Cronos Wellbeing Solutions Ltd. Privacy Policy

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

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 Cronos Wellbeing Solutions Ltd. This definition shall, where applicable, incorporate the definitions provided in the UK General Data Protection Regulation ("UK GDPR") and EU Regulation 2016/679 ("GDPR"); and

1.2 "We/Us/Our" means EMDR Solutions Online Ltd whose registered address and main trading address is 2 Steeplechase Court, Andover Hants SP11 6GG.

### 2. Information About Us

2.1 Our Site, Access Intensive Therapies.com/.co.uk, is owned and operated by Cronos Wellbeing Solutions Ltd.

2.2 Our Data Protection Officer is Darah Butler, who can be contacted by email at dr.sarahbutler@outlook.com, or by post at 2 Steeplechase Court, Andover Hants SP116GG.

2.3 The Directors of Cronos Wellbeing Solutions Ltd is HACP, BABCP and EMDR Association registered.

### 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 UK GDPR and 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 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 sections 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 without your explicit consent.

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):

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 (e.g., PayPal or other payment systems 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 for our services.

## 6. How Do We Use Your Data?

6.1 Under the UK 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 Cronos Wellbeing Solutions Ltd., 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 or 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, 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 without your explicit consent.

### 7. Cookies and Tracking Technologies

7.1 Our website does not currently use cookies or tracking technologies to collect personal data without user consent. However, we may use essential cookies to enhance site functionality. A detailed Cookies Policy is available, outlining their purpose and how you can manage them.

### 8. How and Where Do We Store Your Data?

8.1 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.

8.2 Your data will be stored:

8.2.1 On computers permanently located in the Company's premises with a payment processing facility, and WIX.

8.3 Data Security. 8.3.1 To protect your data, we have taken suitable measures to safeguard and secure any data we hold about you. These include:

- Encrypting all emails containing personal data;
- Transmitting personal data only over secure networks;
- Storing hardcopies of personal data securely;
- Locking computers used to view personal data before leaving them unattended;
- Using passwords and encryption for all electronic copies of personal data;
- Keeping all software up-to-date and installing security-related updates promptly.

### 9. Data Breach Policy

In the unlikely event of a data breach:

9.1 We will notify affected users and relevant authorities (e.g., the ICO) within 72 hours if required by law.

9.2 We will take immediate steps to identify and resolve the breach, as well as implement measures to prevent future breaches.

#### 10. How Can You Access Your Data?

10.1 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."

10.2 All subject requests should be made in writing and sent to the email or postal addresses shown in Part 11.

10.3 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.

10.4 We will respond to your subject access request within one month. In complex cases, we may take up to three months, but we will keep you informed of progress.

### 11. International Data Transfers

11.1 If data is transferred outside the UK or EU, we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) or other approved mechanisms.

### 12. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact us by email at dr.sarahbutler@outlook.com.