



PRIVACY POLICY

1. This Website is owned and operated by Ellie Garnham. The following terms and conditions govern your use of this site and all other Ellie Garnham sites and products, some of which (but not all) are listed herein.

For the purpose of this agreement and for ease of use, any reference to "we", "us" or the "Company" shall be a reference to Ellie Garnham and any reference to "the Website" shall be a reference to any and all websites owned by the Company, their respective products, and their employees and agents.

2. By accessing this Website and any of the Company's properties, you are acknowledging and accepting the conditions of this Privacy Policy for all of the Company's properties.

The Websites include, but are not limited to: elliegarnham.com.au

3. We respect your rights to privacy under the Privacy Act 1988 (Cth) (Privacy Act) and so in accordance with this Act, we are compliant with its requirements in respect of the collection, management and disclosure of your personal information.

4. We also uphold your rights to privacy if you are based in the European Union, in accordance with the General Data Protection Regulation (GDPR) (EU). Your rights under the GDPR are listed below.

If you do not wish to provide personal information to us, then you do not have to do so. However, this may affect your use of this Site or any products and services offered on it.

5. What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Privacy Act and GDPR. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

What information may we collect from you?

Ellie Garnham may collect the following personal information from you:

1. name;
2. current mailing or residential address;
3. email address;
4. telephone number;
5. age or birth date; and
6. profession or occupation.
7. preferences and opinions
8. any other information requested on this Site or otherwise requested by us or provided by you

7. We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

1. to provide our services to you;



2. to send communications requested by you;
3. to answer enquiries and provide information or advice about existing and new services;
4. to provide you with access to protected areas of our website;
5. to comply with any Law, rule, regulation, Lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority;
6. For internal record keeping
7. Marketing including direct marketing
8. To run competitions or offer additional benefits to you.
9. For market research and business development including website development.

8. How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

1. when you make an enquiry about our services;
2. through your access and use of our website, including when you register as a member of our website;
3. during conversations between you and our representatives;
4. when you ask to be placed on one of our subscription/ mailing lists; or
5. when you become a client or customer of ours or otherwise use our products or services.

9. What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

1. we may not be able to provide our products or services to you, either to the same standard or at all;
2. we may not be able to provide you with information about services that you may want, including information about special promotions; or
3. we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

10. Security

As our website is linked to the Internet, and the Internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

11. Please be advised that for any forums, Live Facebook Videos, Webinars you attend, recordings can be enabled by a meeting or webinar host. By signing up for any of Ellie Garnham's, or any other host authorised by Ellie Garnham, webinar services or live calls or otherwise using them in any way, including without limitation by attending any Ellie Garnham meeting or webinar, you expressly acknowledge that we may make and store Recordings for meetings or webinars, and may make such recordings available to hosts and other Attendees at the direction of Ellie Garnham. If you do not want to be recorded, you can choose to leave the meeting or webinar.

12. To whom will Ellie Garnham disclose my personal information?

We may disclose your personal information to:

1. our employees, contractors or service providers for the purposes of operating our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
2. suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
3. any other organisation for any authorised purpose with your express consent.

We only disclose this information if the third party has agreed to comply with the standards in our Privacy Policy.



13. We may disclose personal information:

- for the purpose of providing information, products, services or marketing to customers;
- to credit reporting agencies and courts, tribunals, regulatory authorities where customers fail to pay for goods or services provided by us to them;
- to courts, tribunals, regulatory authorities, and law enforcement officers as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- to third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia.

14. If there is a change of control of our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at Law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser. We would seek to only disclose information in good faith and where we have sought to maintain confidentiality.

15. Your use of our Site:

As with most online businesses, we may log information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.

16. Your opinion and feedback: We may contact you to voluntarily respond to questionnaires, surveys or market research to seek your opinion and feedback. Providing this information is optional to you.

If we receive your personal information from third parties, we will protect it as set out in this Privacy Policy.

17. Your rights and controlling your personal information;

Choice and Consent: Providing us with your personal information is optional to you. You can choose not to provide personal information. When you provide us with your personal information, you consent to the terms in this Privacy Policy, and to us disclosing or receiving your personal information for these purposes.

Restrict: You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this Privacy Policy.

Access: You may request details of personal information that we hold about you, in certain circumstances set out in the Privacy Act 1988 (Cth). An administrative fee may be payable for the provision of information. We may refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

Correction: If you believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us by email. We rely in part upon customers advising us when their personal information changes. We will respond to any request within a reasonable time. We will endeavour to promptly correct any information found to be inaccurate, incomplete or out of date.

Complaints: If you believe that we have breached the Australian Privacy Principles and/or the GDPR and wish to make a complaint about that breach, please contact us by email setting out details of the breach. We will promptly investigate your complaint and respond to you in writing setting out the outcome of our investigation, what steps we propose to take to remedy the breach and any other action we will take to deal with your complaint.



Unsubscribe: To unsubscribe from our e-mail database, or opt out of communications, please contact us at the details below.

18. Storage and Security

We are committed to ensuring that the information you provide is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure

No information transmitted over the Internet can be guaranteed to be secure. We cannot guarantee the security of any information that you transmit to us, or receive from us. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by Law to retain it (whichever is the later).

19. Cookies & Web Beacons

We may use cookies on this Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. However, once you choose to furnish the Site with personally identifiable information, this information may be linked to the data stored in the cookie.

We may use web beacons on this Site from time to time. Web beacons or clear .gifs are small pieces of code placed on a web page to monitor the behaviour and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

20. Links to other websites

Our Site may contain links to other websites of interest. We do not have any control over those websites. We are not responsible for or liable for the protection and privacy of any information which you provide whilst visiting such websites, and such websites are not governed by this Privacy Policy.

21. Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

PayPal or Moonclerk or Eventbrite

22. How long do you retain my personal data for?

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your



personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By Law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years for Australian tax Law purposes.

In some circumstances you can ask us to delete your data; see your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

23.If I am based in the EU, what are my legal rights under the GDPR? If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection Laws in relation to your personal data:

1. The right to be informed – that's an obligation on us to inform you how we use your personal data;
2. The right of access – that's a right to make what's known as a 'data subject access request' for copy of the personal data we hold about you;
3. The right to rectification – that's a right to make us correct personal data about you that may be incomplete or inaccurate;
4. The right to erasure – that's also known as the 'right to be forgotten' where in certain circumstances you can ask us to delete the personal data we have about you (unless there's an overriding legal reason we need to keep it);
5. The right to restrict processing – that's a right for you in certain circumstances to ask us to suspend processing personal data;
6. The right to data portability – that's a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);
7. The right to object – that's a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
8. Rights in relation to automated decision making and profiling – that's a right you have for us to be transparent about any profiling we do, or any automated decision making. These rights are subject to certain rules around when you can exercise them.

If you wish to exercise any of the rights set out above, please contact us at elliegarnham@gmail.com

24. How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires correction. If we do not agree that there are grounds for correction, then we will add a note to the personal information stating that you disagree with it.

25.How can you withdraw your consent to this privacy policy?

You may withdraw your consent to this privacy policy at any point. If you wish to withdraw your consent to our collection and retention of your data, please contact our Data Protection Officer at ellie@elliegarnham.com.au and we can arrange for your data to be deleted.



You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this Privacy Policy.

To unsubscribe from our e-mail database, or opt out of any communications, please contact us at the email address listed at the start of the Privacy Policy, with "Unsubscribe" in the subject line of the e-mail.

26. What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act and/or GDPR, if applicable).

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your Data Protection Officer using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Data Protection Officer by email on

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Testimonials

If you provide us with a testimonial, you give us your consent for the use of your name and the Service to be displayed on any of our Websites, or in our other marketing materials, together with the content of the testimonial that you provide.

Comments

Comments and other content submitted to our sites are not saved on our servers unless they were marked as false positives, in which case we store them long enough to use them to improve the service to avoid future false positives.

Termination

We may cancel or terminate your right to use some or any of our sites or any part of those sites at any time without notice, and at our discretion. In the event of cancellation or termination, you are no longer authorized to access the part or parts of the sites affected by such cancellation or termination. The restrictions imposed on you with respect to material downloaded from any of our sites, and the disclaimers and limitations of liabilities set forth in these Terms of Service, shall survive.

Changes to This Privacy Policy

This Privacy Policy may be amended, including with changes, additions and deletions, from time to time in our sole discretion. Your continued use of our Site following any amendments indicates that you accept the amendments. You should check this Privacy Policy regularly, prior to providing



personal information, to ensure you are aware of any changes, and only proceed to provide personal information if you accept the new Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

For questions and notices, please contact us at:

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