

Privacy Policy

This Privacy Policy was last modified on.

Changing Lives Counselling (collectively "Changing Lives," "we," "us," "our"). Changing Lives Websites and Mobile Application are strongly committed to protecting your privacy and providing a safe experience. We are committed to be your most trusted ally in your pursuit of well-being. We want to ensure you understand the information we collect, how we use it, how we share it, and how you can control your information. We have developed this Privacy Policy to inform you of our policies regarding the collection, use, and disclosure of Information we receive from users of the Website and Mobile Application. Changing Lives (the "Company").

This Privacy Policy, along with our *Term & Conditions*, governs your use of this site. By using Changing Lives (the "Website" and "Mobile Application"), or by accepting the Terms of Use (via opt-in, checkbox, pop-up, or clicking an email link confirming the same), you agree to be bound by our terms and this Privacy Policy.

Information We Collect

When you use our Services, we may automatically collect information, when:

- **E-mail interconnectivity.** If you receive email from us, we may use tools to capture data related to when you open our message, click on any links or banners it contains and make purchases. The purpose for collection and use of this data is that we have a business need to understand how you interact with our communications to you and honouring your requests based on our communications, such as to unsubscribe.
- **Mobile devices (such as phones, tablets, and other digital media streaming devices).** We may collect information from your Mobile Device, such as unique identifying information broadcast from your device when visiting one of our Services. The purposes of collection and use of this data are that we have a business need to identify unique visitors and understand how users interact with us on their devices.
- **Website interactions.** We use technology to discover how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser. The purposes of collection and use of this data are that we have a business need to understand how

you interact with our website to better improve it, and to understand your preferences and interests to select offerings that you might find most useful. We also have a business need to secure our Services and detect and prevent fraud.

- **Location data.** When you use certain of our Services, we may solicit your permission to collect your location data. Some features within our Services (such as location-based offers, such as a nearby medical office or pharmacy) may only function upon confirmation of your location, and therefore such features will not be available if you choose not to provide your location data. The specificity of the location data may depend on several factors, including the device you are using and how you are connected to the Internet. If you enable location services for our Services, we may collect location data periodically as you use or leave open our Services. Depending on the platform you use to access our Applications (e.g., Apple's iOS, Google's Android) you may be able to control whether location data is collected from with the controls on your device.
- **Cookies, generally.** We and our service providers operating on our behalf, and other businesses who collect information on our pages may automatically collect or receive certain information associated with you and/or your device(s) as part of your use of the Services through device-based tracking technologies such as cookies, pixels, tags, beacons, scripts or other similar tracking technology (collectively "Cookie"). The purposes for collection and use of this data is that we have a business need to make our website operate efficiently, provide you with different website experiences, and to provide you with ability to save your preferences such as login and preferred language. See our Cookie Policy for more information.
- **Cookies, for advertising.** Some of our Services participate in behaviour-based advertising, which means that technology (e.g., a Cookie) is used to collect information about your use of our Services to provide advertising about products and services tailored to your interests on our Services, or on other websites. The purposes for collection and use of this data are that we have a business need to engage in behaviour-based advertising and capture analytics on our Services. The information we collect may include geolocation data, such as (a) information that identifies the precise location of your mobile device (when you agree to allow an App or Service to collect this) and (b) your IP address, which may be used to estimate your approximate location. We use this information to ensure that the Services work properly, and to deliver customized content and advertising, including personalized ads, to you. See our Cookie Policy for more information.

- **Cross-device tracking.** We and our service providers may collect and store information about users' interactions with unaffiliated websites and applications that use our technologies, including cookies and similar tracking technologies. This allows us to infer the presence of a common user or household behind multiple devices or browsers, for instance, and then link those browsers and devices into a device graph. The purposes for collection and use of this data are that we have a business need to understand our users' use of our sites across devices to allow users to use our services on one device and pick up seamlessly where they left off on another device. We also have a business need to provide personalized advertising on each device that is inferred from the browsing patterns on all the devices.
- **Data analytics.** We use certain web analytics services, including third-party services such as Google Analytics, to help us understand and analyse how visitors use our Services. We may collect information, including your browser type, operating system, Internet Protocol (IP) address, domain name, click-activity, referring website, and/or a date/ time stamp for visitors. The purpose for collection and use of this data is that we have a business need to monitor our networks and the visitors to our websites. We may receive reports based on the use of these technologies on both an individual and aggregated basis. These analytics services, including third-party services such as Google Analytics, also use this information to place advertisements for our products on other websites that you visit after your use of the Site. These advertisements may be based on actions such as the pages you visited and actions you take during your use of the Site. You also may choose to install [the Google Analytics Opt-Out Browser Add-on](#) to opt out of Google Analytics data collection.

Information Provided Voluntarily

Personal Information. You may be asked to provide personal information including your name, address, email address and phone number when you sign up for any of our newsletters, respond to a survey, or purchase a product or service. We will only request the personal information that is required to fulfil our obligations to you, i.e. to deliver what you have requested, as well as to comply with any legal obligations that may accompany such an exchange.

Order & Billing Information. If you place an order through our Website of Mobile Application, we track certain information about the products and services you purchase. At checkout, you will also be required to provide

additional information required for processing your payment. This generally includes a debit or credit card or other payment information, expiration dates, card security codes, your billing address or similar information. This information is generally processed and captured by third-party vendors, such as payment processors and merchant account providers. To the fullest extent possible, we make an effort not to capture or retain this information ourselves (unless, for example, we are requested to process a refund, follow up on the delivery of goods or services, or work with customers or vendors on resolving any errors or other scenarios.) Third-party vendors who assist us in any of our business functions will also be doing so pursuant to their own terms and conditions, including privacy policies and terms of use.

Information Collected Automatically

In addition to the information described above, we may collect some or all of the following information:

Activity Info (Log Data). Information may be collected based on your use of the Website or Mobile Application, which generally includes information about your computer hardware and software, such as:

Internet Protocol (“IP”) addresses, operating systems, browser types, device types, URLs, access dates and times; Website pages that you visit; referring website information; universally unique identifiers (“UUID”), advertising identifier (“IDFA”), carrier and country location, hardware and processor information, network type, and other related data.

Use of Cookies. Our website may use cookies to deliver a better experience for you. Cookies are files with small amounts of data that a website stores on your computer’s or mobile device’s hard drive so that certain information about your visit and web-browsing preferences will be recognized upon a return visit. Cookies serve functions such as “remembering” log-in names and passwords or enabling or saving shopping cart contents. Like many websites, we may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us improve the experience you have with our Website. Most web browsers have a function that allows you to delete existing cookies on your device or you can set your browser options to that your device does not receive or accept cookies. Doing this may interfere with your ability to use the Website.

Third-Party Analytics. We use third-party analytics services (such as Google Analytics) to evaluate and aggregate visitor data. These services help us evaluate Visitors' use of the Website, including time spent on certain pages, which areas of the Website receive the most traffic, how often visitors visit pages within the Website, and provide general geographic location about visitors, the source of referred traffic (from other websites, vs search engines, etc). These third party analytic services use cookies and other technologies to help analyse and provide us the data. By providing your consent to this *Privacy Policy*, you consent to the collection and review of data about you by these analytics providers in the manner and for the purposes set out herein.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. If you opt out of any service, you may not enjoy the full functionality of the Website.

Other Third-Party Tracking Tools. We may also collect or receive information from third parties, such as Facebook, Instagram and/or other third-party social media and similar sites.

How to Access Your Personal Information

If you have provided personal, billing or other voluntarily provided information, you may access, review and make changes to it via instructions found on the Website or by emailing us at changinglivesccs [at] gmail [dot] com. To manage your receipt of marketing and non-transactional communications, you may unsubscribe by clicking the "unsubscribe" link located on the bottom of any related email from the Company. Emails related to the purchase or delivery of orders are provided automatically – Customers are not able to opt out of transactional emails. We will try to accommodate any requests related to the management of Personal Information in a timely manner. However, it is not always possible to completely remove or modify information in our databases (for example, if we have a legal obligation to keep it for certain timeframes, for example).

How We Use and Share the Information

We use the collected Information to understand customer needs, including regarding our Website services to:

- present you with information through our Website and email services;
- provide our services, process orders, and administer our programs;

- maintain and improve our Website;
- respond to your requests, and provide customer service, including in response to any problems that may arise, such as difficulties in navigating our Website or accessing certain features;
- solicit your feedback, and to inform you about our products and services and those of our third-party marketing partners that we feel may be of interest or value to you;
- personalize or display advertisements to you on third-party platforms;
- improve our services or offerings; and
- fulfil our legal or contractual obligations to you.

As with transactions elsewhere, when you purchase products, services, or programs via our Website, your credit card company will also retain certain information regarding your purchase. We will not otherwise provide any personal data to your credit card company without your permission.

We may share the Information collected with joint venture partners, affiliates, agents, current or prospective business partners, businesses under common control, third-party businesses or partners participating in administering our programs or services, or to those providing business functions such as technical support, customer service, marketing assistance, etc. These businesses will only have access to information as necessary to perform their functions and to the extent permitted by law.

In the event of the sale or transfer of our business to a third party buyer, including in the event of bankruptcy or liquidation, we may, as necessary, share your data with the buyer or transferee.

In the event that we have to collect on a debt owed to us by you, we may, as necessary, share your information with an attorney or a court of law to enforce our rights and collect what is owed.

Under certain circumstances we may be obligated or compelled to disclose the Information: when required by law, court order or government agency, or when disclosing such Information is reasonably required to protect the Company, its property, the Website, the safety of visitors or others.

Retargeting / Personalized and Behavioural Ads

We may, using the techniques described above, and in conjunction with third party marketing partners, gather information from your visit to our Website for purposes of providing relevant advertising content to you in the future. This means that through third party marketing partners or third-party sites such as Google, Facebook, or Instagram, we may display advertisements to you (remarketing or retargeting), based on usage data collected during your visit to our website.

Google Analytics

As described above, we use Google Analytics on our website. We may utilize any of the following advertising features that utilize the Google advertising cookies: Remarketing with Analytics, Demographics and Interest reporting, Segments, and DoubleClick integration.

To opt out of seeing personalized ads via the Google platform, please visit <https://support.google.com/ads/answer/2662922?hl=en>

For more information regarding how Google uses cookies in advertising and how you can control advertising cookies, visit <http://www.google.com/policies/technologies/ads/>

To personalize the ads you see via the Google platform, visit <http://www.google.com/settings/ads>

For more information on how Google uses data when you visit its partners' sites or apps, visit <http://www.google.com/policies/privacy/partners/>

Or, via an opt-out browser add-on, you can opt out of having your site activity available to Google Analytics. For more information, or to install the opt-out browser ad-on, please visit <https://support.google.com/analytics/answer/181881?hl=en> Please note that if you opt out of any service, you may not enjoy the full functionality of the Website.

Google Ad Words

We may utilize Google Ad Words, which provides certain of the information collected on our website to the Adwords advertising network. To opt out of Google Ad Words, visit <https://support.google.com/ads/answer/2662922?hl=en>

Facebook Custom Audience

We may utilize Facebook's Custom Audience capability which allows us to display ads on Facebook to individuals on our email lists or in our database. We may provide personal information to Facebook, such as your name, email address and phone number to enable Facebook to identify whether you are a Facebook account holder. To opt-out of the Facebook Custom Audience, please email us at [changinglivesccs \[at\] gmail\[dot\] com](mailto:changinglivesccs@gmail.com) with (1) "Facebook Custom Audience Opt-Out" in your Subject Line, and (2) your name and email address in the body of the email.

Other Personalized and Behavioural Advertising Services

We may participate in other retargeting services that are like those described above.

Managing Cookies Via Your Browser

You may be able to change your cookie preferences via your browser settings. Please visit your browser's help section for assistance with turning on notifications regarding cookies or disabling cookies through your browser.

Managing Cookies on Your Mobile Device

You may be able to change your cookie preferences on your mobile device either via your browser settings, or via the settings (preferences) on your device. For additional info, please visit <http://www.allaboutcookies.org/mobile/>

Use Caution When Sharing Information Online

When you voluntarily make your Personal Information available online in an environment shared by third parties – including in webinars, classes, online conferences, via email, on message boards, chat rooms or on blogs, or via telephone calls or conferences – that information can be viewed, saved, collected, heard, and/or used by others outside of the Company. We are not responsible for any unauthorized third-party use of information provided in these contexts. Please be mindful whenever you share any information online.

Security of Your Information

The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we incorporate standard industry practices internally and with our services providers, which we believe is sufficient for the information involved, we cannot guarantee its absolute security. Because we work with third-party businesses and vendors in various aspects of our business including operating this website, database management, website

security, etc., we cannot guarantee the absolute security of our databases, nor can we guarantee that the Information you supply will not be intercepted while being transmitted to and from us over the Internet. Any information that you provide to us via email should be treated with extra caution, as we cannot control the level of security available through email providers.

Children

We are strongly committed to protecting the safety and privacy of children who visit our website. We do not knowingly collect Personal Information from children under the age of 13 through the Website or Mobile Application. If you are under 13, please do not give us any Personal Information. We encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will make best efforts to immediately delete that information from our databases.

External Websites

While we have carefully chosen those vendors with whom we work, especially those involved in the transmission of data on behalf of our business, we do not control and are not responsible for the privacy practices or content of third-party websites, including those of affiliates, business partners, sponsors, advertisers, or other websites to which we may link from time to time. When visiting any third-party websites, you are responsible for reviewing the privacy policy and terms of use applicable to each site. They may be different than those that you see here.

Visitors Outside Australia

Our Website and Mobile Application and the servers that make this Website and available worldwide are in Australia. The Internet laws in the Australia govern all matters relating to this Website and Mobile Application. Any information you provide in subscribing to or visiting our Website or Mobile Application will be transferred to Australia. By visiting our Website and accessing Mobile Application and by submitting information, you authorize this transfer, processing, and use.

EU Visitors and the GDPR

If you live in the EU, certain of your data may be subject to protection by the General Data Protection Regulation (the "GDPR"), a privacy regulation intended to help you have greater control over your personal data.

Under the GDPR, you have the following rights, which we extend to all our website visitors:

- to know what information is being collected, as disclosed in this Privacy Policy (“right to transparent information”);
- to object on grounds relating to your situation to the collection or processing of certain kinds of information (“right to object”);
- to withdraw consent even after it has been given, without affecting the lawfulness of the processing of your data prior to your withdrawal (“right to withdraw consent”);
- to access, modify or update your information so that it is correct (“right to access” and “right to rectification”);
- to have your information deleted or erased (“right to erasure” or “right to be forgotten”);
- to have your data transferred or ported elsewhere (“right to data portability”);
- and the right to restrict processing in certain situations (“right to restriction of processing”).

For purposes of the GDPR, fully possible do not directly collect or maintain personal data of our EU visitors or clients. This is done through partnerships with third-party vendors who have systems designed for the collection and storage of data on behalf of their clients (“data processors”). The data is only kept as long as is reasonably required to accomplish the purpose or purposes for which it was collected. Certain data may be expunged or utilized more quickly than others, and depending on your engagement and behaviours, including purchasing behaviours, we may be engaged in a business or contractual relationship with some longevity. (For example, if you purchase a course or program, or services that span over some time, you will continue to receive communications in regards to those offerings or services).

The categories of data processors with whom we work, and that help us in the collection of information that allows us to serve and interact with you include website analytics provider(s), website and webform plug-ins and related third-party services that allow us to maintain an up-to-date online platform and communicate with you electronically, an email service provider or providers to assist in managing email correspondence with our visitors, customers and list, as well as payment processor(s) and/or merchant

account(s) to help us transact sales online and follow up with you regarding any purchases.

Those within the Company that may have access to the data include Officers, Directors, Managers, Supervisors, Salespersons, or those providing customer or technical support. Access to the data is provided for specific purposes, generally related to communicating with you, fulfilling our contractual obligations, providing customer service or technical support, collecting payment, or monitoring performance of marketing and sales efforts.

You may contact us at any time to have your information with us or any of these processors updated or corrected, deleted, or to obtain a copy for your records. Additionally, you may opt out of receiving any additional emails or marketing messages from us by clicking the “unsubscribe” link at the bottom of our email notifications.

Further, if you feel that we have not complied with the relevant data protection regulations, please contact us by sending us an email at [changinglivesccs \[at\] gmail \[dot\] com](mailto:changinglivesccs@gmail.com) with your first and last name, your country of origin, and a summary of your concern or complaint. We will endeavor to respond at our earliest possible convenience to address your concern. If contacting us does not resolve your complaint, you may have additional options.

Residents in Designated Countries may also have the right to lodge a complaint with the relevant EU data protection authority.

Changes to This Privacy Policy

The Company may update this Privacy Policy from time to time as necessary to protect our users and to comply with a changing environment. Please review the Privacy Policy when you visit our Website or Mobile Application to remain updated on our current policy. We have no intentions of making any changes to our Privacy Policy and practices to make them less protective of personal information collected in the past. By accessing the Website and/or using our services after making any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the information. You are advised

to review this Privacy Policy periodically for any changes. Whenever we make changes to this Privacy Policy we will update the date at the top.

Contact Us

If you have any questions about this Privacy Policy, please contact us via email at [changinglivesccs \[at\] gmail \[dot\] com](mailto:changinglivesccs@gmail.com) with "Privacy Policy" in the subject line.