

Speech Tech, MB | PRIVACY POLICY

Effective as of November 8, 2023

Introduction

At Speech Tech MB, which develops and owns the CatZu mobile application, we handle your data so that neither we nor anyone else can use them to harm your interests and rights, such as your right to privacy.

This Privacy Policy describes how the CatZu mobile application collects and uses your personal information when you interact with this application and/or use CatZu websites that link to this Privacy Policy ("Websites").

We may change this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we will notify you by email if we have your email address, or through a notice on the Websites and/or App before the change takes effect.

The policy extends to:

our website: <http://cat-zu.com/>

our email: catzugame@gmail.com

Who are we and how can you contact us?

Who are we and how can you contact us?

This privacy notice aims to give you information on how your personal data is

processed by CatZu mobile application and CatZu websites. In this notice, we refer to ourselves as «we», «us», «our» or Speech Tech.

The CatZu mobile application is a product of Speech Tech MB and mention of this product in this Policy will be associated with the legal entity Speech Tech MB.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using:

our email: catzugame@gmail.com

our postal address: LT-09110 Lithuania, Vilnius, Žirmūnų g. 105-88

What data, for what purposes, based on what grounds, and how long we process the data?

We act as the controller of your personal data, as we independently decide for what purposes we need them and choose services and tools for their processing.

Speech Tech Services

Purpose: To provide an online educational products, services, content and features, including through the CatZu mobile application (the «App»), Speech Tech-controlled social media pages, Speech Tech software, and our technology (collectively the «Speech Tech Services»). Online educational products and services includes single practice with Speech Tech AI's instructions.

Data collected: Nickname, email, social networks (to accomplish registration), age and other information that we got from you.

Legal Basis: Contract/Agreement (Art. 6(1)b of GDPR)

Development of Services

Purpose: To develop, test, and improve Speech Tech Services, including, for example, content-related features, monitor and analyze trends, usage and activities in connection with our Services, send you technical notices, updates, security alerts and support and administrative messages, and to troubleshoot products and features.

To monitor and analyze trends, usage and activities in connection with our App.

Data collected: Browser and/or App information; location information (Country/Region); interests/affinities within the App; sessions (completed sessions across OS); information about your device (description of a device that is used to access the App, for example, device ID, type of OS, its version); information that is gathered about your use of the App (frequency of use, experienced problems, etc.) via cookies or similar technologies (for instance, through third party services like Firebase and Amplitude).

Legal Basis: Legitimate interest to improve the quality of our goods and services (Art. 6(1)f of GDPR)

Communication with You

Purpose: To provide and deliver the products and services you request, process transactions and send you related information, including confirmations and reminders, changes to our policies and terms, technical notices, updates, security alerts and support and administrative messages.

Data collected: Nickname, Email or social networks (if you chose to register using a social network).

Legal Basis: Legitimate interest to improve the quality of our goods and services (Art. 6(1)f of GDPR)

Marketing

Purpose: If you visit our websites or use our App, we may log information about how and when you visit, and your interactions with them, and use this information to customize product and service offerings and recommendations to you.

Data collected: Email, browser and/or app information; first name and last name (if you chose to register using a social network); nickname.

Legal Basis: Necessity to comply with our legal obligations (Art. 6(1)c of GDPR)

Legal Reasons

Purpose: To comply with applicable law or respond to valid legal process, including from law enforcement or government agencies, to investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, and to enforce or investigate potential violations of our Terms of Use or policies.

Data collected: Nickname, email, browser and/or app information

Legal Basis: Necessity to comply with our legal obligations (Art. 6(1)c of GDPR)

What Personal Data Do We Receive?

Account Information: which may include nickname, email, contact information, social networks (to accomplish registration), age.

Device Information: Information about the phones, people use when interacting with CatZu mobile application, which may include information about the speakers, microphone, camera, OS version, platform, IP address (which may be used to infer general location at a city or country level), device attributes (like operating system version and battery level), Wi-Fi information, country, region, city.

Services and Website Usage: Information about how people and their devices interact with CatZu mobile application, such as: clicks, keystrokes or actions and other user inputs that help us to understand App usage, improve product design, and suggest features, completed games and practices, how often you use the App, how long you are in the App usage time, total events, length of game sessions,

permission to use camera, times of game sessions per week and other usage information and metrics.

This also includes information about when and how people visit and interact with CatZu's websites, including what pages they accessed, their interaction with the website features, and whether or not they signed up for a CatZu mobile application.

Communications with CatZu: Information about your communications with CatZu, including relating to support questions, your account, and other inquiries.

The information covered above is de-identified and does not refer to any identified or identifiable natural person, we may use it for any business purpose, and per se does not qualify as personal data. To the extent information covered above is associated with an identified or identifiable natural person (if we, for example, start collecting identifiers that whilst linked to the information will amount to personal data under applicable law) and is protected as personal data under applicable data protection laws, it will be referred to in this Privacy Policy as "Personal Data."

Where did we get your data from?

Speech Tech Services

We may obtain personal data directly from you.

Development of Services

We may obtain personal data directly from you or from App/Browser.

Communication with You

We may obtain personal data directly from you or from App/Browser

Marketing

We may obtain personal data directly from you, or Browser (such as Mozilla Firefox, Google Chrome, or Microsoft Internet Explorer) automatically transmits some information to us every time you access content on one of our internet domains. Examples of such information include the URL of the particular Web page you visited, the IP (Internet Protocol) address of the computer you are using, or the browser version that you are using to access the website.

Legal Reasons

We may obtain personal data directly from you.

Who do we share your personal data with?

Information about these companies and their data protection practices:

Amplitude. Amplitude is a behavioral analytics product that is enabling us to see and analyze how you navigate through the App, what features you prefer the most, and how to improve your experience with the App. See more here about Amplitude's approach to privacy [here](#).

Adapty. Adapty is a low-code A/B testing of monetization mechanics and subscriber services for apps. See more here about Adapty's approach to privacy [here](#).

Appsflyer. Appsflyer is a SaaS mobile marketing analytics and attribution platform. See more here about Appsflyer's approach to privacy [here](#).

Backendless. Backendless is mBaaS is a complete backend with support for user authentication, data persistence, file storage, messaging and custom business logic. See more here about Amplitude's approach to privacy [here](#).

Bugfender. Bugfender is a log storage service for application developers. The services are provided by Beenario GmbH. Address: Tonbachstrasse 102, 72270 Baiersbronn, Germany, VAT ID: DE299463958. See more here about Pipedrive's approach to privacy [here](#).

Facebook Pixel. Facebook Pixel is an advertising tool that uses a short piece of code that is installed on your websites to track visitors. The services are provided by Facebook Ireland Ltd. Address: 1601 South California Avenue, Palo Alto, CA 94304, USA. See more about Facebook privacy policy [here](#).

FireBase. FireBase is an analytical platform owned by Google that allows us to understand the App usage and user engagement. See more about FireBase's privacy policy [here](#).

Google Docs. Google Docs is a cloud-based online text editor. The service is provided by Google LLC. Address: Google LLC, Google Data Protection Office, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA. See more here about Google's approach to privacy [here](#).

Google Drive. Google Drive is a cloud-based storage and syncing service. The service is provided by Google LLC. Address: Google LLC, Google Data Protection Office, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA. See more here about Google's approach to privacy [here](#).

Google Search Console. Google Search Console is a free service that helps to monitor, maintain, and troubleshoot site's presence in Google Search results. The service is provided by Google, Inc. Google, Inc. Address: Google, Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, California 94043, USA. See more here about Google's approach to privacy [here](#).

Mailchimp. Mailchimp is an email service provider (ESP), built for helping

businesses with email and online marketing. The services are provided by Rocket Science Group, LLC. Address: Rocket Science Group, LLC, 675 Ponce De Leon Ave # 5000, Atlanta, GA 30308, USA. See more here about Mailchimp's approach to privacy [here](#).

MailerLite. MailerLite is a service that provides clients with a means to collect email addresses and to create, send and track email promotions and other services. The services are provided by UAB "MailerLite". Residence at Mindaugo str. 1A-57, LT-03108 Vilnius, Lithuania, if Customer's billing address on the applicable Order Form is located in the EU; or (b) MailerLite, Inc., a Delaware corporation at 548 Market St PMB 98174 San Francisco, California 94104-5401 US. See more here about MailerLite's approach to privacy [here](#).

Microsoft Office 365. Microsoft Office 365 is a cloud-based subscription service that offers tools to work with documents and e-mail in apps like Excel and Outlook. The services are provided by Microsoft Corporation LLC. Address: Microsoft Corporation LLC, 1600 One Microsoft Way, Redmond, WA 98052-6399, USA. See more here about Microsoft Corporation LLC approach to privacy [here](#).

Types of Cookies

CatZu cookies

When you visit CatZu mobile application website, we send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser. We use cookies to improve the quality of our Service by storing user preferences and tracking user trends. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some CatZu mobile application website features and services will not function properly if your cookies are disabled. Cookies collect the date and time of your visit, your registration information, and other technical information.

CatZu uses persistent cookies

This means that the cookie stays on your hard drive until you delete it. You can delete our cookie at any time by following the instructions contained in your browser's help file, or by contacting the company providing your browser's technical support. Speech Tech does not use cookies to store information such as credit card numbers, telephone numbers, or any other sensitive information.

CatZu uses cookies to deliver content specific to your interests, to save your password so you don't have to re-enter it each time you visit our website, and for other purposes. CatZu uses cookies for statistical purposes, as they allow us to collect information about page views.

Retention

We retain personal data for as long as required to engage in the uses described in this Privacy Policy, unless a longer retention period is required by applicable law.

The criteria used to determine our retention periods include the following:
the length of time we have an ongoing relationship with you and provide Services to you (for example, for as long as you have an account with us or keep using our services);

whether account owners modify or their users delete information through their accounts;

whether we have a legal obligation to keep the data (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them).

Information from Third-Party Social Media Services

CatZu mobile application allows to create an account and log in to use the Service through Apple, Facebook, and Google. If you decide to register through or otherwise grant us access to a Third-Party Social Media Service, we may collect personal data that is already associated with Your Third-Party Social Media Service's account, such as First and Last name, email and profile picture.

You may also have the option of sharing additional information with us through Your Third-Party Social Media Service's account. If you choose to provide such information and personal data, during registration or otherwise, you are giving Speech Tech permission to use, share, and store it in a manner consistent with this Privacy Policy.

Your rights

Access, correct or delete

You have the right to access, correct, or delete your personal data and the right to restrict their processing, as well as the right to data portability.

Withdraw consent

If we process your data based on your consent, you have the right to withdraw your consent at any time. If you would like to exercise your right to withdraw your consent, please contact us via the above contacts.

Please keep in mind that in case of a vague access, erasure, objection request or any other request in exercise of the mentioned rights we may engage the individual in a dialogue so as to better understand the motivation for the request

and to locate responsive information. In case this is impossible, we reserve the right to refuse granting your request.

Please note that we will grant your request within 30 days after receiving it, but it may take us up to 90 days in some cases, for example for full erasure of your Personal Data stored in our backup systems – this is due to the size and complexity of the systems we use to store data.

Data Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. These include internal reviews of our data collection, storage and processing practices, and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal information.

We restrict access to personal information to Speech Tech employees, contractors, and agents who need to know that information in order to operate, develop, or improve our Services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

However, please note that no data transmission over the Internet can be guaranteed to be 100% secure, so while Speech Tech strives to protect your information, Speech Tech cannot ensure or warrant the security of any information that you voluntarily give to Speech Tech.

Where we store your information?

Your data will be hosted securely within the EU. We share information with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf. If we transfer your information to a data processor, for example, the Amplitude to assist us in keeping you up-to-date with announcements, news and information, and they are located outside of the EU, we shall take all reasonable steps to ensure that your information is protected as if we hosted it ourselves.

Children

Our Services are not intended for independent use by anyone under 16 years of age without adult supervision (by parents, legal representatives, specialists). We do not knowingly collect personal information from children under 16 years of age. In the event that we discover that a child under 16 has provided us with personal information, we will immediately delete it from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we can take appropriate action.

If you are in the EEA, Switzerland, or the UK, your rights in relation to your personal data processed by us as a controller specifically include:

Right of access and/or portability

You have the right to access any personal data that we hold about you and, in some circumstances, have that data provided to you so that you can transfer that data to another provider.

Right of erasure

In some cases, you have the right to the erasure of personal data that we hold about you (for example, if it is no longer necessary for the purposes for which it was originally collected).

Right to object to processing

Under some circumstances, you have the right to request that we stop processing your personal data and/or stop sending you marketing communications.

Right to rectification

You have the right to require us to correct any inaccurate or incomplete personal data.

Right to restrict processing: In some cases, you have the right to request that we restrict processing of your personal data (for example, where you believe that the personal data we hold about you is not accurate or lawfully held).

Legal Basis for Processing Personal Data

We only use your information in a lawful, transparent, and fair manner. Depending on the specific personal data concerned and the factual context, when Speech Tech processes personal data as a controller for individuals in regions such as the EEA, Switzerland, and the UK, we rely on the following legal bases as applicable in your jurisdiction:

As necessary for our contract

When we enter into a contract directly with you, we process your personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract (i.e., providing Services). If we do not process your personal data for these purposes, we may not be able to provide you with all Services.

Consistent with specific revocable consents

We rely on your prior consent in order to utilize cookies to engage advertising and analytics partners to deliver tailored advertising and analysis of our website usage. You have the right to withdraw your consent at any time by visiting our cookie management tool.

As necessary to comply with our legal obligations

We process your personal data to comply with the legal obligations to which we are subject for the purposes of compliance with EEA laws, regulations, codes of practice, guidelines, or rules applicable to us, and for responses to requests from, and other communications with, competent EEA public, governmental, judicial, or other regulatory authorities. This includes detecting, investigating, preventing, and stopping fraudulent, harmful, unauthorized, or illegal activity ("fraud and abuse detection") and compliance with privacy laws.

To protect your vital interests or those of others

We process certain personal data in order to protect vital interests for the purpose of detecting and preventing illicit activities that impact vital interests and public safety.

As necessary for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data

We process your personal data based on such legitimate interests to (i) enter and perform the contract with the account owner; (ii) develop, test, and improve our Services and troubleshoot products and features; (iii) send marketing communications, advertising, and promotions related to the Services; and (v) comply with non-EEA laws, regulations, codes of practice, guidelines, or rules applicable to us and respond to requests from, and other communications with, competent non-EEA public, governmental, judicial, or other regulatory authorities,

as well as meet our corporate and social responsibility commitments, protect our rights and property and the ones of our customers, resolve disputes, and enforce agreements.

International Data Transfers

CatZu operates globally, which means personal data may be transferred, stored (for example, in a data center), and processed outside of the country or region where it was initially collected where CatZu or its service providers have facilities or parent legal entities– including in countries where meeting participants or account owners hosting meetings that you participate in or receiving messages that you send are based.

Therefore, by using CatZu or providing personal data for any of the purposes stated above, you acknowledge that your personal data may be transferred to or stored in the EU where we are established, as well as in other countries outside of the EEA, Switzerland, and the UK. Such countries may have data protection rules that are different and less protective than those of your country.

We protect your personal data in accordance with this Privacy policy wherever it is processed and take appropriate contractual or other steps to protect it under applicable laws. Where personal data of users in the EEA, Switzerland, or the UK is being transferred to a recipient located in a country outside the EEA, Switzerland, or the UK which has not been recognized as having an adequate level of data protection, we ensure that the transfer is governed by the European Commission's standard contractual clauses. Please contact us if you would like further information in that respect.

Complaint

In accordance with Art. 77 GDPR, you, as a data subject, have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or where an alleged infringement of the GDPR has taken place.

If you have any questions about the protection of your personal data, you can contact us by using our contact details:

our email: catzugame@gmail.com

our postal address: Speech Tech MB, LT-09110 Lithuania, Vilnius, Žirmūnų g. 105-88