

SE Factory B.V. – EMDR Kit Webshop – Privacy Statement

Version: 02/06/2026

This privacy statement applies to all personal data processed via our webshop (www.emdrkit.com) and during our commercial operations.

Article 1. Data Controller and Scope

1.1 SE Factory B.V. ("EMDR Kit") is the data controller.

- **Chamber of Commerce:** 51508893
- **Address:** De Deimten 7, 9747AV, Groningen, The Netherlands
- **Email:** info@emdrkit.com

1.2 **Language:** These conditions are drafted in English. In the event of any discrepancies between the English text and any translations thereof, the English text shall prevail and be decisive.

1.3 **Compliance:** We ensure that all personal data is treated in compliance with the General Data Protection Regulation (GDPR), the UK-GDPR, and applicable US privacy laws (such as CCPA/CPRA).

1.4 **Minors:** Our services are strictly intended for professional adults. We do not knowingly collect data from individuals under the age of 18.

Article 2. Purposes of Data Collection

We process personal data for the following primary purposes:

2.1 **To execute the agreement:** Processing orders, managing payments (Mollie/Klarna), and coordinating shipping (PostNL/FedEx via Sendcloud).

2.2 **Website:** Showing our website in a correct and personalized manner.

2.3 **Onboarding & Support:** Sending onboarding emails to help you use our products effectively and handling warranty claims.

2.4 **Communication:** Sending essential transactional emails (order confirmations, invoices, and shipping updates) and other communication with customers, suppliers and business partners.

2.5 **Quality & Reviews:** Sending one-time review invitations via **Trustpilot**.

2.6 **Marketing:** Sending a quarterly newsletter via **MailerLite**, only if explicit consent is provided.

2.7 **Improve:** To better understand your needs (whether or not via cookies) and thus to be able to evaluate and (tailor-made) improve our company, our services, website, software, hardware and security.

2.8 **Security & Fraud:** Identifying and minimizing unauthorized activities or misuse.

2.9 **Requests:** Registering and handling complaints, applications and requests.

2.10 **Analysis:** Conducting (demographic and statistical) research on an anonymous basis, for instance to create management information.

2.11 **Compliance:** Comply with the legal (tax) retention obligation and other legal and regulatory obligations.

2.12 **Claims:** To serve us in legal disputes.

Article 3. Categories of Data & Specific Protocols

3.1 **Identity:** Name, company name, billing/shipping addresses, and contact details (like phone number and e-mail address).

3.2 **Agreement:** All details concerning the agreement, including the purchase history and payment details.

3.2 **Content & Medical Data Protocol:** We collect information from contact forms and emails. **Note:** Users are strictly requested *not* to enter patient-identifiable or medical data in free-text fields. If we detect unsolicited medical data, our protocol is to destroy this information immediately.

3.3 **Automated Decision Making (Klarna):** If you choose Klarna, they may perform an automated credit assessment. SE Factory B.V. has no influence over this result. If denied, we recommend using an alternative payment method. You have the right to contact Klarna for a human review of their decision.

3.4 **Cookies:** We use **Cookiebot** to manage your consent. This allows you to accept or decline tracking pixels (Google, Meta, LinkedIn) with a single click and easily withdraw consent at any time.

Article 4. Access, Rectification, and Erasure

4.1 You have the right to access, rectify, or erase your data.

4.2 Requests can be sent to info@emdrkit.com. We respond within 30 days.

4.3 Proof of identity may be requested. Please black out your photo and Citizen Service Number (BSN) on any ID copies.

Article 5. Third Parties & International Transfers

5.1 **Sub-processors:** We share data with Mollie, Klarna, WooCommerce, Sendcloud, Trustpilot, and MailerLite.

5.2 **USA (CCPA/CPRA):** We do not "sell" or "share" personal information for cross-contextual behavioral advertising as defined by US law. We do not offer financial incentives for the collection of data.

5.3 **Transfers:** For global shipping and tools (e.g., MailerLite), data may be transferred outside the EEA. We ensure appropriate safeguards (Standard Contractual Clauses) are in place.

Article 6. Security & Data Breaches

6.1 We use industry-standard encryption (SSL/TLS).

6.2 **Breach Protocol:** In the unlikely event of a data breach that poses a high risk to your rights, we will notify you and the relevant supervisory authorities without undue delay, typically within 72 hours of discovery.

Article 7. Retention Periods

7.1 **Fiscal Records:** Invoices and payment data are stored for 7 years (statutory requirement).

7.2 **Correspondence:** General emails and warranty-related data are stored for **5 years** to ensure we can provide adequate support throughout the product's life cycle and warranty period.

7.3 **Guest Data:** As we use Guest Checkout, we do not maintain permanent user accounts. Data is deleted once the legal or commercial purpose is fulfilled.

Article 8. Complaints

8.1 If you have concerns, contact us at info@emdrkit.com.

8.2 You have the right to lodge a complaint with the **Dutch Data Protection Authority** (Autoriteit Persoonsgegevens) or your local supervisory body in the UK or USA.