

My Smart Care for Data for Good (MySmaCa) App Privacy Policy

Effective date: 20/03/2025

WHY THIS DOCUMENT?

METEDA s.r.l., Via Antonio Bosio 2, Rome, 00161 Italy ("METEDA") – the legal producer of the My Smart Care for Data for Good App ("MySmaCa" or the "App") is fully committed to the protection of your Personal Data and intends to provide you with relevant information about how METEDA processes your Personal Data on the App and to whom it is or may be disclosed.

This App Privacy Policy does not cover, and we are not responsible for, the privacy, information or other practices of third parties, including third parties that operate sites or web properties available through the App or to which the App refers or contains links that are not operated or controlled by METEDA ("Third-Party Services"). This App Privacy Policy does not apply to Third Party Services. The availability or inclusion of links to such sites or web properties in the App does not imply our review or endorsement of Third Party Services. You should contact such sites or web properties directly for information about their privacy policies.

However, for the Third Party Services integrated into the App, the processing of your Personal Data is done in accordance with this Privacy Policy and applicable law. In particular, the Software uses Third Party Services for authentication, health data analysis, and provision of environmental information. Specifically:

- **Partisia Applications ApS** - for managing secure authentication and consents via blockchain.
- **Cardiolyse Oy** - for analysis of ECGs and detection of cardiac abnormalities using machine learning.
- **OpenWeather Ltd** - for providing meteorological data, pollen levels and air quality.

You can exercise your rights under the GDPR (access, rectification, cancellation, objection, restriction of processing, data portability) by contacting METEDA directly or the respective service provider, depending on the relevant processing.

Therefore, below you will find all relevant information regarding the processing of Personal Data performed on this App. Please note that the content of this App Privacy Policy may change from time to time, for example in case of evolution of our processes or as a result of applicable laws. METEDA reserves the right to change this App Privacy Policy without notice. If METEDA changes this App Privacy Policy, an updated version will reflect those changes. Although METEDA will notify you of any changes to this App Privacy Policy, you should check regularly for changes. By using this App, you consent to any material changes to this App Privacy Policy and to any new practices that may affect Personal Data previously collected.

REMINDER: WHAT IS PERSONAL DATA AND ITS RELATED PROCESSING

For the purposes of this App Privacy Policy, Personal Data means any information about an identified or identifiable natural person. METEDA and its respective contractors (including, without limitation, call centers, data hosting providers) and/or your health care provider will use the

information you provide, including Personal Data, in connection with the purposes and objectives set forth in this App Privacy Policy.

For the sake of clarity, Personal Data is any information about a person. Such Personal Data may take the form of:

- Basic identifying information, such as name or date of birth;
- Information that can be attributed to you directly or indirectly, such as information provided to the health care provider;
- Information that can be associated with you or your device, such as the IP address (i.e., the network address of the machine);

WHAT PERSONAL DATA DOES THIS APP COLLECT?

During use, this App may collect the following categories of Personal Data:

- **Identifying Data:** any information provided directly by you while using the App or by the health care provider as part of the onboarding of the App that enables your identification, directly or indirectly, such as your name, gender, date of birth, contact information (email address, phone number), or medical record/patient identification number.
- **Health data:** include information related to the diagnosis and management of health conditions, clinical data collected through connected medical devices or entered manually by the user, biometric data (such as weight, body parameters, and physiological data), information related to therapeutic plans, results of examinations and diagnostic analysis performed through automated algorithms or artificial intelligence, as well as data related to daily habits and activity relevant to health management.
- **Geolocation data:** includes information related to the user's approximate geographic location.
- **Usage Data:** any information related to your connection to, access to, and use of the App (e.g., the type of mobile device used, the unique ID of the mobile device, the IP address of the mobile device, the operating system of your mobile device, and information about how you use the App).

FOR WHAT PURPOSES DOES THIS APP COLLECT PERSONAL DATA?

The App is intended as a support for patients to support the management of chronic diseases such as COPD, cardiovascular disease (CVD) and diabetes, offering multilingual content and an educational system with validated materials and questionnaires to promote patients' active involvement in the treatment and management of their own health.

Any processing of Personal Data must be done for a defined purpose. In this regard, the collection and processing of Personal Data on this App occurs for the following purposes:

- **User registration, app operation and data visualization:** ensuring that the app functions properly, particularly by ensuring that users are registered and can access and view their data through their individual accounts.
- **Authentication and/or registration of users on third-party platforms, as well as therapeutic support:** allow users to access the App via external authentication systems, such as Single Sign-On authentication (SSO Partisia) and Cardiolyse, as well as process geolocation data to offer personalized weather forecasts and monitor pollen and air pollutant levels.

- **App user/patient support and guidance:** to enable the App to send notifications, reminders and advice considering the information entered in the App.
- **Improvement of products and services:** identifying usage trends, developing new products and services, and understanding how you and your device interact with our services through the use of analytic technologies that support IP anonymization without ever revealing the METEDA user's full IP address; tracking and responding to security issues; conducting surveys and investigating App crashes: collecting and submitting crash reports that include technical information about the App at the time of the crash, the App log, basic metrics such as App launches and session duration, and low-resolution video of App usage before and at the time of the crash in order to help resolve service issues.

FOR WHAT REASONS DOES THIS APP PROCESS YOUR PERSONAL DATA?

For the purposes of this App, your Personal Data is processed solely on the basis of the processing purposes described above:

- **User registration, operation of the App and data display:** the processing of personal data is based on the End User License Agreement (EULA), which is the agreement between you and METEDA under which you can access and use the services of the App;
- **Support and guidance for App users/patients:** the processing of personal data is based on your consent and, where this purpose requires the processing of health data, on your specific consent to the processing of health data;
- **Improvement of products and services:** the processing of personal data is based on METEDA's legitimate interests;
- **Patient protection and safety:** the processing of personal data is based on fulfilling METEDA's legal obligations in order to control the safety and efficiency of this App.

HOW LONG IS PERSONAL DATA COLLECTED IN THIS APP KEPT?

Through their respective contractors, METEDA may retain Personal Data for as long as you use the App and for a reasonable period of time thereafter. Please note that some or all of your Personal Data may be necessary for the proper operation of the App and that the law may require us to retain certain information. Your Personal Data will be retained for the specific duration described below and in any case only for the duration necessary to fulfill the purposes set forth above, unless additional retention is necessary to meet legal or regulatory requirements or to protect METEDA's interests.

Specifically, your **identifying and health information** is pseudonymized and encrypted as soon as it is provided by you and will be retained until (i) your health care provider determines that you may benefit from continued use of the App to manage your treatment plan or (ii) the App is available for use, whichever comes first.

- **User registration and operation of the App and display of data:** the data processed for this purpose will be retained for the duration of your use of the App / until your decision to delete the account, as well as for the next ten (10) years to allow you to re-enter the account in the event of a change in the decision to delete;
- **App user/patient support and guidance:** data processed for this purpose will be kept for the duration of the user's use of the App;
- **Improvement of products and services:** data processed for this purpose will be kept for three (3) years;

- **Patient protection and safety:** data processed for this purpose will be kept for ten (10) years.

WHO HAS ACCESS TO PERSONAL DATA?

Unless you contact us directly, METEDA will not have access to your Personal Data through the App. METEDA's contractors, who help provide the services of the App, may have access to your Personal Data; however, these contractors are subject to confidentiality requirements and have agreed not to disclose any identifiable information to METEDA or any third party unless required by law. METEDA may have access to de-identified information of users of the App, subject to consent as described in this App Privacy Policy. Other people who download and use the App will not have access to your information at any time.

- METEDA may share Personal Data submitted by you, or automatically collected through the App, for the following reasons:
- Authentication and data storage via blockchain: use of the App requires prior or concurrent authentication via Partisia SSO, a secure blockchain-based authentication system; Meteda guarantees the security and confidentiality of your data exchanged with Partisia and does not retain any personally identifiable information other than that required for authentication, as well as the latest health data provided by you; however, if you revoke your consent to the processing of your authentication data by Partisia Applications ApS, you will no longer be able to access the App, as authentication through Partisia is a necessary requirement for the use of the service; consequently, revocation of your consent to Partisia will also result in the termination of the processing of your Personal Data through the App;
- ECG analysis and detection of cardiac abnormalities: the App integrates with Cardiolyse, a machine learning-based analytics platform, to process ECG data and identify any cardiac abnormalities or conditions such as COPD; health data transmitted to Cardiolyse are anonymized and processed in accordance with current regulations;
- Geolocation data: the App integrates with OpenWeather to provide weather data and air quality information to offer personalized weather forecasts and monitor pollen and air pollutant levels;
- With its affiliated entities, contractual third parties of our global affiliates, group companies, etc. in order to ensure the proper use and operation of the App services;
- As required by law, such as to comply with a subpoena or similar legal process, or to report adverse events;
- When it believes in good faith that sharing is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, respond to a government request, or otherwise exercise our legal rights or defend against legal claims;
- When believes it is necessary to share information to assist in an investigation or to prevent illegal activities, suspected fraud, or situations involving potential threats to the safety of any person;
- To third parties with whom METEDA jointly markets a product or service or jointly conducts a program or activity, subject to the collection of a separate consent;
- If METEDA is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified by e-mail and/or by a prominent notice on our website of any changes in the ownership or uses of this information, as well as the choices you may make regarding this information.

Any affiliated entity, respective contractor or other third party described above to whom we are granted access or to whom we transfer Personal Data is required to maintain the confidentiality of your Personal Data.

In the event that Personal Data is transferred outside the country of origin, such transfer will be covered by appropriate safeguards, particularly the EU standard contractual clauses.

YOUR RIGHTS: METEDA WILL ENSURE THAT YOU CAN EXERCISE YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION.

You can exercise your rights as provided by applicable data protection laws.

As such, you are entitled to:

- object to the processing of your Personal Data. You may opt out of any collection of information by uninstalling the App from your mobile device. You can use the standard uninstall procedures that may be available as part of the mobile device or through the marketplace or mobile app network. You must uninstall App to stop data entry and collection of data entered directly from you;
- access with a simple request to your Personal Data - in which case you can ask to receive a copy of your Personal Data, unless such Personal Data is made available to you directly;
- Request rectification of your Personal Data if it is inaccurate, incomplete or outdated;
- Obtain the deletion of your Personal Data in the specific cases provided by law;
- Obtain the restriction of the processing of your data in the specific cases provided by law;
- where appropriate, receive your data in a standard format for transmission to another data controller;
- File a complaint with the data protection authority.

To exercise the above rights, please contact MySmaCa customer service via email at assistenza@meteda.it.

To exercise your rights vis-à-vis the other owners, please consult their respective privacy policies.

Further using the App:

- Confirm that you are at least 18 years of age;
- You acknowledge and agree that you have read this App Privacy Policy in its entirety, understand it, and agree to the collection, use, and processing of information as described in this App Privacy Policy, which may be modified by METEDA at any time effective upon its posting. Your continued use of this App constitutes your acceptance of this App Privacy Policy and any updates thereto.

By using the App and accepting this Policy, you provide your specific consent to the transmission of your Personal Data to:

- **Partisia Applications ApS** - Åbogade 15 Aarhus N 8200 Denmark - for the purposes of secure authentication and consent management using blockchain.
- **Cardiolyse Oy** - Terkko Health Hub, Haartmaninkatu 4, 00290 Helsinki, Finland - for the analyses of RAW ECG data and the provision of a cardiovascular risk assessment.
- **OpenWeather Ltd** - 30 St Mary's Axe, The City Of London, London, Greater London, EC3A 8BF, United Kingdom - for the provision of meteorological data, pollen levels and air quality.