Website Privacy Policy

Type of website: Web App **Effective date:** 24th day of July, 2026 **Website URL:** https://www.emdrpro.com/

https://www.emdrpro.com/ (the "Site") is owned and operated by Ronan Diffily. Ronan Diffily is the data controller and can be contacted at: admin@emdrpro.com

Purpose

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site of the following:

1. The personal data we will collect;
2. Use of collected data;
3. Who has access to the data collected;
4. Real-time application data sub-processing (Ably);
5. The rights of Site users; and
6. The Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

GDPR & UK Data Protection

For users in the European Union, we adhere to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

We have not appointed a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.

Additional Information for Australian Users

For individuals located in Australia, the following additional provisions apply in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**:

- **Anonymity and Pseudonymity (APP 2):** Where it is lawful and practicable, Australian users have the right to interact with our Site anonymously or by using a pseudonym (e.g., for general inquiries). However, utilizing real-time session features may require the transient processing of technical data like IP addresses.
- **Cross-Border Data Disclosures (APP 8):** Data may be routed or processed via third-party infrastructure located outside of Australia. We take reasonable steps to

ensure that our overseas data processors do not breach the Australian Privacy Principles.

Consent & Legal Basis for Processing

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR. We rely on the following legal bases:

1. **Consent:** Users have provided their consent to the processing of their data for one or more specific purposes (e.g., website analytics or voluntary communication).
    - **Withdrawing Consent:** When processing is based on consent, you may withdraw it at any time by emailing admin@emdrpro.com.
2. **Legitimate Interests / Performance of Service:** Processing necessary for delivering technical functionality and real-time interactive session features requested by users (e.g., establishing live web connections via our messaging infrastructure).

Personal Data We Collect

Data Collected Automatically When you visit and use our Site, we may automatically collect and process the following information:

1. **Analytics Data:** Page interactions and statistical usage.
2. **Technical Network Data (IP Addresses):** Transient IP address data required to route real-time signals during interactive EMDR sessions.

Data Collected in a Non-Automatic Way We may also collect the following data when you perform certain functions on our Site:

1. Buttons clicked.

This data may be collected using the following methods:

1. Google Analytics.
2. Ably Realtime Infrastructure (for live session synchronization).

How We Use Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy. We do not collect or store personal health data, medical notes, or personal identities during EMDR app sessions.

- **Analytics:** Used to evaluate site design, user traffic, and overall application performance.
- **Real-Time Session Delivery:** Used strictly to route live visual/audio synchronization commands between participants during an EMDR session.

Who We Share Personal Data With

Employees & Internal Access We may disclose user data to any member of our organisation who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

Third-Party Data Processors We share data with the following third parties to maintain and deliver our services:

- **Google Analytics**
    - *Purpose:* Website performance & statistics
    - *Data Shared:* Anonymized analytics & button clicks
- **Ably Realtime (Ably.com)**
    - *Purpose:* Technical infrastructure for real-time session synchronization
    - *Data Shared:* Transient IP addresses & anonymous session states

(Note: The table format was converted to a list above to ensure it copies perfectly into Google Docs without formatting errors).

Dedicated Notice Regarding Real-Time Session Connectivity (Ably) To provide real-time audio and visual synchronization between therapists and clients, our EMDR application uses real-time messaging infrastructure provided by Ably Realtime (cdn.ably.com).

- **Data Processed:** When joining a session, your web browser connects directly to Ably's network. To establish and route this live connection, Ably temporarily processes your IP address. Under the GDPR, an IP address is recognized as personal data.
- **Anonymity & Privacy Safeguards:** Users connect using temporary, randomly generated identifiers (e.g., client-x8z9k2). We do not transmit names, email addresses, session notes, or personal health information to Ably.
- **Data Processing Agreement:** Ably operates strictly as a technical Data Sub-processor under a GDPR-compliant Data Processing Addendum (DPA). Technical routing data is held transiently solely for the duration necessary to maintain network connectivity.

Other Disclosures We will not sell or share your data with other third parties, except in the following cases:

1. If the law requires it;
2. If it is required for any legal proceeding;
3. To prove or protect our legal rights; and
4. To buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to another Site, please note that we are not responsible for and have no control over their privacy policies and practices.

How Long We Store Personal Data

User data will be stored only until the purpose for which it was collected has been achieved. Real-time network routing data (such as IP addresses used during live sessions) is processed transiently and is not permanently retained by EMDR Pro.

How We Protect Your Personal Data

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times, and therefore we are unable to guarantee the security of user data beyond what is reasonably practical.

Your Rights as a User

Under the GDPR, you have the following rights:

1. Right to be informed;
2. Right of access;
3. Right to rectification;
4. Right to erasure;
5. Right to restrict processing;
6. Right to data portability; and
7. Right to object.

Children

We do not knowingly collect or use personal data from children under 16 years of age. If we learn that we have collected personal data from a child under 16 years of age, the personal data will be deleted as soon as possible. If a child under 16 years of age has provided us with personal data, their parent or guardian may contact our privacy officer.

How to Access, Modify, Delete, or Challenge Data

If you would like to know if we have collected your personal data, how we have used it, or to exercise any of your statutory rights under the GDPR, please contact our privacy officer:

Ronan Diffily admin@emdrpro.com

Do Not Track Notice

Do Not Track ("DNT") is a privacy preference that you can set in certain web browsers. We do not track the users of our Site over time and across third-party websites and therefore do not respond to browser-initiated DNT signals.

Cookie Policy

A cookie is a small file stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to disable cookies entirely in your internet browser, though this may alter your user experience.

We use the following types of cookies on our Site:

1. **Analytical Cookies:** Analytical cookies allow us to improve the design and functionality of our Site by collecting data on how you access our Site.
2. **Third-Party Cookies:** Third-party cookies created by external analytics partners (e.g., Google Analytics).

(Note: Interactive EMDR application pages operate on an isolated script environment free from tracking cookies.)

Complaints

If you have any complaints about how we process your personal data, please contact us at admin@emdrpro.com.

If you feel we have not addressed your concern in a satisfactory manner, you have the right to lodge a complaint directly with a supervisory authority, such as the Data Protection Commission (DPC) of Ireland.

For Australian Users: If you are an Australian user and remain unsatisfied with how we have handled a privacy complaint, you also have the right to escalate your concern to the **Office of the Australian Information Commissioner (OAIC)**. You can find out more about lodging a complaint on their website at www.oaic.gov.au.

Contact Information

If you have any questions, concerns, or complaints, you can contact our privacy officer, Ronan Diffily, at:

admin@emdrpro.com