

Privacy Policy

Effective Date: April 26, 2026

This Privacy Policy (“Policy”) explains how **JDIV Studios LLC** (the “**Company**,” “**we**,” “**us**,” or “**our**”) collects, uses, and protects Personal Data in connection with its child-directed speech therapy application (the “**App**”).

The App is designed **for children** to practice and improve speech and language skills, and may be used only with the involvement and consent of a parent or legal guardian (“**Parent**”). Protecting children’s privacy is a core principle of the App’s design.

DEFINITIONS

- “**Controller**” means the natural or legal person that determines the purposes and means of processing Personal Data.
- “**Personal Data**” means any information relating to an identified or identifiable individual.
- “**Services**” means the App’s speech-therapy features, including microphone use for speech practice and limited usage analytics.
- “**Subscriber**” means the Parent or legal guardian who consents to a child’s use of the App and accepts the Terms.
- “**Child**” means a user under the age defined as a child by applicable law (including under 13 in the United States).

CHILDREN’S PRIVACY NOTICE

The App is **directed to children** and subject to children’s privacy laws, including the **U.S. Children’s Online Privacy Protection Act (COPPA)** and **GDPR-K** in the EU and UK.

We:

- Collect **only the minimum data necessary** to provide speech-therapy functionality
- Do **not** permit advertising or behavioral tracking
- Provide Parents with control over their child’s information

If we become aware that we have collected Personal Data from a child without required parental consent, we will delete it promptly.

DATA WE COLLECT

Information We Do Not Collect

The Company does **not** knowingly collect:

- Advertising identifiers
- Behavioral or targeted advertising data
- Precise geolocation data
- Social media account information
- Contact information directly from children
- Voiceprints or biometric identifiers beyond speech audio used solely for therapy

Audio Recording and Microphone Use (Local-Only)

The App uses the device microphone to allow children to **record speech for therapy exercises**.

Important disclosures:

- Audio recordings are **processed locally on the device only**
- Audio recordings are **not transmitted to Company servers**
- Audio recordings are **not shared with third parties**
- Audio recordings are **not used for advertising, profiling, or marketing**
- Audio recordings are used **solely** to provide speech-therapy feedback and progress tracking

Retention:

Audio recordings remain stored locally on the device and are retained **only until the child's account is deleted**, at which time they are removed.

Usage and Progress Data

We may collect limited information about App use, such as:

- Completed exercises
- Session frequency or duration
- Progress indicators related to speech development

This information is used exclusively to:

- Provide and improve speech-therapy features
- Track learning progress over time
- Maintain app reliability and security

Parent or Guardian Information

We may collect limited information from Parents, including:

- Parent or guardian email address
- Consent confirmation
- Communications related to the child's use of the App

DATA SOURCES AND PROCESSING

The Subscriber directly provides most Personal Data we collect. Limited technical data may be processed through service providers such as **Firebase** and **Cloudflare** solely to support App functionality and security.

The Company processes Personal Data only where:

- Necessary to provide the Services
- Required for security or operational purposes
- Required by law
- Based on valid parental consent

Consent may be withdrawn at any time.

SHARING OF PERSONAL DATA

The Company:

- Does **not** sell children's Personal Data
- Does **not** share audio recordings
- Does **not** use third-party advertising or tracking SDKs

Personal Data may be disclosed only:

- To service providers supporting App functionality under strict confidentiality obligations
- Where required by law or legal process

- To protect the safety, rights, or security of users or the App

DATA RETENTION

- Audio recordings: retained **locally on the device only** until account deletion
- Account and progress data: retained until deletion is requested or required by law

When Personal Data is no longer required, it is deleted or securely isolated.

SECURITY OF PERSONAL DATA

The Company uses appropriate technical and organizational measures to protect Personal Data, including:

- Device-level protections
- Access controls
- Secure infrastructure
- Regular security assessments

No system is completely secure, but we continuously work to safeguard user information.

PARENTAL RIGHTS

Parents and legal guardians have the right to:

- Review Personal Data collected from their child
- Request deletion of the child's account and associated data
- Withdraw consent at any time
- Contact us with privacy-related questions or concerns

Requests may be submitted to:

josephdaloisioiv@jdivstudios.com

INTERNATIONAL USE

The App may be used globally. Because audio recordings are processed locally and not transmitted, children's speech data is not transferred across borders.

Any other Personal Data processed internationally is protected using legally recognized safeguards where required.

MODIFICATIONS TO THIS POLICY

The Company may update this Policy from time to time. Material changes will be reflected by updating the effective date and, where required, providing notice through the App or app-store listing.

CONTACT INFORMATION

If you have questions or concerns about this Policy or children's privacy, please contact:

JDIV Studios LLC

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