

Sound Genetics App Privacy Policy

Sound Genetics, Inc values your trust and wants you to be familiar with how we collect, use, retain, and disclose information that we collect through our Sound Genetics mobile application. We provide the App using our acoustic bioengineering technology. The App helps you manage and secure your login information by allowing you to access your 2FA codes using only your voice.

PERSONAL INFORMATION

“Personal Information” is information that identifies you as an individual or relates to an identifiable individual. The App collects Personal Information, including:

- Telephone number
- **Recording of your voice and your unique voice signature:** When you choose to create a voice signature using the App, we will record your voice and create an algorithm of the sound of your voice. This algorithm is your unique voiceprint or “voice signature” and may be considered sensitive information. Your voice signature will identify you, and we will retain and use it to authenticate your identity each time you use the App. Our use, disclosure, and retention of your voice signature is limited, as specifically described [here](#).
- 2FA codes associated with your device
- Approximate location derived from IP address
- Information collected automatically [as described in the “Information Collected Automatically” section below](#).
- Device ID
- Your device’s microphone, camera, and stored photos, if you give Sound Genetics permission to access them.

Collection of Personal Information

We and our service providers collect Personal Information through the App, for example, when you create a voice signature and provide your phone number. We may also collect Personal Information automatically as described in the “Information Collected Automatically” section below.

We need to collect Personal Information to provide the App's services to you. If you do not provide the information requested, we may not be able to provide the App's services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the App, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Use of Personal Information

Use of Your Voice Signature: Your voice signature will be used for only two purposes: (1) authenticating your identity each time you use the App; and (2) internal improvements to/development of the company's voice signature/acoustic bioengineering technology.

We and our service providers use Personal Information for the following purposes:

1. Providing the functionality of the App and fulfilling your requests.

- To provide the App's functionality to you, such as arranging access to your account and providing you with related customer service.
- To respond to your inquiries and fulfill your requests.
- To send administrative information to you, including information regarding the App and changes to our terms, conditions, and policies.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

2. Providing you with our newsletter and/or other marketing materials.

- To send you marketing communications that we believe may be of interest to you, including information about our services, new products, and other news about our company.
- To send you SMS text messages. Please keep in mind that message and data rates may apply. You should check with your mobile service provider for applicable data rates. At any time, you may text back "HELP" for further information regarding SMS/text messages.

We will engage in this activity with your consent or, as applicable, where we have a legitimate interest.

3. Analyzing Personal Information for business reporting and providing personalized services.

- To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve the App.
- To better understand your interests and preferences, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
- To better understand your preferences so that we can deliver content via the App that we believe will be relevant and interesting to you.

We will provide personalized services based on our legitimate interests, and with your consent to the extent required by applicable law.

4. Aggregating and/or anonymizing Personal Information.

- We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.

We engage in these activities based on our legitimate interest.

5. Accomplishing our business purposes.

- For data analysis, for example, to improve the efficiency of the App.
- For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements.
- For fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
- For developing new products and services.
- For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures.
- For identifying usage trends, for example, understanding which parts of the App are of most interest to users.
- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users.

- For operating and expanding our business activities, for example, understanding which parts of the App are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, based on our legitimate interest, and/or with your consent, as applicable.

Disclosure of Personal Information

Disclosure of Your Voice Signature: We will not disclose your voice signature to any third party apart from our trusted service providers, for example, service providers who help us store your voice signature, unless: (1) You or your legally authorized representative provide consent to such disclosure; (2) The disclosure is required by local, state/provincial, or federal law; or (3) The disclosure is required pursuant to a valid warrant or subpoena.

We disclose Personal Information:

- **To our third-party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as app hosting, data and audio analysis, payment processing, security and fraud prevention, information technology and related infrastructure provision, customer service or related benefits, email delivery, auditing, and other services.

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - This may include laws outside your country of residence.
- **To cooperate with public and government authorities.**
 - To respond to a request or to provide information we believe is necessary or appropriate.
 - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
 - For example, when we respond to law enforcement requests and orders or provide information that we believe is important.

- **For other legal reasons.**
 - To enforce our terms and conditions;
 - To protect our operations;
 - To protect our rights, privacy, safety, or property, and/or that of you, or others.
 - **In connection with a sale or business transaction.**
 - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.
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INFORMATION COLLECTED AUTOMATICALLY

We automatically collect certain information from you when you use the App, including to recognize you as you use or return to the App, to understand how the App is used, to optimize user engagement with the App, and to improve and enhance your experience. We and our service providers may collect information automatically in a variety of ways:

- **Your device.** Certain information is collected automatically through your device, such as your screen resolution, operating system, device manufacturer and model, and language. We use this information to ensure that the App functions properly.
- **Your use of the App.** When you download and use the App, we and our service providers track and collect App usage data including content viewed, features used, and the dates and times of your interactions with the App (including when your device accesses our servers), and what information and files have been downloaded to the Mobile App based on your device number. We use this information to understand how users engage with the App and to improve the App experience.
- **IP Address.** Your IP Address is a number that is automatically assigned to your device by your Internet Service Provider. An IP Address may be identified and logged automatically in our server log files whenever a user accesses the App, along with the time of the visit and the pages visited. We use IP Addresses for purposes such as calculating usage levels, diagnosing server problems, and administering the App. We may also derive your approximate location from your IP Address.

- **Physical Location.** We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we may not be able to provide you with the applicable personalized services and content.

We may use and disclose information collected automatically for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat the information as Personal Information under applicable law, such as under Canadian law, we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy. In some instances, we may combine information collected automatically with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

DATA SECURITY

We use commercially reasonable physical, organizational, technical, and administrative measures designed to protect Personal Information within our organization. For example, we encrypt your voice signature. Authorized personnel will have access to your Personal Information as necessary for the purposes described in this Privacy Policy, including for technical support and to provide customer service. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

CHOICES AND RIGHTS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from:

- Receiving SMS/text messages from us. If you no longer want to receive SMS/text messages from us on a going-forward basis, you may opt out by texting back "STOP."

In each case, please make clear in your request what you are opting out from. We will try to comply with your request as soon as reasonably practicable. Please note that if you opt out

of receiving marketing related messages from us, we may still send you important administrative messages, from which you cannot opt out.

Your Personal Information Rights

Deletion of Your Voice Signature: We will delete your voice signature at any time upon your request, but your voice signature is not automatically deleted when you delete your Sound Genetics app account. To delete your voice signature, email us at support@soundgeneticsinc.com

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to, opt out of, or withdraw your consent to the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us in accordance with the “Contacting Us” section below. We will respond to your request consistent with applicable law.

In your request, please make it clear what Personal Information your request relates to and the specific nature of your request. For your protection, we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

FOR EEA/UK RESIDENTS: You may also lodge a complaint with a data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of EEA data protection authorities is available at <https://ec.europa.eu/newsroom/article29/items/612080>, and the UK Information Commissioner’s Office’s contact details can be found at <https://ico.org.uk/global/contact-us/>.

DATA RETENTION AND DELETION

We retain Personal Information, including your voice signature, for as long as needed or permitted in light of the purpose(s) stated in this Privacy Policy and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the App's services to you, for example, for as long as you have an account with us or keep using the App;
- Whether there is a legal obligation to which we are subject, for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them;
- Whether retention is advisable in light of our legal position, such as in regard to applicable statutes of limitations, litigation, or regulatory investigations.

We will retain your voice signature for as long as needed to verify your identity, for the life of your Sound Genetics account, or until you withdraw your consent, but in any event for not more than 3 years after your last interaction with the Sound Genetics app, unless retention is otherwise required by law or legal process, consistent with applicable law.

We will destroy or dispose of your Personal Information, including your voice signature, as required by applicable law. For example, we may destroy electronic records of your voice signature through such processes as overwriting magnetic media, degaussing, or physical destruction, and we may dispose of paper records by such processes as shredding or incineration.

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the App links. The inclusion of a link on the App does not imply endorsement of the linked site or service by us or by our affiliates. Please note that the App may include the ability to access and submit certain information directly to an application platform, such as Apple's App Store or Google Play. Such information is submitted by you directly to such third parties and this Privacy Policy does not apply to any such information submitted by you.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Meta, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the App.

Please note that the Properties may include the ability to access and submit (including, for example, via a third-party software application or service that is available through or in connection with a Property) certain information directly to third parties, such as Facebook, or to any application platform, such as Apple’s App Store or Google Play. Such information is submitted by you directly to such third parties and this Privacy Policy does not apply to any such information submitted by you.

USE OF THE APP BY MINORS

The App is not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the App you understand that your information will be transferred to jurisdictions outside of your province or country of residence, including the United States, which may have data protection rules that are different from those of your province or country. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Information.

SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the App or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

The “LAST UPDATED” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the App.

Contact Us

For any questions, contact us at: support@soundgeneticsinc.com