

# Privacy Policy

We at New Conversation, LLC (“Dr Joanne Siebert” or “Happy Clam Chiropractic,” “we,” “us,” or “our”) have created this privacy policy (“Privacy Policy”) because we know that you care about how the information you provide to us is used and shared. This Privacy Policy applies to our information collection and use practices: (i) online when you visit our website, including, without limitation, drhollycastle.com (“Website”); and (ii) offline when you provide information to us.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Service.

## Acceptance of Terms

By visiting any of our Website, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Service and Disclaimer, all of which govern your use of the Website. By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

**Please read this Privacy Policy carefully before using this website.**

## Privacy Policy Consent

The Website and its content are owned by New Conversations, LLC. The term “you” refers to the user or viewer of our website, including, without limitation, DevelopYourHealth.com and HappyClamChiropractic.com.

This Privacy Policy describes how we collect, use, process and distribute your information, including Personal Data (as defined below) used to access this Website. We will not use or share your information with anyone except as described in this Privacy Policy. The use of information collected through our Site shall be limited to the purposes under this Privacy Policy and our Terms of Service to customers.

Please read this Privacy Policy carefully. We reserve the right to change this Privacy Policy on the Website at any time without notice. In the event

of a material change, we will let you know via email and / or a prominent notice on our Website.

Use of any personal information or contribution that you provide to us, or which is collected by us on or through our Website or its content is governed by this Privacy Policy. By using our Website or its content, you consent to this Privacy Policy, whether or not you have read it.

## Information We May Collect

We collect personal information from you so that we can provide you with a positive experience when utilizing our Website or content. We will only collect the minimum amount of information necessary for us to fulfill our obligation to you. We may collect:

1. A name and an email address so we can deliver our newsletter to you – you would be affirmatively consenting to this by providing this to us in our contact forms.
2. Billing information including name, address and credit card information so that we can process payment to deliver our products or services to you under our contractual obligation.
3. A name and an email address if you complete our contact form with a question. We may send you marketing emails with either your consent or if we believe we have a legitimate interest to contact you based on your contact or question.
4. Information from you from a co-branded offer. In this case, we will make clear as to who is collecting the information and whose privacy policy applies. If both / all parties are retaining the information you provide, this will also be made clear as will links to all privacy policies.

Please note that the information above (“Personal Data”) that you are giving to us is voluntary, and by you providing this information to us you are giving consent for us to use, collect and process this Personal Data. **You are welcome to opt-out or request for us to delete your Personal Data at any point by contacting us at [drj@DevelopYourHealth.com](mailto:drj@DevelopYourHealth.com).**

If you choose not to provide us with certain Personal Data, you may not be able to participate in certain aspects of our Website or content.

## Other Information We May Collect:

### Anonymous Data Collection and Use.

To maintain our Website's high quality, we may use your IP address to help diagnose problems with our server and to administer the Website by identifying which areas of the Website are most heavily used, and to display content according to your preferences. Your IP address is the number assigned to computers connected to the Internet. This is essentially "traffic data" which cannot personally identify you but is helpful to us for marketing purposes and for improving our services. Traffic data collection does not follow a user's activities on any other websites in any way. Anonymous traffic data may also be shared with business partners and advertisers on an aggregate basis.

### Third-Party Analytics.

We use third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Website and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Website.

### Use of "Cookies".

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. You can find more information about web cookies here: [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie)

- **Strictly necessary cookies.** These are cookies that are required for you to use the features available on this Website. They include, for example, the ability to login and post a comment.
- **Analytical/performance cookies.** These cookies allow us to recognize, track, and count the number of visitors who come to this Website. They also allow us to track broken pages on the Website and to count what visitors do when they click through the website.

- **Functionality cookies.** These cookies allow us to track and remember your preferences for our Website. For example, we can personalize content for you, greet you by name and/or remember your preferences (for example, your choice of language or region).
- **Targeting cookies or advertising cookies.** These cookies allow us to deliver advertisements that match your interest level and browsing history. They also allow us to limit the number of times you see a particular ad.

We may use the standard “cookies” feature of major web browsers. We do not set any personally identifiable information in cookies, nor do we employ any data-capture mechanisms on our Website other than cookies. You may choose to disable cookies through your own web browser’s settings. However, disabling this function may diminish your experience on our Website and some features may not work as intended.

## Third-party cookies

This Website sets third-party cookies to track usage, social sharing and more. These cookies are not under our control, and serve to help us understand the visitors who come to the Website, as well as support our connection to other third party sites. (Again, see the Wikipedia page above for detailed explanations of third party services/cookies).

- **Google Analytics** –Google Analytics is used to collect data about website usage. This data does not include personally identifiable information. Data is stored anonymously and temporarily, and is automatically deleted after a period of time per Google’s policies, For more information on Google Analytics, including how to opt out from certain data collection, please visit [Google.com/policies/privacy/](https://www.google.com/policies/privacy/).

## Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded

content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

## **What We Do With Information We Collect**

### **Contact You.**

We may contact you with information that you provide to us based on these lawful grounds for processing:

1. We may contact you if you give us your clear, unambiguous, affirmative consent to contact you.
2. We will contact you under our contractual obligation to deliver goods or services you purchase from us.
3. Legitimate Interest. We may contact you if we feel you have a legitimate interest in hearing from us. For example, if you sign up for a webinar, we may send you marketing emails based on the content of that webinar. You will always have the option to opt out of any of our emails.

### **Process Payments.**

We will use the Personal Data you give to us in order to process your payment for the purchase of goods or services under a contract. We only use third party payment processors that take the utmost care in securing data and comply with the GDPR.

### **Targeted Social Media Advertisements.**

We may use the data you provide to us to run social media advertisements and/or create look-alike audiences for advertisements.

### **Share with Third Parties.**

We may share your information with trusted third parties such as our newsletter provider in order to contact you via email, our merchant accounts to process payments, and Google / social media accounts in order to run advertisements and our affiliates.

## **Viewing by Others**

Note that whenever you voluntarily make your Personal Data available for viewing by others online through this Website or its content, it may be seen, collected and used by others, and therefore, we cannot be responsible for any unauthorized or improper use of the information that you voluntarily share (i.e., sharing a comment on a blog post, posting in a Facebook group that we manage, sharing details on a group coaching call, etc.).

## **Submission, Storage, Sharing and Transferring of Personal Data**

Personal Data that you provide to us is stored internally or through a data management system. Your Personal Data will only be accessed by those who help to obtain, manage or store that information, or who have a legitimate need to know such Personal Data (i.e., our hosting provider, newsletter provider, payment processors or team members).

It is important to note that we may transfer data internationally. For users in the European Union, please be aware that we transfer Personal Data outside of the European Union. By using our Website and providing us with your Personal Data, you consent to these transfers in accordance with this Privacy Policy.

## **Data Retention**

We retain your Personal Data for the minimum amount of time necessary to provide you with the information and/or services that you requested from us. We may include certain Personal Data for longer periods of time if necessary for legal, contractual and accounting obligations.

## **Licenses and Idea Submissions**

You grant to Dr. Holly Castle a non-exclusive, worldwide, royalty-free, irrevocable, perpetual license, with the right to sublicense, to reproduce, sell, distribute, transmit, create derivative works of, publicly display and publicly perform any materials and other information (including, without limitation, ideas contained therein for new or improved products or services) you submit to public areas of the Website by all means and in any media now known or hereafter developed. You hereby waive your

moral rights in any such materials and information, and you hereby warrant that any such materials and information are original to you, or that you have the right to submit and license such materials and information in the manner described herein. You agree that you shall have no recourse against Dr. Joanne Siebert for any alleged or actual infringement or misappropriation of any proprietary right in your communication to us.

## **Confidentiality**

We aim to keep the Personal Data that you share with us confidential. Please note that we may disclose such information if required to do so by law or in the good-faith belief that: (1) such action is necessary to protect and defend our rights or property or those of our users or licensees, (2) to act as immediately necessary in order to protect the personal safety or rights of our users or the public, or (3) to investigate or respond to any real or perceived violation of this Privacy Policy or of our Disclaimer, Terms and Conditions, or any other terms of use or agreement with us.

## **Passwords**

To use certain features of the Website or its content, you may need a username and password. You are responsible for maintaining the confidentiality of the username and password, and you are responsible for all activities, whether by you or by others, that occur under your username or password and within your account. We cannot and will not be liable for any loss or damage arising from your failure to protect your username, password or account information. If you share your username or password with others, they may be able to obtain access to your Personal Data at your own risk.

You agree to notify us immediately of any unauthorized or improper use of your username or password or any other breach of security. To help protect against unauthorized or improper use, make sure that you log out at the end of each session requiring your username and password.

We will use our best efforts to keep your username and password(s) private and will not otherwise share your password(s) without your consent, except as necessary when the law requires it or in the good faith belief that such action is necessary, particularly when disclosure is

necessary to identify, contact or bring legal action against someone who may be causing injury to others or interfering with our rights or property.

## **How You Can Access, Update or Delete Your Personal Data**

You have the right to:

1. Request information about how your Personal Data is being used and request a copy of what Personal Data we use.
2. Restrict processing if you think the Personal Data is not accurate, unlawful, or no longer needed.
3. Rectify or erase Personal Data and receive confirmation of the rectification or erasure. (You have the “right to be forgotten.”).
4. Withdraw your consent at any time to the processing of your Personal Data.
5. Lodge a complaint with a supervisory authority if you feel we are using your Personal Data unlawfully.
6. Receive Personal Data portability and transference to another controller without our hindrance.
7. Object to our use of your Personal Data.
8. Not be subject to an automated decision based solely on automatic processing, including profiling, which legally or significantly affects you.

You may unsubscribe from our e-newsletters or updates at any time through the unsubscribe link at the footer of all email communications. If you have questions or are experiencing problems unsubscribing, please contact us at [drcastle@drhollycastle.com](mailto:drcastle@drhollycastle.com).

## **Security**

We take commercially reasonable steps to protect the Personal Data you provide to us from misuse, disclosure or unauthorized access. We only share your Personal Data with trusted third parties who use the same level of care in processing your Personal Data. That being said, we cannot guarantee that your Personal Data will always be secure due to technology or security breaches. Should there be a data breach of which we are aware, we will inform you immediately.



## **Anti-Spam Policy**

We have a no spam policy and provide you with the ability to opt-out of our communications by selecting the unsubscribe link at the footer of all emails. We have taken the necessary steps to ensure that we are compliant with the CAN-SPAM Act of 2003 by never sending out misleading information. We will not sell, rent or share your email address.

## **Third Party Websites**

We may link to other websites on our Website. We have no responsibility or liability for the content and activities of any other individual, company or entity whose website or materials may be linked to our Website or its content, and thus we cannot be held liable for the privacy of the information on their website or that you voluntarily share with their website. Please review their privacy policies for guidelines as to how they respectively store, use and protect the privacy of your Personal Data.

## **Children's Online Privacy Protection Act Compliance**

We do not collect any information from anyone under 18 years of age in compliance with COPPA (Children's Online Privacy Protection Act) and the GDPR (General Data Protection Regulation of the EU). Our Website and its content are directed to individuals who are at least 18 years old or older. If you are under the age of 18, do not, under any circumstance, submit any personal information to us and always rely on a parent or guardian to assist you.

## **Notification of Changes**

We may use your Personal Data, such as your contact information, to inform you of changes to the Website or its content, or, if requested, to send you additional information about us. We reserve the right, at our sole discretion, to change, modify or otherwise alter our Website, its content and this Privacy Policy at any time. Such changes and/or modifications shall become effective immediately upon posting our updated Privacy Policy. Please review this Privacy Policy periodically. Continued use of any information obtained through or on the Website or its content following the posting of changes and/or modifications constituted acceptance of the revised Privacy Policy. Should there be a material change to our Privacy

Policy, we will contact you via email or by a prominent note on our Website.

## **Data Controller and Processors**

We are the data controllers as we are collecting and using your Personal Data. We use trusted third parties as our data processors for technical and organizational purposes, including for payments and email marketing. We use reasonable efforts to make sure our data processors are GDPR-compliant.

## **Disputes**

This Privacy Policy is governed by the internal substantive laws of the State of Arizona, without reference to its conflict of laws principles. All disputes shall be resolved as described in Dr. Siebert's Terms of Use.

If you have any questions about this Privacy Policy, please contact us at: 44574 W. Copper Trail Maricopa, AZ 85139 or [info@DevelopYourHealth.com](mailto:info@DevelopYourHealth.com)