DATA GOVERNANCE & CLINICAL PRIVACY CONFIDENTIALITY

PRIVACY POLICY

Comprehensive data protection framework detailing how Trance Therapeutics Private Limited collects, safeguards, processes, and retains personal and health intake data.

TRANCE THERAPEUTICS PRIVATE LIMITED • Last Updated: 02-11-2026 • Version 1.0

COMMITMENT TO CLINICAL DISCRETION & PRIVACY

- **Data Controller:** Trance Therapeutics Private Limited (Company Reg. No. 0288858 | FBR NTN: G364163), located at House 763, Street 49, G-11/2, Islamabad, Pakistan.
- **Strict Health Data Confidentiality:** Medical and psychological intake records are collected solely with your explicit consent to evaluate safety and contraindications for psilocybin Sessions. We never sell or use health data for advertising.
- **Tokenized Payment Security:** Card transactions are processed directly by PCI-compliant payment processors. We never store full card numbers or CVV security codes.
- **18+ Age Requirement:** Our Site, Products, and Sessions are strictly restricted to adults aged 18 and older. We do not collect or hold children's personal data.
- **Direct Privacy Contact:** Exercise your access, correction, erasure, or withdrawal rights at any time by emailing inquire@trancetherapeutics.com.

1. Who We Are

Trance Therapeutics Private Limited, trading as Trance Therapeutics ("Trance Therapeutics," "we," "us," "our"), is the designated data controller responsible for the personal information described in this Privacy Policy. Our registered corporate address is House 763, Street 49, G-11/2, Islamabad, Pakistan (Company Registration No. 0288858; FBR NTN: G364163), and our official contact for all privacy matters is inquire@trancetherapeutics.com (Phone: 03009155561).

We operate www.trancetherapeutics.com (the "Site"), where we offer psilocybin-containing mushrooms, microdose products, and related botanical goods ("Products") and manage bookings for facilitated sessions, ceremonies, consultations, and integration services ("Sessions").

2. Scope of This Policy

This Privacy Policy explains what personal and health-related information we collect, why we collect it, how we use and protect it, with whom we share it, how long we retain it, and the privacy rights available to you. It covers the Site, our e-commerce checkout and consultation booking systems, our emails and client communications, and our in-person Sessions.

It does not cover third-party websites linked from our Site, nor the independent data practices of your bank, card issuer, or payment gateway.

3. Categories of Personal Information We Collect

3.1 Identity and Contact Data — Full name, email address, phone number, physical delivery address, billing address, and (where applicable) the recipient details for a gift order.

3.2 Order and Transaction Data — Products purchased or Sessions booked, transaction dates, amounts, currency (PKR), order and booking reference numbers, refund and chargeback history, and courier delivery tracking logs.

3.3 Payment Data — Payment card brand, masked last four digits, expiry date, cardholder name, and an encrypted processor token. We do not store full payment card numbers or CVV security codes.

3.4 Session and Health Intake Data — This is our most sensitive category of personal data and may include:

- Session and consultation booking details, attendance records, and no-show history;
- Your stated therapeutic or personal intentions, experience level, and prior psychedelic history;
- Current prescription medications, supplements, and diagnosed physical or psychiatric conditions relevant to biological and psychological safety;
- Pregnancy and breastfeeding status;
- Allergies and dietary requirements for in-person ceremonies or sessions;
- Brief session observation notes recorded by assigned facilitators;
- Preparation and post-session integration call notes; and
- Designated emergency contact name, relationship, and telephone number.

3.5 Communications Data — Emails, website contact-form inquiries, WhatsApp or chat support transcripts, customer review submissions, and our administrative replies.

3.6 Technical and Usage Data — IP address, device and browser type, operating system, referring URL, pages viewed, time spent on pages, and approximate geographic region derived from IP address.

3.7 Marketing Data — Your communication preferences, newsletter opt-ins, opt-outs, and engagement metrics with our educational or promotional emails.

We strictly adhere to data minimization: our health intake forms request only information that directly affects your physical and psychological safety during a Session, never your entire unrelated medical history.

4. How We Collect Your Information

- **Directly from you —** At e-commerce checkout, during consultation or Session booking, in pre-session medical intake questionnaires, in email or phone correspondence, in submitted reviews, and in person at Sessions.

- **Automatically —** Via strictly necessary, functional, and analytics cookies and similar web technologies when you browse the Site (see Section 8).
- **From third parties —** From our authorized payment processors (transaction confirmations and fraud-prevention signals), domestic courier partners (delivery status updates), and website analytics providers.

5. Why We Use Your Data, and Our Lawful Bases

We process personal data only where we have an established lawful basis, as detailed in the governance schedule below:

Processing Purpose	Categories of Data Used	Recognized Lawful Basis
Fulfilling e-commerce orders: payment capture, discreet packing, shipping, returns, and refunds	Identity, contact, order, payment, delivery	Performance of a contract
Administering Session & Consultation bookings, rescheduling, and cancellations	Identity, contact, booking	Performance of a contract
Assessing your physiological & psychological fitness for psilocybin; adjusting dose; managing Session safety	Session and health intake data, emergency contact	Explicit consent (special category data), plus contract necessity
Facilitator preparation and confidential clinical handover between assigned facilitators	Health data, intentions, session notes	Explicit consent
Answering customer inquiries and providing concierge support	Identity, contact, communications	Legitimate interests (customer service) / contract
Fraud prevention, chargeback defence, and securing the Site	Identity, order, payment, technical	Legitimate interests (protecting the business)
Tax, corporate accounting, and statutory FBR/SECP record-keeping	Identity, order, transaction	Legal obligation
Service and transactional communications (confirmations, dispatch alerts, appointment reminders, aftercare)	Identity, contact	Contract necessity

Processing Purpose	Categories of Data Used	Recognized Lawful Basis
Educational newsletters, marketing emails, and campaign retargeting	Identity, contact, technical, marketing	Consent (new subscribers) or legitimate interests (existing customer soft opt-in)
Website performance analytics and user-experience improvement	Technical, usage	Consent, or legitimate interests where aggregate
Establishing, exercising, and defending legal claims	All relevant categories	Legitimate interests
Complying with a lawful regulator, court order, or law enforcement request	As legally required	Legal obligation

Where we rely on legitimate interests, we have balanced our operational interest against your privacy rights and expect the impact on you to be minimal and predictable. You have the right to object to processing based on legitimate interests at any time (see Section 12).

6. Special Protections for Health & Intake Data

6.1 Why We Need It. Psilocybin interacts with several common pharmaceutical medications and is contraindicated in specific cardiovascular and psychiatric conditions. Without accurate health intake information, we cannot safely determine dosing or admit you to a Session.

6.2 Explicit Consent. We request your explicit consent to process your health intake data—separately from our general Terms of Use—via a dedicated checkbox on the medical intake form. You may withdraw this consent at any time by contacting inquire@trancetherapeutics.com, though withdrawing consent prior to a scheduled Session means we cannot safely facilitate that Session for you.

6.3 Strictly Restricted Access. Health intake records are strictly restricted on a need-to-know basis to the facilitators assigned to your Session, our clinical booking administrator, and—where a licensed clinician is engaged—that clinician. Health data is never visible to other Session participants.

6.4 Zero Commercial Exploitation. We never sell, rent, or monetize health data, and we never use health intake disclosures for marketing or advertising profiling.

6.5 Session & Integration Notes. Facilitators record brief internal working notes (covering dose administered, timing, key observations, and integration aftercare). These are internal safety records rather than a hospital file, and you may request a copy at any time.

6.6 Not a External Clinical Record. Unless we expressly state that a licensed physician or clinical psychologist is conducting a medical consultation, our records do not constitute a statutory clinical medical record and are never shared with external physicians unless you explicitly ask us to do so.

6.7 Medical Emergencies. In the event that you require urgent medical attention during an in-person Session, we will share necessary health and intake information with attending paramedics or hospital personnel and notify your designated emergency contact.

7. Payment Security & Processors

Online card and digital payments are processed through our authorized third-party payment gateways and acquiring banking partners, who act as independent data controllers for payment execution and anti-fraud screening. Your sensitive card details are transmitted directly to the processor via encrypted channels; we receive only a tokenized reference and transaction confirmation.

We never accept or store full payment card details via email, WhatsApp, or telephone.

8. Cookies and Similar Technologies

8.1 What They Are. Cookies are small text files placed on your device that enable the Site to remember your session, maintain your shopping cart, and measure platform performance.

8.2 Cookie Categories We Use. We categorize cookies across four functional tiers:

Cookie Category	Operational Purpose	Consent Requirement
Strictly Necessary	WooCommerce cart persistence, checkout flow, session authentication, CSRF security tokens, load balancing, and fraud prevention	Not required (essential for site operation)
Functional	Remembering user interface preferences, language, and regional display settings	Consent
Analytics	Counting aggregate visits, understanding page navigation flow, and diagnosing technical errors	Consent
Marketing / Advertising	Measuring campaign effectiveness, retargeting, and social media attribution pixels	Consent

8.3 Managing Cookies. Our cookie notice allows you to accept or decline non-essential cookies on your first visit and update your preferences at any time via your browser settings or our site cookie controls. Blocking strictly necessary cookies will prevent the WooCommerce cart and checkout from functioning.

8.4 Browser Privacy Signals. Where your browser transmits a Global Privacy Control (GPC) or Do Not Track signal, we honour it for non-essential cookies to the extent supported by our technical stack.

8.5 Analytics Safeguards. Where web analytics tools are active, IP anonymization is enabled so that analytics reporting remains aggregated and non-identifying.

9. Marketing & Client Communications

- **Transactional Messages:** Order confirmations, courier dispatch notices, consultation booking confirmations, preparation reminders, and post-session aftercare instructions are essential service communications and cannot be opted out of while you have an active order or booking.
- **Marketing Messages:** Promotional and educational newsletters require your opt-in consent, or rely on a soft opt-in where you are an existing customer and the communication relates to similar offerings. Every marketing email includes an immediate one-click unsubscribe link.
- **Retargeting:** Where enabled, retargeting cookies may display Trance Therapeutics advertisements on third-party platforms. You may disable this by declining marketing cookies or adjusting your ad settings on those platforms.
- **No Sale of Personal Data:** We never sell your personal information to data brokers or third parties. You may opt out of any targeted advertising or marketing list at any time via the cookie banner or by emailing inquire@trancetherapeutics.com.

10. Who We Share Your Information With

We share only the minimum personal data necessary for each service partner to perform its contracted role:

Recipient Category	Data Shared	Operational Purpose
Payment processors and acquiring banks	Identity, order, payment token, technical metadata	Payment capture, anti-fraud screening, chargeback resolution
Domestic couriers and fulfilment partners	Name, delivery address, phone number, parcel reference	Discreet domestic delivery of your order across Pakistan
Facilitators and clinical session staff	Identity, contact, health intake data, stated intentions	Safe screening, dosing preparation, and running your Session
Booking and scheduling platforms	Identity, contact, appointment slot details	Managing consultation and Session appointments
Email and SMS/WhatsApp communication providers	Identity, contact, message content	Sending order confirmations, appointment reminders, and support replies

Recipient Category	Data Shared	Operational Purpose
Web hosting, CDN, and IT security providers	Technical, usage, encrypted database records	Operating, backing up, and securing the Site
Analytics providers	Aggregated technical and usage metrics	Measuring and improving Site performance
Accountants and statutory auditors	Transaction, invoice, and order records	Statutory accounting and FBR/SECP tax compliance
Legal counsel and professional insurers	Relevant case records as necessary	Legal advice and defence of claims
Regulators, courts, and law enforcement	Strictly as mandated by valid legal process	Compliance with statutory legal obligations
A corporate successor entity	Applicable business records upon formal transfer	Corporate restructuring, merger, or acquisition

All third-party processors are bound by strict contractual confidentiality obligations to process personal data solely on our instructions and to maintain robust security controls. We never permit service providers to use your data for their own independent marketing.

11. International Data Transfers

Trance Therapeutics Private Limited is headquartered and operates in Pakistan. Certain technical infrastructure providers—such as cloud hosting, email delivery, and payment gateways—may process encrypted data on servers located outside Pakistan.

Where personal data is transferred outside Pakistan or across jurisdictions with cross-border transfer restrictions, we rely on recognized legal safeguards, including contractual data-protection clauses and technical encryption in transit and at rest.

12. Your Data Protection Rights

Subject to applicable law and statutory record-keeping exemptions, you hold the following rights regarding your personal information:

- **Access —** Request confirmation of what personal data we hold about you and obtain a copy of that record.
- **Rectify —** Request correction of any inaccurate or incomplete personal or health intake information.
- **Erase —** Ask us to delete personal data that we no longer require (subject to mandatory tax, accounting, and clinical safety retention periods).

- **Restrict —** Request that we temporarily restrict processing of your data while a concern or accuracy dispute is investigated.
- **Port —** Receive personal data you provided to us in a structured, machine-readable format.
- **Object —** Object to processing conducted under legitimate interests, including any direct marketing.
- **Withdraw Consent —** Withdraw previously granted consent (including health data consent) at any time, without affecting the lawfulness of processing carried out prior to withdrawal.
- **Complain —** Lodge a formal complaint with the relevant data protection or consumer regulatory authority.

How to Exercise Your Rights: To exercise any of these rights, email inquire@trancetherapeutics.com. We respond to all verified requests within 30 days (extendable with notice for complex requests). Requests are handled free of charge unless manifestly unfounded or repetitive. We may request reasonable proof of identity before releasing sensitive records to protect your confidentiality.

Automated Decisions & Marketing Opt-Out: We do not make solely automated decisions that produce legal or similarly significant effects, other than standard automated fraud screening by payment processors. If a transaction is declined by automated screening, contact inquire@trancetherapeutics.com and our team will review it manually.

13. Data Retention Schedule

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to satisfy statutory tax, accounting, and clinical safety obligations:

Category of Personal Data	Mandatory Retention Period
Order, invoice, and financial transaction records	7 years (statutory tax and corporate accounting compliance)
Courier delivery and tracking logs	2 years from delivery confirmation
Medical intake questionnaires and health screening data	7 years from the date of your most recent Session
Facilitator session observations and integration notes	7 years from the date of your most recent Session
Emergency contact details	Until you request removal, or 7 years from your last Session
Customer account profile details	While your account remains active, plus 2 years following closure
Customer support correspondence and inquiries	3 years from resolution of the inquiry

Category of Personal Data	Mandatory Retention Period
Marketing preferences and opt-out suppression logs	Until consent is withdrawn, plus 6 months to ensure suppression
Aggregated website analytics data	14 months
Chargeback and payment dispute case files	3 years following final dispute resolution

When a retention period expires, we permanently delete or irreversibly anonymize the record. Complete purging from encrypted disaster-recovery backups may lag active deletion by up to 90 days, during which time the backups remain isolated from routine access.

14. Technical & Organizational Security

We implement rigorous technical and organizational safeguards to protect your personal and health data against unauthorized access, alteration, or loss:

- TLS/SSL cryptographic encryption across all Site pages, intake forms, and checkout flows;
- Direct tokenization of payment card credentials at the payment processor level (card numbers are never stored on our servers);
- Strict role-based access control (RBAC) limiting health intake data strictly to assigned facilitators and clinical administrators;
- Multi-factor authentication (MFA) enforced on administrative and database accounts;
- Encrypted storage and encrypted off-site backups;
- Routine security patching and software dependency updates; and
- Immediate access revocation and least-privilege reviews whenever personnel roles change.

Breach Notification. If a personal data breach occurs that is likely to result in a high risk to your rights or safety, we will notify affected individuals and any applicable regulatory authority without undue delay, detailing the nature of the incident and protective steps to take.

Security Limits. While we maintain industry-standard safeguards, no internet transmission is completely immune from risk. Standard unencrypted email is not a confidential channel; never send payment card numbers by email.

15. Children's Privacy (Strict 18+ Policy)

The Site, our botanical Products, and our Sessions are strictly restricted to adults aged 18 years and older. Purchasers must be 18+ and Session participants must be 18+, so we do not knowingly collect or hold children's personal data. If we discover that personal data has been submitted by an individual under 18, we will delete it immediately.

16. Third-Party Links and Embedded Content

External links and embedded third-party widgets (such as maps, videos, or review tools) are governed by the respective providers' privacy policies. Interacting with an embedded widget may allow that third party to detect your IP address or set cookies; our cookie controls govern the tracking categories under our management.

17. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect operational, legal, or regulatory changes. Material updates are published on the Site with a revised "Last Updated" date and, where a change is significant and we hold your email address, notified to you directly at least 14 days in advance. The version in force when your data was collected governs that data unless you consent to the updated terms.

18. Privacy Contact and Complaints

We welcome the opportunity to resolve any privacy question or concern directly. Please contact our Privacy & Data Governance team first using the official details below. You also retain the right to lodge a complaint with your local data protection or consumer supervisory authority at any time.

DATA CONTROLLER & PRIVACY GOVERNANCE CONTACT

- **Data Controller:** TRANCE THERAPEUTICS PRIVATE LIMITED
- **Privacy & Data Governance Email:** inquire@trancetherapeutics.com
- **Registered Postal Address:** House 763, Street 49, G-11/2, Islamabad, Pakistan
- **Direct Phone & WhatsApp:** 03009155561 (+92 300 9155561)
- **Corporate Registration & Tax ID:** Company Registration No. 0288858 | FBR NTN: G364163
- **Official Website:** www.trancetherapeutics.com