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## PRIVACY NOTICE

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XR Therapeutics 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 all of our data subjects, clients, customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations

### 1. Information About Us

XR Therapeutics

Private Limited Company registered in England.

Room 1.1, Northern Design Centre, Abbott's Hill, NE8 3DF

VAT number: GB377054873

Data Protection Lead: Chris Gowland

Email address: [chrisgowland99@gmail.com](mailto:chrisgowland99@gmail.com)

Postal address: Northern Design Centre, Abbott's Hill, NE8 3DF.

Regulated by the MHRA as a manufacturer of a UKCA Class I Software as a Medical Device (SaMD) specifically developed to support healthcare professionals in conducting Cognitive Behavioural Therapy (CBT) and other talking therapies to support treatment of anxiety, phobias, depression, and other mental health disorders.

XR Therapeutics has DTAC certification, meeting NHS standards for clinical safety, usability, and accessibility.

XR Therapeutics is compliant with the requirements of NCSC Cyber Essentials.

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What Is Personal Data?


Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

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- a) The right to be informed about our collection and use of your personal data. This Privacy Notice 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 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making and data profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.


It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

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

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. We **would welcome the opportunity to resolve your concerns** ourselves however, so please contact us first, using the details in Part 12.

## 5. What Personal Data Do You Collect and How?

XR Therapeutics may collect and hold some or all of the personal data set out in the table below when communicating with private clients only, using the methods also set out in the table. We may collect ‘special category’ or ‘sensitive’ personal data, including personal data relating to children and data relating to criminal convictions and/or offences. No personal (patient identifiable) data is collected using our Boundless software when used by therapists or third parties to treat patients.


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Data Collected	How we may collect the data
Personal health information including health conditions (special category)	Email Consent form for private treatment
Personal contact information including email address, phone number, address	Email Website enquiry form Consent form for private treatment
Payment information including bank details, insurance providers, insurance policies	Email

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may/will use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Personal health information Personal contact information Payment and billing data	Legitimate interests in services provided and to undertake post market surveillance as per our regulatory obligations.  Contract to provide private treatment
Supplying our product	Personal contact information Payment data Health data	Contract to provide private treatment
Managing payments for our product	Financial information Insurance information Personal information	Legitimate interests to fulfil agreement  Contract
Personalising and tailoring our products	User feedback Personal contact information	Legitimate interests – improvement of product, and to undertake post market surveillance as per our regulatory obligations and to monitor clinical safety.
Communicating with you.	Personal contact information Notification preferences	Legitimate interest - improvement of product, and to undertake post market surveillance as per our regulatory

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		obligations and to monitor clinical safety.
Supplying you with information that you must opt in for (you may opt-out at any time)	Personal contact information Marketing preferences Interaction data Personal data	Consent form for private treatment
Case studies	Contact information Marketing preferences Interaction data Personal & Health data	Consent form for private treatment

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, text or post with information, news, and offers on our products and services. **You will not be sent any third party unlawful marketing or spam.**

We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will not share your personal data with third parties for marketing purposes.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.


If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

We **will not keep your personal data for any longer than is necessary** in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Special category data (health conditions).	8 years.
Contact information including email, phone numbers, address.	8 years.
Payment information including card details, bank accounts, insurance policies.	8 years.

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Profile information including preferences and interests, enquiries into our product and communications.	8 years.
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## 8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This data will be stored digitally via a cloud software system and backed up on a hard drive that will be located at the Northern Design Centre, Abbotts Hill, NE8 3DF. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

## 9. Data Security, Backups, and Disaster Recovery

We take appropriate technical and organisational measures to protect your personal data, including measures designed to ensure its confidentiality, integrity, and availability (as required under UK/EU data protection law).

As part of our business continuity and disaster recovery planning, we maintain secure backup systems. These backups are used only to restore services in the event of an incident and are not accessed or processed for any other purpose.


Where our backup or disaster recovery services are provided by third-party hosting or cloud providers, we ensure that appropriate safeguards are in place for any international transfers of personal data, such as UK adequacy regulations, EU adequacy decisions, or approved contractual clauses.

## 10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

- If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- In some limited circumstances, we may be **legally** required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Recipient	Activity Carried Out	Sector	Location
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Insurance provider	Payment for treatment carried out.	Insurance.	United Kingdom.
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If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

### 11. How Can I Access My Personal Data?

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 personal data is held). This is known as a “**subject access request**”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we require to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 7 days to acknowledge and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within 28 days. 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 kept fully informed of our progress.

### 12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of Data Protection Lead - Chris Gowland.


Email address: [hello@xrtherapeutics.co.uk](mailto:hello@xrtherapeutics.co.uk)


Postal Address: Room 1.1, Northern Design Centre, Abbott’s Hill, Gateshead, NE8 3DF.

### 13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

This Privacy Notice was last updated in March 2026.

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Version	Change	Date	Approved By
1.0	Initial issue	July 2025	
2.0	Updated to define between B2C and B2B personal data collection	20/3/26	Philippa Takhar