Latest updated: October 16, 2026

Privacy Policy – Artemis Research Project

1. General

At **ABC Labs AB** ("ABC", "we" or "us") we protect the personal integrity of individuals and always strive for a high level of data protection. This privacy policy explains how we collect and use your personal data when you participate in the research project **Artemis** – a longitudinal population-based cohort for evaluation of new methods in precision medicine (the "**Research Project**" or "**Artemis**"). It also describes your rights and how you can assert them. It is important that you read and understand the privacy policy and feel safe in our processing of your personal data. You are always welcome to contact us if you have any questions.

This privacy policy is a supplement to the information for research participants provided together with the consent form that you sign when you join Artemis, and should be read together with them. The Research Project has been approved by the Swedish Ethical Review Authority (reference number 2025-08919-01).

Who is covered by this policy?

This privacy policy applies to you who:

- Participate in, or have been invited to participate in, Artemis (**participant**)
- Contact us with questions about Artemis via telephone, e-mail or the project website (**interested party**)

This policy applies only to Artemis. ABC's general privacy policy, available at www.abclabs.se, applies to ABC's other services but does not apply to your participation in Artemis. This policy does not cover data handled by third parties acting as independent controllers, such as the provider of any wearable device you choose to use in the project, or research collaborators who receive data from the Research Project (see Section 6). These third parties are responsible for complying with applicable data protection regulations and have their own privacy policies. To understand how these actors use your personal data, we refer to their respective policies.

2. About us and the Research Project

ABC Labs AB, company registration number 559248-8208, is the research principal (Sw. *forskningshuvudman*) for Artemis, which means that ABC is the organisation responsible for the Research Project. The principal investigator is Professor Ulf Gyllensten.

The purpose of Artemis is to promote better public health by developing preventive care and treatment based on the individual's unique circumstances, by increasing understanding of how different factors interact to affect health, with the goal of improving prevention, diagnosis and treatment of widespread diseases (the "**Purpose of the Research Project**"). Your data may also be used in health-economic research to help optimise public healthcare systems.

ABC is also a healthcare provider. Within Artemis, ABC's medical staff perform health examinations, review your results, communicate them to you together with any lifestyle advice and, where needed, refer you to a specialist. This part of the project is healthcare and is also subject to Swedish healthcare legislation, including the Patient Data Act (2008:355).

ABC's role in personal data processing

A data controller is the entity that decides for what purposes personal data shall be processed, and how the processing shall be carried out. The data controller may use a so-called data processor. A data processor is an entity that may only process personal data in accordance with instructions from the data controller and may not use the personal data for its own purposes.

ABC is the data controller for the processing of your personal data in Artemis described in this privacy policy.

Some other organisations involved in the project have the following roles :

- **Karolinska Institutet** is responsible for the LifeGene study and its data and samples, which it discloses to us with your consent, and, as the organisation responsible for Karolinska Institutet Biobank, for the storage of your research samples in accordance with the Biobanks Act (2023:38).
- **Karolinska University Hospital Laboratory** analyses your clinical samples on our behalf under a service agreement and has no responsibility for the research. For this analysis it acts as our data processor.
- **The provider of the wearable device** (ring and/or watch) is responsible for the processing in its own apps and services under the terms you accept with it. We are responsible for the data we collect from the device for the Research Project.
- **Research collaborators and research data repositories** are responsible for their own processing of the data they receive from us (see Section 6).
- **Other care providers** to whom we refer you are responsible for their own patient records.

ABC does not decide jointly with any of these organisations on the purposes and means of the processing described in this policy, so there is no joint controllership in Artemis. If this changes, we will update this policy and make the essence of the arrangement between the joint controllers available to you, as required by GDPR Article 26.

3. What personal data do we collect about you and when?

Personal data in this context refers to all information that is attributable to a natural person and that can be used directly or indirectly to identify them (e.g. name, contact details, personal identity number, location information, employer).

We may collect personal data about you in several different ways, as we describe below. We primarily collect information directly from you, for example at health examinations and in questionnaires. In accordance with the ethical approval and your consent to participate under the Ethical Review Act (see “Ethical approval and your consent” in Section 4), we also collect information

about you from other sources, such as health data registers, other care providers and earlier research studies, as described below.

We collect the following personal data from you if and when you:

- Register for and participate in health examinations (name, personal identity number, contact details, results of physical examinations and of measurements of organ function through digital sensors, e.g. blood pressure and heart rhythm, images of your face taken with ordinary (RGB), thermal (infrared), and hyperspectral cameras for facial analysis, and results of clinical analyses of your samples).
- Give blood, saliva, urine and stool samples, at the examinations or at home via fingerprick (human samples and analyses of biomolecules in them, including DNA, RNA, proteins and metabolites; analyses of DNA constitute **genetic data**).
- Fill in health questionnaires (information about your health, medical history, living habits and lifestyle, and about your household, including any children and their ages).
- Use a wearable health device (ring and/or watch) offered in the project (e.g. data on activity, sleep, heart rate and other sensor data).
- Discuss your results with our medical staff (notes in your patient record, a recording of the discussion and any transcript or summary of it).
- Contact us or exercise your rights (name, contact details and the content of your enquiry).

We may also collect information from:

- Karolinska Institutet, regarding data and stored blood samples from the LifeGene study in which you have previously taken part. These samples are stored at Karolinska Institutet Biobank and will be reanalysed in Artemis.
- The National Board of Health and Welfare (Socialstyrelsen), via the LifeGene database at Karolinska Institutet, from the Medical Birth Register (including information about the births of your children), the National Patient Register, the Prescribed Drug Register, the Cancer Register, the Cause of Death Register and the Dental Health Register.
- Statistics Sweden (SCB), from the LISA database, regarding socioeconomic data such as education, occupation and income.
- Other care providers, regarding your patient records (earlier diagnoses, treatments and other medical information).
- The provider of the wearable device, if you choose to use one in the project.
- Research collaborators, regarding further data they have generated from your data and samples, which they return to the project's research database when their analyses are completed.
- The Swedish Population Register (SPAR/Navet), to keep your name and address up to date. This information is used only to administer your participation and is not used in the research.
- Authorities, where required by law.

Some of the data listed above are special categories of personal data (sensitive personal data): health data, genetic data, biometric data (the images of your face taken at the health examinations) and data revealing ethnic origin (which may follow from the analyses of your DNA).

You are not obliged to provide personal data to us, but participation in Artemis is not possible without the data needed for the Research Project.

4. How are we using your personal data and on what legal ground?

Ethical approval and your consent

Taking part in Artemis is always voluntary and requires your informed consent under the Swedish Ethical Review Act (2003:460). Under the GDPR, however, the legal basis for our processing of your personal data in the Research Project is not your consent, but the fact that the research has been approved by the Swedish Ethical Review Authority and is carried out in the public interest (see the table below). Your consent under the Ethical Review Act is an ethical requirement and an important safeguard: we only carry out the research on you, and use your data and samples, in the way you have consented to and within the scope of the ethical approval. If new research arises that is not covered by your consent, the Swedish Ethical Review Authority will decide whether you need to be asked again. Section 8 explains what happens if you withdraw your consent.

Artemis is only open to adults aged 18 or older who take part in the LifeGene study. We do, however, process some information about participants' children and other family members: from the Medical Birth Register (for example the child's birth weight and diagnoses) and the information you give in the questionnaire about children in your household and their ages. We process this information on the legal grounds for the Research Project (row 1 in the table below, GDPR Articles 6(1)(e) and 9(2)(j)).

The processing is covered by the ethical approval and is needed to study, for example, how pregnancy and birth relate to later health. The information is pseudonymised and the results are only analysed at group level. Because the children do not take part in Artemis themselves, and informing each of them individually would involve a disproportionate effort, we rely on the exception for scientific research in GDPR Article 14(5)(b) and make this information publicly available in this policy instead.

Purpose	*Legal ground*
1. Conducting the Research Project (scientific research) We process your personal data, including health data, genetic data, biometric data and data revealing ethnic origin, to carry out scientific research within the Purpose of the Research Project. This includes compiling and linking data from health examinations, samples, questionnaires, wearable devices, LifeGene, health registers and patient records, and analysing it, including with AI and other advanced analytical methods. This includes health-economic analyses to help optimise public healthcare systems.	*Performance of a task carried out in the public interest, pursuant to GDPR Article 6(1)(e) and Chapter 2, Section 2 of the Swedish Data Protection Act (2018:218), as the processing is scientific research approved under the Swedish Ethical Review Act (2003:460) (ref. 2025-08919-01).* *These sensitive personal data are processed pursuant to GDPR Article 9(2)(j), as the processing is necessary for scientific research purposes, is subject to the safeguards in GDPR Article 89(1) and has been approved under the Ethical Review Act.* *Your informed consent under the Ethical Review Act is required to participate in Artemis and determines the scope of what we do, but it is not the legal basis for the processing under the GDPR.*
2. Health examinations, feedback of results and referrals (healthcare) We process personal data, including health data, samples and results, to carry out the health examinations, have your results reviewed by medical staff and communicated to you together with any lifestyle advice, refer you to a specialist where needed, and keep patient records.	*Performance of a task carried out in the public interest, pursuant to GDPR Article 6(1)(e), and provision of health care, pursuant to GDPR Articles 9(2)(h) and 9(3), in accordance with the Patient Data Act (2008:355) and other health and medical care legislation.* *Keeping patient records: legal obligation, pursuant to GDPR Articles 6(1)(c) and 9(2)(h), under the Patient Data Act.*
3. Collection, storage and analysis of samples We collect your samples, reanalyse blood samples you previously gave in LifeGene, and store the research samples pseudonymised at Karolinska Institutet Biobank, and have them analysed in Sweden or, where analysis methods are not available in Sweden, in another EEA country or a third country (see Section 6).	*For personal data: the legal grounds for the Research Project (row 1). The storage and use of the samples themselves also requires your consent under the Biobanks Act (2023:38) which you give separately in the consent form. Keeping and using the samples for future research requires your separate consent as well.*
4. Collection of patient records from other care providers We request information about earlier diagnoses, treatments and other medical information from other care providers.	*The legal grounds for the Research Project (row 1). The other care provider decides, under the confidentiality rules that apply to it, whether the information can be disclosed to us*

5. Disclosure to external research collaborations We disclose pseudonymised or anonymised data and samples to academic institutions and companies conducting research within the Purpose of the Research Project, including by depositing pseudonymised data in research data repositories with controlled access (see Section 6).	*The legal grounds for the Research Project (row 1), provided that the specific research is covered by ethical approval. By consenting to participate in the Research Project, you also consent to ABC disclosing the data notwithstanding confidentiality under the Patient Safety Act (2010:659), to the extent it originates from your health examinations. Data we have received from registers, LifeGene and other care providers is only disclosed to the extent permitted by the conditions under which it was released to us. The recipient is responsible for having its own legal basis for its processing.*
6. Recording of discussions with medical staff We make a video recording of the discussion with medical staff about your results and may create a transcript or summary of it to ensure quality and participant safety, and to develop the ability to communicate health information to participants.	*The legal grounds for the Research Project (row 1).*
7. Contact about future research If you have consented to it, we may contact you about future research projects.	*The legal grounds for the Research Project (row 1), provided that you have agreed to be contacted.*
8. Communication and administration of your participation We use your contact details to send invitations to examinations, reminders and home-sampling kits, to keep you informed on an ongoing basis about which data has been shared and with which recipients, to inform you about the project, and to answer your questions and handle requests to exercise your rights.	*Performance of a task carried out in the public interest, pursuant to GDPR Article 6(1)(e) (as for row 1), and legal obligation, pursuant to GDPR Article 6(1)(c), when we handle requests to exercise your rights.* *Personal identity numbers are processed where clearly justified with regard to the need for secure identification, pursuant to Chapter 3, Section 10 of the Swedish Data Protection Act.* *Enquiries from interested parties who do not take part in Artemis: legitimate interest, pursuant to GDPR Article 6(1)(f), in answering your questions.*
9. Security, quality assurance and supervision We process personal data to protect the data and samples in the project, log and review access, handle personal data breaches and respond to supervisory authorities.	*Legal obligation, pursuant to GDPR Article 6(1)(c), e.g. under the GDPR and the Patient Data Act, and the legal grounds for the Research Project (row 1).*

10. Anonymisation For analyses that do not require knowledge of your identity, and when the retention period ends, we anonymise the data where effective anonymisation is possible. Where it is not, for example for genetic data, the data is used in pseudonymised form and deleted when the retention period ends. Anonymised data is no longer personal data and falls outside the scope of the GDPR.	*The anonymisation itself is carried out on the legal grounds for the Research Project (row 1).*
11. Establishing, exercising or defending legal claims Where necessary, we use your personal data to handle, exercise or defend legal claims, for example in a dispute, and may share it with external advisers, counterparties and authorities for that purpose.	*Legitimate interest, pursuant to GDPR Article 6(1)(f), in handling, exercising and defending legal claims. Sensitive personal data is only used where necessary for this purpose, pursuant to GDPR Article 9(2)(f).*

All processing of personal data is carried out in accordance with the GDPR and we ensure that only necessary data is processed for the purposes stated above.

5. AI, automated processing and online information

We use modern technology, including AI and other advanced analytical methods, to analyse the data in the Research Project and find new connections between different factors and health. These analyses are carried out on pseudonymised or anonymised data, and may be carried out outside Sweden (see Section 6) and research results are analysed at group level. No decisions that have legal effects for you or similarly significantly affect you are made based solely on automated processing, including profiling. Your results from health examinations are always reviewed by medical staff before they are shared with you. Where AI or other analyses are carried out by external service providers, they act as our data processors and receive only pseudonymised data. Identifiable personal data in the Research Project is stored in Sweden. Results from the research analyses are not used for your care and are not returned to you individually.

Website, participant portal/app and wearable devices

When you use the project website, participant portal/app or the wearable device offered in the project, we may receive or collect information about your use of them, such as:

a) Details of the online content you have viewed or interacted with, such as your browser, software, pages you have viewed and what you have “clicked” on.

b) Services, software or server logs that store information about your use of the website and the participant portal/app , including, for example, your IP address, browser information (including HTTP user agent strings), HTTP client request information and the time and location of your activities, domain, device and application settings, errors and hardware activity.

Generally, such online or system information is collected through the use of digital identifiers such as browser cookies, plugins or your IP address. These identifiers are used to distinguish information provided through the hardware, browser or account that you use. However, we may associate the information collected with one of your accounts, for example, if you are logged into our services when the information is collected.

Legal ground: We process this information to provide, secure and improve the website and the participant portal/app, based on our legitimate interest in operating secure and functional digital services (GDPR Article 6(1)(f)), and, where it is needed to administer your participation, on the legal grounds in row 8 of the table in Section 4. Data from the wearable device is processed for the Research Project on the legal grounds in row 1.

Cookies: We only use cookies and similar technologies that are strictly necessary for the website and the participant portal/app to work, unless you agree to others. Cookies that are not strictly necessary, for example for analytics, are only used if you have consented to them in our cookie banner, in accordance with the Swedish Electronic Communications Act (2022:482). You can withdraw that consent at any time in the cookie settings.

Retention: Log data is kept for 12 months and then deleted, unless it is needed to investigate a security incident.

6. Who has access to your personal data?

Employees and consultants

Only those employees and consultants within ABC who need access to your personal data to perform their duties are authorized to process them. Medical staff are subject to professional confidentiality under the Patient Safety Act (2010:659). Research staff work with pseudonymised data, and the code key that links the data to you is kept separately with restricted access.

Sharing of personal data

We do not share your personal data with third parties except as described below. We only share the amount of data necessary for the specific purpose and always strive for the highest relevant degree of pseudonymisation or anonymisation.

- **External service providers and subcontractors:** We use external IT and logistics providers to provide technical services, secure data storage, identification services (e.g. BankID), logistics (e.g. home-sampling kits), support, cybersecurity and other necessary processing of personal data. These actors only process data according to our instructions and according to concluded personal data processing agreements. Legal ground: these providers process data on our behalf, so the processing is covered by the legal grounds for the purpose in question (see Section 4).
- **Laboratories and biobank:** Clinical samples are analysed on our behalf by Karolinska University Hospital Laboratory. Research samples are stored pseudonymised at Karolinska

Institutet Biobank and analysed at laboratories in Sweden or, if analysis methods are not available in Sweden, in another EEA country or a third country. Laboratories receive only pseudonymised samples and the minimum data necessary. Samples sent abroad are labelled only with an internal sample number, without any clinical or other information about you. Samples are only sent abroad under a material transfer agreement that regulates which analyses may be performed and how the samples are handled afterwards. Legal ground: rows 2 and 3 of the table in Section 4.

- **Research collaborators:** As part of the Research Project, and as covered by your consent to participate, pseudonymised or anonymised data and samples may be disclosed to academic institutions and companies conducting research within the Purpose of the Research Project. Disclosure only takes place for research covered by ethical approval and under an agreement that requires confidentiality, appropriate security and prohibits any attempt to identify you. Recipients are responsible for their own processing. We will keep you informed on an ongoing basis about which data has been shared and with which organisations, and you can also ask us at any time. If you have questions about or objections to a particular disclosure, you can contact us. If you no longer want your data to be shared with a particular recipient, you can withdraw your consent to sharing with that recipient by contacting us or the recipient. Legal ground: row 5 of the table in Section 4.
- **Research data repositories:** When research results are published, pseudonymised individual-level data may be deposited in research data repositories with controlled access. Only researchers approved by the repository can access the data, under conditions that prohibit any attempt to identify you. Legal ground: row 5 of the table in Section 4.
- **Other care providers:** If you need further examination or care, we will refer you to a specialist or other care provider and share the information needed for the referral. Legal ground: provision of health care, pursuant to GDPR Articles 6(1)(e) and 9(2)(h) and the Patient Data Act (row 2 of the table in Section 4).
- **Statutory obligations:** We may share information with authorities if required by law, court order or other legal obligation. Legal ground: legal obligation, pursuant to GDPR Article 6(1)(c).
- **Insurance:** If you report an injury in connection with sampling, information may be shared with ABC's patient insurer. Legal ground: legal obligation under the Patient Injury Act (1996:799), pursuant to GDPR Article 6(1)(c), and, for health data, GDPR Article 9(2)(f).

A current list of our personal data processors can be provided upon request, and a current list of research collaborators can also be provided upon request.

Transfer outside the EU/EEA

Research analyses of samples may take place outside the EU/EEA if the analysis methods are not available within the EU/EEA, AI and other advanced analyses of pseudonymised data may be carried out outside Sweden, and research collaborators may be established outside the EU/EEA. In such cases only pseudonymised data and samples are transferred, and we ensure that the transfer is covered by an adequacy decision of the European Commission or by the Commission's standard contractual clauses together with any necessary supplementary measures. Before each transfer we carry out a transfer impact assessment and, where needed, take additional technical, organisational

or contractual measures. Identifiable personal data is stored in Sweden. You can obtain information about the safeguards used, or a copy of them, by contacting us.

7. Storage, verification and deletion of personal data

We only save your personal data for as long as it is necessary to fulfil the purpose, i.e. for the Research Project and, for patient records, as required by healthcare legislation.

Deletion: Data that is no longer necessary for the Research Project, healthcare documentation or quality assurance is continuously deleted to ensure that we only process relevant personal data. We conduct an annual review to identify and delete information that is no longer needed.

- Research data is kept pseudonymised in the project's protected data domain for as long as necessary for the Research Project and up to 15 years. It is then anonymised or, where effective anonymisation is not possible (for example for genetic data), deleted.
- Patient records from health examinations are kept for at least ten years after the last entry, as required by the Patient Data Act, also if you end your participation.
- Research samples are stored pseudonymised at Karolinska Institutet Biobank for up to 15 years, which corresponds to the planned duration of the Research Project (until 2040). If you have separately consented to it, they may also be kept and used for future research within the Purpose of the Research Project, subject to ethical approval. If you withdraw your consent to storage, the samples are destroyed or de-identified.
- Video recordings of discussions with medical staff are kept for 12 months and then deleted.
- Transcripts and summaries of discussions with medical staff are kept for 12 months and then deleted.
- Contact details and records of your consent are kept while you participate and thereafter for as long as necessary to document your consent and any withdrawal and to establish, exercise or defend legal claims.
- Enquiries and requests to exercise your rights are kept for 12 months after they have been handled.
- Records of which data has been disclosed to which recipients are kept for as long as the research data is kept, so that we can keep you informed about disclosures.
- Log data from the website and the participant portal/app is kept as described in Section 5.

Security measures: We use technical and organizational security measures such as:

- Encryption when storing and transferring sensitive information.
- Limited access to personal information based on the need-to-know principle.
- Regular security review and risk analysis.
- Access minimization to sensitive personal information.
- Training for employees.
- Pseudonymisation (coding) of research data, with the code key kept separately.
- Storage of identifiable data only within the project's protected data domain, and anonymised analysis environments for analyses that do not require knowledge of your identity.
- Logging and systematic log review of access to patient records.
- Agreements with recipients requiring confidentiality and prohibiting re-identification.

If a personal data breach affecting your personal data or samples occurs, we will notify you promptly and inform you of the measures taken.

8. Your rights

Regarding personal information for which we, ABC, are the personal data controller, you as a participant have, among other things, the following rights:

- **Right to access.** Upon request, we will confirm whether we are processing your personal data and, if so, provide you with a copy of it, including why we are processing the data. The right of access does not apply to information that we are not allowed to disclose to you under confidentiality rules (Chapter 5, Section 1 of the Swedish Data Protection Act). For patient records, access may therefore in exceptional cases be limited under the Patient Safety Act (2010:659) and the Patient Data Act (2008:355). Results from the research analyses are not returned to you individually as part of the Research Project, but this does not limit your right to request access to your personal data under the GDPR.
- **Right to rectification.** If your personal data is inaccurate or incomplete, you have the right to have it corrected or completed. If we have shared your personal data with others, we will, as far as possible, notify them of the corrections.
- **Right to restriction.** In certain cases, for example while we verify whether your data is correct, you have the right to request that the processing of your data is restricted.
- **Right to erasure.** You can ask us to erase or remove your personal data and we will do so, e.g. when it is no longer needed. Notwithstanding this, we also have the right to refrain from erasing certain data as stated in this policy, for example due to legal requirements to save certain data under healthcare legislation or where erasure would be likely to render impossible or seriously impair the research (GDPR Article 17(3)(d)).
- **Right to object to processing of personal data.** You can ask us to stop processing your personal data at any time and we will do so: (i) where we process your data for research in the public interest, on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest (GDPR Article 21(6)); or (ii) where we base the processing on legitimate interests - unless we can demonstrate compelling reasons for the processing.
- **Rights regarding automated decision-making and profiling**. You have the right not to be subject to decisions based solely on automated processing of your personal data, including profiling. No such decisions are made in Artemis.
- **Right to withdraw your consent to participate.** Your consent under the Ethical Review Act is not the legal basis for our processing under the GDPR (see Section 4), but you can withdraw your consent to participation in Artemis, or to any optional part of it (storage of your samples in a biobank, storage of your samples for future research, or being contacted about future research) , at any time, without giving a reason and without it affecting your future care or treatment. If you withdraw your consent to participation, we will stop collecting new data and samples from you. In accordance with the Ethical Review Act and the ethical approval, data collected before your withdrawal may still be used in the research, and patient records will be kept as required by the Patient Data Act. Samples will be destroyed or de-identified if you withdraw your consent to their storage. If you end your participation, we will not disclose any further data about you to research collaborators, but data already

disclosed may continue to be used by them within the scope of the ethical approval. You can also withdraw your consent to sharing with a particular recipient by contacting us or that recipient. To withdraw your consent, or any part of it, contact the principal investigator by e-mail to info@artemisresearch.se or by post to the address in Section 9. You do not need to give a reason, and we will confirm when your withdrawal has been registered.

- **Right to complain to the Swedish Authority for Privacy Protection .** If you have any comments about this policy, including how we have handled your personal data, you can report this to the Swedish Authority for Privacy Protection via https://www.imy.se/.
- **Right to compensation.** If you have suffered damage as a result of us processing your personal data in breach of the GDPR, you have the right to claim compensation.
- **Rights under the Patient Data Act.** As a patient, you also have rights under the Patient Data Act (2008:355) in respect of your patient records from the health examinations. You can, as a rule, request access to your patient records and information about who has had electronic access to them (log extract). You can also apply to the Health and Social Care Inspectorate (IVO) to have your patient records destroyed in whole or in part.

If you have any comments or questions regarding our compliance with this Policy or other information, please contact us using the contact details below and we will clarify our use of your personal information and answer your questions.

Some of your rights are limited by the GDPR itself when we process data for scientific research in the public interest, for example the right to erasure (Article 17(3)(d)) and the right to object (Article 21(6)), and by confidentiality rules under Swedish law.

We aim to respond to your request within one month of receiving it. If a request is complex or we receive many requests, we may need more time and will tell you why. To protect your data, we need to verify your identity before we handle your request (for example via BankID). If we cannot comply with your request, we will explain why.

9. Contact

If you have any questions about this Policy or wish to exercise your rights, please reach out to the contacts below.

- **Your participation, including withdrawing your consent in whole or in part:** the principal investigator, Professor Ulf Gyllensten, info@artemisresearch.se.
- **This policy and your data protection rights (Section 8):** ABC's Data Protection Officer, dpo@artemisresearch.se.
- Address: ABC Labs AB, Hagaplan 4, 113 68 Stockholm
- Web site: www.abclabs.se
- Project website: www.artemisresearch.se

10. Changes to this Policy

We will update this policy as necessary and will publish any changes on the project website. We will notify you directly of material changes. If a change affects what you have consented to, we will ask for your consent again where required.