

## LANGAWARE Privacy Policy

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LANGAWARE (“We,” “us,” and “our”) takes your privacy seriously and we know you do too. This Privacy Policy describes our practices and procedures relating to the use of your personal data when you use our Service (as defined below) and provides information about your rights and the choices you may make regarding your personal data (as that term is defined below).

By using the Service, as defined below, you agree to the collection and use of personal data in accordance with this Privacy Policy.

### Key Points

- Our Service is a machine-learning tool for assessing an individual’s risk of developing diminished cognition, depression, or certain other neurodegenerative or psychiatric conditions using recordings of the human voice. We provide the Service via a web-based application and through programmatic integration with third-party applications.
- We process personal data to provide this assessment. The key personal data that we process are your birthday, gender, native language, contact information, and speech samples. If you use the Service in collaboration with a healthcare provider, we may also process your diagnosis information from your healthcare provider if your provider elects to provide it. The Service processes this personal data on a pseudonymous basis. However, the healthcare facility, healthcare provider, or mobile app through which you use the Service can use a pseudonymous identifier to find your results and other data.
- We also process personal data of individuals who access the Service to ensure security and availability, communicate with users, and facilitate users’ access to assessment results.
- Of course, we may also process personal data relating to those who send us correspondence or questions for the purpose of responding.
- This privacy policy applies only to the Service. It does not apply to individuals who are applicants, employees, or other kinds of workers for our company.
- You can contact us if you have questions using the contact information provided below.

## Definitions

For the purposes of this Privacy Policy:

- **Device** means the device used to access our Service, such as a computer, a cellphone, or a digital tablet.
- **Personal Data** is data that relates to an identified or identifiable individual. In the laws of some jurisdictions, personal data is known as personal information and may include data that relates to an identified or identifiable household.
- **Service** refers to our machine learning tool for assessing the risk of developing dementia or diminished cognition using recordings of the human voice. We make the Service available via a web application. We also make the Service available through third-party applications (including web applications and mobile apps) that integrate the Service with their applications using our API (application programming interface). The Service does not include the portions of our public-facing website other than those used to provide the machine learning tool.
- **Service Provider** refers to others we employ (other than members of our own workforce) to provide the Service on behalf of the Company and who are contractually prohibited from using personal data received from the Company except as we direct. In some jurisdictions, Service Providers are known as “processors.”

For the ease of reading, these terms are capitalized in this document only when necessary for clarity.

## Collecting and Using Your Personal Data

We collect the following categories of personal data:

<b>Data Subject Category</b>	<b>Categories</b>	<b>Additional explanation</b>	<b>Source</b>
Individuals using the Service for voice analysis	Pseudonym	This is a pseudonymous identifier that allows us to store the information you provide to the Service in a manner in which it is not stored in association with your name but can be accessed by your healthcare facility, healthcare provider, or app provider.	We generate the pseudonym automatically when you use the Service

Individuals using the Service for voice analysis	Date of birth		You or your healthcare facility/healthcare provider
Individuals using the Service for voice analysis	Native language		You or your healthcare facility/healthcare provider
Individuals using the Service for voice analysis	Gender		You or your healthcare facility/healthcare provider
Individuals using the Service for voice analysis	Voice samples	These are the voice samples that you provide to the Service.	You
Individuals accessing the Service or our website	Usage data	This includes data relating to your Device (including its hardware and software) and data describing your use of our Service.	Automatic collection from you, your Device, or from your use of the Service
Individuals accessing the Service	Contact information	This may include a physical address, e-mail address, phone numbers, or other kinds of contact information.	You
Individuals accessing the Service	Access credentials, such as account identifiers (sometimes known as "log-ins" and corresponding passwords)		You, when you first use the Service
Individuals who send us correspondence using the Service or our website	Name, contact information, and contents of correspondence	We use this information to review and respond to correspondence	You, if you send correspondence to us or otherwise contact us

## Use of Your Personal Data

The Company uses personal data for the following purposes:

<b>Personal Data Categories</b>	<b>Purpose</b>	<b>Lawful Basis/bases of P (for individuals in the UK, EU, or EEA)</b>
Pseudonym, date of birth, native language, voice samples, contact information, access credentials	To provide, improve, and maintain the Service, including to monitor usage and maintain security	Performance of contract; for our legitimate interest in securely providing and improving the Service
Contact information; access credentials	To enable you to create and manage your account	Performance of contract; for our legitimate interests in providing

		users of the Service with a secure account
Contact information	To contact you regarding the Service or our Company	Performance of contract; for our legitimate interests in communicating with users of our Service
Contact information; contents of correspondence	To manage your requests or respond to communications from you	Consent; for our legitimate interests in maintaining records of correspondence
All categories	For business transfers: We may use your personal data to evaluate or conduct a merger or restructuring of our business	For compliance with our legal obligations; for our legitimate interests in the development and success of our business
All categories	For legal compliance: We may share your personal data when we are compelled to do so by law or when needed to defend ourselves from legal claims	For compliance with our legal obligations; for our legitimate interest in preserving the Service for its users and the benefit of the public

To the extent the Service collects personal data that reveals information concerning health, we process such personal data based on your explicit consent.

We share your personal data in the following situations:

- **With Service Providers:** We share your personal data with Service Providers to enable us to provide the Service. For instance, we use Google as a Service Provider to transcribe speech samples as part of the technology we use.
- **For business transfers:** We may share your personal data in connection with a business transfer as described above.
- **With our affiliates:** We may share your personal data with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other companies that are under common control with us.
- **With your consent or at your direction:** We may share your data with your consent or when you direct us to do so.

### [Cookies and Tracking Technologies](#)

Our Service does not employ cookies or similar tracking technologies.

### [Retention of Your Personal Data](#)

We retain personal data only for as long as is necessary for the purposes set out in this Privacy Policy, or for so long as is required by law. What is necessary may

vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data:

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

### Location of Personal Data Processing

We collect and process your personal data from data centers within the United States. By using our Service directly, you consent to the processing of your personal data in the United States.

If you use our Service through a third-party and your personal data are transferred to us from the European Economic Area or United Kingdom, we have put in place appropriate safeguards to ensure that your personal data are properly protected and processed only in accordance with applicable law. Those safeguards may include the use of standard contractual clauses, reliance on a binding corporate rules program, or participating in a recognized adequacy framework.

### Personal Data Security

We have enacted safeguards aimed at ensuring that your personal data is processed securely and in accordance with this Privacy Policy. We process personal data only in those legal jurisdictions where, in our view, there are adequate controls in place to protect your personal data. We also require our Service Providers to enact reasonable safeguards to protect your personal data.

Although the security of your personal data is important to us, no method of transmission over the internet or method of electronic storage is 100% secure. While we use commercially reasonable means to protect personal data, we cannot guarantee its absolute security.

### Third Party Websites and Mobile Apps

Except for processing by our Service Providers, this privacy policy does not apply to third party websites, products, or services. For example, if you use our Services through a third party's app, this privacy policy does not cover that app.

In such cases, the terms, conditions, and privacy practices of the third party may govern.

## Children's Privacy

Our Service is not intended for users under the age of 18 and, therefore, we do not knowingly collect personal data from anyone under that age. If you believe that your child or a child in your care has provided us with personal data, please contact us so we can promptly delete such personal data.

## Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will also let you know via a prominent notice in the Service, prior to or contemporaneous with the change becoming effective, and update the "Last updated" date at the top of this Privacy Policy.

We encourage you to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective on the date specified in each revision to the Privacy Policy.

## Additional Information for Individuals in the United States

We provide this information to discuss our approach to several privacy protective mechanisms that exist under U.S. state and federal law:

- Global Privacy Control (GPC) - GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of the sale/sharing of personal data. To activate GPC, you must enable a setting or use an extension in your Device. Please review your browser or device settings for more information regarding how to enable GPC. We interpret the GPC signal, when we receive it, as indicating your wish to opt out of the sale of your data and the sharing of your personal data for behavioral advertising purposes to the extent required by law. However, because we do not sell personal data or share it for behavioral advertising purposes, the GPC signal does not change the way we process your personal data.
- Do-Not-Track – Because no consensus has emerged regarding how to process the do-not-track signal (a signal different from the GPC), we do not process or respond to such signals. Nevertheless, our Service does not engage in tracking except as described above.

## Your Privacy Rights

Individuals in certain legal jurisdictions have certain legal rights, as described below, with respect to personal data relating to them. Applicable law may provide exceptions and limitations to these rights.

**Access** - You may have to request access the personal data we process.

**Rectification** - You may request that we correct any personal data that you believe to be inaccurate.

**Deletion** - You may request that we delete your personal data. We may delete your data entirely, or we may anonymize or aggregate your information such that it no longer reasonably identifies you.

**Data Export** - You may request that we send you a copy of your personal data in a common portable format of our choice.

**Restriction** - You may request that we restrict the processing of personal data to what is necessary for a lawful basis.

**Objection** - You may have the right under applicable law to object to any processing of personal data premised on our legitimate interests. In addition to the general objection right, you may have the right to object to processing:

- for profiling purposes;
- for direct marketing purposes (we will cease processing upon your objection); and
- involving automated decision-making with legal or similarly significant effects (if any).

**Regulator Contact** - You have the right to file a complaint with a supervisory authority or other regulator about our processing of personal data. Please see this [directory](https://edpb.europa.eu/about-edpb/board/members_en) for contact details: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). If you are in Switzerland, please visit this FDPIC site for contact details: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>. If you are in the United Kingdom, please see this site for contact details: <https://ico.org.uk/global/contact-us/>.

If you access our Service through a third-party's healthcare facility, healthcare provider, mobile app, or other application, you can exercise your rights by contacting the third party. You can also contact us to exercise your rights by using the contact information in the "Contact Us" section, below. We, or the

third party through which you access our Services, may be legally required to verify your identity before we may process your request to exercise your rights.

### Contact Us

If you have any questions about this Privacy Policy or our processing of personal data, or if you would like to exercise your rights, we invite you to contact us using the below contact information.

- By writing to us at Langaware, Inc., 16192 Coastal Hwy., Lewes DE 19958, USA
- By emailing us at [privacy@langaware.org](mailto:privacy@langaware.org)
- By visiting us at <https://www.langaware.com/contact>.