

Neurobono Data Protection Notice

Who we are

We are Neurobono Limited. Our address is Office 2, Block 3, The Waterways, Sallins, Co. Kildare. W91 T6EF. We can be contacted by email at info@neurobono.com. We are a provider of EEG Neurofeedback services. EEG Neurofeedback is a support intervention that can help symptom management for individuals with autism.

Purpose of processing

We process the personal data of our clients, including parents or guardians (including special category data including data about sensitive matters such as health) in order to provide the EEG neurofeedback session itself, and to keep records in order to monitor progress and ensure a high level of customer service and care to our clients. We also process information for research processes, including developing our product or furthering the development of the discipline of EEG neurofeedback.

We also process data of prospective clients and visitors to our website and people who have engaged with our marketing campaigns or with our market research in order to market and sell our service and better engage with our target customers.

Legal basis for processing

We process the personal data of clients based on an agreement with the client or their parents or guardians and for sensitive data, on the basis of consent in addition to an agreement. In some instances, we may process client data on the basis of it being necessary in relation to legal claims, or on the basis of it being required for the vital interests of the client

When we process the data of prospective clients and visitors to our website, we do so based on consent, as part of the steps to enter an agreement, or our legitimate interests or the legitimate interests of a third party.

When and how we share data

We may share data as part of our operations, our research work or our marketing activity or because of our legal obligations. This will include sharing it with data processors who help us provide our service, and with research partners.

We always have regard to the data protection and privacy rights of our clients and others when we do so. This includes putting in place appropriate contractual bases and pseudonymisation and anonymisation of data where appropriate and ensuring that an appropriate legal basis is in place in each instance.

Retention of data

We will retain this data for a period depending on the circumstances and the type of data. We will retain information related to marketing, sales and market research for not more than 10 years. We will retain information relating to the treatment of clients for at least seven years and for whatever longer period we consider appropriate, allowing for the possibility that a client may wish to inquire about the services we have provided at a later point in their lives.

Rights of Data Subjects

Data subjects whose data we process have a variety of rights they may exercise by contacting us. These are:

- the right of access. You may request a copy of the data we hold about you.
- the right of rectification. If we have incorrect information about you, you may have that incorrect information corrected or removed.
- the right of restriction of processing. This means that in certain circumstances you can restrict the processing of your data to certain purposes.
- the right of erasure. This means you can have some or all of the information about you removed, unless we have a good reason or a legal obligation not to.
- the right to data portability. This is the right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable formats
- the right to withdraw consent. Where our processing is based on consent alone, you can withdraw your consent at any time.

You can exercise your rights by contacting us at the address above. You also have the right to complain to the Irish Data Protection Commissioner(<http://www.dataprotection.ie/>), and to take action through the Courts.

Last revised: 14 July 2025