Privacy Policy

***Document reference**: PrivacyNL2609a*

1. Introduction

Welcome to consciousgrowth.eu. We are committed to protecting your privacy and ensuring that your personal information is handled in a safe and responsible manner. This Privacy Policy outlines how we collect, use, and protect your personal data when you visit our website and use our services, including our legal psychedelic retreats in the Netherlands.

Michael Conti and Joan Manuel Giménez Sanchíz are joint data controllers responsible for the personal data processed through this website and our retreat services. Our main establishment is located in Spain (Avinguda de la Generalitat 29, 2-1, Santa Coloma de Gramenet). Your data is handled under the EU General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR") and the Dutch GDPR Implementation Act (Uitvoeringswet Algemene Verordening Gegevensbescherming, "UAVG"). You can contact either of us about your data at contact@consciousgrowth.eu, and you can exercise your rights against either of us.

2. Information We Collect

Personal Data provided by You.

- **Identification & Contact Details:** Full name, date of birth, gender identity, residential address, email address, phone number, country of residence, and profession.
- **Special Category Data (Health & Psychological History):** Physical health status, medical history, cardiovascular/neurological conditions, current and past medications, supplements, allergies, dietary needs, mental health history, personal trauma history, substance use, past psychedelic experiences, and psychological intentions/goals for the retreat. *(Note: This sensitive data is processed strictly based on your explicit consent under Article 9(2)(a) GDPR).*
- **Intake & Screening Notes:** Professional observation notes and assessment summary details taken during pre-screening consultations to evaluate your suitability for retreat participation.
- **Financial & Billing Information:** Payment receipts, contribution amounts, transaction logs, and billing addresses required for invoicing and accounting compliance.
- **Scholarship Application Records:** Information regarding your request for financial assistance. Proof of income, student, or unemployment status submitted during evaluation is **permanently deleted immediately** upon review and approval/rejection of the application.
- **Emergency Contact Details:** Full name, relationship, phone number, and email address of a designated person to contact in case of an emergency during a retreat. *(Please ensure you inform your emergency contact that you have provided their details to us).*
- **Preparation & Integration Insights:** Information shared in Preparation Questionnaires or during pre-/post-retreat virtual consultations via Google Meet regarding your personal history, expectations, and integration support needs.
- **Marketing & Newsletter Preferences:** Name and email address collected when you subscribe to our newsletter or opt-in to receive updates about future Conscious Growth retreats via MailerLite.

Non-Personal Data and Web Analytics.

When you visit our website consciousgrowth.eu, we may automatically collect standard technical and browsing data, including:

- IP address and rough geographic location
- Browser type, language, and operating system
- Pages viewed, links clicked, and date/time of access
- Referring URLs and site navigation patterns

3. How We Use Your Information

We use the information we collect for the following purposes:

- To send you newsletters and promotions as long as you opted to receive them
- To provide and manage our services, including retreat bookings and consultations
- To process payments and manage billing
- To communicate with you regarding your inquiries, bookings and our services
- To assess your suitability for participation in our retreats, including reviewing medical history
- To ensure participant safety and comply with health and legal requirements
- To improve our website and services
- To comply with legal obligations and protect our legal rights

4. Legal Bases for Processing Personal Data

We process personal data under the following legal bases:

- **Application Form**: Processed under Article 6(1)(b) GDPR as necessary to evaluate and process your request prior to entering into a retreat agreement.
- **Intake & Screening Notes:** Processed under Article 9(2)(a) GDPR (Explicit consent provided during intake) in conjunction with Article 6(1)(b) GDPR (Pre-contractual suitability assessment) and Article 6(1)(f) GDPR (Our legitimate interest in ensuring retreat safety and risk management).
- **Intake Form** (incorporating Informed Consent and Data Protection Notice)**:** Health-related information is special category data under Article 9 GDPR. We process this data based on your explicit consent pursuant to Article 9(2)(a) GDPR, in conjunction with:
  - Article 6(1)(b) GDPR (to assess suitability and safely fulfil our contractual obligations before and during the retreat), and
  - Article 6(1)(f) GDPR (our legitimate interest in maintaining participant safety and defending against legal or insurance claims).

  Note: Explicit consent is required for participation. Consent cannot be withdrawn retroactively for data already processed for safety or legal purposes.
- **Registration Form 1:** Processed under Article 6(1)(b) GDPR (to perform the retreat agreement) and Article 6(1)(f) GDPR (for the establishment, exercise, or defence of legal claims and business administration).
- **Registration Form 2** (used only when a participant returns within 1 year of their last intake, incorporating updated health information and the Data Protection Notice): processed on the same bases as the Intake Form above.
- **Retreat Agreement**: Processed under Article 6(1)(b) GDPR (to perform the retreat agreement) and Article 6(1)(f) GDPR (for the establishment, exercise, or defence of legal claims and business administration).
- **Preparation Questionnaire**: Processed under Article 6(1)(b) GDPR as necessary for retreat preparation and facilitation. Where special-category data is voluntarily provided, Article 9 GDPR applies.
- **Invoicing, Payments & Financial Trail**: Processed under Article 6(1)(c) GDPR (Compliance with legal, commercial, and tax obligations).

- **Scholarship Applications & Financial Proof**: Processed under Article 6(1)(b) GDPR (Pre-contractual steps taken at our request).
- **Participant History & Contact Database**:
  - *For prospective leads*: Article 6(1)(a) GDPR (Your explicit consent given via web forms) or Article 6(1)(f) GDPR (Legitimate interest in responding to your inquiries).
  - *For confirmed participants*: Article 6(1)(f) GDPR (Our legitimate interest in maintaining operational continuity, alumni administration, and handling repeat bookings).
- **Marketing Communications**: Processed under Article 6(1)(a) GDPR on the basis of consent, which can be withdrawn at any time.
- **Research Consent and Research Data**: Processed on the basis specified in the relevant research documentation.

5. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including to comply with legal, financial, or contractual obligations, or to establish, exercise, or defend legal claims:

- **Application Form**: Until the retreat date (basic information only; no sensitive data).
- **Intake & Screening Notes:**
  - *For applicants who do not attend*: 6 months from the introductory call.
  - *For confirmed participants*: 3 months from the retreat unless a longer retention is necessary in connection with an actual or reasonably anticipated legal claim. Access is strictly restricted to the Joint Controllers.
- **Intake Form with health screening**: 7 years from the retreat date (or, where applicable, from the participant's most recent retreat). Access to health data during this period is strictly restricted to authorised personnel on a need-to-know basis.
- **Registration Form 1** (practical information only): retained for the same period as the Retreat Agreement and Intake Form it accompanies.
- **Registration Form 2** (returning participants, contains some medical data, used only where the participant returns within 1 year of their last intake): 7 years from the retreat date (or, where applicable, from the participant's most recent retreat). Access to health data during this period is strictly restricted to authorised personnel on a need-to-know basis.
- **Retreat Agreement** (incorporating Participation Agreement and Informed Consent, Terms & Conditions and Data Protection Notice): 7 years from the retreat date.
- **Preparation Questionnaire**: 3 months after the retreat date, unless a longer retention period is required by law or is necessary in connection with an actual or reasonably anticipated legal claim.
- **Invoicing, Payments & Financial Trail**: 7 years from the end fo the fiscal year.
- **Scholarship Applications & Financial Proof**: permanently deleted immediately upon approval or rejection of scholarship application. We retain only the final agreed contribution amount on the registration record.
- **Participant History & Contact Database**:
  - *For prospective leads*: 2 years from the last active interaction or until consent is withdrawn.
  - *For confirmed participans*: 5 years following the last attended retreat.
- **Marketing/newsletter consent**: Until withdrawn or no longer necessary for the relevant purpose.
- **Research Consent**: 10 years from date of signing, where necessary to document the basis on which research data was collected.
- **Anonymised research data**: Potentially indefinitely, provided the data has been genuinely anonymised and can no longer reasonably be linked to an identifiable individual.

Justification for retention period

The retention period for participant, contractual and health-screening records reflects the nature of our retreats and the need to maintain appropriate records for contractual, financial, insurance, health and safety, regulatory and legal purposes. In particular, records may be necessary to establish the circumstances of a participant's attendance, the information available to us at the time of screening, the

terms agreed with the participant, and to establish, exercise or defend legal claims that may arise after the retreat.

Where a legal, insurance or regulatory matter is active or reasonably anticipated, relevant records may be retained beyond the standard retention period for as long as necessary to resolve that matter.

If person does not attend the retreat they applied for

Where an applicant completes an Application Form, Intake Form, Registration Form 1 or Registration Form 2 but does not go on to attend a retreat – for example following withdrawal, non-selection at screening, or cancellation – we delete that data within 3 months of the decision not to proceed, unless the person informs us otherwise in writing due to them wanting to defer the application to a later retreat.

6. How We Share Your Information

We do not sell or rent your personal information to third parties. We may share your information with third parties in the following circumstances:

- To protect the rights, property, or safety of consciousgrowth.eu, our clients, or others
- With service providers and partners who assist us in delivering our services (e.g., payment processors, healthcare professionals)
- When required by law or in response to legal requests

We use the following service providers to store or process your data on our behalf:

- **Proton** (Proton AG, Switzerland): end-to-end encrypted email and file storage, with servers in Switzerland or the EU. Switzerland is recognised by the European Commission as providing adequate data protection. Your health and screening information is held only in Proton.
- **Google** (Google Ireland Limited): calendar and video calls. Data may be processed in the United States, where the transfer relies on the EU-US Data Privacy Framework and standard contractual clauses.
- **MailerLite**: sending newsletters by email. Servers in the EU.

7. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss or misuse. However, no system is completely secure, and we cannot guarantee the absolute security of your information.

8. Your Rights

You have the following rights regarding your personal data:

- **Access**: You can request a copy of the personal data we hold about you.
- **Rectification**: You can request that we correct any inaccuracies in your personal data.
- **Deletion**: You can request that we delete your personal data, subject to certain legal restrictions.
- **Objection**: You can object to the processing of your personal data for direct marketing purposes.
- **Restriction**: You can request that we restrict the processing of your personal data under certain circumstances.
- **Withdrawal of Consent**: Where our processing is based on your consent, including health data provided under Article 9(2)(a) GDPR, you can withdraw that consent at any time. This does not affect the lawfulness of processing carried out before withdrawal, or processing carried out for other purposes.
- **Complaint**: You have the right to lodge a complaint with a supervisory authority, such as the Spanish Agencia Española de Protección de Datos (AEPD) or the Dutch Autoriteit Persoonsgegevens (AP), if you believe your data protection rights have been infringed.

- **Data Portability**: You can request that we transfer your personal data to another organisation, where technically feasible.

To exercise these rights, please contact us at contact@consciousgrowth.eu. We will reply within one month.

9. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance your experience on our website. Cookies are small data files stored on your device. You can control the use of cookies through your browser settings.

10. International Data Transfers

If we transfer your personal data outside the European Economic Area (EEA), we will ensure that appropriate safeguards are in place, such as standard contractual clauses approved by the European Commission, to protect your data.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any significant changes by posting the new policy on our website and updating the effective date. Your continued use of our services after the changes take effect constitutes your acceptance of the revised policy.

12. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us using the details provided on our website consciousgrowth.eu or our email: contact@consciousgrowth.eu.