

PRIVACY POLICY

This Privacy Policy sets out the commitment of **The Effectology Method Pty Ltd** trading as **Miriam Castilla** (ABN 31 626 923 359) (“Miriam Castilla”, “we”, “us”) to protect the privacy of personal information we collect about you, including through this website, www.miriamcastilla.com (“Website”), as well as through our other business operations or directly from you.

Please read this Privacy Policy carefully and contact us using the details set out below if you have any questions.

By providing us with personal information, you indicate that you have had sufficient opportunity to access this Privacy Policy and that you have read and accepted it and consent to the collection, use, holding and disclosure of your personal information as outlined.

If you don't want to provide personal information to us, then you don't have to, however this may affect your use of this website.

1. TYPES OF PERSONAL INFORMATION WE COLLECT

The types of personal information we collect may include:

- identity data (including your name and username or similar identifier);
- contact data (including your contact details such as your billing and delivery address, email address and telephone number);
- transaction data (including details about payments to and from you and other details of products you have purchased from us);
- technical data (including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website);
- profile data (including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses);
- usage data (including information about how you use our website, products and services); and
- marketing and communications data (including your preferences in receiving marketing from us and our third parties and your communication preferences).

If you're a customer and would like to deal with us anonymously or use a pseudonym, feel free to do so.

2. HOW WE COLLECT PERSONAL INFORMATION

We collect this information from you when you make an enquiry with us (for example, by telephone or email), purchase a product from us, sign up for a service via our website or submit a contact enquiry on our website, etc.

We are committed to using lawful and fair means to collect personal information and collecting it from others only when it is unreasonable or impracticable to obtain certain information from you directly. We collect personal information about you from:

- You
- Searches and enquiries
- Your use of our website

Third parties may also use cookies, web beacons and similar technology to collect or receive information from our 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 we receive your personal information from third parties, we will protect it as set out in this Privacy Policy.

We will destroy or de-identify information where we form the opinion that the information has been provided to us unlawfully or unfairly.

3. WHY WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We collect, hold, use and disclose your personal information as is reasonably necessary for us to perform our core functions and activities, including for the following purposes:

- to contact and communicate with you
- to provide goods and/or services to you
- to maintain a database of customers, subscribers or similar
- to market to you and others, including remarketing (this may involve the use of a Facebook pixel or similar technology to allow us to display our advertising to you elsewhere on the internet, for example, on Google or Facebook)
- for internal record keeping
- for statistical purposes
- as required by law

Where we disclose your personal information to third parties for these purposes, we will do our 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. We will also be diligent in ensuring that the personal information we disclose is accurate, up-to-date, complete and relevant.

We will not use or disclose personal information for the purpose of direct marketing unless you have consented to the use or disclosure of the information for that purpose.

Your personal information may be disclosed to international recipients as part of our ordinary business functions.

Please note that we will not disclose your personal information for any purpose other than the purpose for which it was collected without your consent, unless we are required to do so by law.

4. USE OF COOKIES

As you probably know, a cookie is a small text file that's placed on your computer to help us remember your preferences, like your login information or location. Cookies are used for a variety of reasons. We use cookies to make it easier and faster for you to use our website. We also use cookies for security purposes to protect you online. We and our third-party vendors may also use cookies to display advertisements to you elsewhere on the internet.

5. LINKS TO OTHER SITES

To help you find more information, we sometimes include links to other helpful websites from our website. Please note that this Privacy Policy only applies to information that we collect on our website (not any other site). As we aren't responsible for data collection on those other sites, our Privacy Policy won't apply. We can't guarantee any of the privacy practices of other websites, so please be safe and make sure you read their privacy policy before giving them your personal information.

6. HOW YOU CAN ACCESS AND CORRECT YOUR PERSONAL INFORMATION

Access: You can request details of personal information that we hold about you. We will respond to any request to access information within a reasonable time.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details set out below. We rely in part on you advising us when your personal information changes. We will endeavour to promptly correct any information found to be inaccurate, incomplete or out of date and to notify you of the correction, unless it is impracticable or unlawful to do so.

Deletion: If you want us to delete personal information we hold about you or to not collect information from you for a specific purpose, such as targeted advertising, please contact us using the details set out below. Please note that if we agree to delete your information, because of backups and records of deletions, it may be impossible to completely delete your information without retaining some residual information. We will functionally delete the information and we will not sell, transfer, or use personal information relating to you in any way moving forward.

We will respond to any request to access, correct or delete information within a reasonable time.

7. HOW WE MAINTAIN THE SECURITY OF YOUR INFORMATION

We are committed to ensuring that the personal information we hold is secure and protected from misuse, interference, loss and unauthorised access, modification or disclosure. We undertake the following precautions to protect personal information we hold:

- our website contains pages encrypted with SSL (Secure Sockets Layer) to ensure the safety of any data that is submitted through use of this website
- we limit access to personal information to a “need-to-know” basis
- we protect devices we use to collect, hold, use and disclose personal information with industry-standard anti-virus software
- our devices are protected by password and are stored in secure premises
- data is securely stored on cloud servers
- our email data is encrypted
- all hard copies of personal information are kept in secure storage with access by authorised personnel only
- all conversations involving the discussion of personal information take place in private, where conversations are unable to be overheard by unauthorised personnel
- if we no longer need personal information, we take reasonable steps to delete or de-identify the information

While we take commercially reasonable measures to maintain a secure website and business, electronic communications and databases are subject to errors, tampering and break-ins, and we cannot guarantee or warrant that such events will not take place and we 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, we will notify you as soon as possible after the occurrence in accordance with our obligations under the Privacy Act and related legislation.

8. DO YOU LIVE IN THE EU?

The Effectology Method Pty Ltd is committed to looking after our customers in the EU and we make every effort to comply with the GDPR.

9. WHAT IS PERSONAL DATA?

Any information relating to you.

10. WHAT IS PROCESSING?

Any operation on personal data like recording, structuring, storing etc.

11. WHO IS A CONTROLLER?

The person or body who determines how and why personal data is processed. In this case that's us – The Effectology Method Pty Ltd.

12. OUR COMMITMENT

The personal data we collect is:

- a. processed lawfully, fairly and transparently;
- b. collected for the specified, explicit and legitimate purposes including creating our mailing list, direct marketing, taking payment and getting your goodies to you;
- c. adequate, relevant and limited to what is necessary for our purposes;
- d. 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);
- e. not stored than for longer than is necessary; and
- f. processed in a manner that ensures appropriate security of the personal data.

13. YOUR CONSENT

The Effectology Method Pty Ltd requests your consent to the processing of your personal data for the purpose of creating our mailing list, marketing, taking payment and distribution/deliveries.

You give us consent to process your personal data. You can withdraw that consent at any time by sending an email to support@miriamcastilla.com. If you ask us to, we will stop using your personal data as soon as possible.

14. HOW THE EFFECTOLOGY METHOD PTY LTD WILL WORK WITH YOUR PERSONAL DATA

To help you to understand how we will work with your personal data we set out some key information below. As always if you have any questions just ask – we are here to help!

Who is the controller of the data? The Effectology Method Pty Ltd

Privacy contact: Miriam Castilla

What are the purposes for processing the personal data? Creating our mailing list, direct marketing, taking payment and getting your goodies to you or to the lucky receiver!

What is the legal basis for processing the personal data? Where we 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 a positive act (i.e. accepting this Privacy Policy) knowing that you can withdraw it at any time. If you are arranging a delivery it is a contractual requirement to take the payment/billing details and delivery information (otherwise we can't get your goodies to you!). Where we have collected data from you other than pursuant to an engagement or your consent, we have collected data to facilitate our pursuing our legitimate business interests.

Who receives your personal data? Your data is received by us, The Effectology Method Pty Ltd, and by our key suppliers including our distribution and delivery team, and our marketing platforms like Facebook and Instagram.

Will we transfer data to a third country? No.

How long will your personal data be stored? We store all order and customer information indefinitely. This is necessary for our legitimate business purposes and to fulfil the purpose for which we collected the data, for example, to make a delivery to you, to contact you for marketing purposes and to facilitate your easy and convenient use of our website and ordering system.

15. YOUR RIGHTS

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 contact you promptly and inform you if we require payment of a fee. We will not be obliged to comply with the request until we have received the fee. Just contact us by phone or email if you have a request like this.

You have the right to lodge a complaint with a supervisory authority. The Effectology Method Pty Ltd hopes that you will not have complaints but if you do please raise them with us. You also have a right to lodge a complaint with the supervisory authority in the EU Member state where you live or work.

Where we have collected data from you where you have 'opted in' for direct marketing purposes pursuant to an offer, the provision of your personal data is a contractual requirement for the delivery of an opt in material. Similarly, if you are arranging a delivery it is a contractual requirement to take the payment/billing details and delivery information. If you do not provide personal data, we will not be able to provide our products or services to you.

Is there automated decision making (including profiling)? Any automated decision making would only relate to decisions necessary for us to perform the services as agreed for you such as choice of delivery service provider or method. Please note that we also utilise Facebook and Instagram advertising services, which may also utilise automated decision making. Please refer to their privacy statement, available at <https://www.facebook.com/privacy/explanation>, for more information. Please note that we are not affiliated with or sponsored by Facebook or Instagram.

We may collect other personal data about you from other sources. All such data is obtained from government registers and is publicly available. The categories of personal data include names, addresses and contact details.

16. HOW YOU CAN MAKE A COMPLAINT ABOUT PRIVACY BREACH

If you believe that we have breached this Privacy Policy and want to make a complaint about that breach, please contact us using the details set out below. If you are unsatisfied with our response, the Office of the Australian Information Commissioner may be able to assist you with a review of our decision. Contact the OAIC for more information.

17. HOW YOU CAN UNSUBSCRIBE OR OPT OUT

We like to keep our customers and website visitors up to date, so from time to time we'll send you newsletters, invitations and updates. Not to worry: our emails will always come with an "Unsubscribe" button, so you can opt out at any time. To unsubscribe from our email database, or opt out of communications, use the "Unsubscribe" button in our communication or contact us using the details set out below.

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 http://www.networkadvertising.org/managing/opt_out.asp. Please note that the website may not work as well for you if you disable cookies.

You can also opt out of information collecting for advertising targeting by visiting www.aboutads.info/choices.

18. CHANGES TO THIS POLICY

We reserve the right to make amendments to this Privacy Policy at any time. If you have objections to the Privacy Policy, you should not access or use our site. If we decide to change our Privacy Policy, we'll let you know by posting such changes on our website.

19. CONTACT DETAILS

For any questions or notice, please contact us using these details:

Miriam Castilla

support@miriamcastilla.com

This Privacy Policy was last updated: 25th January, 2021