

Privacy Policy

In order to provide you with Speech and Language Therapy services we will collect and hold personal data about and on you. We are also required to comply with the General Data Protection Regulation (Regulation (EU) 2016/679 (the “GDPR”)) and as such hereby set out details as to how we process your data and your rights. All Therapists are registered with the Information Commissioner's Office (ICO) as Data Controllers or Data Processors, as appropriate.

What data we hold

There are 3 main types of data which Beautiful Voice Limited retains:

- Clinical Data needed to provide a service.
- Financial Data from clients for billing.
- Contact Data from referrals.

Our lawful basis for processing your data

We may process or share Your data that We hold based on the following legal basis:

- Consent. We may process your data if you have given us specific consent to use your personal information and explicit consent to use your data for the purposes mentioned below in the “**How we use the data**”.
- Legitimate Interests. We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a contract. Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract and provide you the services.



- Legal Obligations. We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests. We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which We are involved.
- More specifically, we may need to process your data or share your personal information in the following situations:
 - o Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
 - o Vendors, consultants and other Third-Party Service Providers. We may share your data with third-party vendors, service providers, speech and language therapists, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, provide therapy sessions, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the services, which will enable them to collect data on our behalf about how you interact with our services over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this Privacy Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.



- o Business Partners. We may share your information with our business partners to offer you certain products, services or promotions

How we collect your data

Voice and video data are collected during the use of the Beautiful Voice platform only. Additional information may be given to us verbally, in writing, via email, via our website or other Third Party websites such as the assigned clinical partner. This may be provided by you or others who may include members of your family, carers, case managers and medical or healthcare professionals involved in your care.

How we use the data

We need your data in order for us to:

- Provide therapy services via the platform. The platform provides real-time biofeedback, analysis and results of the user's therapy outcomes, and monitoring of the user's progress. These features are only enabled with the voice and video data collected via the platform.
- Facilitate speech and language therapy services provided to you. We may use your information to book appointments with our speech and language therapists as part of the Therapy Package. Our speech and language therapists will normally be external therapists under a contract with us.
- Request feedback. We may use your information to request feedback and to contact you about your use of our services.
- To enable user-to-user communications. We may use your information in order to enable user-to-user communications with each user's consent.
- To manage user accounts. We may use your information for the purposes of managing our account and keeping it in working order.
- To send administrative information to you. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.



- To protect our Services. We may use your information as part of our efforts to keep our services safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- Fulfil and manage your orders. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the services.
- To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- Deliver targeted advertising to you. We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- For research purposes and to improve the services offered to you. These research activities may include gathering information you are sharing with us such as your daily therapies, time of practising the therapies, voice, speech and language qualities, therapy sessions and routines, therapy background, your progress, etc. If the Therapist needs to cancel an appointment they will let you know as soon as possible and reschedule the appointment.

How we store your information

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed



to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our services is at your own risk. You should only access the services within a secure environment.

Who has access to my data?

Apart from Beautiful Voice team having access to your data for the listed purposes in “**How we use the data**”, we only share and disclose your information with the following third parties. We do not give or sell client details to any third parties.

- Accredited speech and language therapists under contract with Beautiful Voice Limited for provision of services have access to your clinical data and contact data. Your data will only be accessed by your treating therapist(s) unless it is appropriately required by the other therapists for the purposes outlined above. This includes Speech and Language Therapists registered with RCSLT (Royal College of Speech and Language Therapy) who are providing supervision or mentoring for the treating Therapist.
- Apple; Google and Stripe for invoicing and billing
- Cloud Functions for Firebase, Cloud Storage for Firebase, Firebase Hosting, Google Cloud Storage and Google App Engine for functionality and infrastructure optimisation

Data retention

Beautiful Voice Limited is subject to the legal/regulatory period of retention of data specific to health. This retention period is 7 years beyond the end of care (discharge) or 7 years after the age of 18 years if the data subject is a child when discharged. Following the necessary retention period, data will be securely destroyed.

Financial Data is kept for 6 years to adhere to HMRC guidelines. Financial data cannot be removed before 6 years; however, it can be shared with you to allow for any correction or for you to make a health insurance claim.



We will delete any data which is trivial or transitory in nature, or which in our opinion is no longer required for the purposes set out above. We will update the data to ensure that any errors or inaccuracies are corrected.

Beautiful Voice Limited has no responsibility for any data collected or retained on Third-Party websites.

General information about your data and your rights

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If You have questions or comments about your privacy rights, you may email us at contact@beautifulvoice.co.uk

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time by sending an e-mail at

contact@beautifulvoice.co.uk. Your request should clearly state the information for which withdrawal is requested. Please note that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. If your withdrawal refers to your voice and video data, please note that we will not be able to provide the services to you and this may lead to the termination of your account.