

Who We Are

Prentke Romich Company, doing business as, PRC-Salttilo (“PRC-Salttilo”, “us”, “we”, “our”) is a U.S.-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 and services that promote success for individuals who use augmentative and alternative communication, 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-Salttilo’s Privacy Policy (the “Policy”). The purpose of this Policy is to describe to you how your personal information may be collected, used, disclosed, and otherwise processed by us. By using our Products and Services (defined below) and providing your personal information to us, you understand that we will process your personal information as described in this Policy.

This Policy does not apply to “Personal Health Information,” which is subject to privacy regulations published under the federal Health Insurance Portability and Accountability Act of 1996, that PRC-Salttilo collects in other contexts. For information about how PRC-Salttilo handles your Personal Health Information, please see our HIPAA Notice of Privacy Practices (aacfunding.com/notice-of-privacy-practices).

This Policy is reviewed and may be updated from time to time 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. Please review it periodically. If you have any questions about our privacy practices, please contact the PRC- Salttilo Privacy Officer at privacy@prc-salttilo.com.

If you are a U.S. resident of an Applicable State (defined below), including California, you may learn about your data privacy rights under applicable law [here](#).

Visitors from the European Economic Area and United Kingdom may learn more about their data protection rights [here](#).

If you are a student or parent or school district representative, you may learn more about school and student data protection rights [here](#).

Application of this Policy

This Policy applies only to PRC-Salttillo Products and Services as defined below, including:

- The PRC-Salttillo family of Online Services:
 - Our websites, including aacandautism.com, aacfunding.com, aaclanguagelab.com, aaclearningjourney.com/learn, alpforaac.com, lampwflapp.com, minspeak.com, prc-salttillo.com, realizelanguage.com, and touchchatapp.com (collectively, our “Sites”);
 - Our mobile applications, including any versions of Colourful Semantics, Dialogue® AAC, LAMP Words for Life®, Predictable, Scene and Heard Pro, TouchChat®, Unity® AAC, and Voca Quest (collectively, our “Apps”);
 - Our subscription services including iShareTC, iShareWFL, and Realize Language™;
- Web services;
- Devices and equipment;
- Software; and
- Our offline services, such as customer service calls or in-person customer training events.

This Policy applies only to our Products and Services, and does not apply to the products, applications, or websites of third parties that you may be able to access from PRC-Salttillo’s Products and Services. Our Online Services may contain links to other websites. We are not responsible for the privacy practices or content of those websites. We encourage you to review the privacy statements of any websites you visit or digital services you use to better understand how they use and share your personal information.

For additional information about specific PRC-Salttillo Products and Services, visit www.PRC-Salttillo.com and navigate to the webpage for that product or service.

What is “Personal Information”?

Personal information means information that identifies, directly or indirectly, a specific person. “Personal information” includes “personal data” and “sensitive personal information” as defined in applicable privacy law. 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. Personal information does not generally include information available or reported in a summarized or grouped manner, such as aggregate information and statistics.

What Personal Information Does PRC-Salttillo Collect?

PRC-Salttillo collects, uses, and discloses your personal information in accordance with applicable law.

PRC-Salttillo and our vendors may collect, use, store, and transfer the following types of personal information gathered from your interaction with our Products and Services, including when you order a product or service from us by you and others, fill out a form, communicate with us, or access our Online Services:

- Identity Data, including first name, last name, username or similar identifier, professional title and license information, and date of birth.
- Contact Data, including billing address, delivery address, email address and telephone numbers (work and personal).
- Medical Data, including relevant health and medical information about you. Where we collect Medical Data, we

will only request the personal information required for the specified purpose and will ask for your explicit consent through a signature, unless processing is necessary for urgent circumstances we are required to use your personal information for your vital interests or those of another person.

- 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.
- 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.
- 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 our Products and Services.
- Usage Data, including information about how you use and interact with our Products and Services.
- Marketing and Communications Data, including your preferences in receiving marketing from us and your communication preferences.
- Any other information you voluntarily include in your communications with us.

When and How We Collect Your Personal Information

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

- **Direct interactions.** You may give us your Identity, Contact, Medical, Financial, Profile, and Marketing and Communications Data by filling in forms or by corresponding with us by mail, phone, email or otherwise. This includes personal information you provide when you:
 - apply for or buy our Products and Services;
 - use our Products and Services;
 - apply for a product loan;
 - contact us to ask questions or for product support or repairs;
 - visit or create an account to use our Products and Services;
 - subscribe to our newsletter;
 - request marketing communications to be sent to you;
 - book any kind of appointment with us, such as a consultant appointment;
 - register to attend an event or a training (such as a customer training event either online or in person);
 - enter a competition, promotion, or survey;
 - give us feedback or use our online chat service; or
 - fill in any forms – for example, a product return form or a photo & video media permission form.

- **Automated Technologies or Interactions.** As you interact with our Products and Services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies, web beacons, pixels, APIs, SDKs, server logs and other similar technologies (collectively, “Cookies”). We may also receive Technical Data about you if you visit other websites. For more information, please see our Cookie Policy (prc-salttillo.com/cookie-policy).
- **Interactive Features.** We may also engage vendors to provide certain interactive features on our Sites. Your use of these interactive features is voluntary, and we may retain the information that you submit through these features. For example, we may offer an interactive chat feature on our Sites to assist you with your order and for other customer service purposes. When you participate in the interactive chat, with a live agent, the contents of the chat may be captured and kept as a transcript. By using these features, you understand that our vendors may process the information obtained through the feature to provide the service on our behalf.

Why Do We Use and Disclose Your Personal Information?

PRC-Salttillo uses personal information in accordance with applicable law. We may use and disclose your personal information within our company, our affiliates, business partners, and vendors to:

- perform any contract we have with you, for example to ensure that we send your order to your preferred address;
- process your orders and provide you with the Products and Services you request;
- communicate with you, including to respond to your questions and requests, provide you with documentation or communications you have requested, send you notices about our Products and Services, or offer customer support;
- market and advertise our Products and Services, including to send you news, updates, special offers and promotions, and targeted advertising;
- personalize our content, including to make recommendations to you about our Products and Services, to tailor the information we send or show you, and to offer location-based customizations and personalization based on your purchase history or past interactions with our Products and Services;
- monitor and analyze trends, usage, and the activities of users of our Products and Services to better understand how our customers access and use our Products and Services in order to improve them, respond to user preferences, and for other research purposes;
- improve our Products and Services and notify you about important updates;
- perform internal business analyses or for other business purposes, such as evaluating transactions involving our Products and Services;
- identify, prevent, investigate, and take other actions with respect to suspected or actual fraud or illegal activity or other activity that violates our policies;
- ensure the security and integrity of our personal information processing;
- protect our rights, property, or safety and that of our customers and our confidential and proprietary information;
- comply with applicable laws, rules, regulations, and legal processes as well as our company policies, including to respond to claims asserted against us and to enforce or administer terms and agreements; and
- achieve other purposes, with your consent (as required).

We work with various vendors who support our Products and Services, including vendors who assist with payment processing, shipping, marketing, and technology support services. When reasonably necessary to perform the services we engage the vendors for, we will permit these vendors to use your personal information only for the specific purpose for which they are engaged. For example, we will provide your name and shipping information to a shipping vendor or your email address to a marketing vendor when you choose to receive our marketing communications. We will also give personal information to the government, regulators, law enforcement, or other authorized parties in response to reasonable requests, in emergency situations, and when needed to exercise or defend our rights or those of others.

If at any time we engage in a sale, merger, transfer, or other transaction involving our business or our assets, we may disclose personal information as part of the business transaction, including for negotiation of it.

Mobile Applications and Related Services

This section covers the PRC-Salttillo Apps. When you use the Apps, we may obtain the following personal information from you:

- **Account Information.** When you register for an account, you may provide information such as your full name, postal address, email address, and telephone number.
- **Customer Interaction Information.** We obtain any information that you provide to us, including any personal information, when you contact us or interact with the Apps.

Information obtained automatically. In addition to personal information that you choose to submit through the Apps, other technologies may collect information about you or how you interact with the Apps. When you interact with our Apps, we may get information about the type of device you use, your IP address, device ID or other unique identifier, the resources within the Apps that you review or interact with, the time and length of your use of the Apps, and other usage data.

We will store your personal information that we obtain through the App for no longer than is necessary to achieve the purposes for which the information was collected, or as may be permitted under applicable law.

You may adjust certain preferences and settings through the settings menu in the App, or by changing the settings on your device. You may uninstall an App from your device at any time to discontinue the collection of your personal information through that App.

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 Apps may use Apple Intelligence features provided by Apple Inc. to enhance user experience, including predictive text, personalized suggestions, and accessibility improvements. For more information about how Apple handles your information, see their Privacy Policy, located here: <https://www.apple.com/legal/privacy/data/en/intelligence-engine/> and for specific information about Apple Intelligence, see their statement located here: <https://www.apple.com/legal/privacy/data/en/intelligence-engine>. No data is collected by PRC-Salttillo from your use of the Apple Intelligence features in our Apps.

Schools and Student Personal Information

When an Educational Agency (EA) contracts with PRC-Salttillo to make our Products and Services available to students for educational purposes, PRC-Salttillo may be considered a school official with a legitimate educational interest in student personal information. As such, PRC-Salttillo complies with applicable laws and regulations such as the Family Educational Rights and Privacy Act (“FERPA”) at 20 U.S.C. § 1232g (34 CFR Part 99); the Children’s Online Privacy Protection Act (“COPPA”) at 15 U.S.C. § 6501-6506 (16 CFR Part 312), and other applicable state privacy laws and regulations.

None of the PRC-Salttillo software applications or other Products and Services 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 vendors or business partners and does not use student personal information for commercial purposes. Student personal information is retained only for educational purposes.

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 information via authorized inquiries from the school. Please contact the PRC-Salttillo privacy officer at privacy@prc-salttillo.com if you have questions about our use of student personal information and for guidance on how to make such a request.

Parents or students who wish to access student personal information or delete student personal information should direct their request to their EA.

In the event of a breach, as defined by relevant law and contractual agreements between PRC-Salttillo and local EAs, of student data, PRC-Salttillo will follow their established breach response plan, along with any regulatory and contractual requirements for breach response and notification.

Biometric Data

As used in this Policy, “biometric data” includes “biometric identifiers” and “biometric information”. “Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color.

“Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

Where a PRC-Salttillo Product or Service collects biometric data, we will provide you with the following information about that Product or Service when using it:

- that biometric data is being collected and stored;
- the specific purpose for collecting and using biometric data;
- the length of time for which the data is being collected, stored, and used;
- whether the biometric data may be shared with service providers or other parties; and
- any protective measures utilized to safeguard biometric data.

PRC-Salttillo will retain biometric data according to the following retention schedule. PRC-Salttillo shall retain biometric data only until the first of the following occurs:

- the initial purpose for collecting or obtaining such biometric data has been satisfied; or
- PRC-Salttillo receives a written request from the customer for the biometric data to be deleted.

PRC-Salttillo shall use a reasonable standard of care to store, transmit, and protect from disclosure any biometric data collected. PRC-Salttillo will use industry standard methods to permanently dispose of biometric data.

Additional Privacy Disclosures for U.S. Residents

Depending on your state of residency, you may have certain rights over your personal information that we process. Additionally, you may designate an authorized agent to make a request on your behalf. Privacy rights requests are subject to our verification process and applicable law. If you have any questions about this process, including asking us to review requests we are unable to fulfill, please email privacy@prc-salttillo.com or call us at 800.262.1984.

- **Right to Know.** You have the right to ask for information about the personal information we have about you, including the categories of personal information we have collected about you, the sources of that personal information, what categories of personal information we have sold or used for targeted advertising or cross-context behavioral advertising, the categories of parties that received your personal information from us, and our purposes for collecting, selling, or sharing your personal information.
- **Right to Confirm and Access.** You have the right to know whether we have your personal information and to access that personal information in a useful and portable format.
- **Right to Delete.** You have the right to ask that we delete your personal information.
- **Right to Correct Inaccuracies.** You can ask us to correct inaccuracies in your personal information. If you have an account with us, you can review, update, and change your personal information in your account settings whenever you want.
- **Right to Opt Out of the Sale of Personal Information and Targeted Advertising.** We do not sell or share personal information for cross-context behavioral or targeted advertising purposes.

Information for Visitors from the European Economic Area and United Kingdom

As a supplement to the information provided throughout this Policy, we provide the following information as a notice to residents of the European Economic Area (“EEA”) of their rights under the European Union’s General Data Protection Regulation and residents of the United Kingdom (“UK”) of their rights under the United Kingdom’s General Data Protection Regulation.

PRC-Salttillo is the data controller for personal information collected through our Products and Services. You may be required to provide certain personal information, such as your contact information and payment details, in order to use our Products and Services.

Personal Information We Collect and Why

We have set out below, in a table format, a description of the ways we use personal information, and our legal bases for doing so. Note that we may process your personal information under more than one legal basis at times. Please contact us at privacy@prc-salttillo.com if you require additional details about our legal bases for processing your personal information.

Purpose/Activity	Type of Personal Information	Lawful Basis
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order. Including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Choose and correctly set up a suitable device for you (d) Deliver a product to you (we may need to share your details with a third party providing a service, such as delivery couriers)	(a) Identity (b) Medical (c) Contact (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you (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)
To manage our relationship with you, including: (a) Notifying you about changes to our terms or Policy; (b) Sending you legally required information relating to your orders or information about product recalls; (c) Asking you to leave a product review or take a survey; (d) Responding to your queries, refund requests or complaints	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our Products and Services, to provide you with the best service and to understand how we can improve our service based on your experience)
To administer and protect our business and our Products and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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) (b) Necessary to comply with a legal obligation

Purpose/Activity	Type of Personal Information	Lawful Basis
To deliver relevant content and advertisements to you; send you relevant communications in relation to updates, offers, and our Products and Services; 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 and Services, to develop them, to grow our business and to inform our marketing strategy and to run our loyalty scheme)
To use data analytics to improve our Products and Services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our Products and Services, to keep our Products and Services updated and relevant, to develop our business and to inform our marketing strategy)
To share personal information with law enforcement	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical	(a) Necessary to comply with a legal obligation. (b) Necessary to perform a contract with you (c) Necessary for our legitimate interests (to protect our legal rights and to prevent misuse of our Products and Services)
For credit checks and fraud management	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical	(a) Necessary to comply with a legal obligation. (b) Necessary to perform a contract with you. (c) Necessary for our legitimate interests (to protect our legal rights and to prevent misuse of our Products and Services)

We may also process your personal information when you have consented to our processing of your personal information. When you consent, you may change your mind and withdraw your consent at any time by emailing us at privacy@prc-salttillo.com.

If you would like to submit a complaint about our use of your personal information, you may contact us at privacy@prc-salttillo.com or submit a complaint directly to the data protection authority in your jurisdiction.

If you reside in the EEA, you can find information about your data protection authority **here**. If you reside in the UK, you may file complaints with the Information Commissioner's Office **here**.

When you directly provide your personal information through our Products and Services, you acknowledge that your personal information is being provided by you to a company based in the United States. The laws that apply to personal information protection in the United States differ from those applicable in the EEA and the UK.

Apple Intelligence processing may be performed on your Product or Service by Apple under its own legal basis. PRC-Salttillo does not transfer Apple Intelligence data outside the EEA.

If it is necessary for us to transfer personal information out of the EEA and the UK, we do so by using suitable data transfer safeguards, such as the standard contractual clauses approved by the European Commission, which impose data protection obligations on parties to the transfer. You may obtain additional information about our data transfer mechanisms by contacting us at **privacy@prc-salttillo.com**.

What Are Your Privacy Rights?

You may have one or more of the following privacy rights under privacy laws applicable to you and/or your personal information, which may be exercised free of charge in most instances:

- to access any of your personal information that we process;
- to correct your personal information when incorrect, out of date, or incomplete;
- to request deletion of your personal information or that of your minor child;
- to opt out of marketing and related communications;
- to withdraw your consent to our processing of your personal information;
- to object to or restrict the way we process your personal information;
- to transfer your personal information to a third party by providing to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format.

If you wish to exercise any of the rights set out above, please contact us at **privacy@prc-salttillo.com**.

If you would like to submit a complaint about our use of your personal information, you may contact us at **privacy@prc-salttillo.com** or submit a complaint directly to the data protection authority in your jurisdiction.

Personal Information Transfers

When you directly provide your personal information through our Products and Services, you acknowledge that your personal information is being provided by you to a company based in the United States. The laws that apply to personal information protection in the United States differ from those applicable in the EEA and the UK.

If it is necessary for us to transfer your personal information, we do so by using suitable data transfer safeguards, such as the standard contractual clauses approved by the European Commission, which impose data protection obligations on parties to the transfer. You may obtain additional information about our data transfer mechanisms by contacting us at **privacy@prc-salttillo.com**.

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 Products and Services from outside of the United States, please be aware that PI collected through our Products and Services will be processed in the United States. Privacy laws in the United States are likely different from those of your country of residence. By submitting your PI through our Products and Services, you acknowledge that your PI will be processed in the United States in accordance with this Policy.

Marketing

We may collect certain information to better serve you, including in the event you have questions about Products and Services you have purchased from us. PRC-Salttillo may contact you to provide you with introductory and support information, Product and Service offerings 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 or following the instructions provided in our marketing communications to unsubscribe.

How Long Does PRC-Salttillo Keep Your Personal Information?

PRC-Salttillo does not automatically destroy all personal information when individuals terminate their relationships with us. The personal information may continue to be necessary for meeting our legal, regulatory, and contractual obligations, even after the person stops receiving Products and Services through PRC-Salttillo. In general, we retain personal information for no longer than is necessary to achieve the purposes for which the personal information was collected, or as may otherwise be permitted or required under applicable law. To determine an appropriate retention period, we consider the scope and sensitivity of the personal information; the potential risk of harm from unauthorized access to, use of, or disclosure of the personal information; the purposes for which we process the personal information; whether we can achieve our purposes through other means; our business needs; and applicable legal, regulatory, and contractual requirements. Our policies and procedures that protect personal information against unauthorized processing apply to all personal information we retain.

Questions

If you have questions about this Policy, your privacy practices, or your privacy rights, please contact us using the information provided below.

PRC-Salttillo
Attn: Privacy Officer
1022 Heyl Rd.
Wooster, OH 44691
800.262.1984
privacy@prc-salttillo.com