### 14. YOUR RIGHTS

- 14.1. You may request access to, rectification or erasure of your personal data, restriction of processing or object to processing for automated decision-making. You also have the right to data portability. We may request a reasonable fee to process a data portability request that is manifestly unfounded or excessive, based on the administrative costs of complying with the request. We will inform you if we require payment of a fee. If you have such a request, please send an email to lynette@soulsourcewisdom.com.
- 14.2. You have the right to lodge a complaint with a supervisory authority in the UK or EU member state where you live or work. However, I ask that you first raise any complaint with me and I will endeavour to resolve it to your satisfaction.
- 14.3. Is there automated decision making (including profiling)? Any automated decision making would only relate to decisions necessary for me to perform my Services for you. I may also utilise LinkedIn, Facebook and Instagram advertising services, which may utilise automated decision making. Please refer to their privacy statement for more information. I am not affiliated with or sponsored by LinkedIn, Facebook or Instagram.

## 15. HOW YOU CAN MAKE A COMPLAINT ABOUT PRIVACY BREACH

If you believe that I have breached this Privacy Policy and you want to make a complaint about that breach, please contact me as set out below.

## 16. HOW YOU CAN UNSUBSCRIBE OR OPT OUT

- 16.1. I may email you newsletters, invitations and updates from time to time. My emails will include an "Unsubscribe" button and you can opt out at any time.
- 16.2. You can block the use of cookies by selecting the appropriate settings on your browser. You can opt out of third party vendor cookies by visiting your Google's Ad settings or <a href="http://www.networkadvertising.org/managing/opt\_out.asp">http://www.networkadvertising.org/managing/opt\_out.asp</a>. Please note that my website may not work as well for you if you disable cookies.

## 17. CHANGES TO THIS POLICY

If I make changes to my Privacy Policy, I will post the amended Privacy Policy on my website.

### 18. CONTACT DETAILS

For any questions or notice, please contact Soul Source Wisdom at lynette@soulsourcewisdom.com.

This Privacy Policy was last updated: April 2023