



JTS私隱政策

生效日期：2026年10月21日

JTS 自願遵守聯邦《1988年隱私法 (Privacy Act)》以及新州《2002年健康記錄與信息隱私法 (HRIP Act)》

1. 本政策適用範圍

- 1.1 本政策適用於 **Yuanru Jenni Lu** (經營者) 以 **Jenni True Self** 商業名義經營的業務，包括網站 **trueselfofficial.com**，以及通過 WhatsApp、電郵、Zoom 或其他方式提供的初步對談和家族系統排列工作坊服務（以下統稱「本服務」）。
- 1.2 本業務以個人獨資經營者（sole trader）形式營運。本政策中的「我們」「本經營者」均指上述經營者。
- 1.3 本政策說明我們如何收集、使用、保存、保護及披露個人資料，以及你可以如何行使相關私隱權利。
- 1.4 我們會按照適用的澳洲法律處理個人資料，包括在適用情況下遵守《1988年隱私法》(Privacy Act 1988) 及《澳洲隱私原則》(Australian Privacy Principles)。

2. 我們收集哪些個人資料

我們只會在提供本服務所合理需要的範圍內，收集相關個人資料。

2.1 瀏覽網站

本網站目前不設網上報名表格，亦不主動使用追蹤 Cookie、Meta Pixel、Google Analytics 或其他第三方廣告追蹤工具。

如你只是瀏覽網站，我們一般不會要求你提供姓名、電話號碼或其他直接識別身份的資料。

不過，網站主機或相關技術服務供應商可能會基於網站運行、故障排查及資訊保安需要，自動收集一般技術記錄，例如 IP 地址、訪問時間、瀏覽器類型及錯誤記錄。相關資料的收集方式取決於實際使用的主機及網站設置。

2.2 通過 WhatsApp 或電郵聯絡

當你通過 WhatsApp 或電郵聯絡我們時，我們可能會收集：

- 你的姓名或顯示名稱；
- 電話號碼或電郵地址；
- 訊息內容及聯絡時間；
- 你主動提供的其他資料。

你首次聯絡我們時，無須提供私人家庭經歷、醫療資料或其他敏感資料，只需表達預約意向即可。

2.3 初步對談及工作坊

如你預約30分鐘免費初步對談，或參加六週家族系統排列工作坊，我們可能會收集：

- 姓名或稱呼、聯絡電郵及電話號碼；
- 年齡範圍、現居城市及就業狀況；
- 與服務適配有關的感情狀況；
- 你主動分享的個人成長經歷及家庭關係，包括與父母的關係；
- 你曾經嘗試過的方法、目前面對的困難及希望改變的方向；
- 報名、付款、出席及課程安排記錄；
- 你在對談或工作坊中選擇分享的其他資料；
- 如你同意錄影或錄音，相關影像、聲音及其中包含的個人資料。

我們不會刻意收集與本服務目的無關的個人資料。

3. 敏感資料及知情同意

3.1 家庭關係及個人成長分享可能包含私密或敏感內容。根據具體內容，部分資料可能屬於《Privacy Act 1988》所定義的敏感資料，例如有關心理健康、醫療狀況或其他受法律特別保護的資料。

3.2 在適用法律要求取得同意的情況下，我們會在收集敏感資料前取得你的明確同意，並向你說明資料的收集目的、使用方式及相關處理安排。

3.3 在30分鐘初步對談開始前，我們會說明對談可能涉及家庭關係及個人經歷。你可以選擇不回答個別問題，亦可以要求暫停或結束對談。

3.4 我們會盡可能在收集資料前說明相關用途及保存安排。取得同意後，才會在約定範圍內收集相關資料。

3.5 你可以只通過 WhatsApp 或電郵詢問服務詳情及預約時間，無須在首次聯絡時披露任何私人經歷。

3.6 如你不同意提供某些資料，我們會在合理可行的範圍內說明是否仍可提供相關服務，以及不提供該資料可能產生的影響。

4. 我們如何使用你的個人資料

我們可能會將你的個人資料用於以下目的：

- 安排及進行30分鐘免費初步對談；
- 瞭解你的服務需要，並評估本服務是否適合你；
- 安排工作坊、發送課程通知及處理行政事宜；
- 記錄付款、出席及相關業務記錄；
- 回應你的查詢、處理資料查閱或更正請求；
- 在取得適當同意的情況下，進行內部服務檢討或研究；
- 履行適用法律規定的義務，以及處理必要的法律事項。

我們不會出售或出租你的個人資料，亦不會為了與本服務無關的營銷目的而使用你的資料。

如我們日後希望將你的資料用於本政策未說明的其他目的，且適用法律要求另行取得同意，我們會事先取得你的同意。

未經你另行明確同意，我們不會將可識別你身份的個人分享內容、故事或引述公開用於宣傳、社交媒體或營銷材料。

5. 誰可能接觸你的資料

5.1 經營者本人

初步對談及工作坊均由經營者本人進行。經營者會限制個人資料的使用及接觸範圍，並採取合理措施保護資料。

5.2 技術服務供應商

為提供及管理本服務，我們可能使用以下供應商：

- **網站主機：**網站寄存及域名服務供應商（包括 Cloudflare）；
- **即時通訊：**WhatsApp，由 Meta 相關實體提供；
- **電郵服務：**Cloudflare 電郵轉寄服務，及 Microsoft Outlook 郵箱；
- **視像會議：**Zoom。

這些供應商可能按照各自的服務條款及私隱政策處理相關資料。其具體資料收集、使用、儲存及跨境處理方式，取決於所使用的服務、賬戶設置及適用條款。

我們不會僅因使用這些服務，便保證所有資料均只儲存在澳洲境內。

5.3 跨境資料處理

部分技術服務供應商可能在澳洲境外儲存或處理個人資料，包括在美國或其他國家及地區。

在適用法律要求的情況下，我們會採取合理措施處理跨境資料披露，並考慮相關供應商的私隱及資料保安安排。

如你希望瞭解某項服務的資料處理方式，可通過本政策所列的聯絡電郵向我們查詢。

5.4 法律要求及其他允許的披露

除上述情況外，如法律要求或授權披露資料，或為處理依法允許的特定事項所必需，我們可能在法律允許的範圍內披露相關資料。

我們不會因為其他工作坊成員提出要求，就向其提供你的私人對談記錄或個人資料。

6. 個人資料的保存期限

我們會根據資料用途、業務需要、適用法律及資料敏感程度，決定合理的保存期限。

目前的保存安排如下：

- **未參加工作坊的人士：** 初步對談記錄原則上於對談結束後12個月內刪除或去識別化；如無須保留有關記錄，我們可能更早處理。
- **工作坊參加者：** 與服務相關的必要記錄原則上於工作坊結束後保存最多7年，之後刪除或去識別化；如法律要求或授權繼續保存，或存在其他合法保存需要，則按適用規定處理。
- **錄影及錄音資料：** 按第10條及錄影前向你說明的具體保存期限處理。
- **付款及業務記錄：** 按適用的財務、稅務及其他法律要求保存。

如資料已不再為相關用途所需要，且沒有適用法律或其他合法理由要求繼續保存，我們會採取合理措施刪除資料或確保資料不再能夠識別個人身份。

7. 個人資料安全

我們會根據資料性質、數量及潛在風險，採取合理的技術及管理措施，防止個人資料遭到未經授權的存取、遺失、濫用、更改或披露。

相關措施可包括：

- 使用設有密碼保護的裝置及帳戶；
- 為適用的裝置及帳戶啟用雙重認證；
- 為 WhatsApp 啟用應用程式鎖及兩步驗證；
- 根據實際使用情況，採用適當的加密備份方式，或關閉不必要的雲端備份；
- 限制個人資料的存取及使用；
- 避免未經授權轉發、截圖或公開分享私人訊息；
- 在資料不再需要時，採取合理措施刪除或去識別化。

儘管我們會採取合理的保安措施，任何電子傳輸或儲存方式均不能保證絕對安全。

如發生適用法律所規定須通知的資料洩露事件，我們會按照相關法律要求採取適當行動。

8. 你的私隱權利

在適用法律及相關例外情況下，你可以向我們提出以下請求：

- **查閱資料：**查詢我們是否持有你的個人資料，並要求查閱相關資料；
- **更正資料：**要求更正不準確、不完整或過時的個人資料；
- **刪除資料：**要求刪除不再需要保存的個人資料；
- **撤回同意：**對於以你的同意為依據處理的資料，可在適用情況下撤回同意；
- **提出投訴：**就個人資料的收集、使用、保存或披露方式提出疑問或投訴。

提出刪除請求並不代表所有資料均可立即刪除。如法律要求或授權繼續保存相關記錄，我們會在適用範圍內說明處理方式。

你可通過以下電郵提出請求：

聯絡電郵：hello@trueselfofficial.com

我們會在合理時間內回應，並按適用法律處理你的請求。需要核實身份時，我們可能會要求提供合理且必要的驗證資料。

如你對我們的處理方式不滿意，可先向我們提出投訴；如問題未獲妥善解決，你亦可向澳洲資訊專員辦公室（Office of the Australian Information Commissioner, OAIC）查詢或投訴：

網站：<https://www.oaic.gov.au>

9. Cookie 及網站追蹤技術

本網站目前不主動使用廣告追蹤 Cookie、Meta Pixel、Google Analytics 或其他第三方廣告追蹤工具。

網站主機、網站平台或安全服務仍可能使用維持網站正常運作所需的技術，例如基本功能 Cookie 或服務器記錄。實際情況取決於網站平台及主機設置。

如日後新增會影響個人資料收集或使用的分析、廣告追蹤或其他相關工具，我們會在適當情況下更新本政策，並在法律要求時提供相應通知或取得同意。

10. 初步對談及工作坊的錄影與錄音

10.1 錄影目的

30分鐘初步對談及部分工作坊環節可能錄影或錄音，擬定用途為經營者的內部服務檢討及研究，不用於公開宣傳、社交媒體發佈或對外銷售。

10.2 事先說明及同意

在錄影或錄音開始前，我們會向你說明：

- 哪些環節會被錄製；
- 錄製的具體目的及使用方式；
- 哪些人士可以接觸相關資料；
- 保存期限及刪除安排；
- 如你不同意錄製，是否仍可參加對談或工作坊，以及有哪些替代安排。

在適用法律要求取得同意的情況下，我們會在錄製前取得你的明確同意。對於可能包含敏感資料的錄製內容，我們會特別注意同意是否充分、具體及自願。

10.3 不同意錄影

你可以在錄製前提出疑問或表達不同意。我們會根據實際服務安排，說明是否可以採用不錄影的方式提供服務，或是否需要另行商議替代安排。

10.4 小組錄影

如錄影涉及其他組員的影像、聲音、個人經歷或分享內容，我們會在錄製前說明安排，並取得適當同意。未經另行明確同意，不會將可識別組員身份的錄影或內容公開使用。

10.5 保存及刪除

錄影及錄音資料會按照事先告知的具體保存期限處理。除非有合法的繼續保存理由，我們會在保存期限屆滿或資料不再需要時，採取合理措施刪除或去識別化。

有關資料的保存及安全措施，亦適用本政策第6條及第7條。

11. 私隱政策的更新

我們可能因服務安排、技術供應商、資料處理方式或適用法律的變化而修訂本政策。

更新版本會在本網站公佈，並註明修訂後的生效日期。

如有重大變更，我們會在適當情況下採取合理措施通知受影響人士。對於法律要求另行取得同意的變更，我們會按相關規定處理。

12. 聯絡我們

如你對本私隱政策、個人資料的處理方式或相關權利有任何疑問，請通過以下方式聯絡我們：

- 經營者姓名：Yuanru Jenni Lu
- 商業名稱：Jenni True Self
- ABN：47 227 005 489
- 網站：trueselfofficial.com
- 聯絡電郵：hello@trueselfofficial.com

- **WhatsApp** : +61 434 202 628

我們重視你的私隱，並會盡合理努力，以透明、尊重及負責任的方式處理你的個人資料。

JTS Privacy Policy

Effective Date: 21 October 2026

JTS voluntarily complies with the Commonwealth Privacy Act 1988 and the New South Wales Health Records and Information Privacy Act 2002 (HRIP Act).

1. Scope of This Policy

- 1.1 This Privacy Policy applies to the business operated by **Yuanru Jenni Lu (Operator)**, trading as **Jenni True Self**, including the website **trueselfofficial.com** and the introductory consultations and family constellations workshops provided through WhatsApp, email, Zoom or other means (collectively referred to as the “Services”).
- 1.2 The business operates as a sole trader. In this Privacy Policy, “we” , “us” and “our” refer to the above-mentioned operator.
- 1.3 This Privacy Policy explains how we collect, use, store, protect and disclose personal information, and how you may exercise your privacy rights.
- 1.4 We handle personal information in accordance with applicable Australian laws, including the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs), where applicable.

2. What Personal Information We Collect

We collect only the personal information reasonably necessary to provide our Services.

2.1 Website Browsing

Our website currently does not provide online registration forms and does not actively use tracking cookies, Meta Pixel, Google Analytics or other third-party advertising tracking tools.

If you only browse our website, we generally do not ask you to provide your name, telephone number or other information that directly identifies you.

However, our website hosting provider or other technical service providers may automatically collect general technical information for website operation, troubleshooting and security purposes. This may include IP addresses, access times, browser types and error logs. The information collected depends on the actual hosting and website settings.

2.2 Contacting Us Through WhatsApp or Email

When you contact us through WhatsApp or email, we may collect:

- Your name or display name;

- Your telephone number or email address;
- The content of your messages and the time of contact; and
- Any other information you voluntarily provide.

When you first contact us, you do not need to disclose private family experiences, medical information or other sensitive information. You only need to express your interest in making an appointment.

2.3 Introductory Consultations and Workshops

If you book a 30-minute complimentary introductory consultation or participate in a six-week family constellations workshop, we may collect:

- Your name or preferred form of address, email address and telephone number;
- Your age range, current city of residence and employment status;
- Your relationship status, where relevant to assessing the suitability of the Services;
- Personal experiences and family relationship information that you voluntarily share, including information about your relationship with your parents;
- Methods you have previously tried, the challenges you are currently experiencing and the changes you hope to achieve;
- Registration, payment, attendance and course administration records;
- Other information you choose to share during consultations or workshops; and
- Images, audio recordings and personal information contained in them, if you consent to recording.

We do not intentionally collect personal information that is unrelated to the purposes of providing our Services.

3. Sensitive Information and Informed Consent

3.1 Discussions about family relationships and personal growth may involve private or sensitive information. Depending on the specific content, some information may constitute “sensitive information” under the *Privacy Act 1988*, such as information about mental health, medical conditions or other matters specially protected by law.

3.2 Where required by applicable law, we will obtain your explicit consent before collecting sensitive information and explain the purposes for which the information will be collected, how it will be used and the relevant handling arrangements.

3.3 Before your 30-minute introductory consultation begins, we will explain that the discussion may involve family relationships and personal experiences. You may choose not to answer particular questions and may ask to pause or end the consultation.

3.4 Where reasonably practicable, we will explain the relevant purposes and retention arrangements before collecting information. We will then collect the information within the agreed scope.

3.5 You may contact us through WhatsApp or email solely to enquire about the Services or arrange an appointment, without disclosing any private experiences.

3.6 If you do not wish to provide certain information, we will, where reasonably practicable, explain whether we can still provide the relevant Services and what impact withholding that information may have.

4. How We Use Your Personal Information

We may use your personal information for the following purposes:

- Arranging and conducting the 30-minute complimentary introductory consultation;
- Understanding your needs and assessing whether the Services are suitable for you;
- Arranging workshops, sending course notifications and managing administration;
- Maintaining payment, attendance and relevant business records;
- Responding to enquiries and handling requests to access or correct personal information;
- Conducting internal service reviews or research where appropriate consent has been obtained;
- Complying with applicable legal obligations; and
- Addressing necessary legal matters.

We do not sell or rent your personal information, nor do we use your information for marketing purposes unrelated to the Services.

If we wish to use your information for another purpose not described in this Privacy Policy, we will obtain your consent where required by applicable law.

Without your separate and explicit consent, we will not publicly use personal stories, testimonials, quotations or other content that identifies you for promotional purposes, social media or marketing materials.

5. Who May Access Your Information

5.1 The Operator

All introductory consultations and workshops are conducted personally by the operator. We limit access to and use of personal information and take reasonable steps to protect it.

5.2 Technology Service Providers

We may use the following service providers to deliver and administer the Services:

- **Website hosting:** website hosting and domain service providers (including Cloudflare);
- **Instant messaging:** WhatsApp, provided by Meta entities;

- **Email services:** Cloudflare Email Routing (email forwarding) and Microsoft Outlook;
- **Video conferencing:** Zoom.

These providers may process relevant information in accordance with their own terms of service and privacy policies. Their specific data collection, use, storage and overseas processing practices depend on the services used, account settings and applicable terms.

Our use of these services does not guarantee that all information will be stored exclusively in Australia.

5.3 Overseas Data Processing

Some technology service providers may store or process personal information outside Australia, including in the United States or other countries and jurisdictions.

Where required by applicable law, we will take reasonable steps to address overseas disclosures and consider the privacy and security arrangements of the relevant providers.

If you would like to understand how a particular service handles information, you may contact us using the email address provided in this Privacy Policy.

5.4 Disclosure Required or Permitted by Law

In addition to the circumstances described above, we may disclose relevant information to the extent permitted by law where disclosure is required or authorised by law, or is necessary for specific matters permitted by law.

We will not provide your private consultation records or personal information to other workshop participants merely because they request it.

6. Retention of Personal Information

We retain personal information for periods determined by the purpose of collection, business needs, applicable legal requirements and the sensitivity of the information.

Our current retention arrangements are as follows:

- **Individuals who do not participate in a workshop:** Introductory consultation records will generally be deleted or de-identified within 12 months after the consultation ends. Where retention is unnecessary, we may dispose of the records earlier.
- **Workshop participants:** Necessary service records will generally be retained for up to seven years after the workshop concludes and then deleted or de-identified. Longer retention may apply where required or authorised by law or where another lawful reason exists.
- **Video and audio recordings:** These will be handled in accordance with Section 10 and the specific retention period communicated to you before recording.
- **Payment and business records:** These will be retained in accordance with applicable financial, taxation and other legal requirements.

When personal information is no longer needed for its relevant purpose and there is no applicable legal or other lawful reason to retain it, we will take reasonable steps to destroy or de-identify the information.

7. Information Security

We take reasonable technical and organisational measures, having regard to the nature, volume and potential risks of the information, to protect personal information against unauthorised access, loss, misuse, alteration or disclosure.

These measures may include:

- Using password-protected devices and accounts;
- Enabling multi-factor authentication on applicable devices and accounts;
- Enabling WhatsApp app lock and two-step verification;
- Using appropriate encrypted backup arrangements or disabling unnecessary cloud backups, depending on actual usage;
- Restricting access to and use of personal information;
- Avoiding the unauthorised forwarding, screenshotting or public sharing of private messages; and
- Taking reasonable steps to delete or de-identify information when it is no longer required.

Although we take reasonable security measures, no method of electronic transmission or storage can be guaranteed to be completely secure.

If a data breach occurs that is required to be notified under applicable law, we will take appropriate action in accordance with the relevant legal requirements.

8. Your Privacy Rights

Subject to applicable law and relevant exceptions, you may ask us to:

- **Access your information:** Confirm whether we hold personal information about you and request access to that information;
- **Correct your information:** Correct personal information that is inaccurate, incomplete or out of date;
- **Delete your information:** Request the deletion of personal information that no longer needs to be retained;
- **Withdraw consent:** Withdraw consent to processing that relies on your consent, where applicable; and
- **Make a complaint:** Raise concerns or complaints about how your personal information is collected, used, stored or disclosed.

A request for deletion does not necessarily mean that all information can be deleted immediately. If relevant records must or may lawfully be retained, we will explain the handling arrangements to the extent appropriate.

Please submit your request to:

Email: hello@trueselfofficial.com

We will respond within a reasonable period and handle your request in accordance with applicable law. Where identity verification is necessary, we may request reasonable and necessary verification information.

If you are dissatisfied with how we handle your concern, you may first raise the matter with us. You may also contact the Office of the Australian Information Commissioner (OAIC) for information or to lodge a complaint:

Website: <https://www.oaic.gov.au>

9. Cookies and Website Tracking Technologies

Our website currently does not actively use advertising tracking cookies, Meta Pixel, Google Analytics or other third-party advertising tracking tools.

Our website host, website platform or security services may nevertheless use technologies necessary for the website to function, such as essential functional cookies or server logs. Actual practices depend on the website platform and hosting configuration.

If we introduce analytics, advertising tracking or other relevant technologies that affect the collection or use of personal information, we will update this Privacy Policy where appropriate and provide any notices or obtain any consent required by law.

10. Recording of Introductory Consultations and Workshops

10.1 Purpose of Recording

The 30-minute introductory consultation and selected workshop sessions may be recorded. The intended purpose is internal service review and research by the operator. Recordings will not be used for public promotion, social media publication or commercial sale.

10.2 Prior Notice and Consent

Before recording begins, we will explain to you:

- Which sessions or activities will be recorded;
- The specific purpose of recording and how the recordings will be used;

- Who may access the recordings;
- The retention period and deletion arrangements; and
- Whether you may still participate without being recorded and what alternative arrangements may be available if you do not consent.

Where consent is required by applicable law, we will obtain your explicit consent before recording. We will take particular care to ensure that consent is informed, specific and voluntary when recordings may contain sensitive information.

10.3 If You Do Not Consent to Recording

You may raise questions or decline recording before it begins. We will explain whether the Services can be provided without recording or whether alternative arrangements need to be discussed.

10.4 Group Workshop Recordings

If a recording includes other participants' images, voices, personal experiences or shared content, we will explain the arrangements before recording and obtain appropriate consent.

We will not publicly use recordings or content that identifies a participant without separate and explicit consent.

10.5 Retention and Deletion

Recordings will be handled in accordance with the specific retention period communicated to you before recording. Unless there is a lawful reason for continued retention, we will take reasonable steps to delete or de-identify recordings when the retention period expires or the information is no longer needed.

Sections 6 and 7 of this Privacy Policy also apply to the retention and security of recordings.

11. Updates to This Privacy Policy

We may revise this Privacy Policy in response to changes in our Services, technology providers, information-handling practices or applicable laws.

The updated version will be published on our website with a revised effective date.

Where there are significant changes, we will take reasonable steps to notify affected individuals where appropriate. If a change requires separate consent under applicable law, we will handle the change in accordance with those requirements.

12. Contact Us

If you have any questions about this Privacy Policy, how your personal information is handled or your related rights, please contact us using the details below:

- **Operator's Name:** Yuanru Jenni Lu
- **Business Name:** Jenni True Self
- **ABN:** 47 227 005 489
- **Website:** trueselfofficial.com
- **Email:** hello@trueselfofficial.com
- **WhatsApp:** +61 434 202 628

We respect your privacy and will take reasonable steps to handle your personal information in a transparent, respectful and responsible manner.