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PRIVACY NOTICE

General information about our services

Neko Health AB, with registration number 559170-5396 ("**Neko Health**") and our wholly owned clinics in Sweden (as detailed [here](#)) (each a "**Neko Clinic**") (together referred to as "**we**" or "**us**") are committed to the protection of your personal data. Neko Health and our subsidiaries are collectively referred to as the "**Neko Group**".

We value your privacy and are committed to keeping you informed and confident about how we process your personal data. This privacy notice explains what personal data we collect and process about you, why we do it, how we use the personal data, and the measures we take to ensure compliance with applicable laws. It also outlines your rights regarding your personal data. Please contact us if you have any questions about our data practices using the contact details provided in the "Contact" section at the end of this notice.

How we collect your personal data

General

Primarily, we collect your personal data from you directly when you seek proactive healthcare, for example when you book a medical examination in the patient application, provide information to a healthcare professional undergo a medical examination or when you visit the website.

If referred to us by your employer (for occupational health care) or another third party, we collect your personal data from them, including your name, identification number, contact details, and a brief description of the referral purpose.

Coherent record keeping

The Neko Clinic has direct access to your personal data in other healthcare providers' medical record systems. Coherent record keeping is used to ensure good care. Access to your personal data in the system always requires your consent, which you can manage or withdraw in the patient application or by contacting us.

If the healthcare staff assess that information from another healthcare provider that is made available through coherent record keeping is necessary for us to be able to provide you with good and safe care, the information may also be documented in your record at the Neko Clinic, in accordance with the Patient Data Act (2008:355) (sv. *patientdatalagen* (2008:355)) and general practice in healthcare.

Personal data we use in our operations

We collect and use the following categories of personal data about you:

- Audio: such as your voice in a voice recording.
- Communication data: such as contact details, your preferences for digital newsletters and other marketing communications, and, where applicable, communications made with you, including information provided by you in your contact with our customer support.
- Data on lifestyle: such as whether you smoke, use snus, drink alcohol, or other information related to your behaviour.
- Demographic data: such as your age, gender, and heritage.
- Health data: such as skin conditions, blood pressure, pulse wave data, biochemical data, medical history, medical condition, and medication.
- Biometric data: such as physical characteristic (e.g., facial images taken by Neko Health's medical equipment) and physiological characteristics (e.g., data related to your body such as bone density and organ size), that allow for unique identification of you.
- Identity data: such as name, personal identification number, claim number and consents given.
- Patient records: such as notes and comments about your health status.
- Payment information: such as bank and account details, payment details.
- Physical characteristics: such as your height, weight, and skin type.
- Picture material: such as images of you, taken by Neko Health's medical equipment.
- Technical data: such as data about your use of the patient application, the type of device you have used, online identifiers such as IP, MAC addresses and cookies, login details, referral traffic, domain name and time or equivalent provided by you as a website visitor.

When and why we process your personal data

The Neko Clinic's use of your data

Health screening with equipment and tools provided by Neko Health

Who is responsible: Neko Clinic processes personal data to: (i) organise and present information for our staff for efficient care (ii) conduct booked examinations and communicate with you, (iii) prepare automatically generated summaries of your doctor consultations, and (iv) share it with Neko Health for the purpose of displaying results and insights in the patient application.

If you have given your consent, the data will be shared with Neko Health for testing and tool and product development (see below and separate information [here](#)).

What we do: Neko Clinic processes personal from your booking and health examination to deliver, manage and ensure quality of the healthcare services, and to comply with records keeping and other obligations under the Patient Data Act (2008:355) (sv. *patientdatalagen* (2008:355)).

Categories of personal data:

- Audio
- Biometric data
- Communication data
- Data on lifestyle
- Demographic data
- Health data
- Identity data
- Patient records
- Physical characteristics
- Picture material

Legal basis:

Consent (Article 6(1)(a) of the GDPR): the use of your personal data for the above purposes is based on your consent.

The obligation to keep records is based on a legal obligation (*Article 6(1)(c) of the GDPR*).

Legitimate interest (Article 6.1(f) of the GDPR)

The use of your personal data is necessary to fulfil the Neko Clinic's legitimate interest in efficiently organising and presenting information for our staff. Neko Clinic considers that our legitimate interest outweighs your interest in not having your personal data processed for this purpose.

Explicit consent (Article 9(2)(a) of the GDPR).

Special categories of personal data will only be used for the above purposes based on your explicit consent.

The obligation to keep records is based on the healthcare exemption (*Article 9(2)(h) of the GDPR*).

Please note that you have the right to withdraw your consent at any time.

Retention period: Personal data is saved for this purpose for ten (10) years from the visit. The summary of your healthcare contact is kept for as long as you use the patient application or until you have requested that the data is deleted.

Sharing your personal data with other healthcare providers on your request or in case of an in-depth health examination

Who is responsible: Neko Clinic is responsible for sharing your personal data for this purpose.

What we do: If you have given your explicit consent, Neko Clinic will share your personal data with the healthcare provider of your choice, for example to enable it to conduct an in-depth health examination and to display results and insights related to you in the patient application.

Neko Clinics may share your personal data with one another, for example if you book an appointment at one Neko Clinic but conduct the examination at another Neko Clinic. If these Neko Clinics are located in different countries, this will involve transferring your data across borders.

When you give your consent, you also authorise Neko Clinic to share your patient data in accordance with the rules on confidentiality in the Patient Safety Act (2010:659) (sv. *patientsäkerhetslagen*

(2010:659)).

Categories of personal data:

- Biometric data
- Demographic data
- Health data
- Patient records
- Physical characteristics
- Picture material

Legal basis:

Consent (Article 6(1)(a) of the GDPR): the use of your personal data for the above purposes is based on your consent or *conclusion of a contract (Article 6(1)(b) of the GDPR): the use of your personal data for the above purposes is necessary to fulfil the contract for provision of the health examination.*

Explicit consent (Article 9(2)(a) of the GDPR). Special categories of personal data (such as information about your health) will only be used for the above purposes based on your explicit consent.

Please note that you have the right to withdraw your consent at any time.

Retention period: Personal data is saved for this purpose until the disclosure to the healthcare provider has been completed.

Share your personal data with Neko Health for Neko Health's testing and tool and product development.

Who is responsible: Neko Clinic is responsible for sharing your personal data for this purpose.

What we do: If you have given your explicit consent, Neko Clinic will share your personal data with Neko Health for it to conduct tests, develop and improve healthcare equipment, and enhance the tool for generating automated summaries of your healthcare visits.

When you give your consent, you also authorise Neko Clinic to share your patient data in accordance with the rules on confidentiality in the Patient Safety Act (2010:659) (*sv. patientsäkerhetslagen (2010:659)*).

Categories of personal data:

- Audio
- Biometric data
- Demographic data
- Health data
- Patient records
- Physical characteristics
- Picture material

Legal basis:

Consent (Article 6(1)(a) of the GDPR): the use of your personal data for the above purposes is based on your consent.

Explicit consent (Article 9(2)(a) of the GDPR). Special categories of personal data (such as information about your health) will only be used for the above purposes based on your explicit consent.

Please note that you have the right to withdraw your consent at any time.

Retention period: Personal data is saved for this purpose until the disclosure to Neko Health has been completed.

Neko Health's use of your data

Patient application

Who is responsible: Neko Health is the data controller for personal data processed in the patient application, including when you book a health examination and when results and insights deriving from your visit are displayed in the application. The Neko Clinic performing the examination is responsible for processing of your personal data related to the visit.

What we do: Neko Health's patient application enables the health examination bookings and the display of results and insights. We verify your identity via BankID, create your profile for the examination, and manage your booking and profile. Furthermore, we allow you to choose which Neko Clinic you wish to use and share this information with the Neko Clinic conducting your examination.

Categories of personal data:

- Biometric data
- Data on lifestyle
- Demographic data
- Health data
- Identity data
- Payment information
- Physical characteristics

Legal basis:

Conclusion of a contract (Article 6(1)(b) of the GDPR). The use of your personal data for the above purposes is necessary to conclude the contract for provision of the health examination.

Explicit consent (Article 9(2)(a) of the GDPR). Special categories of personal data (such as information about your health) will only be used for the above purposes based on your explicit consent.

Please note that you have the right to withdraw your consent at any time.

Retention period: Personal data is saved for this purpose for 24 months from your last visit to the Neko Clinic and/or use of the patient application (whichever is later) that can be attributed to the same case/care.

Testing and development of medical devices

Who is responsible: Neko Health is the data controller and is responsible for personal data processed for the testing and development of medical devices.

What we do: If you have given your explicit consent, Neko Health will use your personal data to conduct tests to develop, improve and optimise the medical equipment offered to you at the Neko Clinic.

Categories of personal data:

Legal basis:

- Biometric data
- Data on lifestyle
- Demographic data
- Health data
- Patient records
- Physical characteristics
- Picture material

Consent (Article 6(1)(a) of the GDPR): the use of your personal data for the above purposes is based on your consent.

Explicit consent (Article 9(2)(a) of the GDPR). Special categories of personal data (such as information about your health) will only be used for the above purposes based on your explicit consent.

Please note that you have the right to withdraw your consent at any time.

Retention period: Personal data will be saved for this purpose during product testing and until the development related to such testing has been completed. In practice, this is normally for a period of 24 months from your last visit to the Neko Clinic and/or use of the patient application that can be attributed to the same matter/healthcare for which you provided your consent (whichever is later). At the end of the 24-month period, we will no longer use your personal data for this purpose, unless you provide a renewed consent following the same procedure as above.

Furthermore, Neko Health will pseudonymise your personal data (*i.e.*, your personal data will be replaced by a pseudonym or similar) to the extent possible during the test period and take measures to ensure that picture material are not displayed together with other information that can directly identify you.

Reports and statistics at aggregated level (which do not contain any personal data) will be kept indefinitely.

Testing and development of tools

Who is responsible: Neko Health is the data controller and is responsible for personal data processed for testing and development of tools.

What we do: If you have given your explicit consent, Neko Health uses your personal data to develop and improve tools, including AI-based ones, that enhance healthcare professionals' work and add value for you. For example, Neko Clinic provides automated summaries of your healthcare visits, generated by a Large Language Model, delivered via the patient application.

Categories of personal data:

- Audio
- Biometric data
- Data on lifestyle
- Demographic data
- Health data
- Physical characteristics
- Picture material
- And other information that you share during your healthcare contact

Legal basis:

Consent (Article 6(1)(a) of the GDPR): the use of your personal data for the above purposes is based on your consent.

Explicit consent (Article 9(2)(a) of the GDPR). Special categories of personal data (such as information about your health) will only be used for the above purposes based on your explicit consent.

Please note that you have the right to withdraw your consent at any time.

Retention period: Personal data is saved for this purpose during the development process. In practice, this is normally for a period of three (3) months to three (3) years from your last visit to the Neko Clinic.

Furthermore, Neko Health will pseudonymise your personal data (*i.e.*, your personal data will be replaced by a pseudonym or similar) to the extent possible during the development period, and take measures to ensure that picture material are not displayed together with other information that can identify you directly.

Reports and statistics at aggregated level (which do not contain any personal data) will be kept indefinitely.

Clinical studies

Who is responsible: Neko Health is the data controller for the processing of your personal data in connection with clinical studies in which you participate.

What we do: Your personal data may be used in clinical studies as part of research projects aimed at promoting innovation. The studies are self-funded and conducted by doctors in collaboration with other leading clinics and institutions. Your personal data used in the context of the clinical studies is pseudonymised, *i.e.*, your name, personal identification number and other identifiable information will be replaced by a code number.

Categories of personal data:

- Biometric data
- Data on lifestyle
- Demographic data
- Health data
- Patient records
- Physical characteristics

Legal basis:

Research in the public interest (Article 6(1)(e) of the GDPR). The use of your personal data for the above purposes is based on the public interest of the studies.

General interest in the field of public health (Article 9(2)(i) of the GDPR). Special categories of personal data (such as information about your health) are used on the basis that the studies fulfil a general interest in the field of public health.

Retention period: Personal data is saved for this purpose for ten (10) years from the end of the study.

Marketing of our services and other communications

Who is responsible: Neko Health is the data controller for the processing of your personal data for the purpose of marketing our services.

What we do: We may contact you to market our services if you have engaged with us via the patient application (e.g., started but did not complete your booking). We may also follow up on your booking using customer surveys.

Categories of personal data:

- Identity data
- Technical data

Legal basis:

Legitimate interest (Article 6.1(f) of the GDPR)

The use of your personal data is necessary to fulfil Neko Health's legitimate interest in marketing our services. Neko Health considers that our legitimate interest outweighs your interest in not having your personal data processed for this purpose.

Contact us if you want to know more about how we have balanced your interests against ours.

Retention period: We keep your data for this purpose for up to twelve (12) months from your last visit to the Neko Clinic and/or use of the patient application (whichever is later).

Both Neko Health's and the Neko Clinic's use of your data

Internal development purposes

Who is responsible: Neko Health and the Neko Clinic are respectively data controllers and are responsible for the processing of your personal data necessary for the development of our respective activities and services.

What we do: We use your personal data, if necessary, to develop our own businesses.

Categories of personal data:

Relevant categories of personal data necessary for the development purpose. In general, only aggregated and statistical information is used for this purpose.

Legal basis:

Legitimate interest (Article 6(1)(f) of the GDPR):

The use of your personal data is necessary to fulfil our legitimate interest in developing our activities and services. We consider that our legitimate interest outweighs your interest in not having your personal data processed for this purpose.

Contact us if you want to know more about how we have balanced your interests against ours.

Retention period: Personal data is saved for this purpose until the personal data has been anonymised or aggregated.

Transfers of shares and similar

Who is responsible: Neko Health and the Neko Clinic may, in limited cases, transfer your personal data as described below. The recipient is the data controller for its own collection and use of personal data, unless otherwise specified.

What we do: In the event of a transfer of shares, business transfer, merger, capital raising or similar, we will, if necessary, transfer your personal data to buyers, potential buyers, investors and external advisors.

Categories of personal data:

Relevant categories of personal data necessary to fulfil a share transfer or similar.

Legal basis:

Legitimate interest (Article 6(1)(f) of the GDPR): The use of your personal data is necessary to fulfil our legitimate interest to sell shares/operations or merge operations. We consider that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, if the buyer is engaged in the same or similar type of business.

Contact us if you want to know more about how we have balanced your interests against ours.

Establishment, exercise and defence of legal claims (Article 9(2)(f) of the GDPR). Special categories of personal data (such as information about your health) will only be used for this purpose if it is necessary for the establishment, exercise and defence of legal claims.

Retention period: Personal data is saved for this purpose until the transfer of shares or similar has taken place.

Asserting and defending legal claims

Who is responsible: Neko Health and the Neko Clinic are respectively data controllers and are responsible for the processing of your personal data that is necessary to assert and defend legal claims.

What we do: We use, if necessary, your personal data to manage, defend and exercise legal claims and rights, e.g., in connection with a dispute or court proceedings. For this purpose, we may share your data with counterparties, external advisors and authorities.

Categories of personal data:

Legal basis:

Legitimate interest (Article 6(1)(f) of the GDPR): The use of your personal data is necessary for our

Relevant categories of personal data necessary for the management, defence and exercise of legal claims or rights in the specific case.

legitimate interests in managing, defending and enforcing legal claims and rights. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose.

Contact us if you want to know more about how we have balanced your interests against ours.

Establishment, exercise and defence of legal claims (Article 9(2)(f) of the GDPR). Special categories of personal data (such as information about your health) will only be used for this purpose if it is necessary for the establishment, exercise and defence of legal claims.

Retention period: Personal data will be saved for this purpose until the completion of the product testing and development work (as further described in the testing and product development section above), or such longer period as necessary to manage and defend legal claims or disputes arising during such 24-month period.

Your documented consent, including your name, will be saved until the completion of the product testing and development, and thereafter for a further period of ten (10) years to manage, defend and exercise legal claims and rights under the GDPR.

Regulatory compliance

Who is responsible: Neko Health and the Neko Clinic are respectively data controllers and are responsible for the processing of your personal data that is necessary to fulfil our respective company's legal obligations.

What we do: We will, if necessary, use your personal data to fulfil our legal obligations, e.g., to comply with data protection obligations regarding data subjects' rights or to comply with accounting obligations.

Categories of personal data:

Relevant categories of personal data necessary to fulfil the legal obligation.

Legal basis:

Legal obligation (Article 6(1)(c) of the GDPR). Your personal data is used for the above purposes to fulfil a legal obligation.

Retention period: Personal data is saved for such period that is necessary for us to fulfil the specific legal obligation.

Who we share your data with

We only share your data if it is necessary for us to provide our services or as otherwise explained in this privacy notice. **We do not share or sell your personal data for commercial purposes.**

Other healthcare providers

If you visit a Neko Clinic, we share your personal data via our system for coherent record keeping to ensure quality care. This means other healthcare providers may directly access your personal data in the Neko Clinic's medical record system with your consent, which you can manage or withdraw by contacting us.

Within the Neko Group

We may share your personal data within the Neko Group. How and why we share your data is explained above.

Suppliers

We share your personal data with suppliers who process it on our behalf as data processors to provide services to us. We remain responsible for the processing of your personal data. Suppliers are not allowed to use your personal data for their own purposes, and they are contractually and legally obliged to protect it and are bound by confidentiality.

We transfer personal data to the following categories of providers: (1) Customer support (2) External advisors such as law firms (3) Identification services (4) IT service providers (5) Payment service providers (6) Providers of marketing communications.

Co-operation partners

If you participate in our clinical studies, your personal data will be shared with the parties conducting the studies together with us (*i.e.*, other leading clinics and institutions).

Other disclosures

We may share your personal data to meet legal obligations on the Neko Clinic as a healthcare provider. For instance, we may need to provide patient records to the Swedish Health and Care Inspectorate ("**IVO**") (*sv. Inspektionen för vård och hälsa*) for supervision purposes, other regulatory bodies or to our insurance company if you report an injury directly to them.

If you are prescribed medicines in connection with your visit to us, information about the prescription is transferred to the Swedish eHealth Agency (*sv. e-Hälsomyndigheten*), where it is processed in accordance with the Prescription Register Act (1996:1156) (*sv. lagen om receptregister (1996:1156)*).

Where we process your data

Your personal data may be transferred to and processed in countries outside the EU/EEA (third countries), including to the countries where Neko Group operates. In such cases, we implement appropriate contractual, technical and organisational measures to ensure that the level of protection is equivalent to that within the EU/EEA.

We always ensure that a valid transfer mechanism is in place. Where no adequacy decision has been adopted by the European Commission for the relevant third country, we use the European Commission's standard contractual clauses, which you can find [here](#). We also implement additional technical and organisational security measures where necessary.

Your rights

You have specific rights regarding your personal data. We aim to respond to your request within one month of receipt. For complex or multiple requests, we may need extra time and will notify you of the reasons for any delay. If we cannot fulfill your request, we will inform you and explain why.

To process your request, we must verify your identity to, for example, prevent unauthorized access or incorrect data erasure. If needed, we may request additional, reasonable information to confirm your identity. The response period begins once your identity is verified.

For more details on your rights, visit the relevant supervisory authority's website, such as Sweden's Integritetsskyddsmyndigheten (IMY) at www.imy.se/en/.

Right of access ("Data subject access")

You have the right to receive confirmation whether we process your personal data and, if so, to receive a copy of it along with details on how we use it, provided this does not harm others' rights and freedoms. In your request, please specify if you want particular data, such as a specific type or from a certain period.

Right to rectification

You have the right to request correction or completion of inaccurate, incomplete, or misleading personal data. After updating your data, we will notify recipients we have shared it with, unless this is impractical or overly burdensome. Upon request, we will inform you about who received your data.

Right to withdraw your consent

You have the right to withdraw your consent for us to process your personal data at any time by changing your account settings in the patient application or contacting us by using the contact details below. This will not affect processing already done based on your prior consent.

Right to erasure ("Right to be forgotten")

You can request the erasure of your personal data in certain cases. For example, when we no longer need it for its original purpose or if you object to its use under Article 21 of the GDPR, and we lack compelling reasons to continue processing. However, there are exceptions to this right, for example if we are legally required to retain your data or need it for legal claims.

Right to object to our use of your personal data

In certain situations, you have the right to object to our use of your personal data. When we rely on legitimate interest (Article 6(1)(f) of the GDPR) you have the right to object to the use for reasons relating to your specific situation. If we cannot justify continued use, we will stop processing your data for that purpose. However, we may still use it if needed for legal claims.

Right to request the restriction of your personal data

In certain situations, you can request restriction of your personal data, which means that you can, at least for a certain period, request that we limit our use of it. This right applies in the following cases: (a) when you believe your data is inaccurate and while we verify this (b) its use is unauthorized, but you prefer we store it rather than erase it, (c) if we no longer need it for the purpose for which we collected it, but you require it for legal claims; or (d) where you have objected under Article 21 of the GDPR while we evaluate our reasons. If restricted, we may only store your data and use it for legal claims.

Data portability

You have the right to data portability, allowing you to receive a copy of personal data you provided us in a structured, common format. If technically feasible, you can request direct transfer to another recipient. This right applies only to data processed based on your consent or a contract.

Automated individual decision-making

We do not carry out automated individual decision-making that has legal consequences for you or similarly affects you.

Right to lodge a complaint

If you are unhappy or have questions about how we handle your personal data, please contact us to resolve the issue together. You can also file a complaint with the Swedish Supervisory Authority for Privacy Protection ([IMY](#)) or the supervisory authority in your country of residence, workplace, or where you believe a data protection violation occurred.

Right to compensation

If you have suffered material or immaterial damage because we have processed your personal data in breach of the GDPR, you have the right to claim damages.

Specific rights under the Patient Data Act (2008:355) (sv. *patientdatalagen* (2208:355))

As a patient, you are entitled to additional information about your rights linked to the Neko Clinic's use of your personal data in accordance with the Patient Data Act (2008:355) (sv. *patientdatalagen* (2208:355)).

As a general rule, you can request access your medical records. The responsible person will review your request. If it is decided that the medical record, or part of it, should not be disclosed, the matter

will be referred to IVO for further review. You can also request information about who has accessed your data directly and electronically.

Furthermore, you can request the destruction of your medical records, in whole or in part. IVO may approve this if there is a valid reason, or if the medical records are not needed for your care, and no public interest reasons exist to retain it.

If you object to your personal data being made available by electronic access to the staff of another healthcare provider or with another healthcare process within the Neko Group, you have the right to request blocking of your data in certain cases.

For further information, please refer to the specific information provided by each clinic.

Contact us

If you have any questions about this information, our use of your personal data or if you wish to exercise your rights, please contact us at:

Neko Health AB

E-mail: dpo@nekohealth.com

Postal address: Svärdvägen 19, 182 33 Danderyd.

The Neko Clinics

Please refer to the list of Neko Clinics in Sweden and their contact details [here](#).

You can also contact our **Data Protection Officer** at dpo@nekohealth.com.

Notice updates

We periodically update this privacy notice to reflect changes in how we use personal data, such as collecting new data, using data for different purposes, or sharing it with additional recipients. The notice's last update date is shown at the top of this privacy notice. For substantive changes, we will notify you in advance and explain their impact.