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## **PRIVACY NOTICE**

### **General information about our services**

Neko Health AB, with registration number 559170-5396 (“**Neko Health**”), and its wholly owned subsidiaries, HJN Proaktiv Hälsovård AB with registration number 559335-6644 (the “**Healthcare Clinic**”) and NH Consumer Services AB with registration number 559397-8702 (the “**Neko Clinic**”) (together the “**Neko Group**”, “**we**” or “**us**”) are committed to the protection of your personal data.

We care about your privacy, and we want you to always feel safe and informed about how we process your personal data. In our privacy notice you can learn more about what personal data we collect and process about you, why we do it, how we use the data and how we ensure that your personal data is processed in accordance with applicable legislation and what rights you have. Please contact us if you have any questions about how your personal data is processed, using the contact details provided in the “Contact” section at the end of this notice.

### **How we collect your personal data**

#### Information from you

Primarily, we collect your personal data from you directly when you seek healthcare, for example when you provide information to a healthcare professional (in writing or orally), book a medical examination in the patient application or as a result of a medical examination (for example when using Neko Health’s medical equipment).

#### Information about you from other sources

If you have been referred to us by an insurance company, your employer (within the framework of occupational health care), or another third party, we collect the following personal data about you from this party: name, personal identification number, contact details, any claim number and a brief description of what the contact relates to.

#### *Coherent record keeping*

If you visit the Healthcare Clinic or the Neko Clinic, we will share your data through our system for coherent record keeping, which means that other healthcare providers may have direct access to your personal data in Healthcare Clinic’s or the Neko Clinic’s medical record system. The Healthcare Clinic and the Neko Clinic have direct access to corresponding 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 give or withdraw in the patient application or by contacting us at any time.

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 Healthcare Clinic or the Neko Clinic, in accordance with the Patient Data Act (2008:355) (*sv. patientdatalagen (2008:355)*) and general practice in healthcare.

#### *Data from the national pharmaceutical list*

To make safe decisions about your care, e.g., to prescribe medicines, the Healthcare Clinic collects information about your prescribed medicines from the national pharmaceutical list at the eHealth Agency (*sv. e-Hälsomyndigheten*). Information from the national pharmaceutical list is only collected if you have given your consent, which you can give or withdraw in the settings in the patient application or by contacting us at any time.

#### **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, biometric and biochemical data, medical history, medical condition, and medication.
- 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 Healthcare Clinic's use of your data

#### *Provision of healthcare*

*Who is responsible:* The Healthcare Clinic is the data controller for personal data processed as a result of patient visits to the clinic.

*What we do:* The Healthcare Clinic processes personal data derived from your contacts with the clinic in order to implement, administer and ensure quality with the health care services you receive from the clinic, and to fulfil the duty of record keeping and other obligations under the Patient Data Act (2008:355) (sv. *Patientdatalagen* (2008:355)). This includes booking health care visits and other communication with you.

#### *Categories of personal data:*

- Communication data
- Data on lifestyle
- Demographic data
- Health data
- Identity data
- Patient records
- Physical characteristics

#### *Legal basis:*

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

*Provision of healthcare (Article 9(2)(h) of the GDPR).* Special categories of personal data (such as information about your health) are processed to provide healthcare.

*Retention period:* Personal data is saved for this purpose for ten (10) years from the visit.

#### *Health screening with equipment and tools provided by Neko Health*

*Who is responsible:* The Healthcare Clinic is responsible for the processing of your personal data in connection with (i) carrying out a health examination that the Healthcare Clinic and you have agreed on during a healthcare visit, (ii) an in-depth health examination referred from the Neko Clinic, including communication with you in connection with this and (iii) the generation of automatically generated summaries of your healthcare contact.

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

*What we do:* The Healthcare Clinic processes personal data derived from your booking in the patient application and the health examination for the purpose of implementing, administering and assuring the quality of the healthcare services you receive from the Healthcare Clinic, as well as fulfilling record keeping and other obligations under the Patient Data Act (2008:355) (sv. *patientdatalagen* (2008:355)).

#### *Categories of personal data:*

- Audio
- Communication data
- Data on lifestyle

#### *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.

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

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

*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 on the basis of 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 in your medical record for ten (10) years from the visit. The summary of your healthcare contact is saved for one (1) year from the contact from which the summary originates.

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

*Who is responsible:* The Healthcare Clinic is responsible for sharing your personal data for this purpose.

*What we do:* If you have given your explicit consent, the Healthcare Clinic will share your personal data with Neko Health to enable Neko Health to carry out tests, develop and improve the equipment that has been used to provide you with care as well as the tool used to create automatically generated summaries of your healthcare contact.

When you give your consent, you also agree that the Healthcare Clinic may 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
- Demographic data
- Health data
- Picture material
- Patient records
- Physical characteristics

*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.

## The Neko Clinic's use of your data

### *Health screening with equipment and tools provided by Neko Health*

*Who is responsible:* The Neko Clinic is responsible for the processing of your personal data in connection with (i) carrying out the booked examination, including communication with you in connection with it and (ii) preparing automatically generated summaries of your healthcare contact.

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:* The Neko Clinic processes personal data derived from your booking in the patient application and the health examination in order to implement, administer and assure the quality of the healthcare services you receive from the Neko Clinic, as well as to fulfil the obligation to keep records and other obligations under the Patient Data Act (2008:355) (sv. *patientdatalagen* (2008:355)).

#### *Categories of personal data:*

- Audio
- 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*).

*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.

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 one (1) year from the contact from which the summary originates.

### *Sharing your personal data with the Healthcare Clinic in case of an in-depth health examination*

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

*What we do:* If you have given your explicit consent, the Neko Clinic will share your personal data with the Healthcare Clinic to enable the Healthcare Clinic to conduct an in-depth health examination.

When you give your consent, you also authorise the 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:*

- 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 the Healthcare Clinic has been completed.

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

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

*What we do:* If you have given your explicit consent, the Neko Clinic will share your personal data with Neko Health in order to enable Neko Health to carry out tests, develop and improve the equipment that has been used to provide you with healthcare as well as the tool used to create automatically generated summaries of your healthcare contact.

When you give your consent, you also authorise the 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
- 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

### *Booking a health examination*

*Who is responsible:* Neko Health is the data controller for personal data processed in connection with the booking of a health examination in the patient application. The clinic where the health examination is performed (the Healthcare Clinic or the Neko Clinic) is responsible for the processing of your personal data in connection with the booked examination.

*What we do:* Neko Health provides the patient application through which the booking of a health examination takes place. To make a booking, we must verify your identity (via BankID) and create a profile that sets the framework for your examination. Neko Health administers your booking and your profile and will share the information with the clinic where the health examination will be carried out.

#### *Categories of personal 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 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 in order to develop, improve and optimise the medical equipment offered to you at the clinic.

#### *Categories of personal data:*

#### *Legal basis:*

- 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 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 will use your personal data to develop, improve and optimise tools that facilitate and streamline the work of healthcare professionals and/or offer you added value. Such tools may fully or partially include elements of AI. For example, (through the Healthcare Clinic and the Neko Clinic) we offer automatically generated summaries of your healthcare contact based on a so-called LLM (*Large Language Model*). This means that immediately after your healthcare contact, you receive a summary of the contact and the results in the patient application.

### *Categories of personal data:*

- Audio
- 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.



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 one (1) year from your last visit to the 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:*

- 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 been in contact with us via the patient application (e.g., if you were about to book an appointment for a health examination 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 clinic and/or use of the patient application (whichever is later).

## The Neko Group's use of your data

### *Internal development purposes*

*Who is responsible:* Each company within the Neko Group is a data controller and is responsible for the processing of your personal data necessary for the development of its activities and services.

*What we do:* Each company in the Neko Group uses your personal data, if necessary, to develop its own business.

### *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 the legitimate interest of the Neko Group in developing its activities and services. It is the assessment of the Neko Group that the 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:* The Neko Group 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, the Neko Group 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 the legitimate interest of the Neko Group 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:* Each company within the Neko Group is the data controller and is responsible for the processing of your personal data that is necessary to assert and defend legal claims.

*What we do:* Each company within the Neko Group uses, 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:*

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

*Legal basis:*

*Legitimate interest (Article 6(1)(f) of the GDPR):* The use of your personal data is necessary for the legitimate interests of the Neko Group in managing, defending and enforcing legal claims and rights. It is the assessment of the Neko Group 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:* Each company within the Neko Group is responsible for the processing and is the data controller for your personal data that is necessary to fulfil the respective company's legal obligations.

*What we do:* Each company within the Neko Group will, if necessary, use your personal data to fulfil its 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. ***Neko Group does not share or sell your data for commercial purposes.***

### Other healthcare providers

If you visit our clinics, we will share your data through our system for coherent record keeping, which means that other healthcare providers may have direct access to your personal data in the clinic's medical record system.

### Within the Neko Group

In order for us to provide the full body scan, we need to share your data within the Neko Group. How and why we share your data is explained above.

### Suppliers

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

We transfer personal data to the following categories of providers:

- Customer support
- Identification services
- IT service providers
- Payment service providers
- Providers of marketing communications

### Co-operation partners

Neko Health's health examination (with full body scan) is not yet medically authorised. Therefore, to undergo a scan today, you must participate in our clinical studies. This means that your 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 fulfil legal obligations incumbent on us as a healthcare provider. For example, we may need to share copies of patient records in connection with supervision by the Swedish Health and Care Inspectorate (IVO) (*sv. Inspektionen för vård och hälsa*). If you report an

injury directly to our insurance company, we may also share your patient records to the insurance company.

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**

Patient data is only processed within the EU/EEA.

Other data about you, such as technical data, may be transferred to non-EU/EEA countries (such as the US) due to the use of cookies and other tracking technologies in the patient application. In these cases, we ensure that your data is adequately protected by concluding standard contractual clauses (Module 1) with the provider. A copy of these can be found [here](#).

### **Your rights**

You have certain rights in relation to your personal data. We will respond to your request within one month from the date we received your request. However, if your request is complex or if you have submitted multiple requests, we may need additional time to process your request. If so, we will inform you of the reasons for the delay. If we are unable to fulfil your request, in whole or in part, we will inform you of this, including the reasons for this.

When you submit a request to exercise your rights, we need to verify your identity to ensure that you are the person you claim to be. This is to avoid, for example, disclosing personal data to an unauthorised person or erasing personal data incorrectly. If we do not have enough information to confirm your identity, we may ask you to provide additional information about yourself to confirm your identity. We will only request information that is reasonable and necessary in relation to your identity. The period for responding to your request starts once we have confirmed your identity.

Below we explain the rights you have in relation to your personal data. For more information about your rights, please see the website of the relevant supervisory authority. In Sweden, this is Integritetsskyddsmyndighetens (IMY) website ([www.imy.se/en/](http://www.imy.se/en/)).

#### Right of access (Article 15 of the GDPR)

You have the right to receive confirmation from us whether we process personal data about you and, if so, to receive a copy of your personal data together with additional information about how we use your personal data. Please note that the right to a copy of your personal data must not adversely affect the rights and freedoms of others.

If you are interested in certain specific data, please indicate this in your request. For example, you can specify whether you are interested in a certain type of data or data from a certain period.

#### Right to rectification (Article 16 of the GDPR)

You have the right to request that we rectify or complete personal data about you that you consider to be inaccurate, incomplete or misleading.

When we have rectified your personal data, or supplemented it with new information, we will inform those to whom we have shared your data of the updated information - unless this is impossible or too burdensome. If you request it, we will also tell you to whom we have shared your data.

#### Right to withdraw your consent (Article 7 of the GDPR)

You have the right to withdraw your consent to our processing of your personal data at any time by changing your account settings in the patient application or by contacting us at the contact details below. Your withdrawal will not affect processing already carried out on the basis of your consent.

#### Right to erasure (Article 17 of the GDPR)

In certain situations, you have the right to request the erasure of your personal data (“the right to be forgotten”). For example, the right to erasure applies if we process personal data about you but no longer need it for the purpose for which it was collected, or if you have objected to our use of your personal data under Article 21 of the GDPR and we cannot demonstrate compelling reasons to continue to use your personal data despite the objection.

There are several exceptions to the exercise of the right to erasure, including if we are required by law to save your personal data or if your personal data is necessary for the exercise, management and defence of legal claims.

#### Right to object to our use of your personal data (Article 21 of the GDPR)

In certain situations, you have the right to object to our use of your personal data. When we rely on legitimate interest under Article 6(1)(f) of the GDPR, you have the right to object to the use for reasons relating to your particular situation. If we cannot demonstrate compelling reasons to continue using your personal data, we will cease our use of your personal data for the specific purpose.

Furthermore, regardless of the objection, we have the right to continue to use your personal data if necessary for the establishment, exercise or defence of legal claims.

#### Right to request the restriction of your personal data (Article 18 of the GDPR)

In certain situations, you have the right to request the restriction of your personal data, which means that you can, at least for a certain period, request that we limit our use of your personal data. The right to request restriction applies if you believe that your personal data is inaccurate and during the period we are investigating this, if the use of your personal data is unauthorised and you wish us to continue to save your personal data instead of erasing it, or if we no longer need your personal data for the purpose for which we collected it but you need the personal data to establish, exercise and defend legal claims.

You also have the right to request the restriction if you have objected to our use of your personal data under Article 21 of the GDPR and for the period during which we assess whether we have compelling reasons to continue using your personal data.

If the use of your personal data has been restricted, we normally only have the right to save your personal data and not use it for purposes other than the establishment, exercise and defence of legal claims and rights.

#### Data portability (Article 20 of the GDPR)

The right to data portability means that you have the right to obtain a copy of your personal data that you have provided to us in a structured and commonly used format. Furthermore, if technically possible, you have the right to request that the copy of your personal data be transmitted directly to an external recipient.

The right to data portability only applies to personal data that we process on the basis of your consent or contract.

#### Automated individual decision-making (Article 22 of the GDPR)

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 dissatisfied or have questions about how we process your personal data, please contact us. Hopefully we can solve it together. You always have the right to file a complaint with the supervisory authority. The Swedish Supervisory Authority for Privacy Protection ([IMY](#)) is the supervisory authority for our use of your personal data. You also have the right to lodge a complaint with the supervisory authority in the country where you have your residence or workplace, or in the country where you consider that an infringement of the data protection regulations has occurred.

#### Right to compensation (Article 82 of the GDPR)

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 Healthcare Clinic's and the Neko Clinic's use of your personal data in accordance with the Patient Data Act (2008:355) (*sv.patientdatalagen (2208:355)*).

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.



You also have the right to receive information from us about the direct access and electronic access about you that has taken place.

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:

#### **HJN Sweden**

E-mail: [gdpr@cur8.co](mailto:gdpr@cur8.co)

Postal address: Jaktgatan 14, 115 45 Stockholm.

#### **Atrium Vårdcentral**

E-mail: [info@atrium.se](mailto:info@atrium.se)

Postal address: Warfwinges väg 30A, 112 51 Stockholm.

#### **The Neko clinic**

E-mail: [hello@nekohealth.com](mailto:hello@nekohealth.com)

Postal address: Regeringsgatan 61B, 111 56 Stockholm.

You can also contact our **Data Protection Officer** at [dpo@nekohealth.com](mailto:dpo@nekohealth.com).

### **Notice updates**

We regularly update this information. This is to ensure that the information reflects our use of personal data, which may change over time. For example, we may update the information to cover the collection of additional data, if we intend to use data for other purposes or share your data with recipients other than those listed in this notice. If our use of personal data changes, we will update the notice to reflect such changes. At the top of the privacy notice you will see the date when the information was last updated. If substantive changes to the content are made, we will notify you in advance and what these changes mean for you.