

## CRONO WEB APPLICATION

### PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA UNDER ARTICLE 13 OF REGULATION (EU) 2016/679 (GDPR)

Dear Healthcare Professional,

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter, "GDPR"), we wish to inform you that your personal data will be processed in accordance with the principles of lawfulness, fairness, transparency, and with respect for confidentiality and the rights of data subjects.

#### 1. Data Controller:

The Data Controller is **CANÈ S.p.A.**, with its registered office at **via Cuornè 42/a – Rivoli (TO), Italy**, contactable at the email address: [privacy@canespa.it](mailto:privacy@canespa.it)

#### 2. Type of Data Processed

When using the platform, the following personal data of the healthcare professional will be processed:

- **Identification data:** first name, surname, role, and email address.
- **Technical data:** technical data relating to the connection with the web platform, for the purpose of verifying the administration and operation of the treatment. The technical data generated by the connection will include, in particular, the date and time of access to patient device visualisations and, in relation to these, any recorded events.

#### 3. Purposes of Processing and Legal Basis

Personal data will be processed for the following purposes:

1. **Storage and consultation of events stored in the memory of the CRONO® pump in the form of charts and tables:** Remote monitoring of the patient's infusion history and use of the pump.
  - **Legal basis:** performance of a contract (Art. 6(1)(b) GDPR) and protection of health (Art. 9(2)(h) GDPR).
2. **Technical assistance:** management of support requests or reports of malfunctions.
  - **Legal basis:** performance of a contract (Art. 6(1)(b) GDPR).
3. **Regulatory compliance:** fulfilment of legal obligations in the healthcare or regulatory field.
  - **Legal basis:** legal obligation (Art. 6(1)(c) GDPR).
4. **Service improvement:** anonymous data analysis for statistical purposes and to improve device performance.
  - **Legal basis:** legitimate interest of the Controller (Art. 6(1)(f) GDPR).

#### 4. Processing Methods

Data will be processed both electronically and manually, using appropriate technical and organisational measures to ensure the security and confidentiality of the information.

#### 5. Data Recipients

Data may be disclosed to:

- Cloud service providers and technical support providers duly appointed as Data Processors.
- Competent judicial or healthcare authorities, where required by applicable law.

Data will not be disseminated nor transferred outside the European Economic Area without adequate safeguards.

## 6. Data Retention Period, Storage Location, and Automated Tools

The data referred to in section 2 will be retained for 10 years from the end of the use of the pump, unless otherwise required by law.

After this period, the data will be deleted or anonymised.

Data will be stored on servers located within the European Union, specifically at Microsoft Azure data centres, which ensure adequate security measures and compliance with applicable regulations.

No automated decision-making tools (such as profiling algorithms or artificial intelligence systems) are used that could produce legal effects or significantly affect your rights. However, automated tools may be used for data management purposes, such as anomaly monitoring or intrusion detection systems, solely to ensure data security and integrity.

## 7. Data Subject Rights

Data subjects have the right to:

- Access their personal data (Art. 15 GDPR).
- Rectify inaccurate or incomplete data (Art. 16 GDPR).
- Request erasure of data within the limits set by Art. 17 GDPR.
- Restrict processing in the cases provided for by Art. 18 GDPR.
- Receive their data in a structured and machine-readable format (Art. 20 GDPR).
- Object to processing based on the Controller's legitimate interests (Art. 21 GDPR).

You may exercise your rights by contacting the Data Protection Officer (DPO) at [dpo@canespa.it](mailto:dpo@canespa.it)

## 8. Complaint to the Supervisory Authority

If you consider that the processing of your data violates current legislation, you have the right to lodge a complaint with the Data Protection Authority (Garante per la Protezione dei Dati Personali) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## 9. Mandatory or Optional Nature of Data Provision

Providing the requested data is necessary for the of the application associated with the infusion pump. If data are not provided, it will not be possible to deliver the requested service.

Please read this privacy notice carefully before using the application or the infusion pump.

Last updated: 25/09/2025