

# Privacy Policy

*Effective: November 15, 2022*

## Who We Are

Prentke Romich Company, doing business as, PRC-Salttillo (“PRC-Salttillo”, “us”, “we”, “our”) is a US-based manufacturer and supplier of speech generating devices which are durable medical equipment, and associated products and services. We strive to achieve the following:

Our mission:

Enable individuals with speech and language impairments to successfully communicate and interact in their environment.

Our method:

Provide products & services that promote success for individuals who use AAC, their families and their support teams.

Our manner:

Treat everyone with whom we interact with the highest respect. Empower employees to embrace their individual roles in helping our customers achieve success.

## What is this Policy?

This is PRC-Salttillo’s Privacy Policy. The purpose of this Policy is to describe to you how your personal information may be collected, used, shared, and otherwise processed by us. By using our Site and services and providing your personal information to us, you give us permission to process your personal information as described in this Policy. This Policy does not apply to Personal Health Information that PRC-Salttillo collects in other contexts. For information about how PRC-Salttillo handles your Personal Health Information, please see our Notice of Privacy Practices. This policy also explains how you may contact us with questions about this policy, our privacy practices or our management of your personal information. Please review it carefully.

This Policy has been updated to comply with the California Consumer Privacy Act.

## Application of this Policy.

This Policy applies to PRC-Salttillo websites, web services, equipment, and software applications. It applies only to PRC-Salttillo, our websites, our products and services (devices, software applications and mobile applications) and does not apply to the products, applications, or websites of third parties that you may be able to access from our products or from any of PRC-Salttillo's websites. Our web sites contain links to other web sites. We are not responsible for the privacy practices or content of those web sites. We encourage you to review the privacy statements of any web sites you visit to better understand how they use and share your information.

This policy is reviewed from time to time and updated to reflect changes in applicable law or our business and information management practices. This Policy is subject to change at our discretion. We will indicate changes by updating the "Effective Date" at the beginning of the Policy. Your continued use of this website and any PRC-Salttillo services after any update to this Policy will constitute your acceptance of our changes. Please review it periodically. If you have any questions or concerns, please contact the PRC- Salttillo Privacy Officer at [privacy@prc-salttillo.com](mailto:privacy@prc-salttillo.com).

## What is "Personal Information"?

Personal information means information about an identifiable individual. In this Policy, the acronym "PI" will be used to mean personal information. This Policy does not apply to information that has been de-identified. De-identified information is information that does not identify an individual and with respect to which there is no reasonable basis to believe that the information can be used to identify an individual. PI does not generally include information available or reported in a summarized or grouped manner, such as aggregate information and statistics.

## What data does PRC-Salttillo collect?

PRC-Salttillo only collects, uses and discloses your information in accordance with applicable law. We will not collect any personal information from you without your specific knowledge and consent. We hold any information you give us with the utmost care and security. We do not sell, rent, or loan any customer information. When you order or purchase a product or service from us, fill out a form, or browse our websites, you are accepting the conditions of our Privacy Policy which means that you are consenting to our collection, use, disclosure and storage of your information in accordance with this Policy.

PRC-Salttillo may collect, use, store, and transfer the following data gathered from your interaction with our sites and services:

- Identity Data, including first name, last name, username or similar identifier, professional title and license information, date of birth, and gender.
- Medical Data, including relevant health and medical information about you. Where we collect Medical Data, we will only request the information required for the specified purpose and always ask for your explicit consent through a signature, or, under urgent circumstances based on legitimate interest.
- Contact Data, including billing address, delivery address, email address and telephone numbers - both work and personal.
- Financial Data, including bank account and payment card details.
- Transaction Data, including details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data, including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, notes from our conversations with you, details of any complaints or comments you make, items viewed or added to your basket, web pages you visit and how and when you contact us.
- Usage Data, including information about how you use our website, products and services.
- Marketing and Communications Data, including your preferences in receiving marketing from us and your communication preferences.

## When and how we collect your Personal Data.

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact, Financial, Marketing and Communications Data by filling in forms or by corresponding with us by mail, phone, email or otherwise. This includes personal data you provide when you:
  - apply for or buy our products or services online, over the phone or during a consultant visit;
  - apply for a product loan;
  - contact us to ask questions or for product support or repairs;
  - visit and / or create an account on our website;
  - subscribe to our newsletter;
  - request marketing to be sent to you;
  - book any kind of appointment with us such as a consultant appointment;

- book to attend an event (such as a customer training event either online or face to face);
- enter a competition, promotion, or survey;
- give us some feedback or use our on-line chat facility;
- fill in any forms – for example, a product return form or a photo & video media permission form;
- Register for a training through AAC Learning Journey, our online Learning Management System.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. For more information, please see our [Cookie Policy](#).

## How will we use your Data?

PRC-Salttillo will only use your personal data when the law allows us to. We collect your data:

- In order to perform the contract we are about to enter into or have entered into with you for example to ensure that we send completed orders to your preferred address.
- Where it is necessary for our legitimate interests, and your interests and fundamental rights do not override our interests.
- Where we need to comply with a legal or regulatory obligation, for example, for accounting and/or tax purposes.

## Purposes for which PRC-Salttillo may use your Personal Data.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
<p>To process and deliver your order. Including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Choose and correctly set up a suitable device for you</p> <p>(d) Deliver a product to you (we may need to share your details with a third party providing a service, such as delivery couriers)</p>	<p>(a) Identity</p> <p>(b) Medical</p> <p>(c) Contact</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to ensure we provide you with the right product, correctly set up or recover debts due to us and protect you from fraud)</p> <p>(c) Consent for purpose (c) in certain circumstances</p>

<p>To manage our relationship with you. Which includes:</p> <p>(a) Notifying you about changes to our terms or privacy policy;</p> <p>(b) Sending you legally required information relating to your orders or information about product recalls;</p> <p>(c) Asking you to leave a product review or take a survey;</p> <p>(d) Responding to your queries, refund requests or complaints.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services, to provide you with the best service and to understand how we can improve our service based on your experience)</p>
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<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to you; send you relevant communications in relation to updates, offers, services or products; measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> <li>(f) Technical</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy and to run our loyalty scheme)</p>

<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To share data with law enforcement.</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical</p>	<p>(a) Necessary to comply with a legal obligation.  (b) Necessary to perform a contract with you.</p>
<p>For credit checks and fraud management</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical</p>	<p>(a) Necessary to comply with a legal obligation.  (b) Necessary to perform a contract with you.</p>

## App Privacy

TouchChat™ and LAMP Words for Life®

TouchChat™ and LAMP Words for Life® (and all associated apps, e.g., TouchChat with WordPower) are language system applications (apps) downloaded for use on mobile Alternative and Augmentative Communication (AAC) Devices to enable independent communication for people with disabilities. The apps require no sign-in, log-in, or any information to use the app once it is downloaded. The apps only collect any information



voluntarily provided when registering for an account. Account registration is not required to use the app and your registration does not link directly to your app or any device that you use to access the app. If you choose to register for an account, the information requested should be that of the app purchaser/owner and includes basic information: first and last name, email address, home or work address, and phone number. Upon account registration, you may receive emails from PRC-Salttillo regarding the use and implementation of the app. All purchases are done through Apple iTunes and neither the apps nor PRC-Salttillo receive any customer information from Apple.

PRC-Salttillo apps use the TrueDepth camera system to track the movement of the user's head and eyes. This allows for the Head Tracking feature which permits the user to select and activate buttons with their face. In order for this functionality to be possible, the app requires access to the device's camera. This access can be toggled on or off at any time in the device's settings. While using Head Tracking, the camera images and resulting depth data are used only for tracking the position of the user's head and face. None of the information collected by the TrueDepth system is ever transmitted or stored by the app.

PRC-Salttillo does not collect any data containing Protected Health Information (PHI) of the account owner or person using the AAC device at any time through use of the apps. The only data sharing options for app account holders and users is through the use of additional optional on-line subscription services used in conjunction with the apps such as Realize and iShare.

Realize Language™

Realize Language™ (RL) is a server-based file storage system (hereinafter "The Service") that provides a space for Account Holders to store and review client-generated text data created on a client's speech generating device or software (hereinafter "Content"). Account Holders can perform analyses of this data to show word types, frequencies, and distribution over time.

For more information about Realize Language please see <https://realizelanguage.com/info/faqs> And <https://realizelanguage.com/info/terms>.

iSharePRC®

iSharePRC® is a quick and convenient way to securely save and share copies of the LAMP Words for Life® iPad vocabulary files with your team. For more information about iSharePRC®, please see <https://ishareprc.com/help>

iShare

iShare is a subscription that gives a TouchChat device access to a large server, through the wireless connection on the iPod®, iPhone®, or iPad®. You are given access to a private section that only you can access. This is where you can store your personal files. For more information, please see [www.ishareservices.com](http://www.ishareservices.com).

#### Dialogue AAC

Dialogue AAC is a message banking app that stores audio recordings and associated metadata generated and managed by the account holder. This data is stored on a secured sever and fully encrypted using server-side AES-256-bit encryption. Encryption keys are accessible only to administrators and are equally stored in secured locations. No sharing of this data is currently available and PRC-Salttillo does not use this data for any purpose.

### Schools and Student Data Privacy.

PRC-Salttillo does not collect any student personal information. None of the PRC-Salttillo software applications or other products used by students in schools encourage students to in any way make their personal information public. PRC-Salttillo does not disclose any student information or school materials to third parties or partners. Schools do have a right to review, have deleted, and/or refuse to permit any suspected collection or use of a student's information by PRC-Salttillo. PRC-Salttillo will allow for inspection, review, and amendment or changes to any student data via authorized inquiries from the school. Please contact PRC-Salttillo privacy officer at the information provided below if there is a concern about this and for guidance on how to make such a request.

### California Consumer Privacy for Residents of the State of California.

Residents of the state of California have a right to what personal information a business collects about them. Under California law, the definition of Personal Information is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. California residents have the right to know whether a business has sold this personal information or disclosed it for a business purpose and to whom, the right to say no to the sale of personal information, and the right to equal service and price regardless of any requests for information or directed the business not to sell personal information. PRC-Salttillo does not sell any consumer personal information. This Privacy Policy lists the types of personal information that PRC-Salttillo collects. PRC-Salttillo safeguards the personal information of consumers. You may request information the

collection of personal information by contacting our privacy officer at [beth.mulcahy@prentrom.com](mailto:beth.mulcahy@prentrom.com) or calling PRC-Salttillo at 1-(800) 262-1984.

## Information For Visitors from Outside the United States.

PRC-Salttillo is based in the United States and governed by U.S. law. If you are accessing our Site from outside of the United States, please be aware that personal information collected through the Site will be processed in the United States. Data protection laws in the United States are likely different from those of your country of residence. By submitting your personal information through our Site, you acknowledge that your personal information will be processed in the United States in accordance with this Policy. Visitors residing outside the United States may contact us at [privacy@prc-salttillo.com](mailto:privacy@prc-salttillo.com) for more information about our data practices.

## Security and Data Storage.

PRC-Salttillo makes safety while shopping in our on-line store a priority. We do not store your credit card information on our servers and our site is secured using DigiCert SSL Certificates. This ensures encryption of all information sent to us via the World Wide Web and demonstrates our commitment to your security.

PRC-Salttillo stores your data on secure servers located within the United States.

## Marketing.

We may collect certain information to better serve you, including in the event you have questions about a product you have purchased from us. PRC-Salttillo may contact you to provide you with introductory and support information, product or service offering that may be of interest to you or to let you know about important changes at the company. If you receive such information, you have the option to unsubscribe at any time by changing your personal preferences.

How can I look up or control the information that PRC-Salttillo collects about me?

Log into your web account or call us at 800-262-1984 to access and edit your account information.

## What are your data protection rights?

Under certain circumstances, you have rights under data protection laws in relation to your personal data as set out below:

- Access to the personal data we hold about you, free of charge in most cases.

- Correction of your personal data when incorrect, out of date or incomplete - please update your online account, or contact our Customer Service team.
- Erasure of your personal data for example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty).
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.
- That we restrict the way we process your personal data in the following scenarios:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- That we transfer your personal data to a third party by providing to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact us.

## What does PRC-Salttillo do with the information of persons no longer affiliated with PRC-Salttillo?

PRC-Salttillo does not necessarily destroy data when individuals terminate their relationships with us. The information may be necessary for many of the purposes described in this policy, even after the person stops receiving services through PRC-Salttillo. Examples of such purposes include retention laws for audit purposes, warranty, service, and healthcare operations as well as government contracts. The policies and procedures that protect PI against inappropriate use and disclosure will continue to apply regardless of the status of the individual to whom it relates.

## How is this policy made available?

PRC-Salttillo posts this policy on our websites and provides a copy to individuals upon request. PRC-Salttillo is required by law to provide individuals with our Privacy Policy. We are required to abide by the terms of the policy currently in effect.

What should I do if I want a paper copy of this policy, if I have questions about it, or if I think my privacy rights have been violated?

If you would like a paper copy of this policy, have questions about it, or believe its terms have been violated with respect to your information, please let us know immediately. If you wish to file a complaint, you can write to or call us at the address and number listed below. You will not be penalized for filing a complaint. You also have the option of filing a complaint online at [prentrom.com/feedback](http://prentrom.com/feedback) or [salttillo.com/feedback](http://salttillo.com/feedback).

Privacy Officer: Beth Mulcahy

Security Officer: Joe Hartman

PRC-Salttillo

1022 Heyl Rd.

Wooster, OH 44691

(800) 262-1984

[privacy@prc-salttillo.com](mailto:privacy@prc-salttillo.com)

Please include your name, address, and a telephone number where we can contact you, and a brief description of your concern. If you prefer, you may lodge an anonymous complaint online [prentrom.com/feedback](http://prentrom.com/feedback) or [salttillo.com/feedback](http://salttillo.com/feedback).