

PRIVACY NOTICE

General information about our services

Neko Health London Limited (registration no. 15449532) and Neko Health Clinic Limited (registration no. 15243605) (each a “**Neko Clinic**” and collectively the “**Neko Clinics**”) operate private health clinics in the UK and are subsidiaries of Neko Health UK Limited (“**NHUK**”) which is subsidiary of Neko Health AB, a Swedish company with registration number 559170-5396 (“**Neko Health**”). References in this notice to the “**Neko Group**”, “**we**” and “**us**” refer to Neko Health and its subsidiaries. Depending on the processing activity, the data controller may be Neko Health, the relevant Neko Clinic, Neko Group or NHUK. Further details on which legal entity is the data controller is explained for each processing activity below.

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 visit the www.nekohealth.com website (the “**Website**”) 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 (e.g. as a benefit included with your employment), 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.

Communicating and coordinating with other healthcare providers

If you visit a Neko Clinic, we may need to communicate about your care with other healthcare providers outside of the Neko Group, such as your NHS GP. We will always seek your consent before doing this. Examples of where we may ask you for permission to communicate with other healthcare providers include where your Neko scan identifies a new diagnosis, or a known condition that needs more optimal treatment. With your consent, other healthcare providers may also share your personal data with us.

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 e.g. email address, telephone number, country and region, 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.
- Biometric data: such as physical characteristic like facial images taken by Neko Health's medical equipment, physiological characteristics like data related to your body e.g. bone density, 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: 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 or suggestions in relation to your healthcare consultation.

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: [Privacy Notice for Testing and Development in the UK](#)).

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 Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Categories of personal data:

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

Legal basis:

Consent (Article 6(1)(a) of the UK General Data Protection Regulation pursuant to the Data Protection Act 2018 ("UK 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 UK GDPR*).

Explicit consent (Article 9(2)(a) of the UK GDPR). Special categories of personal data (such as information about your health, biometrics) 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 UK GDPR*).

Please note that where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Retention period: Unless necessary for the establishment, exercise or defence of legal claims or required by law, personal data is saved for this purpose for eight (8) years from the visit. The summary and suggestions in relation to your healthcare consultation are kept for three (3) years from the contact from which the summary and suggestions originate.

One Neko Clinic sharing your personal data with another Neko Clinic in case a more in-depth health examination or further analysis is required.

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

What we do: If you have given your explicit consent, one Neko Clinic where you have had a health

examination will share your personal data with another Neko Clinic to enable such other Neko Clinic to conduct an in-depth health examination or analysis.

When you give your consent, you also authorise the Clinic will share your patient data in accordance with the rules on confidentiality under applicable law.

Categories of personal data:

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

Legal basis:

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

Explicit consent (Article 9(2)(a) of the UK 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 where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the Lawfulness of processing based on consent before its withdrawal.

Retention period: Personal data is saved for this purpose until the disclosure to the other Neko Clinic has been completed and as otherwise required by law or necessary for the establishment, exercise or defence of legal claims.

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 tools and equipment that have been used to provide you with healthcare as well as the tool used to create automatically generated summaries and suggestions in relation to your healthcare consultation.

When you give your consent, you also authorise the clinic to share your patient data in accordance with the rules on confidentiality under applicable law.

Categories of personal data:

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

Legal basis:

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

Explicit consent (Article 9(2)(a) of the UK 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 where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the Lawfulness of processing based on consent before its withdrawal.

Retention period: Personal data is saved for this purpose until the disclosure to Neko Health has been completed and as otherwise required by law or necessary for the establishment, exercise or defence of legal claims.

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 Neko Clinic where the health examination is performed 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 an ID verification service) 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
- Biometric data
- Identity data
- Payment information
- Physical characteristics

Legal basis:

Fulfilling obligations under a contract with the data subject (Article 6(1)(b) of the UK 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 UK 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 where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Retention period: Unless necessary for the establishment, exercise or defence of legal claims or required by law, 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 in order to develop, improve and optimise the medical equipment offered to you at the clinic.

Categories of personal data:

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

Legal basis:

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

Explicit consent (Article 9(2)(a) of the UK 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 where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the Lawfulness of processing based on consent before its withdrawal.

Retention period: Unless necessary for the establishment, exercise or defence of legal claims or required by law, 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 Neko Clinic we create automatically generated suggestions for our medical personnel and summaries of your healthcare consultation based on a so-called LLM (*Large Language Model*) which are always reviewed by a health professional using independent clinical judgment. This assists us to compile information and improve the quality of our healthcare interactions with you and means that after your healthcare consultation, you receive a summary of the consultation and the results in the patient application.

Categories of personal data:

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

Legal basis:

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

Explicit consent (Article 9(2)(a) of the UK 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 where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the Lawfulness of processing based on consent before its withdrawal.

Retention period: Unless necessary for the establishment, exercise or defence of legal claims or required by law, 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 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.

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 via email and text to market our services if you have been in contact with us to enquire about our services via the patient application or Website (e.g., if you were about to book an appointment for a health examination but did not complete your booking) or you consent to us contacting you via email and text to market our services to you (e.g., if you join the waitlist on our Website). 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 UK GDPR and Regulation 22 of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR)) The use of your personal data is necessary to fulfil Neko Health's legitimate interest in marketing our services and our business improvement purposes where you have used our services or have been in contact with us enquiring about 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.

Consent (Article 6.1(a) of the UK GDPR and Regulation 20 of PECR). The use of your personal data for the above purposes is based on your consent where you agree to us contacting you via email and text to market our services to you (e.g., if you join the waitlist on our Website)

Please note that where we rely on your consent as the lawful basis of the processing, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the Lawfulness of processing based on consent before its withdrawal.

Retention period: Unless necessary for the establishment, exercise or defence of legal claims or required by law, 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:

- Identity data
 - Technical data
 - Demographic data
- In general, only aggregated and statistical information is used for this purpose.

Legal basis:

Legitimate interest (Article 6(1)(f) of the UK 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: Unless necessary for the establishment, exercise or defence of legal claims or required by law, personal data is saved for this purpose until the personal data has been anonymised or aggregated.

Clinical studies

Who is responsible: Neko Health or NHUK (depending on the applicable entity that is sponsoring or conducting the clinical study) 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 or funded partially or wholly by third parties 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
- Biometric data
- Patient records
- Physical characteristics

Legal basis:

Research task in the public interest (Article 6(1)(e) of the UK GDPR) with the underlying task defined in the relevant clinical study. 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 UK 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: Unless necessary for the establishment, exercise or defence of legal claims or required by law, personal data is saved for this purpose for ten (10) years from the end of the study.

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:

- Technical data
- Demographic data

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

Legal basis:

Legitimate interest (Article 6(1)(f) of the UK 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 UK 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: Unless necessary for the establishment, exercise or defence of legal claims or required by law, 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, or in connection with, any legal proceedings (including prospective legal proceedings) *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:

- Health data
- Biometric data
- Payment information
- And other information that you share during your healthcare consultation

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 UK 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 UK 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 or in connection with, any legal proceedings (including prospective legal proceedings) or for the purpose of obtaining legal advice.

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 six (6) years to manage, defend and exercise legal claims and rights.

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 UK 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 only share your data through our system with other healthcare providers with your explicit consent or as otherwise required by law.

Within the Neko Group

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

If you make a booking in the UK but in future decide to use our services in another country, our clinic in the other country may need your consent to access the personal data collected by Neko Clinic in the UK. In such cases your personal data will be processed in accordance with the section below entitled "Where we process your data" and the Privacy Notice applicable to such other country.

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: (1) Customer support (2) Identification services (3) IT service providers (4) Payment service providers (5) Providers of marketing communications (6) Professional service providers such as lawyers.

Co-operation partners

Neko Health and NHUK may from time-to-time conduct or participate in clinical studies (for example, if a medical device is not yet medically authorised). In such cases, if you wish to participate in such

clinical studies, you will be asked whether you wish to provide your informed consent. In such cases, 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 Care Quality Commission (CQC) or other authorised bodies. If you report an injury directly to our insurance company, we may also share your patient records to the insurance company.

If you have been referred to us by an insurance company, your employer (e.g. as a benefit included with your employment), or another third party, we may share anonymised and aggregated data with the relevant third party to enable them to understand the population-level health of the people who have had a Neko scan, without allowing them to identify individual people from the results. For example, we may disclose the percentage of people with high blood pressure from a sufficiently large enough cohort of people, but we would not tell them who has high blood pressure.

If you are prescribed medicines in connection with your visit to us, information about the prescription is transferred to our electronic prescription provider so that they may either dispense medication to you, or facilitate the dispensing of medication at a pharmacy of your choice.

Where we process your data

We will not transfer or process personal data outside the United Kingdom, nor will we permit personal data to be transferred or processed outside the United Kingdom, unless it is under one or more of the following conditions:

- the territory into which the data are being transferred is covered by UK adequacy decisions or a mechanism such as the UK extension to the EU-US Data Privacy Framework;
- the transfer is made under the standard contractual clauses issued by the Information Commissioner under section 119A(1) Data Protection Act 2018 for example, the International Data Transfer Agreement (IDTA) which is a standard contract that safeguards transfers of personal data from the UK to a third country and / or the International Data Transfer Addendum (Addendum) which is an addendum to the new standard contractual clauses issued by the European Commission;
- the transfer is made under the provision of binding corporate rules; and
- the transfer is made in accordance with one of the derogations set out in the UK GDPR and Data Protection Act 2018.

For more information on these safeguards or to obtain a copy of such safeguards, please contact us.

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 the United Kingdom, this is the Information Commissioner's Office (ICO) website www.ico.org.uk.

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

Where we use consent as our lawful basis, 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 UK 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 UK 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 UK 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 UK 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 UK 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 UK 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 UK GDPR)

The right to data portability means that in certain situations, 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 UK 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 Information Commissioner's Office (ICO) (website www.ico.org.uk/make-a-complaint, address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and Helpline number: 0303 123 1113) is the supervisory authority in the UK 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 UK GDPR)

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

Specific rights under applicable law

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 by email at dpo@nekohealth.com or by post at the following addresses:

Neko Clinics

Postal address: 7 Savoy Court, London, United Kingdom, WC2R 0EX

Neko Health AB

Postal address: Jaktgatan 14, 115 45 Stockholm, Sweden

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.

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