

## Privacy Policy of **FixSpiro** app

The MIR FixSpiro is an app that is aimed at updating and optimizing MIR devices. It discovers your smart spirometry and peak flow meter and automatically updates the bluetooth firmware and the internal software if needed.

### **Information processed by the app**

The app does not collect and process personal data or information referable to natural persons, because it was designed in compliance with the principles of privacy by design and data minimization (pursuant to Article 5 of the GDPR).

The app identifies MIR devices by means of bluetooth technology. In this circumstance, therefore, the software identifies the devices based on their Bluetooth MAC address.

The software checks the firmware version installed on the device and also the software version installed.

### **The update operation**

If the software checking detects that the firmware and software installed on the device are of a previous version, it proceeds to write the new firmware or the software update module.

### **Device data**

The MIR devices that are targets of this software do not have an internal memory and, for this reason, no data and information are stored on the device.

### **Transfer of data**

The app has no connections with services and servers neither Mir nor third parties.

## **Definitions and legal references**

### ***Personal Data (or Data)***

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

### ***User***

The individual owner of the smartphone where this app is installed.

### ***Data Subject***

The person to whom the Personal Data refers.

### ***Data Controller***

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

The Data Controller, unless otherwise specified, is the User.

### ***The App***

The hardware or software tool by which the Personal Data of the User is collected.

### ***Changes To This Privacy Policy***

We may update our Privacy Policy from time to time. You are advised to review this Privacy Policy periodically for any changes here **fixme** Changes to this Privacy Policy are effective when they are posted on this page.

**Contact Us**

If you have any questions about this Privacy Policy, please contact us

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