



PRIVACY NOTICE KAROMY APP

We, Sifi S.p.A, would like to inform you with this privacy notice about the processing of your personal data and about your rights as a data subject when using our KAROMY app.

1.1 Controller of the data processing

The controller for data processing in the context of the KAROMY app is

Sifi S.p.A ("Sifi.de" or "we"),

Via Ercole Patti no. 36,

95025 Aci Sant'Antonio (CT)

E-mail: sifispa@pec.sifigroup.com; privacy@sifigroup.com

1.2 Data protection officer

If you have any questions or suggestions regarding data protection, please do not hesitate to contact us.

You can reach our data protection officer at

Data Protection Officer

E-mail: dpo@sifigroup.com.

1.3 Controller for data processing in the context of patient treatment

The sole controllers for the processing of personal data in the context of the treatment or aftercare of users or patients of the KAROMY app are the physicians, who provide information about this data processing in separate data protection notices.

2. SUBJECT MATTER OF DATA PROTECTION

The subject of data protection is the protection of personal data. This is all information that relates to you as an identified or identifiable natural person (**so-called data subject**). This includes information such as name, postal address, e-mail address or telephone number as well as special personal data, such as health data, which you provide to us when using our KAROMY app.

3. DETAILS OF THE DATA PROCESSING

Below you will find an overview of what personal data we process from you, for what purposes, on what legal basis, and whether we pass this on to third parties in individual cases, how long we store this personal data and where we collect this data.

The processing of the personal data described below is necessary in order to provide you with the KAROMY app and to fulfil the underlying user contract.

3.1 Data processing when using the app

When you use our app, we process your personal data as follows:

Purposes of data processing	Data categories	Legal basis/authorised interest	Categories of recipients of the data	Collection of the data
Patient onboarding We process your data for the purpose of creating a user account by your attending physician and providing you with	<ul style="list-style-type: none">• <u>Master data</u> (e.g. first name, surname, date of birth, treating physician, medical center)• <u>Contact data</u> (e.g. e-mail address, telephone number, address)	We process your data in order to take steps prior to entering into a contract in accordance with Art. 6(1)(b) GDPR and with regard to your health data (and, if specified, further medical information) on the basis of your	IT service provider and hosting provider Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121	Data collection is carried out by your attending physician.

a link to download and access the app.	<ul style="list-style-type: none"> • <u>Health data:</u> Acanthamoeba Keratitis disease • <u>If applicable: personal characteristics</u> (gender) • <u>If applicable: further medical information</u> (use of painkillers) • <u>If applicable: representative data</u> (name, contact details) 	consent in accordance with Art. 9(2)(a) GDPR	Salerno (ITALY)	
<u>Registration process/ account activation/ provision of the app/ app download</u> We process your data for the purpose of activating your user account and providing the KAROMY app and the associated functions and services.	<ul style="list-style-type: none"> • <u>Master data</u> (e.g. first name, surname, date of birth) • <u>Contact details</u> (e.g. e-mail address, telephone number, address) • <u>Device information and identifiers</u> (IP address, operating system, platform type, device type, software and hardware attributes, device ID and app identifiers, device settings, language settings) 	We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR and (with regard to your health data and, if specified, further medical information) on the basis of your consent in accordance with Art. 9(2)(a) GDPR	IT service provider and hosting provider Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY)	We collect the data directly from you.

	<ul style="list-style-type: none"> • <u>Authentication information for the app</u> (user name and password) • <u>Health data:</u> Acanthamoeba Keratitis disease • <u>If applicable: personal characteristics</u> (gender) • <u>If applicable: further medical information</u> (use of painkillers) • <u>If applicable: representative data</u> (name, contact details) 			
<p><u>Therapy management & monitoring</u></p> <p>We process your data for the purpose of your therapy management, including tracking medication intake and visualising the course of therapy.</p>	<ul style="list-style-type: none"> • <u>Course of therapy</u> (frequency of medication intake) • <u>Medication intake</u> (health status in connection with medication intake and tracking the time of intake) • <u>If applicable: data from the questionnaire</u> (questionnaire for the 	<p>We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR and with regard to your health data, course of therapy, medication taken and other medical information, (and if applicable, any data from the questionnaire) on the basis of your consent in accordance with Art. 9(2)(a) GDPR</p>	<p>IT service provider and hosting provider</p> <p>Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY)</p> <p>attending physician</p>	<p>We collect the data directly from you and also receive data from your attending physician.</p>

	assessment of eye pain using self-assessment)		(does not receive access to device information and identifiers & information for authentication for the app)	
<u>Notification function</u> We process your data in order to be able to send you notifications via the app, such as reminders.	<ul style="list-style-type: none"> • <u>Date and time</u> of the notification to you • <u>Content and type</u> of notification (e.g. reminder to complete your questionnaire) 	We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR and, with regard to health data contained therein on the basis of your consent in accordance with Art. 9(2)(a) GDPR	IT service provider and hosting provider Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY)	We collect the data directly from you.
<u>Messenger</u> We process your data that is transmitted to	<ul style="list-style-type: none"> • <u>Date and time</u> of the message • <u>Content</u> of the message 	We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR and, with regard to health data contained therein on the basis of your consent in	IT service provider and hosting provider Healthware Group s.r.l.,	This data is created by the attending physician.

<p>you by the physician via the "Messages" function so that you can receive and view it.</p>		<p>accordance with Art. 9(2)(a) GDPR</p>	<p>Piazza Abate Conforti, SNC - 84121 Salerno (ITALY)</p>	
<p><u>Optical character recognition (OCR)</u></p> <p>We automatically process the texts you have scanned into text that can be used in the app.</p>	<ul style="list-style-type: none"> <u>Camera data:</u> Recording of images for conversion into text 	<p>We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR and, with regard to health data contained therein, on the basis of your consent in accordance with Art. 9(2)(a) GDPR</p>	<p>IT service provider and hosting provider Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY)</p>	<p>We collect the data directly from you.</p>
<p><u>Calendar and event function</u></p> <p>We process your data to organise your events in your personal calendar.</p>	<ul style="list-style-type: none"> <u>Event information</u> (location, date, time, event type) <u>If applicable: further information</u> (description of the event) 	<p>We process your data for the performance of contract with you in accordance with Art. 6(1)(b) GDPR</p>	<p>IT service provider and hosting provider Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY),</p>	<p>We collect the data directly from you and your attending physician.</p>

			attending physician	
<p><u>Library</u></p> <p>We process your data in order to provide you with comprehensive information about your disease, medication and other helpful information.</p>	<ul style="list-style-type: none"> • Information on the questionnaire • Best practices for taking medication • Value of adherence to therapeutic measures • Information on infections and risk factors 	<p>We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR and with regard to health data contained therein on the basis of your consent in accordance with Art. 9(2)(a) GDPR</p>	<p>IT service provider and hosting provider</p> <p>Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY), attending physician</p>	<p>We collect the data directly from you and your attending physician.</p>
<p><u>Management of access rights</u></p> <p>We process your data to enable you to decide about access settings to your data.</p>	<ul style="list-style-type: none"> • Information about your access rights management • Information about which of your attending physicians had access to your user account data and for how long 	<p>We process your data for the performance of a contract with you in accordance with Art. 6(1)(b) GDPR</p>	<p>IT service provider and hosting provider</p> <p>Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY)</p>	<p>We collect this data directly from you.</p>

<p><u>Representative or carer profile</u></p> <p>We process the data of your representative or carer to enable them to use your user account.</p>	<ul style="list-style-type: none"> • <u>Name</u> (first name, surname) • <u>Contact details</u> (e-mail address, telephone number) 	<p>We process this data for the performance or in order to take steps prior to entering into a contract with you in accordance with Art. 6(1)(b) GDPR</p>	<p>IT service provider and hosting provider</p> <p>Healthware Group s.r.l., Piazza Abate Conforti, SNC - 84121 Salerno (ITALY), attending physician</p>	<p>We collect this data directly from the user, the caregiver, or the attending physician.</p>
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3.2 Data processing for the fulfilment of legal obligations and the assertion and defence of legal claims

In individual cases, it may be necessary for us to process the data described above about you as a user or representative or carer in order to fulfil legal obligations. This concerns the fulfilment of state control and information obligations, including (regulatory) official or criminal reporting and information obligations or the fulfilment of your rights as a data subject. In this context, it may be necessary in individual cases for us to disclose your data to authorities or courts. The legal basis for this data processing is Art. 6(1)(c) GDPR.

It may also be necessary for us to process your data on the basis of our legitimate interest in the assertion or defence of legal claims. In these cases, your data may be passed on to our advisors, courts or authorities in individual cases. The legal basis for this data processing is Art. 6(1)(f) GDPR.

3.3 Retention periods

3.3.1 We process the above-mentioned data for as long as you wish to use our KAROMY services.

- 3.3.2 As soon as you delete your account by clicking on "**Delete my account**" under "Settings" or revoke your consent to the processing of your specific personal data, your user account will first be deactivated and your personal data will only be processed for the purpose of transferring your treatment data to the patient file of your treating physician on his behalf. After 30 days, your data will be completely removed from our systems. We will also delete your user account and associated data if you have not used the KAROMY app for more than 3 years. Inactivity means no interaction with and in the KAROMY app, e.g., because the user has not logged into their user account for 3 years.
- 3.3.3 Your data may be stored for longer if we are legally obliged to process your personal data for a longer period. Such legal storage obligations may arise, for example, from commercial and tax laws, such as the German Commercial Code (HGB) or the German Fiscal Code (AO). The retention and documentation periods specified therein are generally two to ten years.

In addition, it may be necessary to process your data for longer in order to obtain evidence within the framework of the statutory limitation provisions. According to §§ 195 ff of the German Civil Code (BGB), these limitation periods can be up to 30 years, with the regular limitation period being 3 years.

4. DATA TRANSFER TO THIRD COUNTRIES

We process your personal data in the above-mentioned cases exclusively in the European Economic Area (EEA).

If data is transferred to entities whose registered office or place of data processing is located outside the EEA or a country for which an adequate level of data protection has been established by a decision of the European Commission, we will ensure before the transfer that the data transfer is covered by a legal basis and that there are guarantees for an adequate level of data protection with regard to the data transfer (e.g. through the agreement of contractual guarantees, officially recognised regulations or binding internal data protection regulations at the recipient) or that you have given your consent to the data transfer.

In these cases, we will inform you about the corresponding data transfer in this privacy notice.

If the data transfer takes place on the basis of Art. 46, 47 or 49(1) subpara. 2 GDPR, you can obtain a copy of the guarantees for the existence of an adequate level of data protection with regard to the data transfer or a reference to the availability of a copy of the guarantees from us.

For detailed information on data transfers to third countries and a copy of the guarantees, you can contact our data protection officer at any time at

E-mail: dpo@sifigroup.com.

5. RIGHTS OF DATA SUBJECTS

5.1 Your rights in detail

You have the right at any time, within the framework provided by law

- in accordance with Art. 7(3) GDPR, to **withdraw** your consent once given in the user settings under "**Withdraw my data**";
- in accordance with Art. 15 GDPR, to request **information** about the personal data processed concerning you. To assert your right to receive a copy in accordance with Art. 15(3) GDPR, you can obtain a copy of your data under the "**Download my data**" tab in the user settings;
- in accordance with Art. 16 GDPR, to request the **rectification** of incorrect or incomplete personal data stored about you;
- in accordance with Art. 17 GDPR, to request the **erasure** of the personal data stored. To exercise this right, you can click on "**Delete my account**" under "**Settings**" in your user account;
- in accordance with Art. 18 GDPR, to demand the **restriction** of the processing of personal data;
- in accordance with Art. 20 GDPR, to **receive** the personal data you have provided **in a structured, commonly used and machine-readable format** or to request that it be **transmitted to another controller**. You can download your data in CSV format under the "**Download my data**" tab.
- to **lodge a complaint** with a **supervisory authority** in accordance with Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or our company headquarters.

- **Objection** pursuant to Art. 21 GDPR

In accordance with Art. 21 GDPR, you have the right to **object** to data processing by us at any time for reasons arising from your particular situation, insofar as this is based on the protection of "**legitimate interests**" in accordance with Art. 6(1)(f) GDPR. If you exercise your right to object, we will cease processing unless we can demonstrate compelling legitimate grounds for further processing which override your rights and interests.

5.2 Assertion of your rights

To assert your rights, you can contact our customer service at any time:

E-Mail: HWG-DPO@eversana.com.

6. JOINT RESPONSIBILITY

6.1 When using the KAROMY app, Sifi and the attending physician process personal patient data or user data for the following purposes under joint responsibility:

Purposes of joint data processing	Personal data
Patient onboarding We process your data for the purpose of creating a user account by your attending physician and providing you with a link to download and access the app.	<ul style="list-style-type: none">From patients: master data, contact details, information for authentication for the app, therapy history, medication intake, other medical informationFrom representatives: Names, contact details, authentication information

- 6.2 To guarantee your rights and in compliance with the provisions of Art. 26 GDPR, the parties have concluded an agreement that sets out the rules for the processing of your personal data.
- 6.3 Sifi and your attending physician fulfil their data protection obligations together in accordance with their respective responsibilities for the data processing described above as follows:
- 6.4 Within the scope of joint responsibility, each party is responsible for the data protection-compliant processing of personal user data.
- 6.5 Each party shall provide the users concerned with the information required under Art. 13 and 14 GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language, free of charge.
- 6.6 Users can assert the rights to which they are entitled under Art. 15 to 22 GDPR against each party. Insofar as the assertion relates to the sole area of responsibility of the other party, the party against which the rights of the data subject are asserted will inform the other party immediately and forward the request. Insofar as the joint area of responsibility is affected, the party against whom the data subject rights are asserted shall process the assertion and inform the other party accordingly.
- 6.7 Enquiries can be sent directly to the attending physician or to Sifi at any time using the contact details given above under [Section 5](#).

7. CHANGES TO THIS PRIVACY NOTICE

- 7.1 The status of this privacy notice is indicated by the date (below). We reserve the right to amend this privacy notice at any time with effect for the future.
- 7.2 The latest version of the data protection notice is always available on the Sifi website and app. We recommend that you inform yourself regularly about changes to this privacy notice.

Status of this privacy notice: September 2025