

# Privacy Policy

Effective date: May 8, 2026 · Version 1.0

This policy explains how **Sing for Speech® via Ossia Music Therapy** collects, uses, and protects your personal information when you use our music-based therapeutic speech program.

## Summary — what this policy means in plain language

- **We do not sell your data.** Your personal information is never sold to third parties, advertisers, or data brokers.
- **Clinicians cannot see your personal data.** If a clinician referred you to the Program, they receive no access to your account, usage history, or personal information.
- **Company staff access is strictly limited.** Internal access to your data is restricted to essential technical operations only, with no behavioral profiling or marketing use.
- **Your health information stays private.** Any information relating to your speech or rehabilitation is treated as sensitive and handled with the highest level of care.
- **You are in control.** You can access, correct, or delete your data at any time by contacting us.

## 1. Who we are

**Ossia Music Therapy** ("we," "us," or "our") is the operator of Sing for Speech eProgram ("the Program"). We are headquartered in Chapel Hill, NC. For all privacy-related questions or requests, contact us at [sfs@ossiamusictherapy.com](mailto:sfs@ossiamusictherapy.com).

## 2. What information we collect

We collect only the information necessary to provide and improve the Program.

### Information you provide directly:

- Name and email address (required to create an account)
- Your role (patient/individual user or licensed clinician)
- Billing information (processed by our third-party payment processor — we do not store full card numbers)
- Any information you choose to provide in your profile or account settings

### Information collected automatically during use:

- Session activity data only when the survey at end of a lesson is submitted (which exercises were completed, session duration, completion rates)
- Device type, operating system, and browser type
- IP address and general geographic region (city/state level only, not precise location)
- Log data such as access timestamps and error reports

**We do not collect:**

- Audio or video recordings of your sessions
- Formal diagnostic or clinical assessment data
- Information from third-party social media platforms
- Precise GPS location

### 3. How we use your information

We use the information we collect solely to:

- Create and maintain your account and provide access to the Program
- Process payments and send billing-related communications
- Send you essential service notifications (account confirmations, password resets, policy updates)
- Improve the Program through aggregated, anonymized analysis of how features are used
- Respond to your support requests or inquiries
- Comply with our legal obligations

We do not use your personal information for behavioral advertising, profiling, or any purpose not listed above.

### 4. What we do not share — and with whom

We do not share your personal data, usage history, session activity, or health-related information with referring clinicians, healthcare providers, or any third party for clinical, commercial, or marketing purposes.

Specifically:

- **Clinicians and healthcare providers:** If you were referred to the Program by a speech-language pathologist or other clinician, that clinician has **no access** to your account, your session data, your progress, or any other personal information. The Program does not operate a shared clinician dashboard. Any communication about your progress with your clinician is entirely at your own discretion.
- **Company employees:** Access to your personal data within our organization is restricted to staff who require it for essential technical operations (such as resolving a technical

support issue you have raised). No employee uses your data for marketing, outreach, or behavioral analysis.

- **Advertisers and data brokers:** We do not sell, rent, or trade your personal data to any third party for advertising or commercial purposes — ever.
- **Other users:** Your account information and activity are not visible to other users of the Program.

#### **Limited circumstances in which data may be disclosed:**

- **Service providers:** We work with a small number of trusted vendors (such as our payment processor and hosting provider) who process data on our behalf under strict contractual data protection obligations. They may not use your data for their own purposes.
- **Legal requirements:** We may disclose information if required by law, court order, or to protect the rights, safety, or property of our users or the public.
- **Business transfer:** If the Company is acquired or merges with another entity, your data may be transferred as part of that transaction. We will notify you before your data becomes subject to a different privacy policy.

## **5. Health information**

Information relating to your speech, neurological condition, or rehabilitation progress is sensitive by nature. We treat all such information with the highest level of protection. We do not:

- Share health-related information with insurance companies, employers, or government agencies except where required by law
- Use health-related information to make eligibility or pricing decisions about you
- Use health-related information for marketing or profiling purposes

Please note: **Sing for Speech eProgram** is not a covered entity under HIPAA and does not operate as a healthcare provider. However, we voluntarily apply equivalent standards of care to any health-related information you share with us.

## **6. Data security**

We implement industry-standard technical and organizational measures to protect your data, including:

- Encryption of data in transit (TLS) and at rest
- Password hashing using secure algorithms (we never store plain-text passwords)
- Access controls limiting internal data access to authorized personnel only
- Regular security reviews of our systems and third-party vendors

No system can be guaranteed 100% secure. In the event of a data breach that affects your personal information, we will notify you promptly in accordance with applicable law.

## 7. Data retention

We retain your personal information for as long as your account is active. If you cancel your subscription or request deletion of your account:

- Your personal account data will be deleted within **30 days** of your request
- Aggregated, anonymized usage data (which cannot identify you) may be retained indefinitely for product improvement purposes
- Billing records may be retained for up to **7 years** as required by tax and financial regulations

## 8. Your rights and choices

You have the following rights with respect to your personal information. To exercise any of these rights, contact us at [sfs@ossiamusictherapy.com](mailto:sfs@ossiamusictherapy.com). We will respond within 30 days.

### Access

Request a copy of the personal data we hold about you.

### Correction

Ask us to correct inaccurate or incomplete information.

### Deletion

Request that we delete your account and personal data.

### Portability

Receive your data in a portable, machine-readable format.

### Objection

Object to certain uses of your data, including analytics.

### Opt-out

Unsubscribe from non-essential communications at any time.

## 9. Cookies and tracking

We use a minimal set of cookies necessary to operate the Program, including:

- **Session cookies:** Required to keep you logged in during a session. These expire when you close your browser.
- **Preference cookies:** Store your settings (such as language or display preferences) between sessions.

We do not use advertising cookies, cross-site tracking cookies, or third-party analytics that share your data outside our platform. You may disable cookies in your browser settings, though this may affect Program functionality.

## **10. Children's privacy**

The Program is intended for adults aged 18 and older (including the parent of a minor user). We do not knowingly collect personal information from anyone under the age of 18. If you believe a minor has provided us with personal information, please contact us immediately at [sfs@ossiamusictherapy.com](mailto:sfs@ossiamusictherapy.com) and we will delete it promptly.

## **11. Changes to this policy**

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. When we make material changes, we will notify you by email and by posting a notice within the Program at least **14 days** before the changes take effect. Your continued use of the Program after that date constitutes acceptance of the updated policy.

We will always maintain a version history of this policy so you can review what has changed.

## **12. Contact us**

If you have any questions, concerns, or requests relating to this Privacy Policy or your personal data, please contact:

**Sing for Speech Privacy Team**

Email: [SFS@ossiamusictherapy.com](mailto:SFS@ossiamusictherapy.com)

If you are located in the European Union or United Kingdom and believe we have not adequately addressed your privacy concerns, you have the right to lodge a complaint with your local data protection authority.

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