

**PRISM THERAPY LIMITED**  
**PRIVACY POLICY**

## **Introduction**

Welcome to Prism Therapy Limited's privacy policy.

Prism Therapy Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website or app (collectively referred to in this policy as our "**website**") (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### **1. Important information and who we are**

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how Prism Therapy Limited collects and processes your personal data through your use of our website, including any data you may provide through the website when you purchase our products and services.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### **Controller**

Prism Therapy Limited is the controller and responsible for your personal data when you use our website (collectively referred to as "we", "us" or "our" in this privacy policy).

We have appointed a data protection manager (DPM) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPM using the details set out below.

#### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our DPM in the following ways:

Full name of legal entity & DPM: Prism Therapy Limited | Richard McDonagh (Director)

Email address: [info@prismtherapyonline.com](mailto:info@prismtherapyonline.com)

Correspondence address: 29 Westland Square, Pearse Street Dublin 2.

You have the right to make a complaint at any time to the Data Protection Commission ("**DPC**"), the Irish regulator for data protection issues at <https://www.dataprotection.ie/>. We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.

#### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title and date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

**Special Categories of Personal Data** is personal data of a particularly sensitive nature, such as details about a person's health, race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data. Where you use our services in order to arrange an online video session with a therapist, you may furnish us with sensitive information falling within the meaning of Special Categories of Personal Data, such as health data. Where this occurs, we will only use such information where you have consented to us doing so for the purpose of matching you with a suitable therapist, and thereafter furnishing the information you

have provided to your chosen therapist so that they can provide the service you have requested. Like all other types of personal data, we handle Special Categories of Personal Data strictly in accordance with our obligations under data protection law.

We do not collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services, such as when you book an appointment for a session with a therapist;
  - create an account on our website; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy at [www.prisitherapyonline.com/cookies](http://www.prisitherapyonline.com/cookies) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

Technical Data from the following parties:

- (a) analytics providers; and
- (b) advertising networks.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where you have consented to us using your personal data for specified purposes. Where consent is the lawful basis we rely upon to handle your personal data, you may withdraw such consent at any time free of charge.

- Where it is necessary for us to comply with a legal obligation to which we are subject.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including to: (a) Arrange an appointment with a therapist (b) Provide products and services to you that you have requested (c) Manage payments, fees and charges (d) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special Categories of Personal Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Where we handle Special Categories of Personal Data in the course of providing services to you, we will only do so with your consent.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to consider how users use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our

effectiveness of the advertising we serve to you	(d) Usage (e) Marketing and Communications (f) Technical	products/services, to develop them and to grow our business)
To use data analytics to improve our website, products and services	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for our products and services, to keep our website updated and relevant and to develop our business)
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products and services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us only if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

### Third-party marketing

We may share your personal data with any third party for marketing purposes. We will only do this where we have your express opt-in consent to do so.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by using the unsubscribe mechanism on each message sent to you, or by contacting us at any time.

## 5. Your personal data and third parties

### *To facilitate sessions*

We may share the patient's personal data with their chosen therapist, and vice versa, in order to facilitate the arrangement and delivery of online video sessions as between the patient and therapist.

### *Third Party Service Providers*

We may share your personal data with third party service providers who perform services and functions at our direction and on our behalf. Such third-party services providers may include administrative service providers, accountants, legal advisers, IT service providers, payment service providers and security services providers engaged by us.

We require all third parties to respect the confidentiality and security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

### ***An Garda Síochána, government or quasi-government bodies, courts and tribunals***

We may share your personal data with these organisations and bodies where we are required to do so by law.

### ***Sale, transfer or merger***

We may share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## **6. International transfers**

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the EEA which give personal data the same protection it has in the EEA.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain

your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## **9. Your legal rights**

You have a number of rights under data protection law in relation to how we use your personal data. These include the right, free of charge, to:

- (a) Be informed about the personal data we hold about you and how we use that information.
- (b) Obtain access to your personal data we hold.
- (c) Have any personal data that we hold about you that you believe is incorrect, incomplete or inaccurate updated or corrected.
- (d) Have your personal data erased.
- (e) Have our processing of your personal data restricted.
- (f) Object to our processing of your personal data.
- (g) Request the transfer of your personal data to you or to a third party.
- (h) Not be subject to wholly automated decisions, including profiling, which produce legal effects or which could have a similarly significant effect on you.
- (i) Lodge a complaint with the Data Protection Commission.

These rights are in some circumstances limited by law. If you wish to exercise any of these rights, you can contact us using the details set out in section 1.

We endeavour to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Updates**

We may update this privacy policy from time to time. Any updates will be made available and, where appropriate, notified to you.