

# PRIVACY POLICY

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

# What personal information do we collect from the people that visit our blog, website or app?

When ordering, scheduling or filling out forms on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, credit card information or other details.

#### When do we collect information?

We collect information from you when you place an order, subscribe to the e-newsletter, schedule a session, fill out a form or enter information on our site.

#### How do we use your information?

We may use the information we collect from you when you, make a purchase, sign up for our e-newsletter, schedule a session, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To enhance your online experience
- To allow us to better service you in responding to your requests
- To quickly process your transactions in accordance with Shopify's privacy policy (click here to view)
- To send periodic emails regarding your order or other products and services (follow up correspondence, e-newsletter delivery, etc.).

#### How do we protect your information?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

#### We do not use Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

\*In the future, all sensitive/credit information you supply will be encrypted via Secure Socket Layer (SSL) technology. This policy will be updated to reflect this at that time.

All transactions are processed through *Shopify.com* and are not stored or processed on our servers. Their privacy policy can be viewed <a href="here">here</a>.

#### Do we use 'cookies'?

We do not use cookies for tracking purposes.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

# Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information.

#### Third-party links

We use three third-party apps in order to enhance your online experience. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

- *MailChimp* Their privacy policy can be viewed here.
- *ScheduleOnce* Their privacy policy can be viewed here.
- <u>Shopify</u> Their privacy policy can be viewed <u>here</u>.

#### Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

Visit: https://support.google.com/adwordspolicy/answer/1316548?hl=en

#### We have implemented the following:

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

#### Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

Also, users can unsubscribe to emails and e-newsletters by using the link at the bottom of each email.

#### California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at: <a href="http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf">http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf</a>

#### According to CalOPPA, we agree to the following:

- Users can visit our site anonymously.
- We added a link to the privacy policy in the footer of our website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found as indicated above.
- You will be notified of any Privacy Policy changes on our Privacy Policy Page
- You can change your personal information:
  - By emailing or calling Managing Your Mind, LLC

#### How does our site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

It's also important to note that we do not allow third-party behavioral tracking.

#### COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the

COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years old.

#### **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

- We will notify the users via in-site notification and/or email
- Within 1 business day
- We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute noncompliance by data processors.

#### **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

## We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Send e-newsletters
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send emails to clients and site visitors after the original transaction has occurred
- Contact you regarding your scheduled session

#### To be in accordance with CAN SPAM, we agree to the following:

- Not use false or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

# General Data Protection Regulation (GDRP)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Managing Your Mind, LLC aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact Managing Your Mind, LLC.

#### In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within emails sent to you. If you are unable to perform these actions yourself, please contact Managing Your Mind, LLC to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data. The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format. The right to withdraw consent. You also have the right to withdraw your consent at any time where Managing Your Mind, LLC relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

## Contacting Us

If there are any complaints, problems or questions regarding this privacy policy or the way we contact you, you may contact us using the information below.

#### Dr. Geri Markel

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