FRANK & CONFIDENTIAL
"Conversations"

PRIVACY POLICY

Effective Date: 01 January 2026

This Privacy Policy describes how **Frank & Confidential** ("we," "us," or "our") collects, uses, and discloses your personal information when you use our personal **Frank & Confidential** services (the "Services"). We are committed to protecting your privacy and the confidentiality of the information you share with us.

1. Our Commitment to Your Privacy

At **Frank & Confidential**, the trust you place in us is fundamental. We understand the highly sensitive and personal nature of the information you may share. This Privacy Policy outlines our unwavering commitment to safeguarding your privacy and maintaining the confidentiality of your personal information. We operate with the highest ethical standards and respect your autonomy and privacy at all times.

2. Information We Collect

We collect information that helps us provide you with our personalised **Frank & Confidential** services. This may include:

- **Information You Provide Directly to Us:**
    - **Contact Information:** Name, email address, phone number, and mailing address.
    - **Personal Background Information:** Details about your life, experiences, relationships, and goals that you choose to share with us during consultations, conversations, or through any forms you complete. This may include sensitive information related to your health, emotional well-being, financial situation, beliefs, or other personal matters, shared solely at your discretion.
    - **Communication Records:** Records of our conversations, emails, messages, and other communications.
    - **Payment Information:** If applicable, billing address and payment details (though we typically use secure third-party payment processors, and do not store full credit card numbers).
- **Information Collected Automatically (Limited):**
    - **Website Usage Data:** If you visit our website, we may collect basic, non-identifying information about your interaction with our site, such as pages viewed, time spent on pages, and referring websites. This is typically collected

via cookies or similar technologies (see Section 6). This data is generally aggregated and anonymous.

3. How We Use Your Information

We use your personal information exclusively for the following purposes:

- **To Provide and Improve Our Services:** To understand your needs, provide empathetic support, offer insights, and facilitate personal growth based on the information you share.
- **To Communicate with You:** To schedule appointments, respond to your inquiries, send service-related notifications, and provide updates.
- **For Internal Record Keeping:** To maintain accurate records of our interactions and your progress, which is essential for consistent and effective service delivery.
- **To Process Payments:** To manage billing and payment for our services.
- **To Enhance Security and Prevent Fraud:** To protect our services and users from fraudulent or malicious activities.
- **To Comply with Legal Obligations:** As required by applicable laws, regulations, or legal processes.

We will never sell, rent, or trade your personal information to third parties for marketing purposes.

4. How We Share Your Information

Your privacy is paramount. We share your information only in very limited circumstances:

- **Service Providers:** We may use trusted third-party service providers to assist us in operating our business (e.g., secure payment processors, secure cloud storage for client notes, website hosting). These providers are contractually obligated to protect your information and are only permitted to use it for the specific services they provide to us. They are not allowed to use your information for their own purposes.
- **Legal Requirements:** We may disclose your information if required to do so by law or in the good faith belief that such action is necessary to:
    - Comply with a legal obligation (e.g., a court order or subpoena).
    - Protect and defend our rights or property.
    - Prevent or investigate possible wrongdoing in connection with the Services.
    - Protect the personal safety of users of the Services or the public.
    - Protect against legal liability.
- **Emergency Situations (Duty to Warn):** In very rare and specific circumstances, if we have a reasonable and credible belief that you or someone else is in immediate danger of serious harm, we may, out of a duty of care, be legally or ethically obligated to disclose relevant information to appropriate authorities (e.g., emergency services, law enforcement). This is an extreme measure taken only when necessary to prevent

imminent harm and will always be handled with the utmost care and consideration for your privacy.

5. Data Security

We are committed to protecting the security of your personal information. We implement a variety of industry-standard security measures, both technical and organisational, to protect against unauthorised access, alteration, disclosure, or destruction of your personal information. These measures include:

- **Encryption:** Using encryption for data in transit and at rest where appropriate (e.g., secure communication channels, encrypted storage).
- **Access Controls:** Restricting access to your personal information to only those who need to know it to provide the Services.
- **Secure Storage:** Using secure, reputable cloud storage providers with robust security protocols.
- **Confidentiality Agreements:** All personnel involved in providing the Services are bound by strict confidentiality agreements.
- **Regular Security Reviews:** Periodically reviewing our security practices to ensure they remain effective.

Despite our efforts, no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

6. Cookies and Tracking Technologies

If we operate a website, we may use cookies and similar tracking technologies (like web beacons and pixels) to track the activity on our Service and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

7. Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Generally, we will retain your information for a period of 5 years after our last interaction, or as otherwise required by law.

8. Your Privacy Rights

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- **Right to Access:** The right to request copies of your personal information held by us.
- **Right to Rectification:** The right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- **Right to Erasure (Right to be Forgotten):** The right to request that we erase your personal information, under certain conditions.
- **Right to Restrict Processing:** The right to request that we restrict the processing of your personal information, under certain conditions.
- **Right to Object to Processing:** The right to object to our processing of your personal information, under certain conditions.
- **Right to Data Portability:** The right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions.
- **Right to Withdraw Consent:** Where we rely on your consent to process your personal information, you have the right to withdraw that consent at any time.

To exercise any of these rights, please contact us using the contact details provided in Section 11. We will respond to your request in accordance with applicable data protection laws.

9. Children's Privacy

Our Services are not intended for individuals under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

10. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Effective Date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

11. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us:

contact@frankandconfidential.com