

# PRIVACY POLICY

## 1 INTRODUCTION

1.1 This privacy policy (hereinafter the "Privacy Policy") applies at all times between Nysnő AB, company registration no. 559307-3413 (hereinafter "Nysnő"), and users (hereinafter the "User") in connection with the use of any of Nysnő's services, the User's usage of Nysnő's website and Nysnő's social media pages, or when contacting Nysnő, for instance via email (hereinafter collectively referred to as "Usage" and "Channels," respectively).

1.2 Nysnő acts as the data controller responsible for processing the User's Personal Data (as defined in section 2), which is registered with Nysnő by the User's action or directly collected by Nysnő from the User via the Channels or from a third party.

1.3 The purpose of this Privacy Policy is to ensure that the User feels confident that Nysnő, as data controller, processes the User's Personal Data in accordance with applicable data protection legislation. Below, the manner in how Nysnő processes the User's Personal Data, the User's rights, and how the User can contact Nysnő if they have questions or wish to exercise their rights, are described.

1.4 By providing information to Nysnő through any of the Channels or by otherwise using Nysnő's services, the User consents to Nysnő processing the User's Personal Data where such processing is necessary for Nysnő to provide services or information to the User or as otherwise stated in section 2 below. If the User does not provide required information or explicit consent where necessary, the User may not access Nysnő's services or information.

1.5 Should Nysnő amend the Privacy Policy, Nysnő will notify the User accordingly.

## 2 PROCESSING, PURPOSES AND LEGAL BASIS

2.1 "Personal Data" means any information relating directly or indirectly to an identified or identifiable natural living person. Personal Data processing occurs through the provision of Nysnő's services or information requested by the User.

2.2 Nysnő processes Personal Data to administer the User's registration for various services and expressions of interest with Nysnő, to enable the User to participate in Nysnő's community, and otherwise to offer the User various services and information from Nysnő. Furthermore, processing is carried out for research purposes and to measure customer satisfaction. The purposes of processing Personal Data are to fully deliver services, inform Users about these services, market them, measure customer satisfaction, and conduct research. Nysnő collects and processes the User's Personal Data only to the extent necessary to provide and market services, deliver related information, measure customer satisfaction, or conduct research. Upon contact with Nysnő, Nysnő saves the Personal Data necessary to communicate with the User. In using Nysnő's services, Nysnő may also need to process necessary Personal Data regarding health and allergies; more information about this is provided in section 3.

2.3 The legal basis for collecting and processing the User's Personal Data is the User's consent, an existing contract between Nysnő and the User, or a legal obligation—such as when Nysnő must retain data according to accounting rules or to deliver a service to the User. Exceptions apply in circumstances where obtaining prior consent is practically impossible, the processing remains lawful, and Nysnő has a legitimate interest in processing Personal Data, e.g., for marketing purposes, follow-up of services performed, or to exercise or defend against legal claims (based on legitimate interests).

## 3 SENSITIVE PERSONAL DATA

3.1 Sensitive Personal Data refers to information revealing ethnic origin, political opinions, religious beliefs, trade union membership, and Personal Data concerning health or sexual life.

3.2 Nysnő may process sensitive Personal Data about the User, such as data concerning physical or mental health, when conducting screenings prior to participation in retreat programs to assess the suitability of participants, or regarding allergies and similar matters, to adapt meals for retreat participants. This processing occurs only after obtaining explicit consent from the User or to fulfill contractual obligations towards the User.

## 4 INFORMATION DISCLOSURE TO THIRD PARTIES

4.1 Nysnő will not share User Personal Data with any third party without the User's consent, except as specified in this Privacy Policy or in Nysnő's cookie policy, unless required by law or necessary in connection with ongoing legal, administrative, or debt recovery proceedings involving Nysnő and the User. However, Nysnő reserves the right to share the User's Personal Data with Nysnő's affiliate, Lavin Education AB, company reg. no. 5594814880 ("Lavin"), if required for Lavin to deliver services to the User according to an agreement between the User and Nysnő.

4.2 Nysnő engages subcontractors to perform services (so-called "data processors"). These subcontractors may handle Personal Data and may require access to User Personal Data collected through Nysnő. Nysnő always strictly limits such subcontractors' access to the Personal Data necessary to fulfill the processing purposes outlined in section 2.2.

4.3 Additionally, Nysnő may engage subcontractors for third-party services related to Nysnő's own services, which provide these third-party services directly to the User and independently act as data controllers, such as payment solution providers. Therefore, Users may sometimes be required to submit Personal Data

directly to these providers, whose handling of Personal Data is not covered by this Privacy Policy. Users are referred to the respective privacy policies of such subcontractors for information on how these subcontractors handle User Personal Data.

4.4 From time to time, Nysnő engages in research collaborations with various external actors, such as universities. Through its operations, Nysnő possesses unique and valuable data relevant to psychedelic research, which can significantly benefit the broader development of the psychedelic field. Nysnő will not share User Personal Data with such third parties without the User's prior consent. However, Nysnő may share anonymized and/or aggregated data that cannot be specifically linked to the User without prior consent. Nysnő may also send inquiries to Users regarding whether they consent to being contacted by external parties for research participation. When research involving Users is conducted by a third party, that third party typically acts as the data controller.

## 5 STORAGE OF PERSONAL DATA

The User's Personal Data is stored on an external server provided by Nysnő's data processor within the EU/EEA.

## 6 TRANSFERS TO THIRD COUNTRIES

As a general rule, Nysnő will not transfer Personal Data to third countries (countries outside the EU/EEA). Should Nysnő need to transfer data, for instance, by selecting a future service provider located outside the EU/EEA, Nysnő will only transfer Personal Data if the third country ensures an adequate level of protection as required by applicable data protection legislation.

## 7 RIGHT OF ACCESS

7.1 The User has the right, free of charge, to request information about the Personal Data that Nysnő processes concerning the User (a so-called "register extract"). Should the User wish to know if Nysnő processes Personal Data about them, they may submit a written and signed request to Nysnő using the contact information provided below. When submitting the request, the User should clearly specify the information they are interested in. This allows Nysnő to provide the relevant details effectively. If the User makes repeated requests, Nysnő may charge a fee or, in some legally stipulated cases, refuse to comply with the request. Further rules apply as stipulated in section 17.1 for the User to exercise their rights according to this section 7.1.

7.2 Extracts from the register will be sent to the User within 30 days of Nysnő receiving the request. If the extract is extensive and Nysnő requires additional time, or if for any reason Nysnő cannot fulfill the request, Nysnő will inform the User accordingly.

## 8 RIGHT TO RECTIFICATION

8.1 To fulfill its obligation to maintain accurate and relevant Personal Data, Nysnő regularly reviews its records and updates Personal Data as necessary. If the User notices that the Personal Data processed by Nysnő is incorrect or incomplete, the User has the right to have their Personal Data corrected. Simple corrections are normally made without delay, but in other cases, Nysnő may need to consider the User's request carefully. Nysnő will not approve a rectification request if it is impossible or demands unreasonable effort.

8.2 If the User's Personal Data is amended at the User's request, Nysnő will inform any subcontractors and partners who previously received this data of the updated Personal Data. If requested by the User, Nysnő will also inform the User about the parties who have been notified of the corrections.

## 9 RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

9.1 The User has the right to request that Nysnő erases their Personal Data if:

- The data is no longer necessary for the purposes for which it was collected and processed by Nysnő;
- Nysnő processes Personal Data based on the User's consent and the User withdraws that consent;
- Nysnő processes Personal Data for direct marketing purposes and the User objects to such continued processing;
- Nysnő processes Personal Data based on legitimate interests and there are no overriding legitimate reasons outweighing the User's interest;
- Nysnő is not processing Personal Data in compliance with applicable regulations;
- Personal Data must be erased to comply with a legal obligation; or
- There is otherwise a relevant legal basis for the User to request erasure of the Personal Data.

9.2 Nysnő has the right to refrain from erasing Personal Data if it is necessary for Nysnő to fulfill a legal obligation, establish or defend legal claims against the User, for example in cases involving disputes due to outstanding claims or the User's breach of agreement with Nysnő.

9.3 Upon receiving the User's request, Nysnő will assess whether grounds exist for erasure of the User's Personal Data. Nysnő will subsequently inform the User of the assessment. If Nysnő erases the User's data upon their request, Nysnő will inform subcontractors and collaboration partners to whom such data was disclosed. However, Nysnő will not perform such notification if doing so is impossible or requires an unreasonable effort.

## 10 RIGHT TO RESTRICTION OF PROCESSING

10.1 The User has the right to request the restriction of processing of their Personal Data by Nysnő in the following circumstances:

- When the User contests the accuracy of the Personal Data, during the period that enables Nysnő to verify its accuracy;
- When the processing is unlawful, and the User opposes the erasure of the Personal Data and requests restriction of the use instead;
- When Nysnő no longer requires the Personal Data for processing purposes, but the User needs it to establish, exercise, or defend legal claims; or
- When the User has objected to processing pending verification on whether Nysnő's legitimate interests override the User's interests.

10.2 Restriction means that Personal Data is marked and thereafter only processed for certain limited critical or statutory purposes.

## 11 DATA RETENTION

The User's Personal Data will not be retained longer than necessary considering the purposes of processing and Nysnő's legal obligations as a company, such as accounting regulations. Nysnő will not store the data longer than necessary under applicable laws, and Nysnő will erase Personal Data according to prevailing legislation after a case-by-case evaluation to determine when different types of Personal Data should be erased.

## 12 RIGHT TO OBJECT

12.1 The User has the right to object to Nysnő's processing of their Personal Data when Nysnő relies on legitimate interest as the legal basis for processing. The User must specify in writing which processing they object to. Following such an objection, Nysnő may only continue processing if it can demonstrate compelling legitimate grounds for the processing that outweigh the interests of the User.

12.2 However, if the User's Personal Data is processed for direct marketing purposes, the User has the absolute right to object to such processing at any time.

## 13 RIGHT TO DATA PORTABILITY

If the User has provided Personal Data to Nysnő, the User may, in certain circumstances, have the right to obtain and reuse their Personal Data, for example, transferring it to another organization. To exercise the right to data portability, the User's request must concern Personal Data provided by the User and processed by Nysnő based on the User's consent or to fulfill a contract between the User and Nysnő. The right to data portability does not apply if Nysnő's processing is based on legitimate interests or a legal obligation. Furthermore, the right to data portability does not apply if such portability is technically difficult to implement.

## 14 RIGHT TO LODGE A COMPLAINT

If the User has any complaints or objections regarding Nysnő's handling of their Personal Data, the User shall initially contact Nysnő directly, so that Nysnő can provide appropriate assistance. The User, however, always has the right to directly lodge a complaint with the supervisory authority responsible for data protection, i.e., the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten).

## 15 SECURITY

Nysnő implements all appropriate technical and organizational security measures as required under applicable laws to protect Personal Data against unauthorized access, alteration, or destruction.

## 16 AUTOMATED DECISION-MAKING AND PROFILING

Nysnő does not use Personal Data for automated decision-making or profiling.

## 17 CONTACT INFORMATION

17.1 If the User wishes to make a request according to their rights stated above, such a request must be submitted in writing and sent by postal mail to Nysnő's registered business address as stated in the official business register at the time—mark the envelope "GDPR". Because it is crucial that Nysnő does not disclose the User's Personal Data to unauthorized persons, requests must be submitted in writing, signed by the User, scanned, and sent by postal mail to Nysnő. The request must also include a signed copy of a valid identification document (passport or driving license) and precise details of the requested action, as well as the User's contact information.

17.2 If the User has any questions regarding this Privacy Policy or Nysnő's processing of Personal Data, they may contact Nysnő via email at [info@nysno.se](mailto:info@nysno.se).