



Kinirons Therapy

Privacy Policy

Kinirons Therapy is committed to protecting your information and your right to privacy. The following Privacy Policy sets out how we collect, use, and store your personal information (this means any information that identifies or could identify you) in connection with your use of and access to Kinirons Therapy's website <https://www.kinironstherapy.com/> (Kinirons Therapy). Together with our Terms of Use, Terms and Conditions, and Cookie Policy, set out the terms which apply when using the Kinirons Therapy website.

The terms "Kinirons Therapy, we, us, and our refer to Kinirons Therapy, the term you refers to you as a user of Kinirons Therapy website. When you use Kinirons Therapy, you trust us with your information (defined below). We seek to explain clearly what information we collect, how we use it, and what rights you have in relation to it. Please read the Policy carefully. If there are any terms within the policy that you do not agree with, please discontinue use of Kinirons Therapy.

Information we may collect about you.

We collect personal information that you voluntarily provide us when registering and using Kinirons Therapy, purchasing packages or services in connection with the platform or otherwise contacting us. The personal information collected will vary depending on the context of your interactions, your choices, and the products/features you use.



We collect several types of information, including, but not limited to

- **Identity Data:** Including first name, last name, and date of birth.
- **Contact Data:** Including billing address, email address, and contact number.
- **Financial Data:** This means the payment method and card details used to process your payments for any packages or services you order. We do not store or process your card details ourselves; they are processed and stored via one of our contracted third-party service providers.
- **Usage Data:** This includes information about your Platform usage, which includes browsing patterns, click stream, page interaction information (clicks you make on a page), and time spent on the website.
- **Marketing and Communications Data:** This relates to your preferences for receiving marketing from us and communication preferences.
- **Other information:** Other information relevant to services, surveys, and/or offers.

All personal information you provide must be true, complete, and accurate. You must notify us of any changes to your information. If you do not provide the information we identify as required or mandatory, we may be unable to provide the goods or services.

Information such as IP address and/or browser/device characteristics are collected automatically when you use Kinirons Therapy. This information does not reveal your



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identity but may include your IP address, country, location and referring URL. We also collect information through cookies and similar technologies. You can find out more about this in our Cookies Policy.

How do we use your information?

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your personal information are for legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We may use your personal information for the following purposes or as otherwise described at the time of collection:

- To operate, maintain, and optimise Kinirons Therapy
- To send administrative information to you for business purposes, legal reasons and/or possibly contractual. We may use your Information to send you product, service, and new feature information and/or information about changes to our terms and/or policies.
- To send you marketing and promotional communications for business purposes and/or with your consent. We and/or our brand partners may use your Information for our marketing purposes if this is in accordance with your



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marketing preferences. You can opt out of our marketing emails; see below for further details.

- Administer surveys and promotions for our business purposes and/or with your consent.
- To support the Platform and respond to your requests, questions, and feedback.
- To request feedback for our business purposes and/or with your consent. We may use your information to request feedback and to contact you about your use and experience of Kinirons Therapy Platform.
- To protect Kinirons Therapy for business purposes and/or legal reasons. We may use Information to keep the Platform safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms or policies for business purposes, legal reasons and/or possibly contractual.
- To respond to legal requests and prevent harm for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other business purposes. We may use your Information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve Kinirons Therapy Platform, products, services, marketing, and your experience.

Will your information be shared with anyone?

Your information will only be shared to comply with contractual obligations, fulfil our business purposes, or with your consent. Most commonly, your information will only be shared and disclosed in the following situations.



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- **Contractual:** So that services in connection with Kinirons Therapy can be fulfilled.
- **Vital Interests:** To investigate, prevent, or act regarding potential violations of our policies, suspected fraud, and illegal activities, or as evidence in litigation in which we are involved.
- **Third-Party Service Providers:** We may share your Information with third-party vendors, service providers, contractors or agents who perform services and require access to such information to do that work. Examples include data analysis, email delivery, hosting services, customer service and marketing efforts. They will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential and may not use it other than as we ask them to and always in accordance with this Policy.
- **Business Transfers:** We may share or transfer your Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Legal Obligations:** We may disclose your Information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **With your Consent:** We may disclose your Information for any other purpose with your consent.

We may disclose aggregated, anonymous information (i.e., information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of Kinirons Therapy Platform. In this event we do not disclose any information which can identify you personally.



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Marketing and Opting Out

If you have given Consent to marketing, we may contact you about our products and services. If you no longer wish to receive such information, you can opt-out at any time by contacting faye@kinironstherapy.com.

How do we keep your information safe?

We have put in place appropriate technical and organisational security measures designed to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. However please also remember that we cannot guarantee that the internet is 100% secure. Although we do our best to protect your Information, the transmission of your Information to and from Kinirons Therapy at your own risk. Please only access our services within a secure environment.

How long do we keep your information for?

We keep your Information for as long as reasonable and necessary to fulfil the purposes outlined in this policy, unless otherwise required by law.

We will only keep your Information for as long as it is necessary for the purposes set out in this policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).



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Is your information transferred internationally?

We may transfer, store, and process your Information in countries other than your own but will take all reasonable steps to ensure it is protected. Whenever we transfer your Information outside of the UK, we will take all reasonable measures that we can to protect your Information in accordance with this Policy and applicable law. If the Information will be transferred outside of the European Economic Area, we will ensure that any additional required measures and/or safeguards are in place (e.g., the EU/US Privacy Shield if the transfer is to the USA, or that the EU model contract clauses are used, if applicable).

You will be required to give consent to certain processing activities before we can process your Information. Where applicable, we will seek consent from you when you first submit Information to or through Kinirons Therapy. If you have previously given your consent, you may freely withdraw such consent at any time. You can do this by emailing faye@kinironstherapy.com.

If you withdraw your consent, and if we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another legal basis for processing your Information, then we may continue to do so, subject to your legal rights. Please note that if we need to process your Information for you to use



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Kinirons Therapy and you object or do not provide consent to us processing your Information, Kinirons Therapy will not be available to you.

Third-party websites

Kinirons Therapy is not responsible for the safety of any information that you share with third-party providers who feature or advertise but are not affiliated with Kinirons Therapy.

Account Termination

You may terminate your account by deleting it on Kinirons Therapy or by emailing faye@kinironstherapy.com.

Once your account is closed no further data will be collected, but we may maintain your Information about you for the purposes authorised under this Policy, unless prohibited by law.

What are your Privacy Rights?



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You have various rights in respect of the personal information we hold about you – these are set out in more detail below. Please note we will require evidence of your identity before we are able to respond to your request. This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up your response. To exercise or discuss any of your rights, please contact us at faye@kinironstherapy.com.

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, whom we share it with, how long we keep it for and whether it has been used for any automated decision making. Where we have good reason and where data protection law permits, we can refuse your request for a copy of your Information, or some aspects of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information about you.
- **Erasure:** In certain circumstances, you have the right to request that the Information we hold about you is erased, e.g., if the information is no longer necessary for the purposes for which it was collected or processed, or our processing of the Information is based on your consent. There are no other legal grounds on which we may process the Information.



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- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Changes to this policy or your personal information

Kinirons Therapy reserves the right, at its sole discretion, to change, modify, add, or remove portions of this policy. We will review and, where necessary, update this policy periodically. When we make minor changes to the policy, we will update the last modified date listed on the page. If we make any significant changes to the Cookie Policy, and where we have your email address, we will endeavour to inform you of the changes in writing.

Whenever you wish to use the Kinirons Therapy, please check the Privacy Policy to ensure you understand the applicable terms. Your use of the platform after the effective date of any policy modification indicates your acceptance of the modified Policy. If you do not agree to any items within the Policy, please immediately stop using Kinirons Therapy. It is important that the information we hold about you is accurate and current. Please keep us informed of any changes, such as a change in your email address.



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Contact Information

Kinirons Therapy has a Data Protection Officer who is responsible for matters relating to privacy and data protection. If you have any questions regarding the privacy practices or your information, please contact the Data Protection Officer at faye@kinironstherapy.com

You have the right to make a complaint at any time to the Information Commissioner's Office (the ICO), the UK supervisory authority for data protection issues. If you are thinking of making a complaint, we would appreciate the chance to address your concerns before you approach the ICO. We welcome and encourage you to contact us in the first instance.

Last updated May 2025

Cookie Policy

Effective Date: [01/05/2025]

Last Updated: [01/05/2025]

At The Mental Health Project (<https://www.kinironstherapy.com/>), we use cookies and similar technologies to enhance your browsing experience, analyse site traffic, and support our mission of improving mental health awareness and support.

By continuing to use our website, you consent to the use of cookies in accordance with this policy.



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1. What Are Cookies?

Cookies are small text files that are stored on your device (computer, tablet, smartphone) when you visit a website. They help websites function efficiently and provide information to the site owners.

2. Types of Cookies We Use

We use the following types of cookies:

- **Strictly Necessary Cookies**
These cookies are essential for the website to function and cannot be switched off. They include things like security, session management, and accessibility.
 - **Performance Cookies**
These help us understand how visitors interact with our website by collecting anonymous usage data (e.g., Google Analytics).
 - **Functionality Cookies**
These allow our website to remember choices you make (such as language preferences) to provide enhanced, personalised features.
 - **Third-Party Cookies**
We may use trusted third parties (e.g., embedded videos from YouTube, social media sharing tools) that also set cookies. Please refer to their cookie policies for more information.
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3. Managing Your Cookie Preferences

You can manage or disable cookies through your browser settings. Most browsers allow you to:

- View which cookies are stored
- Delete cookies
- Block third-party cookies



- Block all cookies (note: this may affect website functionality)

For more information, visit www.aboutcookies.org or your browser's help section.

4. Cookie Consent

When you first visit our website, a cookie banner will appear requesting your consent to non-essential cookies. You may change or withdraw your consent at any time.

5. Changes to This Policy

We may update this Cookie Policy occasionally to reflect changes in technology, law, or our practices. Please review this page regularly.

6. Contact Us

If you have any questions about our use of cookies, please contact:

Email: faye@kinironstherapy.com

Postal Address: 12 St James House, 9-15 St James Road, Surbiton, KT6 4QH, Surrey