

EMDR Solutions Online Ltd
Privacy and Data Management
Policy

April 2019

BACKGROUND

EMDR

Solutions Online Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.emdrgateway.com ("Our Site") and (subject to the limited exceptions in section 6, below) we do not collect or use personal data about you unless you contact us (see section 5, below). Any personal data we do collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of our Site. If you do not accept and agree with this Privacy Policy, you must stop using our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

1.1 "Personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via Our Site or through your communications with EMDR Solutions Online Ltd. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

1.2 "We/Us/Our" means EMDR Solutions Online Ltd whose registered address and main trading address is Ty Melin, Mill Row, Boughrood, Powys LD3 0YD.

2. Information About Us

2.1 Our Site, emdrgateway.com is owned and operated by EMDR Solutions Online Ltd.

2.2 Our Data Protection Officer is Marilyn Tew, and can be contacted by email at marilyntew@btopenworld.com, by telephone on 07799842190, or by post at Ailsa Craig, Greens Lane, Wroughton, Wiltshire SN4 0RJ.

2.3 The Board of Directors of EMDR Solutions Online Ltd are all members of the EMDR Association of the United Kingdom and Ireland, and variously of the UK Council for Psychotherapy, the Association for Family Therapy and Systemic

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note, we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

4.1 Under the GDPR, you have the following rights, which we will always work to uphold:

4.1.1 The right to be informed about our collection and use of personal data. This document should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10;

4.1.2 The right to access the personal data we hold about you (Part 10 will tell you how to do this);

4.1.3 The right to have your personal data rectified if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 10 to find out more);

4.1.4 The right to be forgotten – i.e. the right to ask us to delete or otherwise dispose of any of your personal data we have. Please contact us using the details in Part 10 to find out more;

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability. This means that you can ask us for a copy of your personal data held by us to use with another service or organisation;

4.1.7 The right to object to us using your personal data for particular purpose or purposes;

4.1.8 Rights with respect to automated decision-making and profiling. We do not use your data in this way.

4.2 For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details in Part 10.

4.3 Further information about your rights can be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

4.4 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Data Do We Collect?

5.1 Subject to section 5.2, and 5.3, we do not collect any personal data from you. We do not place cookies on your computer or device, nor do we use any other means of data collection.

5.2 If you send us an email, we may collect your name, your email address, and any other information which you choose to give us.

5.3. We may collect some or all of the following personal data (this may vary according to your relationship with us, e.g. if you wish to subscribe to our video library we will need payment information such as credit or debit card details, whereas, if you are wanting to post a response to a Blog, place an advertisement or add a notice about an EMDR training event, this information will not be needed but others will be):

5.3.1 Name;

5.3.2 Date of birth;

5.3.3 Gender;

5.3.4 Address;

5.3.5 Email address;

5.3.6 Telephone number;

5.3.7 Organisation details (if ordering subscription for a group);

5.3.8 Payment details – for Paypal or other system we offer;

5.3.9 Chosen subscription option (monthly, half yearly, annual or group)

5.3.10 EMDR training undertaken and/or accreditation.

5.4 We may collect such data from you or from the organisation that on your behalf has signed up to our services.

6. How Do We Use Your Data?

6.1 Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for the performance of the service(s) we provide, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. We may process your data for all of these reasons. Your personal data may be used for one or more of the following purposes:

6.1.1 Providing and managing your account.

6.1.2 Supplying our services to you and/or to your employer or organisation.

6.1.3 Communicating with you.

6.2 If you contact us and we obtain your personal details from your email, the ways in which we may use your email address may include:

6.2.1 To reply to your email;

6.2.2 To send you information about EMDRgateway.com, future video productions and other services we provide

6.2.3 To process a request for a subscription to our video library, to cancel an existing subscription or to refund part or all of a subscription if appropriate.

6.2.4. To respond to a request to advertise services on our site, such as supervision, or to seek supervision from a supervisor.

6.2.5. To respond to requests for listing EMDR conferences/training opportunities on our 'NEWS and EVENTS' sections of our website.

6.2.6. To manage responses to our Blogs.

6.3 Any and all emails containing your personal data will be deleted as soon as practicable after the matter you contacted us about has been resolved, or after any service you requested has been actioned and completed and in accordance with Part 8 of this policy.

6.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

6.5 We will not share any of your data with any third parties for any purposes.

7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.

7.2 Your data will be stored:

7.2.1 On computers permanently located in the Company's premises at Ty Melin, Mill Row, Boughrood, Brecon, LD3 0YD; at Ailsa Craig, Greens Lane, Wroughton, SN4 0RJ; at Hill Crest, Bailihelig Road, Llanfaes, Brecon LD3 8LU;

7.2.2 With GoPaywall for subscription processing;

7.2.3 With Paypal for receiving payments from subscribers;

7.2.4 On Square Space for communication purposes using email.

8. Data Security, Retention and Disposal

8.1 Data security.

This is important to us, and to protect your data we have taken suitable measures to safeguard and secure any data we hold about you. These include:

8.1.1 All emails containing personal data must be encrypted;

8.1.2 Personal data may only be transmitted over secure networks;

8.1.3 Hardcopies of personal data, along with any electronic copies stored on physical media should be stored securely;

8.1.4 No personal data may be transferred to any agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation;

8.1.5 Computers used to view personal data must always be locked before being left unattended;

8.1.6 All electronic copies of personal data should be stored securely using passwords and encryption;

8.1.7 All software should be kept up-to-date. Security-related updates should be installed as soon as reasonably possible after becoming available.

8.2 Data retention.

8.2.1 As stated above in Part 7, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed. Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

8.2.2 When establishing and/or reviewing retention periods, the following shall be taken into account:

- The objectives and requirements of the Company;
- The type of personal data in question;
- The purpose(s) for which the data in question is collected, held, and processed;
- The Company's legal basis for collecting, holding, and processing that data;
- The category or categories of data subject to whom the data relates;

8.2.3 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

8.2.4 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria
Subscribers to the Video library	Contact details including email	Communication about new videos, changes in subscription options and charges	Monthly	Three years
Subscriber data on GoPaywall	Debit/credit card payments and subscription choices	Management of subscription choices and 'locked down' pages including cancellations	Monthly	Three years

Paypal accounts	Payments received	Management of subscription payments and related expenses	Monthly	Three years
Quick books	Financial reports on business	Recording all financial transactions	Monthly	Seven years
Vimeo hosting of videos	Videos for viewing by subscription	Core content of site	Monthly	Unlimited
Contributors to the public part of the website: conference/meeting organisers, commentators on news articles	Contact details including email	Communications about news articles and events to promote	Annually	Three years
Advertisers who use the private (subscriber) part of the site	Contact details including email	Responding to requests and monitoring/excluding inappropriate content	Annually	Three years

8.3 Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- 8.3.1 Personal data stored electronically (including any and all backups thereof) shall be deleted using the overwrite method;
- 8.3.2 Special category personal data stored electronically (including any and all backups thereof) shall be deleted using the overwrite method;
- 8.3.3 Personal data stored in hardcopy form shall be burnt to ashes and used in composting;
- 8.3.4 Special category personal data stored in hardcopy form shall be burnt and ashes recycled as above

9. How Can You Access Your Data?

9.1 If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such data is held). This is known as a 'subject access request'.

9.2 All subject requests should be made in writing and sent to the email or postal addresses shown in Part 10.

9.3 There is not normally any charge for a subject request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a reasonable fee may be charged to cover administrative costs in responding, or we can lawfully refuse to deal with the request.

9.4 We will respond to your subject access request within less than a month and, in any case, not more than one month from receiving it (calculated from the day of the week after the request is received). Normally, we aim to provide a complete response, including a copy of our personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be informed of progress.

10. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact us by email at marilyntew@btopenworld.com, by telephone on 7799842190, or by post at Ailsa Craig, Greens Lane, Wroughton, Wilshire SN4 0RJ. Please ensure your query is clear, particularly if it is a request for information about the data we hold about you (as under Part 9, above).

10. Changes to Our Privacy Policy

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

11 Roles and Responsibilities

11.1 The Company's Data Protection Officer is Marilyn Tew (see Part 10 for details)

11.2 The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other Data Protection-related policies (including, but not limited to, its Data Protection Policy), and with the GDPR and other applicable data protection legislation.

11.3 The Data Protection Officer shall be directly responsible for ensuring compliance with the above data retention periods throughout the Company

11.4 Any questions regarding this Policy, the retention of personal data, or any other aspect of GDPR compliance should be referred to the Data Protection Officer.

12 Implementation of Policy

This Policy shall be deemed effective as of April 20 2019. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Marilyn Tew

Position: Director and Data Protection Officer

Date: April 20 2019

Due for Review by: April 2020

Signature: *Richard Worthing-Davies* (Director)

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