

Last update: April 28, 2025

# Privacy Policy

## myflorio™ ITP App

### 1. ABOUT THIS PRIVACY POLICY

This Privacy Policy (the “**Policy**”) explains how information about you is collected, used, and disclosed by Florio GmbH (“**we**”, “**our**”, or “**us**”). This Policy applies to information we collect when you use the “myflorio™ ITP” mobile application (the “**App**”). This Policy applies to users residing in the United States.

We may change this Policy at any time. If we make changes, we will notify you by revising the “last update” date above. We may also use other reasonable means to notify you, including a link posted on the App or by sending a notice to the email address that you provided to us. We encourage you to review the Policy whenever you access the App to stay informed about our information processing practices and the ways you can control your privacy.

### 2. INFORMATION WE COLLECT

#### 2.1 Information you provide directly to us

We collect information you give us. For example:

- Data that you provide directly when you register for, or use, the App. This data will vary, but typically consists of identifiers like your name, email address, and other similar contact data. We also receive data from the communications you send to us, such as customer service inquiries, product reviews, and other feedback regarding the App.
- User credentials. This data may include username, password, and similar security information used to create an account and authenticate users of the App.
- Demographic data. We may collect information from you like your age, gender, country and/or state of residence, and language preference.
- Data that you provide when you participate in post market surveillance surveys that we conduct through the App.
- Other information collected through connected devices or services, including activity information.

#### 2.2 Information we collect automatically

We also automatically collect some information when you download, access or use our App, including:

- Device data. This data could include type of device, operating system, and other software installed on the device, device settings, IP address including non-identifiable location (on city-level), device identifiers and error reports. This data also includes assigned user IDs to handle issues and support requests quickly and efficiently.
- Pseudonymized ID and cookies. When you participate in post market surveillance surveys we conduct through the App, we assign a pseudonymized ID and place cookies to prevent multiple submissions of a survey by the same user.

- Internet or other electronic network activity information. We may collect information about the features you access, your clicking habits, and the timing, frequency, and duration of your interactions through the App.

### 2.3 Health information

We collect health information that you enter when using the App or from connected services (e.g., Apple HealthKit) which you choose to connect to the App. This includes, if you choose to provide it:

- Treatment information (e.g., start/end date of treatment regimen, dose, date/time of medication taken, treatment type (incl. brand of product));
- Information about bruises, petechiae, and bleeds (e.g., location on the body, time/date when noticed, photographs, severity, cause, notes, type of bleed (e.g., nosebleed, gum bleeds, blood in urine, etc.));
- Information about platelet count (e.g. count, date/time, location where count taken);
- information about your fatigue and mood, including date/time, and mood and fatigue level;
- Information about your activity level;
- Information about your next physician appointment (date/time, location, name of physician and/or medical practice);
- Information about how ITP and your treatment affects your daily routine (e.g. level/ effect of ITP on everyday life, time spent at hospital/with a physician including travel time, number of ITP-related hospital visits, difficulties following medication regime, impact of any food restrictions, other medications taken, etc.); and
- Any other information or data you choose to enter or log in the App.

If you choose to connect the App to other services you use, such as Apple HealthKit or Google Health Connect, or to another device, such as a smartwatch or other wearable, we will receive information that you make available to us via the App according to the settings you select within the App and other connected service or device. This information could include, depending on your settings, information collected and stored by the connected service or device (including information stored six months prior to connecting the service), such as your activity levels (e.g. steps, workout types, distance, duration, heart rate, calories burned/energy consumption etc.), biometrics (e.g. weight and height etc.), nutrition information, or sleep pattern data. Your data is subject to the privacy policies applicable to the third party services which you use, which may be different from this Policy. This Policy does not apply to third party services. **The use of information received from Google Health Connect will adhere to the Health Connect Permissions policy, including the [Limited Use requirements](#).**

**We can only make the App available to you if you consent to the processing of your health data.** If you do not want your health data to be processed for all outlined purposes set forth herein and as may be disclosed via the App, please do not sign-up for or use the App. You can withdraw your consent at any time without the lawfulness of processing your data prior to the withdrawal being affected, but you may no longer be able to use the App.

### 3. **HOW WE USE DATA**

We use the information we obtain from you to provide a functional App, and to provide the features or services you request, including to allow you to log your health information and create reports that you may share with others (e.g. your physician), or to receive customer support. We may also use your information to understand usage trends and statistics and to improve the App in accordance with the permissions you grant us by using the App. We may furthermore use your non-identifiable data, which means data based on which you cannot be identified, for supporting ITP-related science and research purposes of medical and research organizations. We will only do so if and to the extent that this is permitted by applicable law. Use of this non-identifiable data by medical and research organizations will only be allowed if approved by an independent external Data Governance Board, consisting of international medical experts and/or representatives of patient associations.

Further to the above, we may use the information you provide or that we collect about you for the following purposes:

- To provide and deliver the information you request or that we think will be of interest to you and send you confirmations, receipts, technical notices, updates, security alerts, and support and administrative messages, as needed for us to perform the contract we have with you based on the terms of use for the App, available here:

<https://florio.com/my-florio-ity-legal-documents>

- To provide you with a customized, personalized experience while using the App;
- To maintain, improve, and expand the App and for other legitimate interests related to providing you the App, including for analytical purposes (using third party software solutions as may be disclosed to you at <https://florio.com/my-florio-ity-legal-documents> under "Service Providers"), for example by monitoring and analyzing trends, usage, and activities in connection with our App, and to personalize the App, content or features that match user profiles or interests or that are based on the information users provide or the actions users take;
- To monitor the safety of the App and user satisfaction with the App in connection with our post market surveillance activities;
- To provide customer service, request feedback, and otherwise contact you about your use of the App (e.g., when we need additional information) for our legitimate interest in ensuring efficient and user-friendly communication with the users and functionality of the App;
- To detect, investigate, and prevent fraudulent transactions and other illegal activities, and protect our rights and property and the rights and property of others, including by enforcing our Terms of Use, maintaining security of data, and to resolve disputes, all in furtherance of our legitimate interests in protecting the integrity of the App, its users, and our business;
- For science and research purposes (non-identifiable data only);
- For any other purpose we disclosed to you at the time of collection, or for which we have otherwise obtained consent.

### 4. **HOW WE SHARE AND DISCLOSE DATA**

We may share information about you for certain business purposes. For example,

- With vendors, consultants, and other service providers or volunteers who need access to such information to perform certain functions on our behalf;
- With service providers: we cooperate with third parties that perform services and process data, some of which is personal data (including health data), according to our instructions in relation to the App, for the purposes of processing information or operating the App, as well as providing content and programs. Such third parties are restricted from processing the data for any purpose other than to provide these services. Read more about this at <https://florio.com/my-florio-itp-legal-documents> under “Service Providers”.
- When we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to comply with the law or legal processes or respond to lawful requests, claims or legal authorities, including responding to lawful subpoenas, warrants, or court orders, or lawful requests by public authorities to meet national security, regulatory, vigilance or law enforcement requirements;
- When we believe such disclosure is necessary to: protect the safety and security of our personnel, other individuals, or the App; prevent fraud, abuse, death or imminent bodily harm, or other unlawful or unauthorized activities; protect the rights or property of us or third parties, including enforcing the terms of our agreements; or to protect our own, or a third party’s legitimate interests relating to law enforcement, litigation, or criminal investigations; and
- In the event of a sale, merger, acquisition, reorganization, or similar event, or in contemplation of such an event (e.g., due diligence), your data may be among the transferred assets.

We may also share your data for any other purpose as disclosed at the time of collection, or when we have otherwise obtained consent. We may share de-identifiable data with third parties, which process it for their own purposes.

We do not, and will not without consent, sell your personal information to third parties. We do permit third parties to collect the information described above through our App and disclose such information with other third parties for business purposes as described in this Policy. The information practices of these third parties are not covered by this Policy.

For information and to opt out of certain data collection and sharing, please visit the National Advertising Initiative website (<https://optout.networkadvertising.org/>).

## **5. THIRD-PARTY PRODUCTS AND SERVICES**

The App may link or otherwise provide access to third-party websites and other products and services that are outside our control, including functionality powered by third parties outside of our control (collectively, “Third Party Products and Services”). We also may make third-party information and other content available on or through the App (“Third Party Content”).

The Third Party Products and Services and Third Party Content are owned and/or controlled by third party entities (“Third Party Entities”), and we are not responsible for the security or privacy of any personal information you share or cause to be shared with any Third Party Entities. You should exercise caution and review the applicable privacy policies of any Third Party Product and Service or Third Party Entities including those you use in connection with the App, before providing them with your personal information.

## 6. WHAT CHOICES YOU HAVE AND HOW YOU CAN EXERCISE THEM

Subject to statutory provisions in your jurisdiction, including the corresponding local laws, you may have a number of rights in connection with our processing of your information. In general, you may have the following types of rights:

- Access: subject to the statutory provisions, you have the right to request access to your information processed by us and receive a portable copy of this data upon proper request.
- Transparency: subject to the statutory provisions, you have the right to request more information about our data processing practices.
- Deletion: subject to the statutory provisions, you have the right, if there are justified grounds, to request the deletion of your data.
- Rectification: subject to the statutory provisions, you have the right to have incorrect data rectified and to have incomplete personal data completed.
- Right to object: subject to the statutory provisions, you have the right, on grounds relating to your particular situation, to object to, and in some cases request the restriction of, any processing of your data for the purposes of legitimate interests pursued by us or a third party.

To exercise these rights, to the extent they are available to you, or if you have any questions, requests, or complaints about the processing of your information in relation to the App, please contact us at [help@florio.com](mailto:help@florio.com).

We will respond to requests in accordance with local laws. If you become aware of changes or inaccuracies in your information, you should inform us of such changes so that the information may be updated or corrected. We may verify your request by seeking additional information from you and/or by requiring you to confirm a link or confirmation code sent to contact information on file for your account. You may be entitled, in accordance with applicable law, to submit a request through an authorized agent. In addition to other remedies, you are also entitled to file a complaint with an appropriate data privacy regulator.

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on the Service may change or no longer be available to you. Any difference in the App is related to the value provided.

## 7. SECURITY, STORAGE AND TRANSFER OF DATA

Your data privacy is important to us. We try to strive to protect the information we maintain; however, we cannot ensure, guarantee, or warrant the security of any information that you transmit to us.

We will store your data only for the period necessary to fulfil the purposes outlined in this App Privacy Policy. After that, we will delete your data, unless statutory retention obligations preclude this or a prolonged storage is necessary in the specific individual case for the establishment, exercise or defence of legal claims. If you withdraw your consent or delete your user account, we will delete your data from our operational database.

We may retain your data after your withdrawal or account deletion, if and to the extent that statutory retention obligations apply or if it is necessary to retain your data for the establishment, exercise or defense of legal claims. In this case we store your data in a storage archive.

Your information may be stored in the European Economic Area (EEA) and in other countries outside the country where you reside. We may also transfer your information to vendors, consultants, and other service providers or volunteers in countries that may not provide the equivalent level of legal protection for personal data but where we have taken security measures in order to protect your data, including, with respect to transfers from the EEA to other countries, by implementing the standard contractual clauses adopted by the European Commission. If you have any questions about these and other security measures we use for the data transfer, please contact Florio at [privacy@florio.com](mailto:privacy@florio.com).

#### **8. CHILDREN AND PARENTS**

We do not knowingly collect or sell any information from children, as defined by applicable law, without parental consent or as otherwise permitted by applicable law.

Consistent with applicable law, for minors who are between the ages of 13 years old and 18 years old, you may request and obtain removal of content or information you post on the Services by emailing [privacy@florio.com](mailto:privacy@florio.com). However, requesting removal of posted content does not guarantee complete removal of the content; for example when another third party reposts the minor's content.

#### **9. DO-NOT-TRACK SIGNALS**

Some mobile and web browsers transmit "do-not-track" signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

#### **10. HOW TO CONTACT US**

Florio GmbH is responsible for your information, and, where such concepts are recognized by law, Florio GmbH is the data controller with respect to your information. If you have a question, concern, or complaint regarding our data privacy practices, or if you would like to exercise any of your rights, you may contact us at [privacy@florio.com](mailto:privacy@florio.com).

You can contact the data protection officer at any time using the contact details below:

Data Protection Officer  
Florio GmbH  
Wilhelm-Wagenfeld-Str. 22  
80807 Muenchen  
Germany  
Email: [privacy@florio.com](mailto:privacy@florio.com)

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