

# PRIVACY POLICY FOR ÕYAMA

Dear User,

Welcome to Õyama! Õyama is a self-care program for mental health provided at [www.getoyama.com](http://www.getoyama.com) (the “Webpage”), (collectively the “Services”) which is provided by the software company Mental Link AB, company registration number 559063-1965 having its registered address at c/o Tech Farm, Kommendörsgatan 9, 114 48 Stockholm, Sweden (“we” or “us”).

Your privacy is important to us. Under the General Data Protection Regulation (2016/679), we are liable for the processing of personal data for which we decide the purposes and the means of processing. With “personal data” we mean information which is directly or indirectly referable to a natural living person, e.g. name and address but also possibly location data or IP addresses. We may collect the information set out below, which include your personal data.

This document contains a policy statement regarding our collection, use and processing of personal data, with whom we may share such data and your rights in relation to your personal data. When you use the Services, we will process personal data for various purposes. In order to use the Service you must first read and accept this Privacy Policy.

You are also required to accept third party provider’s own privacy policies and terms of use: <https://admin.typeform.com/to/dwk6gt>, <https://mailchimp.com/legal/privacy/>

## PURPOSES OF PROCESSING AND LEGAL BASE

The register is composed of the data contained in instances of Õyama. The purpose of processing the data is to provide Õyama services.

## CONSENT

By creating a user account you agree to the processing of personal data as set out in this Privacy Policy.

## WHAT PERSONAL INFORMATION IS PROCESSED?

Õyama processes the following information:

### Personal information

- Full name
- Social security number (or other comparable national identification code, where applicable)
- Email address
- Phone number

Personal data generated and stored during use of Õyama:

- Forms filled by the user
- Other information that is either communicated through Õyama or fetched by Õyama

**Log information:**

- Technical logs (including IP-address) and audit logs are stored on a separate log server
- Õyama administrators use logs for troubleshooting only when necessary
- For more information on log back-ups and long-term storage of log information, please contact us.

## **THE SOURCES OF PERSONAL DATA**

The personal data is collected from the following sources:

- Information entered by the user
- User-specific information entered by the Õyama administrators
- Information imported from other records by the data controller

## **RETENTION OF PERSONAL INFORMATION**

We store your personal data for as long as necessary to perform the Services, unless there is a legal obligation to store the data for longer.

## **DISCLOSURE OF PERSONAL DATA**

No personal data or information is disclosed with any international organisation or party outside of the EEA.

## **YOUR PRIVACY RIGHTS UNDER EU LAW**

You have an absolute right to object to the processing of your personal data for direct marketing. You also have the right to recall your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.

You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used

and machine-readable format, and have the right to transfer such data to another data controllers.

To exercise the aforementioned rights, or if you have any questions about our sharing practices, your rights under EU law, or wish to have your personal information removed, please contact us at the following address: [hello@getoyama.com](mailto:hello@getoyama.com) , Mental Link AB, at c/o Tech Farm, Kommendörsgatan 9, 114 48 Stockholm, Sweden. In order to ensure that you receive a swift response, please state your full name and, if applicable, your address, user name and the email address used for registration. Note that you should sign the request to receive information of the processing of your personal data yourself.

If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

#### **NOTICE OF CHANGES TO THE PRIVACY POLICY**

If we make changes to this Privacy Policy we will notify you by email. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.