**Privacy Policy**

The website and its content are owned by Kim Pennybrook, LLC (“Company”, “we”, or “us”). The term “you” refers to the user or viewer of kimpennybrook.com (“website”).

This Privacy Policy describes how we collect, use, process, and distribute your information, including Personally Identifiable Information (PII) used to access this Website. 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. We will not use or share your information with anyone except as described in this Privacy Policy. The use of information collected through our Sites 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. If you do not agree with any part of this Privacy Policy, you may not use the Site.

**If you are in the European Economic Area, and you use this site, you consent and permit to the transfer of your data from the European Economic Area to the United States only for purposes laid out in this Privacy Policy.**

**Information We May Collect**

Depending on how you communicate with us, we may collect the following information:

* Your email address
* Your first name
* Your last name
* Your phone number
* Your payment information (if you make a purchase through the Website)

B. Information About You That Is Provided Automatically.

Like most places on the Internet, simply by visiting our Website you or your Device automatically tell us certain information. This includes basic information such as your IP address, when you visited, the website from where you came prior to visiting us, the website where you go when you leave our website, your computer’s operating system, and the type of web browser that you are using. Our website automatically records this basic information about you.

And like many other websites, we may use cookies, digital fingerprinting (e.g. device, machine, and Internet browser fingerprints), web beacons, click redirects, pixel tags, container tags, and similar technologies. In plain English, this means information that our website’s server transfers to your computer. This information can be used to track your session on our website and to customize our website content for you as an individual. When you browse our Site, we also automatically receive your computer’s internet protocol (IP) address as well as other information that helps us learn about your browser and operating system (**“Usage Information”**).

*Usage Information We Collect From You*:

List of Usage Information includes:

* Your IP address;
* Your Device type,
* Your unique Device identifier,
* Your location, and
* The type of browser software and operating system you are using.

If you download or use mobile software applications (**“Mobile Apps”**) from our website, we may know your location. In addition, your Device using our Mobile Apps may provide us information about the device, including its unique identifier, make and model, operating system, mobile network carrier, and your telephone number. Your Device may have the ability to disable location services as well as deny us access to other information described in this paragraph. To learn more, check your Device’s user manual and/or contact your mobile device’s manufacturer or service carrier.

The Site may also feature social buttons from networks such as Facebook, Twitter, YouTube, Pinterest, and Instagram. To do so we embed code that they provide. We do not control that code ourselves. In order to function, their buttons generally know if you’re logged in. We do not have any access to that information, nor can we control how those networks use it.

If you access the Site via a mobile app, we use additional identifiers, such as the advertising ID provided by Apple or Android, for similar purposes.

Please note that the PII you are giving to us is voluntary, and by you providing this information you are giving consent for us to use, collect and process this PII. You are welcome to opt-out or request for us to delete your PII at any point by contacting us at butterflyhug@therapysecure.com.

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

**Use of “Cookies”**

We may use the standard “cookies” feature of major web browsers. We do not set any PII 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.

**We use cookies to:**

* Understand and save user’s preferences for future visits.
* Compile aggregate data about site traffic and site interactions to offer better site experiences and tools

**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:

* We may contact you if you give us your clear, unambiguous, affirmative consent to contact you.
* We will contact you under our contractual obligation to deliver goods or services you purchase from us.
* 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 PII 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 to contact you via email, our merchant accounts to process payments, and Google / social media accounts to run advertisements and our affiliates.

**Viewing by Others**

Note that whenever you voluntarily make your PII 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.

**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:

* Request information about how your Personal Data is being used and request a copy of what Personal Data we use.
* Restrict processing if you think the Personal Data is not accurate, unlawful, or no longer needed.
* Rectify or erase Personal Data and receive confirmation of the rectification or erasure. (You have the “right to be forgotten”).
* Withdraw your consent at any time to the processing of your Personal Data.
* Lodge a complaint with a supervisory authority if you feel we are using your Personal Data unlawfully.
* Receive Personal Data portability and transference to another controller without our hindrance.
* Object to our use of your Personal Data.
* 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 hello@lithesome.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 within 7 business days. Our website is scanned on a regular basis for security holes and known vulnerabilities to make your visit to our site as safe as possible.

 We use regular 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.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

 All transactions are processed through a gateway provider and are not stored or processed on our servers.

**Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others’ rights, property or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

**Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. 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.

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

Google, as a third-party vendor, uses cookies to serve ads on our site. Google’s use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

**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.

**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 e-mails. 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 is directed to individuals who are at least 18 years old or older.

**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 of the 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.

**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.

**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: http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf

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

Users can visit our site anonymously.

Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.

Our Privacy Policy link includes the word ‘Privacy’ and can easily be found on the page specified above.

**You will be notified of any Privacy Policy changes:**

* On our Privacy Policy Page

**Can change your personal information:**

* By emailing us

**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.

**Does our site allow third-party behavioral tracking?**

It’s also important to note that we allow third-party behavioral tracking

**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 to:

* Send information, respond to inquiries, and/or other requests or questions
* 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 our clients after the original transaction has occurred.

To be in accordance with CANSPAM, 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.

If at any time you would like to unsubscribe from receiving future emails, you can email us at butterflyhug@therapysecure.com.

**Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

 Kim Pennybrook at butterflyhug@therapysecure.com

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