

CRONO MOBILE APPLICATION

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

Dear User,

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

1. Data Controller:

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

2. Type of Data Processed

When using the application and the infusion pump, the following personal data will be processed:

- **Identification data:** first name, surname, date of birth, email address, and mobile phone number.
- **Health data:** information relating to therapy (e.g. residual volume, flow rate, bolus dose, loading bolus, non-delivered bolus, pump settings).
- **Technical data:** information about the device used, such as the serial number, stored events, first connection date, and last synchronisation.

3. Purposes of Processing and Legal Basis

Your personal data will be processed for the following purposes:

1. **Display of infusion status and consultation of events stored in the memory of the CRONO® pump:** downloading infusion events from the pump's memory and transmitting data to a secure cloud server.
 - **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:** explicit consent (Art. 6(1)(a) and Art. 9(2)(a) GDPR).

4. Processing Methods

Your 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

Your data may be disclosed to:

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

Your 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 infusion pump, unless otherwise required by law.

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

Your 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

As a data subject, you have the right to:

- Access your 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 your 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.

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.

9. Mandatory or Optional Nature of Data Provision

Providing your data is necessary for the use 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.

Last updated: 25/09/2025