

SPEAKUNIQUE LIMITED

PRIVACY POLICY FOR CUSTOMERS

SpeakUnique Limited ("**we**", "**the Company**", "**our**") are committed to protecting and respecting the confidentiality, integrity and security of personal data about individuals whose data we hold ("**you**", "**your**").

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and how we comply with our responsibilities under applicable data protection laws ("**Data Protection Laws**"). Please read this policy carefully.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: <https://www.speakunique.co.uk/su-upload/PrivacyPolicy.pdf>.

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1. IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy aims to give you information on how we collect and process your personal data through your use of this website, our app and the services that we provide to you, including the development of personalised synthetic voices.

Data controller

For the purpose of the Data Protection Laws, the data controller of your personal data is SpeakUnique Limited, a company registered in Scotland (company registration number is SC615673). You can contact us by post (at 8.16 Appleton Tower, 11 Crichton Street, Edinburgh EH8 9LE) or by email (for general queries at info@speakunique.co.uk or for support at support@speakunique.co.uk).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us by email at privacy@speakunique.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in June 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third party links

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

What personal data we collect

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, gender and native language.
- **Contact Data** includes billing address, postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Voice Data** includes the information you provide about your speech characteristics and accent, the recordings of your voice that you submit to us and the voice file that we develop for you in connection with the products and services you have purchased from us.
- **Health Data** includes information you voluntarily provide to us about your medical condition and its impact on your speech.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, diagnostic feedback to ascertain performance of our website and app, time zone setting and location, browser plug-in types and versions, operating system and platform, date/time stamp, referring/exit pages, clicked pages, other information your browser may send to us and other technology on the devices you use to access our website and app.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Except as set out in this privacy policy, we do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, health, trade union membership, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Please check that the information you are providing to us is complete and accurate before submitting it. By providing information to us, you confirm that it is complete and accurate.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- Direct interactions. You may give us your Identity, Contact, Voice and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise:
 - apply for our products or services;
 - create an account on our website or app;

- submitting recordings of your voice to us;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a promotion or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will 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. Please see our [cookie policy](#) for further details.
 - Third party sources. We will receive personal data about you from various third parties as set out below:

Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU; and
 - (b) advertising providers such as Facebook based outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe Payments based outside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party), except where your interests and fundamental rights and freedoms do not override those legitimate interests.
- Where we need to comply with a legal obligation.
- Where you have provided your consent.

Where we process personal data on the basis of your consent, you have the right to withdraw your consent at any time by contacting us at privacy@peakunique.co.uk.

Purposes for which we will 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 ground 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 (c) Voice (d) Profile (e) Health	(a) Performance of a contract with you (b) If you notify us about a medical condition (in order to improve our understanding of how to build, repair or design your voice), we will process that health data on the basis of your consent
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Voice (e) Health (f) Transaction (g) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) If a charitable organisation is contributing to the fees for your voice file (and as a result we collect health data to link this funding to your SpeakUnique account), we will process that health data (and share it with the relevant charitable organisation) on the basis of your consent
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you

<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Responding to enquiries from you</p>	<p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Transaction</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To develop a voice file for you to download and/or store until such time as you request the voice file to be made available to you. We may combine recordings of other voices with your recordings to develop a voice file for you depending on certain factors, including the quality of your recording and/or the level of damage to your voice</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Voice</p> <p>(f) Health</p> <p>(g) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p> <p>(c) If you notify us about a medical condition (in order to improve our understanding of how to build, repair or design your voice), we will process that health data on the basis of your consent</p>
<p>To enable you to complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Voice</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business, app and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Voice</p>	<p>(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 reorganisation or group restructuring exercise)</p>

		(b) Necessary to comply with a legal obligation
To store Voice Data in our internal voice bank and to use Voice Data for research and development purposes, and commercial licensing purposes in connection with the services we currently provide (including to develop or improve voice files for others (such as people whose voices may have damaged or degenerated to such an extent that their recordings are insufficient for use in the development of voice files without being combined with other voice recordings)) and in connection with services we may provide in the future (including outside of the scope of speech synthesis and communication aids).	(a) Identity (b) Voice	Necessary for our legitimate interests (for running our business and provision of our services, including to develop voice files for other people using your Voice Data, provided that your Voice Data will only be used in combination with other people's Voice Data to develop synthetic voices for individuals in a way which ensures that you cannot be identified from the voice file created for another person. We may continue to store and use your Voice Data at all times including if you cancel your subscription or if you ask us to delete any of your personal data, including on an anonymised basis by deleting your Contact Data from our voice bank and/or de-linking your Voice Data from your Contact Data so we are not able to identify you from your Voice Data.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use data analytics to improve our app, website, products/services, marketing, customer relationships and experiences and to analyse	(a) Technical (b) Usage	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>trends, gather demographic information.</p> <p>We use cookies and other tracking technologies that are stored on your computer or mobile device. Please see our Cookies Policy here for further details.</p>		
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you (marketing)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications 	<ul style="list-style-type: none"> (a) You have given us your consent to send marketing communications to you. (b) Necessary for our legitimate interests (to develop our products/services and grow our business based on what we think you may want or need, or what may be of interest to you) if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchased from us. (b) We will get your express opt-in consent before we share your personal data with any third party for third party marketing purposes.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original

purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this policy, where this is required or permitted by law.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

5. DISCLOSURES OF YOUR PERSONAL DATA

We will not disclose personal data we hold about you to any third party except as set out below. We will only disclose personal data which we hold about you to these third parties in connection with the purposes set out in the table above.

- External Third Parties including:
 - service providers acting as processors who provide IT, payment and system administration services.
 - professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, accounting and other professional and/or advisory service providers.
 - HM Revenue & Customs, regulators and other authorities acting as processors or controllers who require reporting of processing activities in certain circumstances.
 - Third parties with which we may collaborate or engage in research with or with whom you apply for funding.
 - Specific third parties listed in the table above describing the purposes for which we will use your personal data.
 - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets, or a successor in interest in the unlikely event of our insolvency, winding up or liquidation. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

All third parties are required to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our third party service providers (such as IT and system administration service providers) to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Except to charitable organisations who are providing funding for your voice file, we do not share details of your Health Data with any third party controllers.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer personal data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe / the UK and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see section 9.(c) below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

In certain circumstances, you have the right to:

- (a) request access to your personal data (known as a "data subject access request"). This enables you to request a copy of the personal data we hold about you and to check that we are lawfully processing it;
- (b) request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected;
- (c) request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no justified reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
- (d) object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes;
- (e) request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it; and/or
- (f) request the transfer of your personal data to another controller. This enables you to ask us to either send you the personal data which we hold about you, and/or transfer that personal data to another controller, where our processing of that personal data is based on your consent or pursuant to our performance of a contract with you, and where the processing is carried out by automated means.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at privacy@speakunique.co.uk.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to this policy

We may make changes to this privacy policy at any time. Any changes we make will be posted on this page and, where appropriate, notified to you in writing. Please refer back to this page regularly to see any changes or updates to this policy.

Contact

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so by email to privacy@speakunique.co.uk.