

DRAFT LAST EDITED BY FIROUZA ESHONOVA LESS THAN A MINUTE AGO ON 2025-03-02

Privacy Policy

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EXPLICIT CONSENT

Data Protection Declaration for the App

In this data protection Declaration, you will find out what data we collect in connection with operation of our App, as well as the type, scope and purpose of the processing of personal data (hereinafter referred to as "data").

Scope of the EZSpeech Digital Speech Therapy Application

EZSpeech is a Digital Speech Therapy Application facilitates the treatment of speech and language disorders, voice productions, [swallowing functions] and general communication abilities that have been impaired as a result of disease, injury, developmental delay or surgical procedures, without speech therapist being present during a treatment session.

For more information about the App refer to EZSpeech User Manual.

1. Responsible/Contact/Management

Mila4AI Inc.
8 The Green Suit H
Dover, DE 19901
email: admin@ezspeech.app
Firouza Eshonova, CEO

2. Data Protection Officer

Bakhodur Eshonov, Data Protection Officer
bakhodur.eshonov@ezspeech.app

3. Terms used

All data protection terms have the same meaning as defined in the General Data Protection Regulation (EU) 2016/679 ("GDPR")

4. Types of Personal Data Collected

The types of personal data we collect include:

- Identity Data
- Contact Data
- Health Data
- Biometric Data
- Location Data
- Online Identifiers
- Demographic Data

5. Purposes of processing and legal basis

We only use your personal data for the following purposes:

1. Intended Use of our Application (legal basis: consent, Art. 6(1) lit. a) and Art. 9(2) lit. a) of the GDPR).
2. Permanent Guarantee of the technical functionality, user-friendliness and further development of the Application (legal basis: consent, Art. 6(1) lit. a) and Art. 9(2) lit. a) of the GDPR).
3. Legally prescribed processing purposes, such as billing to a health insurance company or to fulfill of legal obligations related to medical products, etc., but also as defense of legal claims (legal basis: legal obligation, Art. 6(1) lit. c) of the GDPR in conjunction with the respective special statutory provision, Art. 6(1) lit. d) and e) of the GDPR and Art. 9(2) lit. c), f) to j) of the GDPR, insofar as applicable.

6. Wording of your declaration of Consent

At the end of the document you will find the wording of your declaration of consent.

7. Description of the necessary data processing within the scope of the intended use

7.1 Processing of inventory data, payment data, etc.

We process your inventory data (name, contact details, etc.) as well as data records from the interface of your PC or mobile phone for the following purposes:

- Establishment, execution and termination of purchase or service contracts;
- Creating an account in the App;

- Provision of the App and the respective functions and content;
- Answering contact requests and communicating with users;
- Processing the payment for the product;
- Answering support requests;
- Safety measures.

7.2 Processing of special categories of personal data (biometric data, health data, demographic data etc.)

We process your personal data for the following purposes:

- Treatment support: providing therapy resources, tools and exercises to help you improve your speech outcome
- Provision of speech therapy services: processing video data to extract relevant facial features to detect and interpret movements of facial muscles involved in execution of relevant speech therapy exercise
- Personalization: adapting the settings to the user's facial parameters to ensure accuracy of exercises' assessment; adapting the therapy to the user, including adaptation to age and disabilities
- Customization: creation of Individual Plan of Care (IPOC), relevant to the user's state, age and progress
- Progress tracking: generation, storage and display of user's performance to measure the effectiveness of therapy and amend IPOC if needed
- Research and development: Conducting analysis to improve the quality of our therapy programs, develop new features and contribute to scientific research in the area of speech therapy. If possible, such analysis is always based on anonymized and aggregated data, so that no information that directly identifies you is processed.

7.3 Processing your billing data, consisting of the activation code you entered, which is provided by your payment processor or health insurance company, to bill our services in connection with the use of the App and forwarding this to the responsible health insurance company for billing purposes if the service is from your health insurance is reimbursed.

7.4. In connection with the fulfillment of our statutory obligations to which we are subject, we process your data provided as part of the intended use of the App, including user, application, technical and billing data, such as in particular to fulfill obligations under medical product law, such as for Carrying out conformity assessment procedures and monitoring the App after it has been placed on the market.

7.5. In order to bill or fulfill our statutory obligations, we can also pass your data to the responsible payment processor or supervisory authorities, whereby we usually only pass on your data in pseudonymous form, so that no information that directly identifies you is communicated.

8. Withdrawal of consent and other rights

You have the right to access, rectify, restrict or object to the processing of your personal data. You can exercise these rights by contacting our Data Protection Officer at the provided contact information in Section 2.

You have the right to withdraw your consent at any time via settings menu in the EZSpeech Application. Please note that if your consent to the intended use of the application is withdrawn, all functions of EZSpeech Application will naturally no longer be available to you and your account will be deleted.

For children under the age of 18 consent or withdrawal of consent should be given by their parent or legal guardian.

9. Privacy by default

In accordance with the data protection principle "Privacy by Default", our application allows individual adjustment of certain features in certain cases. All features offered within this application are fundamental part of the intended use and are required for optimal use of the application as a whole. However, Mila4AI Inc. understands that different people may have different preferences in terms of communication, sustainability control, etc. so some features are designed to be optional and can be turned on and off via "settings" function in the Application.

This includes, for example, using push notifications to send you notifications. When you first start using the Application, you will be asked if you want to enable these features in your settings menu. You can also activate and deactivate these features later. The same applies, for example, to emails with which EZSpeech can remind you to carry out exercises.

10. Recipients of Personal Data

10.1. We can transmit your personal data collected via application to the following processors in accordance with Article 28 of the GDPR, who support us in operating the application and are providing the services:

Surname	Seat	Function	Processed Personal Data
Amazon Web Services Inc.	410 Terry Avenue North, Seattle, WA 98109-5210	Cloud Platform Provision of the server and database resources for the operations of EZSpeech Application	Inventory Data, Contact Data, Health Data, Biometric Data, Billing Data, Data to improve the product
Stripe	354 Oyster Point Boulevard, South San Francisco California 94080	Stripe	Processing of the payment

11. Use of cookies

When you use the Application, we may utilize cookies for authorization purposes. Cookies are small text files that are placed on your device's browser when you interact with our application. These cookies serve as a means of securely identifying and authenticating you as a user.

You have the option to manage and control cookies through your browser settings. You can choose to block or delete cookies, but please be aware that this might impact the functionality of the App, as certain features rely on cookies for proper operation.

12. Data retention

We will retain your personal data only for as long as it is necessary to fulfill the purpose for which it was collected, as it is outlined in this Data Protection Declaration. The specific retention periods may vary based on the type of data and the purposes for which it is being processed. Generally, we will retain your data for the following retention periods:

- **Intended Use of the Application:** We will retain your data as long as your account is active and for a reasonable period thereafter, in case you choose to reactivate your account.
- **Technical Functionality and Application Development:** We will retain data necessary to ensure the technical functionality, user-friendliness and continued development of the Application.
- **Legally Prescribed Processing Purposes:** We will retain necessary data to fulfill legal obligations, including billing to health insurance companies, compliance with Medical Device Regulation, and defense of our legal claims, in accordance with applicable regulations.
- **Research and Development:** Aggregated and pseudonymized data used for research and development purposes will be retained for a period necessary to conduct analysis and contribute to scientific advancements.
- **Billing data:** Your billing data, including activation code and associated information, will be retained for the duration of billing and accounting purposes.

After the retention period expires, your personal data will be securely deleted or anonymized in a manner that ensures it cannot be linked back to you.

If you have questions regarding specific retention periods for certain types of data, or if you wish to request deletion of your data, please contact our Data Protection Officer at the provided contact information in Section 2.

13. Data Security Measures

We take data security seriously and have implemented a range of technical and administration measures to safeguard your personal data against unauthorized access, loss, manipulation and disclosure. These measures are designed to ensure confidentiality, integrity and availability of your data. Some of the security measures we have in place include:

- **Encryption:** We use encryption techniques to protect the transmission of data between your device and our servers. This helps prevent unauthorized parties from intercepting your data during transmission.
- **Access control:** Access to your personal data is restricted to authorized personal and trusted third-party service providers who require access for legitimate purposes. Access controls are regularly reviewed and updated as needed.
- **Data minimization:** We only collect and retain personal data that is necessary for the purposes outlined in this Data Protection Declaration. Unnecessary data is minimized to reduce the risk associated with data processing.
- **Anonymization, pseudonymization and aggregation:** Where feasible, we use techniques to anonymize, pseudonymize and aggregate data, ensuring that individual users can not be directly identified in research and analysis.
- **Regular Audits:** We conduct regular internal audits and assessments of our data processing practices to identify and address any vulnerabilities and risks.
- **Employee Training:** Our employees and authorized personnel are trained on data protection and security practices, ensuring that they understand their responsibilities and obligations.

Despite our efforts to ensure data security, it's important to note that no method of data transmission or storage is completely foolproof. However, we continually strive to enhance our security measures to protect your data to the best of our abilities.

If you suspect unauthorized access or have concerns about the security of your personal data, please contact our Data Protection Officer immediately using the contact information provided in Section 2.

14. International Data Transfer

In certain cases, your personal data may be transferred to and processed in countries outside the European Economic Area (EEA). These international data transfers are conducted in compliance with applicable data protection regulations and with the necessary safeguards to ensure the security and protection of your data. When we transfer your data internationally, we adhere to one or more of the following measures:

- **EU Standard Contractual Clauses:** We may use contracts approved by the European Commission that include standard contractual clauses to ensure an adequate level of data protection during international transfers.
- **Approved Codes of Conduct or Certification Mechanism:** If applicable, we may rely on approved codes of conducts or certification mechanisms that provide appropriate safeguards for international data transfers.
- **Binding Corporate Rules:** In case involving transfers within our corporate group, we may implement binding corporate rules that ensure consistent data protection practices across the group's entities
- **Recipient's Adequacy:** We may transfer data to countries that have been recognized by the European Commission as providing an adequate level of data protection.
- **User Consent:** For certain transfers, we may seek your explicit consent to proceed with the international data transfer, ensuring that you are fully informed and have the opportunity to exercise control over your data.

15. Update to this Data Protection Declaration

At Mila4AI we are committed to ensuring the protection of your privacy and data rights. As technology and regulation evolve, we may need to update our Data Protection Declaration to reflect those changes. If any substantial changes are made to this Data Protection Declaration, we will provide you with notice through prominent notification within the Application or via the email address associated with your account.

EXPLICIT CONSENT

By using the EZSpeech Digital Speech Therapy Application ("the App"), you acknowledge and agree to the processing of your personal data as outlined in this Data Protection Declaration. Your explicit consent forms the legal basis for the collection, processing and use of your data.

You have the right to withdraw your consent at any time by following procedures outlined below.

Consent:

I [USER NAME] / the parent or legal guardian of [CHILD USER NAME] as hereby give my explicit consent to the processing of personal data of [USER NAME] for the purposes outlined in this Data Protection Declaration, including:

- **Intended use of the Application:** I consent to the processing of my personal data for the intended use of the App, which involves provision of speech therapy exercises, personalized content and parameters, progress tracking to improve speech and language abilities.
- **Technical Functionality and Application Development:** I consent to the processing of my personal data for maintaining technical functionality, user-friendliness, and further development of the App, ensuring optimal user experience.

- **Legally Prescribed Processing Purposes:** I consent to the processing of my data as required for legally prescribed purposes, such as billing, compliance with medical product laws and defense of claims.
- **Research and development:** I consent to the processing of anonymized, pseudonymized and aggregated data for research and development purposes to enhance therapy programs' quality and contribute to scientific research.
- **International Data Transfers:** I consent to the transfer of my data to countries outside the European Economic Area (EEA) as declared in Section 14 of Data Protection Declaration.

Withdrawal of consent:

I understand that I have the right to withdraw my consent at any time by contacting Data Protection Officer using contact information in Section 2.

By providing this explicit consent, I affirm that I have read and understood this Data Protection Declaration and I agree to this terms.

Record Release

Activity	Date	Name (Role)
Creation	2023-07-11 09:13:00	Firouza Eshonova