

# LANGaware Software as a Service

## Privacy Policy

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LANGaware Inc (“The Langaware”, “We,” “Us,” and “Our”) takes privacy seriously. This privacy policy describes our practices and procedures relating to the use of personal data when using our Service (as defined below) and provides information about rights and the choices the User(s) may make regarding personal data (as that term is defined below).

By using the Service, as defined below, All Parties 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 the User(s)’ date of birth, gender, native language, contact information, and speech samples. If the User(s) uses the Service in collaboration with an Organization (e.g., healthcare provider), we may also process their diagnosis information from the Organization if the Organization elects to provide it. The Service processes this personal data on a pseudonymous basis. However, the Organization or mobile app through which the User(s) uses the Service can use a pseudonymous identifier to find the 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 provide us contact information for correspondence, send us correspondence or questions for the purpose of responding.
- This privacy policy applies only to the Services. It does not apply to individuals who are applicants, employees, or other kinds of workers for our Langaware .
- All Parties can contact us if they have questions using the contact information provided below.

## Interpretation

For the purposes of this privacy policy:

**Device** means the device used to access our Service, such as a computer, a cell phone, or a digital tablet.

**User** refers to the person that provides the speech sample (the **Individual**) or the healthcare provider that has entered the Langaware Platform (see below) as a Permitted User.

**Permitted User** refers to the individual(s) that uses the Service and has been granted an access account.

**Personal data** is data that Users provide while using the Service and identify or may identify this User or include, constitute or generate personal identifiable information.

**Service** means the service having the core functionality described on the Langaware Platform, as the Langaware Platform is updated from time to time.

**Service Provider** refers to others we employ (other than members of our own workforce) to provide the Service on behalf of the Langaware and who are contractually prohibited from using personal data received from Langaware except as we direct. In some jurisdictions, Service Providers are known as “processors”.

**Organization** refers to a person that includes an individual, a body corporate, an association of persons (whether corporate or not), a trust, a government department, or any other entity. This entity authorizes access to the service for the Permitted User.

**Langaware Platform** means the internet site (URL) provided by us that provides the Service, or such other sites notified to All Parties by us.

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

## Collecting and Using Personal Data

We collect the following categories of personal data:

Data Subject Category	Categories	Additional explanation	Source
The User(s) providing the speech sample (*)	Pseudonym [1]	This is a pseudonymous identifier that allows us to store the information the User(s) provides to the Service in a manner in which it is not stored in association with their name but can be accessed by the Organization.	We generate the pseudonym automatically when User(s) uses the Service

The User(s) providing the speech sample (*)	Date of birth [2]		The User(s)' or the User(s)' Organization
The User(s) providing the speech sample (*)	Native language [3]		The User(s)' or the User(s)' Organization
The User(s) providing the speech sample (*)	Gender [4]		The User(s)' or the User(s)' Organization
The User(s) providing the speech sample (*)	Speech samples [5]	These are the speech samples that the User(s) provides to the Service.	The User(s)
The User(s) providing the speech sample (**)	Contact information [6]	This may include a physical address, e-mail address, phone numbers, or other kinds of contact information.	The User(s)
The User(s) providing the speech sample (**)	Diagnosis Information [7]	We may also process diagnosis information by the User(s)' Organization if the Organization elects to provide it.	The User(s)' Organization
The Permitted User(s) or User(s) accessing and using the Service (*)	Usage data [8]	This includes data relating to the device used: (a) Permitted User(s)' Device or (b) the User(s)' Device, (including its hardware and software) and data describing their use of our Service.	Automatic collection from (a) the Permitted User(s)' Device, or (b) the User(s)' Device or from their use of the Service
The Permitted User(s) accessing the Service or our Langaware Platform and the Organization (*)	Contact information [9]	This may include email address, or other kinds of contact information.	Permitted User(s)/the Organization
The Permitted User(s) accessing the Service or our Langaware Platform (*)	Access credentials, such as account identifiers (sometimes known as "log-ins" and corresponding passwords) [10]		Permitted User(s)
Individuals whose contact information has been provided to us for correspondence (**)	Contact information, contents of correspondence [11]	We use this information to review and send/respond to correspondence.	The User(s) or any individual(s) who initiates contact with us directly by sending correspondence through our Langaware Platform.

(\*) Required, (\*\*) Optional

## Use of Personal Data

The Langaware uses personal data for the following purposes:

Personal Data Categories	Purpose	Lawful Basis/bases of Processing (for individuals in the UK, EU, or EEA)
Pseudonym [1], date of birth [2], native language [3], speech samples [4], contact information [6], access credentials [10]	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 [9]; access credentials [10]	To enable the Permitted User(s) to create and manage their account	Performance of contract; for our legitimate interests in providing users of the Service with a secure account
Contact information [6] [9]	To contact All Parties regarding the Service or our Langaware	Performance of contract; for our legitimate interests in communicating with users of our Service
Contact information [6] [9]	To circulate our Newsletter	Consent
Diagnosis Information [7]	To improve, and maintain the Service	Performance of contract; for our legitimate interests in improving, and maintaining the Service.
Contact information [6] [11], contents of correspondence [11]	To manage requests or respond to communications from an individual	Performance of contract for our legitimate interests in maintaining records of correspondence
All categories	For business transfers: We may use 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 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

We share personal data in the following situations:

- **With Service Providers:** We share 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 personal data in connection with a

business transfer as described above.

- **With our affiliates:** We may share personal data with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent Langaware and any other companies that are under common control with us.
- **With the User(s)' consent or at the User(s)' direction:** We may share data with the User(s)' consent or when the User(s) directs us to do so.

### **Cookies and Tracking Technologies**

Our Service does not employ cookies or similar tracking technologies.

### **Retention of Personal Data**

The determination of the retention period takes into account factors such as:

- 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 with continued processing, retention, and deletion.

For providing the Service in US under HIPAA and applicable laws:

personal data are retained and not deleted for the purposes set out in this privacy policy, or for so long as is required by law.

For providing the Service in EU under GDPR and applicable laws:

- **Users:** For an indefinite period of time on an opt out basis.
- **Permitted Users:** As long as they keep their account active

### **Location of Personal Data Processing**

We process personal data in data centers within the United States. By using our Service directly, All Parties understand that the processing of the User(s)' personal data takes place in the United States.

In case that personal data is transferred to us from the European Economic Area or United Kingdom, or through a third-party, we have put in place appropriate safeguards to ensure that personal data is properly protected and processed only in accordance with applicable law. Those safeguards may include the use of standard contractual

clauses for GDPR, 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 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 personal data. We also require our Service Providers to enact reasonable safeguards to protect personal data.

Although the security of 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 Langaware Platforms and Mobile Apps**

Except for processing by our Service Providers, this privacy policy does not apply to third party Langaware Platforms, products, or services. For example, if the User(s) or Permitted User(s) 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 an individual believes that their child or a child in their care has provided personal data to us, they are encouraged to contact us so that 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 All Parties of any changes by posting the new privacy policy on this page.

We will also let All Parties 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, the Permitted User(s) or the User(s) must enable a setting or use an extension in their Device. The Permitted User(s) or User(s) must review browser or device settings for more information regarding how to enable GPC. We interpret the GPC signal, when we receive it, as indicating the User(s)' wish to opt out of the sale of their data and the sharing of their 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.

### **User(s)' 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 - The User(s) may have to request access to the personal data we process.

Rectification - The User(s) may request that we correct any personal data that they believe to be inaccurate.

Deletion - The User(s) may request that we delete their personal data. We may delete their data entirely, or we may anonymize or aggregate their information such that it no longer reasonably identifies them. Please note that personal data in the US region, under HIPAA and applicable laws are not subject to deletion.

Data Export - The User(s) request that we send them a copy of their personal data in a common portable format of their choice.

Restriction - The User(s) request that we restrict the processing of personal data to what is necessary for a lawful basis.

Objection - The User(s) 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, they may have the right to object to processing:

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

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

If a User accesses our Service through a third-party's healthcare facility, healthcare provider, mobile app, or other application, they can exercise their rights by contacting the third party. They can also contact us to exercise their rights by using the contact information in the "Contact Us" section, below. We, or the third-party through which a User accesses our Services, may be legally required to verify their identity before we may process their request to exercise their rights.

### Contact Us

If All Parties have any questions about this privacy policy or our processing of personal data, or if User(s) would like to exercise their rights, we invite them 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>