



Soturi™ App Privacy Notice

Effective date: 17.12.2021

Latest update: 10.05.2022

This privacy notice (“Notice”) describes the personal data that is collected during the use of **Soturi™** app. Orion Corporation and Healthware Group s.r.l. respect your privacy and are committed to protecting your personal data. Please read this Notice carefully.

Soturi™ is a platform, including mobile application (“app”) connected to a wearable device, aiming to support people living with Parkinson’s Disease (PD) in their daily life. This is a minimum viable product (MVP) of **Soturi™**, which is intended only for pilot use in Italy, Germany and France, and for a scientific study in Finland. The purpose of the use of this MVP version of **Soturi™** app (“**Soturi™** app”) is to collect data to better understand how patients may benefit from its features and services, and to better recognize PD symptoms towards improving and building future digital disease management solutions for PD. For this reason, use of **Soturi™** app includes automatic data acquisition and collection of information provided by users. Collected data will be analyzed for further development of digital treatment and monitoring solutions for PD and/or similar diseases. Data collection with MVP is intended to take place until the end of June 2023, however no longer than the end of year 2023. **Soturi™** app shall be available for users until end of 2023 or once a commercial version of **Soturi™** app is available, unless otherwise stated with updated privacy notice.

Soturi™ app has been co-designed with experts in PD. The app includes digital services (“Service”) in the areas speech support (called “speech exercise program” in the application), physical exercise (called “physical exercise program” in the application), and psychological support (called “anxiety relief” in the application) specifically designed for people with PD. In addition, the app includes features (“Features”) for medication intake tracking and reminders as well as symptom tracking.

In order for you to use the **Soturi™** app, we require certain personal data. Note that in case you choose not to provide us with your personal data, it will not be possible for you to use the app. By switching the toggles with the statements “I give my consent...” upon first registration to the app, you agree to your data being processed as described in this Notice. You further acknowledge that giving your consent for the processing of personal data as described in this Notice is entirely voluntary and you are not under a legal obligation to provide any personal data.

We may update or amend this Notice at any time, we will notify you about updates and amendments as required by law.

1. Contact Details of Data Controller and Data Protection Officers

Orion Corporation and Healthware Group s.r.l. (also referred to as “we”, “us”, or “our” in this document) are joint data controllers of **Soturi™** app.



Orion Oyj
Orionintie 1
02200 Espoo
Phone. +358 10 4261

Healthware Group s.r.l.
Piazza Abate Conforti s.n.c, 84121 – Salerno – Italy
Phone. +39 089 30 61 411

Data Protection Officers:

Orion Oyj
Orionintie 1
02200 Espoo
email: privacy@orion.fi

Silvio Tortora Maione
Via Alfredo Rocco n. 13
80128 Napoli
email: dpo@healthwaregroup.com

2. Contact Details for data subjects (Soturi™ app users)

Email: support@soturi.health

3. Name of registry

Soturi™ app MVP user registry.

4. Purpose of the processing of personal data

Personal data is collected for the following purposes.

1) Providing the app and its Features and Services:

- Creation and maintenance of your user account.
- Creation of your user profile.
- Providing you with the medication tracking, symptom tracking and anxiety relief features.
- Determining and providing the services, such as speech and physical exercise programs, provided in the app based on your specific needs.
- Deliver emails or remote push notifications as needed, for account management purpose (activation, password recovery) and for supporting and guiding your use of the app and wearable device.
- Performing additional services requested by you.



2) Development of digital treatment and monitoring solutions:

- Development of artificial intelligence (AI) models for the medical and other treatment and / or monitoring solutions of PD or similar diseases.
- Improving the understanding of potential benefits of digital medication tracking, symptom tracking, speech support programs, physical exercise programs and psychological support for people with PD.

3) Improving Soturi™ app and understanding how you interact with the app and the wearable device:

- Measuring and assessing the time spent using the app, its Features and Services as well as the wearable device to understand user activity during data collection with MVP.
- We may use the tracking technologies to understand how you use the app and modify your user experience. For this purpose, we will use tracking technology provided by [Matomo](#).
- We may use information about use of the app to further develop the app and its Features and Services.

We may use the data collected with **Soturi™** app in subsequent scientific studies of PD or similar conditions or other purposes related to the controllers' field of business, by rendering the data into anonymised format.

5. How will we share your personal data?

When we process your personal data, we comply with the law on the processing of personal data. Your personal data will not be passed on to other third parties than the data controllers' service providers or used for purposes other than those described in this Notice.

Orion Corporation and Healthware Group s.r.l. use service providers to collect and process data that assist in the technical implementation of processing purposes, such as data analysis, storage or server maintenance. We use [SeeWeb](#) and [Microsoft Azure](#) for processing data collected through the app and the wearable device. [Flowmailer](#) is used for sending automated push notification or emails and [Matomo](#) for tracking technology implemented in the app. Additional third parties may be used for analysis of data acquired with **Soturi™** app for algorithm development and anonymisation of the data after it has been analysed.

Orion Corporation or Healthware Group s.r.l. may also transfer the personal data stored in the register to another company in case Orion Corporation or Healthware Group s.r.l. decides to sell or license **Soturi™** app to another company. If the ownership or control of Orion Corporation, Healthware Group s.r.l. or its parts or products or services changes, we may transfer your data to a new owner. In such cases, Orion Corporation and Healthware Group s.r.l. require that the recipient of the personal data processes the data in the manner specified in this Notice.

6. Legal basis for the processing of personal data

The legal basis for the processing of personal data is the consent of the data subject. We process special groups of personal data related to your health ("sensitive personal data"), such as information about your PD, with your explicit consent.



7. What personal data is collected?

We collect data from the users themselves, as well as automatically through the wearable device and the app.

During the use of **Soturi™** app, we collect personal data, which is information that makes it possible to identify a person. In addition, we collect sensitive personal data related to your health.

Related to wearable device, a voucher code will be provided to you with which you can order the wearable device directly from Garmin webshop. Garmin will ask for some personal data to be able to deliver the device to you. Garmin will process your personal data to for delivery purposes in accordance with their then-current privacy policy as an independent data controller. We are not responsible for personal data required by Garmin for delivery purposes nor are we collecting that data.

With regard to your use of the wearable device, we collect the data automatically from the wearable device. Garmin will not have access to this data and you do not need to download any of their applications to use the wearable device. If you choose to download a Garmin application and to connect your wearable device with it, any data collected by Garmin is processed by Garmin in accordance with their then-current privacy policy as an independent data controller. We are not responsible for personal data processed by Garmin in connection with any of their applications nor are we collecting that data through such Garmin applications.

When you use **Soturi™** app, we collect the following data.

1. **Data collected during registration, such as:** full name, email address and password.
2. **Data collected for during profiling, such as:** year of birth, sex, weight, height, waist circumference, the year when user was diagnosed with PD.
3. **Data collected when using the app, such as:** information about the medication prescribed to the user, medication intake schedule and time, time and types of symptoms experienced by the user (including motor symptoms and non-motor symptoms), physical capabilities and communication capabilities of the user, benefits of the app and its Features and Services as perceived by the user.
4. **Data that is automatically collected through the wearable device, such as:** raw data collected with the sensors in the wearable device (i.e. accelerometer data, heart rate and stress level, progress metrics on progress made when proceeding with support service programs) and metrics collected from the wearable device (i.e. time periods when wearable device is in use and paired with the app).
5. **Data automatically collected through the app, such as:** used Features and Services, content viewed, times and duration of use of the app as well as IP address and data collected by the tracking technology tool.
6. We may also collect data (such as your name, email address, telephone number) to provide additional services if you are in contact with us through our technical support (support@soturi.health).



Eventually, the following data will be combined and analyzed together: data collected during user profiling, data collected when using the app, data that is automatically collected through the wearable device will be analyzed together for the purpose of *2. Development of digital treatment and monitoring solutions*.

In addition, data automatically collected through the app may be analyzed together with data collected during user profiling, data collected when using the app and data that is automatically collected through the wearable device for the purpose of *3. Improving Soturi™ app and understanding how you interact with the app and the wearable device*.

8. Registry security principles

All data is stored electronically.

All data you enter into the app is stored on your mobile device as well as in an external database to ensure the app is available for you to use at all times. The data stored on the mobile device is only available to the user after logging in to the app.

Data categories that contain sensitive personal data (*2. Data collected during user profiling, 3. Data collected during the use of the app*) are stored in pseudonymized format in an external database. Also raw sensor data automatically collected with wearable device (i.e. accelerometer data and heart rate) is stored separately from all other data in its own database, in pseudonymized format. Pseudonymization means processing personal data in such a way that your personal data can no longer be linked to you without further information. All sensitive personal data is kept separate from identifiable personal data collected during registration (*1. Data collected during registration*). The same person does not have access to both identification data (such as name, email address) and sensitive personal data that is stored in pseudonymized format.

The electronically stored data is stored in a dedicated database, access to which is controlled by user IDs and passwords, as well as various system-level user restrictions. Access to the database is restricted and controlled only by Healthware Group s.r.l. representatives involved in the implementation of **Soturi™** app.

Orion and Healthware Group s.r.l. representatives will only process your identification data (name, contact details) for purpose *1. Providing the app and its Features and Services*, and for supporting your use of the app or wearable device.

People who analyze your data for purpose *2. Development of digital treatment and monitoring solutions* and *3. Improving Soturi™ app and understanding how you interact with the app and the wearable device*, will not be able to identify you, your name or your contact information.

9. Transfer of personal data outside of the EU/EEA

Data collected through the app is stored on a SeeWeb private cloud infrastructure based in Italy. And raw data collected with sensors in the wearable device is stored in Microsoft cloud, which is based in the EEA. For these purposes no personal data is transferred outside of the EEA.



However, for providing technical or customer support, personal data may be transferred in exceptional cases, but not routinely, outside of the EEA to a Microsoft or other service provider. In such cases, the controllers will protect the transfer of personal data outside of the EEA through appropriate safeguards, such as the EU standard contractual clauses.

10. Retention period of personal data

Data collection with MVP is intended to take place until the end of June 2023. Data may be collected for the purposes *2. Development of digital treatment and monitoring solution* as well as *3. Improving Soturi™ app and understanding how you interact with the app and the wearable device* (see section 4 of this Notice) six months after the intended data collection period with MVP, however no later than end of year 2023. Data may be analyzed during and after the intended data collection period, after which the data collected will be anonymised in a manner that no longer permits your identification. Data anonymization will take place no later than end of year 2024.

Personal data may be collected and retained for purpose *1. Providing the app and its Features and Services* (see section 4 of this Notice) until commercial version of Soturi™ app is available, in case you continue using the MVP version of Soturi™ app after year 2023.

11. Right to withdraw consent

As the processing of personal data is based on the data subject's consent, you have the right to withdraw your consent at any time.

You can withdraw your consent to the collection of data through the app. You can do this by selecting the main menu from the top right corner of the homepage and the "Privacy Notice" below it, after which you can withdraw your consent by sliding the togglers in the "Consent" section. Please note that after you withdraw any of the consents you have given, it will not be possible for you to use the app.

12. Other rights of the data subject

If you wish, you can request to view all personal data collected through the app and the wearable device. In this case, the joint data controllers must give you access to the data or confirmation that they will no longer process your personal data collected in the manner described in this Notice. Requests for verification should be made by contacting us, contact details can be found in section 2 of this Notice.

In addition, in certain situations, you have the option of requesting corrections to your personal data, having it deleted, or asking the controller to restrict the processing of your personal data. If you would like your account deleted or deactivated, you can do so by contacting us, contact information can be found in section 2 of this Notice.

If you would like more detailed information about the processing of your personal data, you can contact us, contact information can be found in section 2 of this Notice. If you have general questions about how Orion Corporation and/or Healthware Group s.r.l. process personal data, you can contact Data Protection Officers, whose contact details can be found in section 1 of this Notice.



If you have any comments regarding the processing of personal data by Orion Corporation and/or Healthware Group s.r.l., you can file a complaint with the Data Protection Officer of your country of residence, who is the data protection authority.