

# Privacy

Your privacy is important to ChatterBaby. Because of that, we've developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your information on ChatterBaby.org (the "Site") and the services, features, content, products, hardware or applications we offer (collectively with the Site, the "Services"). We receive information about you from various sources, as discussed below, including: (i) if you register for the Site and the Services, through your user account on the Services (your "Account"); (ii) your use of the Services generally; and (iii) from third party websites and services. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Please take a moment to familiarize yourself with our Privacy Policy and let us know if you have any questions.

**Consent.** By using the ChatterBaby app you consent to our privacy policy and to participate in our research study ([bit.ly/cbconsent](http://bit.ly/cbconsent)).

## **What Does This Privacy Policy Cover?**

This Privacy Policy covers the treatment of personally identifiable information ("Personal Information") gathered when you are using or accessing the Services. Personal Information is data that can be used to identify or contact a single person. This Privacy Policy also covers our treatment of any Personal Information that our business partners share with us or that we share with our business partners.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party websites, services and applications ("Third Party Services") that you elect to access through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

## **What Information Do We Collect?**

### Collection and Use of Personal Information:

You may be asked to provide your Personal Information when you use the Site or Services. We may combine it with other information to provide and improve our Services. You are not required to provide the Personal Information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our Services or respond to any queries you may have.

Some examples of the types of Personal Information ChatterBaby may collect and how we may use it include, but are not limited to:

- When you create an Account, use a ChatterBaby product, download a software update, contact us or participate in an online survey or data donation, we may collect a variety of information, including your name, age, mailing address, phone number, email address, contact preferences, credit card information, username and password. You acknowledge that this information may be personal to you, and by creating an Account on the Services and providing Personal Information to us, you allow others, including us, to identify you and therefore may not be anonymous.

- When you set up ChatterBaby, you'll be asked several questions including child's name, e-mail, child's date of birth, week of delivery and gender. This information is used to collect, measure, and process autism risk.
- We will process the audio recordings from the device. We will also process any video data you may upload, extracting acoustic features. We may also process information from the Services so that we can send you alerts when something happens. We will store this data indefinitely.
- When you share your content with family and friends using the Services, send gift certificates and products, or invite others to participate in the Services, we may collect the information you provide about those people such as name, mailing address, email address, and phone number. ChatterBaby will use such information to fulfill your requests, provide the relevant Services, or for anti-fraud purposes.
- In addition, some features of the Services allow you to provide content to the Services, such as written comments. All content submitted by you to the Services may be retained by us indefinitely, even after you terminate your Account. We may continue to disclose such content to third parties in a manner that does not reveal Personal Information, as described in this Privacy Policy.

You are responsible for protecting user personal information you receive or process and complying with all relevant legal requirements when you use the Services. This includes applicable data protection and privacy laws that govern the ways in which you can use a user's information. Such laws may require that you post, and comply with, your own privacy policy, which must be accessible to ChatterBaby users you interact with and compatible with this policy and ChatterBaby's Terms of Use. For more information on the General Data Protection Regulation, see more resources at <https://gdpr-info.eu> and <http://gdprandyou.ie>.

#### How We Use Your Personal Information:

- The Personal Information we collect allows us to keep you posted on our latest Services, product announcements, software updates, and upcoming events. We also use Personal Information to help us create, develop, operate, deliver, and improve our products, Services, content, and for loss prevention and anti-fraud purposes.
- We may use your contact information to send you information about our Services, but only rarely when we feel such information is important. If you don't want to be on our mailing list, you can opt out anytime by unsubscribing from these messages through your Account settings, although we, regardless, reserve the right to contact you when we believe it is necessary, such as the important notices described below.
- From time to time, we may use your Personal Information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with ChatterBaby, you may not opt out of receiving these communications.
- We may also use Personal Information for internal purposes such as auditing, data analysis, and research to improve our products, Services, and customer communications.

#### Collection and Use of Non-Personal Information:

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. Some

examples of non-personal information that we collect and how we may use it include, but are not limited to:

- We may collect information such as language, zip code, area code, referrer URL, location, and the time zone where the Services are used so that we can better understand customer behavior and improve our Services.
- We collect data from the voluntary survey which includes medical history and autism risk factors, which we will use to understand the relationship between vocal patterns and developmental disorders.

This information is aggregate and considered Aggregate Information (defined below), and used to help us provide more useful information to our customers and to understand which parts of our products, and services are of most interest. Aggregated Information is considered non-personal information for the purposes of this Privacy Policy. If we do combine non-personal information with Personal Information the combined information will be treated as Personal Information for as long as it remains combined.

### Collection and Use of Other Information:

#### IP Address Information and Other Information Collected Automatically:

We automatically receive and record information from your web browser when you interact with the Services, including your IP address and cookie information. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Services (e.g., what links you have clicked on).

Generally, the Services automatically collect usage information, such as the number and frequency of visitors to the Site. We also collect statistical information about how both unregistered and registered users, collectively, use the Services (“Aggregate Information”). Some of this information is derived from Personal Information. This statistical information and Aggregate Information is not Personal Information and cannot be tied back to you, your Account or your web browser. This information may be used to improve the relevancy of results provided by our Services and enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

We may collect some device-specific information if you access the Services using a mobile device. Device information may include but is not limited to unique device identifiers, network information, and hardware model, as well as information about how the device interacts with our Services.

#### Information Collected Using Cookies:

Cookies are pieces of text that may be provided to your computer through your web browser when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you visit the Site and otherwise use the Services through the Internet.

Our cookies do not, by themselves, contain Personal Information, and we do not combine the general information collected through cookies with other Personal Information to tell us who you are. As noted, however, we do use cookies to identify that your web browser has accessed aspects of the Services and may associate that information with your Account if you have one.

Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies active, because they enable you to take advantage the most attractive features of the Services.

This Privacy Policy covers our use of cookies only and does not cover the use of cookies by third parties. We do not control when or how third parties place cookies on your computer. For example, third party websites to which a link points may set cookies on your computer.

#### Information Related to Advertising and the Use of Web Beacons:

To support and enhance the Services, we may serve advertisements, and also allow third parties' advertisements, through the Services. These advertisements are sometimes targeted and served to particular users and may come from third party companies called "ad networks." Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms.

Advertisements served through the Services may be targeted to users who fit a certain general profile category and may be based on anonymized information inferred from information provided to us by a user, including Personal Information (e.g., gender or age), may be based on the Services usage patterns of particular users, or may be based on your activity on Third Party Services. We do not provide Personal Information to any ad networks for use outside of the Services.

To increase the effectiveness of ad delivery, we may deliver a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network's servers, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site.

The United States, European Economic Area ("EEA") Member States, and other countries all have different laws. When your information is moved from your home country to another country, the laws and rules that protect your personal information in the country to which your information is transferred may be different from those in the country in which you live. For example, the circumstances in which law enforcement can access personal information may vary from country to country. In particular, if your information is in the US, it may be accessed by government authorities in accordance with US law.

To the extent that ChatterBaby is deemed to transfer personal information outside of the EEA, we rely separately, alternatively, and independently on the following legal bases to transfer your information:

#### Model Clauses

The European Commission has adopted standard contractual clauses (also known as Model Clauses), which provide safeguards for personal information that is transferred outside of Europe. We often use these Model Clauses when transferring personal information outside of Europe.

#### Privacy Shield

ChatterBaby does not participate in Privacy Shield at this time.

## Information Regarding Your Social Networks:

Occasionally, you can use your Account on our Services to interact with your accounts on other services, such as Facebook or Twitter. In addition to using your third party account credentials to sign in to the Services, you can access posting and sharing tools on the Services, including a “share” button that allows you to post information to your social networks outside of the Services (“Share”). Please note that these tools may be operated by Third Party Services.

By using these tools, you acknowledge that some Third Party Account Information may be transmitted into your Account with us, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy. Additionally, when you use one of these sharing tools, the Third Party Service that operates the tool may be collecting information about your browser or online activity through its own tracking technologies and subject to its own privacy policy. Lastly, when you use these tools, some of your information from the Services (such as the reservation information you selected to Share) may be shared with the Third Party Service and others. Therefore, we encourage you to read the privacy policies and other policies of the social networks you use in connection with the Services. **How, and With Whom, Is My Information Shared?**

The Services are designed to help you share information with others. As a result, some of the information generated through the Services is shared publicly or with third parties. If we process your information based on our legitimate interests as explained above, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or changing your account settings.

## Public Information About Your Activity on the Services:

Some of your activity on and through the Services is public by default. This may include, but is not limited to, content you have posted publicly on the Site or Social Media or otherwise through the Services.

Registered users may have some of this information associated with their Accounts. Unregistered users will not have this association, but information concerning their use of the Services (such as what pages they have visited) may be tracked anonymously through the use of cookies and stored by us.

Please also remember that if you choose to provide Personal Information using certain public features of the Services, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Services.

You are responsible for protecting user personal information you receive or process and complying with all relevant legal requirements when you use the Services. This includes applicable data protection and privacy laws that govern the ways in which you can use a user’s information. Such laws may require that you post, and comply with, your own privacy policy, which must be accessible to ChatterBaby users you interact with and compatible with this policy and ChatterBaby’s Terms of Use. For more information on the General Data Protection Regulation, see more resources at <https://gdpr-info.eu> and <http://gdprandyou.ie>.

## IP Address Information:

While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

#### *Information You Elect to Share:*

You may access other Third Party Services through the Services, for example by clicking on links to those Third Party Services from within the Site. We are not responsible for the privacy policies and/or practices of these Third Party Services, and you are responsible for reading and understanding those Third Party Services' privacy policies. This Privacy Policy only governs information collected on the Services.

#### *Aggregate Information:*

We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. Aggregate statistics of all surveys are provided after participants contribute data. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non Personal Information about you that they have independently developed or acquired.

#### *Email Communications with Us:*

We may communicate with you requesting participation in our research study, or presenting services we may feel will be of interest to you.

#### *User Profile Information:*

User profile information including your username and other information you enter may be displayed to other users to facilitate user interaction within the Services. We will not directly reveal user email addresses to other users.

#### *Shipping and Billing Information:*

We will not collect billing information, as our service is free.

#### *Information Shared with Our Service Providers:*

We employ and contract with people and other entities that provide us with certain services (our "Service Providers"). We may need to share Personal Information with our Service Providers in order to provide products or services to you. We provide these Service Providers with only the information they need to perform their services and work closely with them to ensure that your privacy is respected and protected. Unless we tell you differently, our Service Providers do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Service Providers.

#### *Information Shared with Our Business Affiliates:*

In certain situations, businesses or third-party websites and products we're affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). In other situations, you may be able to use your Account on our Services to interact with your accounts on other services. We will share your Personal Information with these affiliated business only

to the extent that it is related to such transaction or service. One such service may include the ability for you to automatically transmit content and/or information in third party accounts to your Services profile or to automatically transmit information in your Services profile to your third-party account; for example, by using Amazon Alexa. We have no control over the policies and practices of third-party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies. You hereby consent to our sharing of Personal Information with such businesses.

We disclose information that we collect through the Services in the following circumstances:

–To our advertising and marketing partners in order to promote our Services, including joint marketing partners and affiliates.

–To a potential or actual acquirer, successor, or assignee as part 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 bankruptcy or similar proceedings).

–If required to do so by law or in the good faith belief that such action is appropriate (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

–We will never sell your Personally Identifiable Information, but we may sell aggregated, anonymized forms of information to third parties.

–We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services, based on information relating to your access and use of the Services and other websites or online services. To do so, these companies may place or recognize a unique cookie on your browser (including through use of pixel tags). To learn more about this practices, and to learn about your choices in connection with it, please visit the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising at [www.aboutads.info](http://www.aboutads.info), or the Network Advertising Initiative at [www.networkadvertising.org](http://www.networkadvertising.org).

#### *Information Disclosed Pursuant to Business Transfers:*

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

#### *Information Disclosed for Our Protection and the Protection of Others:*

We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user

support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

### Information We Share With Your Consent:

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

### **Is Information About Me Secure?**

We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

We otherwise store all of our information, including your IP address information, using industry-standard techniques. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

### **What Information of Mine Can I Access?**

If you are a registered user, you can access information associated with your Account by logging into the Services. Registered and unregistered users can access and delete cookies through their web browser settings.

*California Privacy Rights:* Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: 760 Westwood Plaza, Suite 28-224, Los Angeles, CA 90095.

### Children's Privacy

You must be at least eighteen (18) years of age to register for and use the Service. Our products and services are not directed to children under 13, and we request that they not provide personal information through the Services.

### Compliance With Laws

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our services.

### Changes to our Privacy Policy

We may amend or update this policy from time to time. If we believe that the changes are material, we'll let you know by doing one (or more) of the following: (i) posting the changes on or through the Services, (ii) sending you an email or message about the changes, or (iii) posting an update in the version notes on the Apps' platform. We encourage you to check back regularly and review any updates. Your continued use of our products and services after any change in this Privacy Policy will constitute your acceptance of the change.



## **How Can I Delete My Account?**

Should you ever decide to delete your Account, you may do so by emailing [arianaanderson@mednet.ucla.edu](mailto:arianaanderson@mednet.ucla.edu). If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, your research information is frequently downloaded and de-identified within our research database (removing your email and baby's date of birth). Because of this, it is not possible to remove all information you have ever provided to us, because we cannot identify which sample is from you personally.

## **What Choices Do I Have Regarding My Information?**

- You can use many of the features of the Services without registering, thereby limiting the type of information that we collect.
- You can always opt not to disclose certain information to us, even though it may be needed to take advantage of some of our features.
- You can delete your Account. Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion will remain stored by us and may be publicly accessible.

## **What Happens When There Are Changes to this Privacy Policy?**

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we collect or use information, we will notify you by posting an announcement on the Services or sending you an email. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted. If we decide to change our privacy policy, we will post the changes at this location, and we will note the date it was last modified.

This policy was last modified on Wednesday, May 23, 2018.

## **What If I Have Questions or Concerns?**

If you have any questions or concerns regarding privacy using the Services, please send us a detailed message to [arianaanderson@mednet.ucla.edu](mailto:arianaanderson@mednet.ucla.edu). We will make every effort to resolve your concerns.

**Effective Date:** December 27, 2017