

Privacy Policy
For Cobblestone Health Ltd
(doing business as Iridology Education)
For www.confidentnutritionist.com

This page informs you of our policies regarding the collection, use, and disclosure of Personal Information we receive from users of the site. We use your personal information for providing and improving the site and for fulfillment of contracts initiated by you. By using the site, you agree to the collection and use of information in accordance with this policy.

IMPORTANT NOTE: By using the Site and/or purchasing, viewing, downloading, or otherwise signing up to receive information from Cobblestone Health Ltd doing business as Iridology Education via email list newsletter, social media posts, blog posts, courses, coaching services, guides, eBooks, forms, worksheets, workbooks, website materials, video recordings, webinars, webinar recordings, e-textbook, and/or digital or print handouts (hereinafter collectively referred to as the "Site, Courses, Services, and/or Products"), you voluntarily agree to be bound by this Privacy Policy.

If you have any questions about this Privacy Policy, please contact Judith Cobb at Judith@cobblestonehealth.com

If you do not agree with the terms of this Privacy Policy, you shall not use or browse the Site.

"Company", "We", "I", "Our", or "Us" means Cobblestone Health Ltd, doing business as Iridology Education, on the website www.confidentnutritionist.com.

"Content" means any and all written, visual, video, or audio information contained on the Site, including, but not limited to, any and all emails received from Judith Cobb, Cobblestone Health Ltd doing business as Iridology Education or www.confidentnutritionist.com, and any and all written or downloadable material purchased, viewed, or otherwise offered on or www.iridology.education, such as blog posts, graphics, designs, documents, information, templates and materials.

"Personal Information" means information that can be used on its own or in conjunction with other information to identify, contact, or locate a person, or to identify an individual in context. For example, personal information includes, among other things, your name, address, email address, telephone number, credit card information, gender, geographic location, site behavior, etc.

"Site, Courses, Services, and/or Products" means www.confidentnutritionist.com, content, email list, social media posts, blog posts, courses, coaching services, guides, eBooks, forms, worksheets, workbooks, website materials, and/or video recordings, webinars, webinar recordings, e-textbook, and/or digital or print handouts, classes, and courses available on the Site.

"Site" means www.confidentnutritionist.com and any and all of the Company's associated pages, tabs, landing pages, forms, or sub-pages.

"You" or "Your" means the user, customer, or viewer of the Site.

The Site and its Content are owned by Cobblestone Health Ltd doing business as Iridology Education, Confident Nutritionist and Judith Cobb.

Judith Cobb, Cobblestone Health Ltd doing business as Iridology Education is committed to protecting your Personal Information. We will only collect or use your Personal Information in accordance with the Privacy Policy herein.

We collection **communication data** that includes any communication that you send to us by any means including but not limited to through a contact form on our website, email, text, social media messaging, social media posting, and by phone. We legally process this data for the purpose of communicating with you, record keeping, and the establishment and pursuit of defending legal claims.

We collect **customer data** as it relates to the purchase of goods or services, and may include your name, delivery address, email address, gender, phone number, geographic location, purchase history, credit card information and browsing habits on our site. We process this data to fulfill your purchases and record such transactions. We legally process this data to fulfill contracts between you and us.

Personal information is collected when you register on the site, place an order, opt-in for a free offer, enter a contest of sweepstakes, respond to a survey, respond to an email (including clicking on links within the email) or participate in other site features. You may visit the site anonymously.

When you **order a product or register for an event** we may ask you for your name, delivery address, email address, gender, phone number, credit card information so that we can fulfill the order or registration. Likewise, we may ask for the same information to fulfill gift orders.

We do not collect **sensitive data** such as information about your race, ethnicity, religion, philosophical beliefs, sex life, sexual orientation, political persuasion, trade union membership, criminal convictions or offenses, health, genetics, or biometrics.

We collect **user data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website along with other online services and business. We do this legally to enable us to properly administer our website and business.

We collect **technical data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyze your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. We legally do this to enable us to properly administer our website and business, to grow our business, and to make marketing strategies.

We collect **marketing data** that includes your preferences about receiving marketing from us, including your communication preferences. We process this data to enable you to partake in our promotions such as sales offers, free contests, giveaways, affiliate offers, to deliver relevant website content and advertisements to you, and to assess the effectiveness of said advertising. We legally do this to enable us to study how customers hear about, access, and use our products and services, and to assess our marketing strategies.

We use **cookies** to enhance your experience and gather information about visitors and their visits to our websites. Please refer to the cookie section below for information about how we use cookies.

If you are outside of the EU: if you sign-up to receive any freebies, downloads, webinars, recordings, courses, or services from the Company, or purchase any products or services from us, you will automatically be added to our email list to receive free email messages from us. You can unsubscribe at any time by clicking "UNSUBSCRIBE" at the bottom of each email. If you have any questions, or difficulty unsubscribing from those emails, send an email to Judith@cobblestonehealth.com to be unsubscribed from future messages.

If you're IN the EU: if you sign-up to receive any freebies, downloads, webinars, recordings, courses, or services from the Company, or purchase any products or services from us, you will only be added to our email list to receive free email messages from us if you **affirmatively consent** to receiving such messages. You can unsubscribe at any time by clicking "UNSUBSCRIBE" at the bottom of each email. If you have any questions, or difficulty unsubscribing from those emails, email Judith@cobblestonehealth.com to be unsubscribed from future messages.

We may use data collection technology such as Google, Jetpack, and similar technology to collect your personal data as itemized previously. The Data Collection Companies also provide us with information about what type of device or software you use, your IP address (with location information), and whether you view the Site on mobile, tablet, or desktop. We legally collect this information to enable us to reply to your communications with us, to keep records, and to establish or pursue or defend legal claims.

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if 1) you made a purchase; 2) asked for information from us about a good or service we offer; 3) you have agreed to receive marketing communications; 4) if you have not opted out of receiving such communications. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out or receiving marketing emails from us at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases.

We may have to **share your personal data** with the parties set out below:

- 1) service providers such as IT and systems administration services
- 2) professional advisors such as lawyers, bankers, auditors, insurers
- 3) government bodies that require us to report processing activities
- 4) third party technology platforms and advertisers that support the running and growth of Cobblestone Health Ltd.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

When using the Site, Courses, Services, and/or Products, **we may use the Personal Information we collect from you** when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication (typically by email), browse the Site, or use certain other Site features in the following ways:

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our Site in order to better serve you.
- To allow us to better serve you in response to your customer service requests.
- To administer a contest, promotion, survey, or other Site feature.
- To quickly process your transactions on and for the Site, Courses, Services, and/or Products.
- To send periodic emails regarding the Site, Courses, Services, and/or Products.

- To tailor social media (i.e., Facebook, Instagram, etc.) advertisements to you.]

We aim to make your visit to our Site as safe as possible. The Site uses commercially acceptable methods of **security protection** to protect your information. The Site is scanned for security breaches using, for example, Wordfence Security. We also use an SSL certificate on the website and never transmit your credit card information by email.

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 Personal Information confidential. By viewing, using, or purchasing on or from the Site, Courses, Services, and/or Products, you acknowledge that Cobblestone Health Ltd, doing business as Iridology Education and its staff and independent contractors may access your Personal Information.

We implement a variety of security measures when a user places an order to maintain the safety of your Personal Information. All transactions are processed through a gateway provider (Paypal or Stripe) and are not stored or processed on our servers.

We **DO NOT sell, trade, or otherwise transfer** to outside (third) parties your Personal Information unless we provide users with advance notice or need to do so in order to comply with the law or an investigation. This does not include website hosting partners and other parties who assist us in operating our website, email service, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release Personal Information when its release is appropriate or necessary to comply with the law, enforce our Site policies, this Privacy Policy, [**OPTIONAL: Terms & Conditions, Disclaimer**], or to protect our rights or others' rights, property, or safety.

We will only retain your personal data for as long as necessary to fulfill the purposes for which it was collected, including satisfying any legal, accounting, or reporting requirements.

For tax purposes the law requires us to keep basic information about our customers, including contact, identity, and financial transactional data for seven years after our last business transaction with them.

In some circumstances we may use your personal data, without any recognizable identifying information, for research or statistical purposes without notifying you.

If the **Personal Information we have collected about you is incorrect** or incomplete in any way, or you would like to update what we have, please contact Judith@cobblestonehealth.com. We will make the appropriate corrections when notified, as long as the corrections requested to be made are not incorrect or fraudulent in any way.

As you browse www.confidentnutritionist.com, advertising **cookies** will be placed on your computer so we can understand what you are interested in.

Cookies are small files with small amounts of data, which may include an anonymous unique identifier and enables the site or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current Site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about Site traffic and Site interaction so that we can offer better site experiences and tools in the future.

To opt out of cookies, to the <settings> tab on your internet browser, select the <block third party cookies and site data> or deselect <accept cookies>.

We use cookies to:

- Help remember and process the items in the shopping cart.
- Compile aggregate data about site traffic and site interactions in order to offer better Site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

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 each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

While you may disable the use of cookies through your browser's settings or options page, you may lose some of the features and functionality of the Site, Courses, Services, and/or Products, as cookies are necessary to help track and enhance your experience on the Site.

The Company DOES USE **social media pixels** (e.g. Facebook pixels) to track visitors to the Site so we can tailor advertisements towards those visitors on various social media platforms, including: Facebook, Instagram, LinkedIn. The Company reserves the right to use pixels in accordance with the terms of the social media platform.

Occasionally, at our discretion, **we may include or offer third-party products, services, or links to articles/blogs/sites on our Site**. These third-party sites may or may not have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites and/or their privacy policy (or lack thereof). Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about any issues you experience with linked-to sites by emailing us at judith@cobblestonehealth.com

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. When you place orders or access your personal information, we offer the use of a secure server. All sensitive/credit information you supply when purchasing from us is transmitted via Secure Socket Layer (SSL) technology (Paypal, Stripe).

To **modify your email subscriptions**, you will find an unsubscribe link at the bottom of each email. Please note, emails are often written and scheduled weeks or months in advance. If you are on an email list that already has been scheduled for one or more emails, removing your information will not take effect for those emails that are already scheduled.

In an attempt to provide you with increased value we may include third party links on our site. These linked 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 and feedback about these linked sites.

You may **opt out** of any future contacts **or verify** the information we have stored about you at any time. You can do so by contacting us via email (judith@cobblestonehealth.com). As such, you may 1) see what data we have about you, if any; 2) change or correct any data we have about you; 3) have us delete any data we have about you; 4) express any concern you have about our use of your data.

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for you. We are not currently using Google Ads on the Site, although this may change in the future.

We have implemented the following through Google Analytics: Demographics and Interests Reporting.

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.

To Opt-Out of Google Ads: You 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.

The privacy policy refers only to information collected through our websites and does not apply to information collected in person at events, on coaching calls, or social media.

Pursuant to **CalOPPA**, we agree to the following:

Users can visit our site anonymously.

There is a link to this Privacy Policy on the footer of the site.

Our Privacy Policy link does include the word 'Privacy' and can easily be found on the page specified above. It is titled "Privacy Policy" very clearly.

If we decide to change our privacy policy, we will post those changes on this page. Policy changes will apply only to information collected after the date of the change. (see bottom of page for "Updated On" date).

We do not specifically market to children under the age of 13. Please STOP and do not use, view, purchase, or otherwise browse the Site, Courses, Services, or Products if you are under 13 years old. If you're younger than 13, you are not permitted to enter any Personal Information on this Site.

If you are a parent and you believe your child under the age of 13 has provided us with Personal Information, please contact us immediately to have it removed by emailing us at judith@cobblestonehealth.com

In order to comply with Fair Information Practices we will take the following responsive action, should a data breach occur: We will notify you via email within 14 days business days of any known breach.

The **CAN-SPAM** Act is a U.S. law which establishes rules for commercial email messages, gives you the right to stop certain commercial emails from being sent to you, and outlines certain penalties for commercial entities or persons who violate the law.

We collect your email address and name so we can:

- Send information, respond to inquiries, and/or other requests or questions.
- Process orders and to send information and updates pertaining to orders of a course, product, or service.
- Send you additional information related to your course, product and/or service.
- Market to our mailing list or continue to send emails to you after the original transaction has occurred.
- Email you a newsletter with free information and advertising certain Products, Services, and/or Courses we offer.

In accordance with the CAN-SPAM Act, we agree to the following:

- We not use false or misleading subjects or email addresses.
- We will identify the email message as an advertisement in some reasonable way.
- We will include our business mailing address and/or physical address in our emails.
- We will monitor third-party email marketing services for compliance. We use Constant Contact or Active Campaign to send our emails to you.
- We will honor opt-out/unsubscribe requests as quickly as possible.

- We will allow users to unsubscribe by using the appropriate link at the bottom of each email.

If at any time you would like to **unsubscribe** from receiving future emails, you can email us at judith@cobblestonehealth.com or follow the instructions at the bottom of any email you receive from us and we will promptly remove you from future correspondence(s). However, unsubscribing from one list or set of emails may not unsubscribe you from receiving ALL future emails from us. If you experience any problems unsubscribing, please email judith@cobblestonehealth.com and we will promptly handle your removal.

If you are located within the European Union ("EU"), you are entitled to certain rights under the GDPR. You have the right to:

- Know how long we'll keep your information. We'll keep your personal information until: (1) you either ask us to delete your information ; or (2) the Company decides it no longer needs the data and the cost of retaining it outweighs the value to keeping it; or (3) seven years past your last transaction with us.
- Access, rectify or erase your personal information.
- Withdraw your consent to the Company's processing of your data, which shall have no effect on the lawfulness of the processing of your personal information prior to your withdrawal.
- Lodge a complaint with a supervisory authority that has jurisdiction over GDPR issues.
- Provide only your personal information which is reasonably required to enter into a contract with us. The Company will not ask for your consent to provide unnecessary personal information on the condition of entering into a contractual relationship with the Company.

If there are any questions regarding this Privacy Policy, you may contact us using the following information:

Cobblestone Health Ltd.

Website: www.confidentnutritionist.com

Mailing Address: 959 Canna Cres SW, Calgary, AB T2W 1N8 Canada

Email: judith@cobblestonehealth.com

Updated on: 1 Dec 2018