

LANGaware Software as a Service

Privacy Policy

New Version – March 2026

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.

1. 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.
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2. 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.

3. Collecting and Using Personal Data

We collect the following categories of personal data:

| Data Subject | Category | Explanation | Source |
|----------------------------------|---------------|--|---|
| User providing speech sample (*) | Pseudonym | Pseudonymous identifier that allows us to store information without association with the User's name, but accessible by the Organization | Auto-generated when User uses the Service |
| | Date of birth | — | |

| Data Subject | Category | Explanation | Source |
|--|-----------------------|---|---|
| User providing speech sample (*) | | | The User or User's Organization |
| User providing speech sample (*) | Native language | — | The User or User's Organization |
| User providing speech sample (*) | Gender | — | The User or User's Organization |
| User providing speech sample (*) | Speech samples | Speech samples the User provides to the Service | The User |
| User providing speech sample (**) | Contact information | Physical address, email, phone numbers, or other contact information | The User |
| User providing speech sample (**) | Diagnosis Information | Diagnosis information from the User's Organization if the Organization elects to provide it | The User's Organization |
| Permitted User or User accessing Service (*) | Usage data | Data relating to the device used and data describing use of our Service | Automatic collection from the User's Device |

() Required, (*) Optional

4. Use of Personal Data

The Langaware uses personal data for the following purposes:

- To provide the Service and deliver assessment results
- To ensure security and availability of the Service
- To communicate with users regarding the Service
- To facilitate users' access to assessment results

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.
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5. Cookies and Tracking Technologies

Our Service does not employ cookies or similar tracking technologies.

6. 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, we retain data only for as long as necessary to fulfill the purposes for which it was collected:

- **Account and Contact Data (Permitted Users):** Retained for as long as the account is active. Upon account deletion, data is removed within 30 days unless legal obligations require longer retention.
 - **Service Provision Data (Speech Samples, Diagnosis for Assessment):** Retained for the duration necessary to deliver the assessment result to the User.
 - **Improvement Data (Speech Samples, Diagnosis used for R&D):** Retained for a period of 5 years or until the User withdraws their consent, whichever comes first. After this period, data is either deleted or fully anonymized.
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7. Location of Personal Data Processing

We process and retain personal data in data centers located based on the User's region. For Users in the United States, processing takes place in the US under HIPAA. For Users in the EEA or UK, personal data is retained and processed within the European Union under GDPR.

In case personal data is accessed from or transferred to a region outside the User's location (e.g., for technical support), we have put in place appropriate safeguards to ensure that personal data is properly protected in accordance with applicable law. Those safeguards include the use of Standard Contractual Clauses (SCCs) and necessary technical measures.

8. 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.

9. 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.

10. 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.

11. 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.

12. 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. 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.
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13. 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 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 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) may request that we send them a copy of their personal data in a common portable format of their choice.
- **Restriction** - The User(s) may 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. If a User is in Switzerland: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>. If in the United Kingdom: <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.

14. 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 support@langaware.com
- By visiting us at <https://www.langaware.com/contact>
- Data Protection Officer: Alexandros Nousias, Alexandros.Nousias@gmail.com