

Privacy Policy

Last updated: May 3, 2020

This is the privacy policy (the “**Policy**”) of www.salsa-research.com (the “**Website**”), operated by Salas Research Limited (the “**Company**,” “**We**,” “**Us**,” or “**Our**”), and offering offers online speech and language analysis tools for the analyzing of individuals’ speech and language pattern (the “**Services**”).

The Company is committed to securing your Personal Data and your privacy. According to this commitment, We will uphold the following principles:

- To be transparent in respect of the collection and processing of Personal Data about you:

It is important to Us that you have at all times all the information required for you to make educated decisions about the processing of Personal Data about you. For this purpose, We will make use of various techniques and measures aimed to provide you with relevant information about the processing of Personal Data about you, in the proper manner and timing.

Our complete Policy is intended to provide you with the widest understanding of the types of Personal Data collected by Us and the manner in which We process them. It is therefore vital that you review the Policy at the first possible opportunity and from time to time.

In addition, if We find you are required to be provided with specific information, We will provide it to you in the appropriate time and place.

If you have any questions you can approach Us by sending an email to the following address: privacy@salsa-research.com and we will address those, subject to legal limitations.

- To process Personal Data about you solely for the purposes outlined in the Policy:

The purposes for which We may process Personal Data about you include, inter alia, to provide Our services (including, but not limited to, the Website and the Services) requested by you, to enhance the user experience in Our services (including, but not limited to, the Website and the Services), to improve Our services (including, but not limited to, the Website and the Services), to protect Our rights and interests, to perform business and administrative activity that supports the provision of Our services (including, but not limited to, the Website and the Services) to Our users, and/or to uphold any legal and/or regulatory requirements. The entire list of purposes for which We use Personal Data about natural persons is listed in section 6 of the Policy.

In addition, We will process Personal Data about you in order to understand your personal needs and preferences.

- To invest significant resources in order to respect your rights in connection with Personal Data about you:

We apply significant resources to allow you to exercise your rights as a data subject. Therefore, you may approach Us any time you wish to review Personal Data about you, have Us amend it, erase it, cease using it for specific purposes or in general, or transfer it to you or to a third party. We will fulfill your wishes in accordance with the law.

- To secure Personal Data about you:

While We cannot promise absolute protection of the Personal Data about you, We can promise that We use and will continue to use a wide array of means and measures aimed at ensuring the Personal Data about you is secured.

Our Complete Privacy Policy

In order to view the entire document, please press [here](#) [**NOTE: “here” should be hyperlinked to a PDF version of the Complete Privacy Policy**].

[NOTE: the webpage below should appear in the following manner: only the number and name of each section should appear, and once any such section is clicked on, the relevant section should unfold so as to allow the person viewing to view the entire wording of that section]

1. To What Does This Privacy Policy Apply?

This Policy describes what kind of Personal Data the Company collects about natural persons, and how it collects it, uses it, shares it with third parties, secures it, processes it, etc.

In this Policy, “Personal Data” refers to any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or in combination with additional information that We have or that We have access to.

In this Policy, the “processing” of Personal Data refers to any operation or set of operations performed on Personal Data, including the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of Personal Data.

You must be at least 18 years old (or such other age permissible by applicable law if higher than 18) to access and/or use Our services and/or register with Us. We do not knowingly collect Personal Data about any person under the age of 18 (or such other age permissible by applicable law if higher than 18). We may process anonymized data that refers to persons under the age of 18.

2. Data Controller

The Company:

The Company is the data controller in respect of the Personal Data about you.

3. When Do We Collect Personal Data About You?

We collect Personal Data about you whenever you use our Services (including, but not limited to, the Website and the Services), use the Website, and/or contact Us. In some instances, you will actively provide Us with the Personal Data, and in other instances, We will collect the Personal Data about you by examining and analyzing your use of Our services (including, but not limited to, the Website and the Services).

We do not collect or retain any personal information with respect to your subjects. All videos used in the course of the Services and information provided for the report are not saved in any way on our server or transmitted over the internet.

4. No Obligation To Provide Personal Data To The Company And Its Implications

You are not obligated to provide Us with any Personal Data about you. However, in some instances, not providing such Personal Data will prevent Us from providing you with the services you requested Us to provide you, will prevent your use of the Website and the Services, and/or will cause the malfunctioning of Our services (including, but not limited to, the Website and the Services). Please see below a detailed description of such instances.

Providing Personal Data in order to contract with you: In some instances, providing Personal Data about you is a precondition to executing a contract between yourself and the Company. In these instances, while you are not obligated to provide Personal Data about you, if you do not provide the Company with such Personal Data, We will not be able to contract with you and therefore will not be able to allow you to use some of Our services.

By way of example, in order to provide you with certain operational messages relating to SALSA Research and/or the Website and/or the Services, We are required to receive your email address.

5. What Personal Data About You Do We Collect?

Personal Data We collect upon registration: first name, last name, personal title, country, email address, password, telephone number, your education, languages in which you work as a speech and/or language therapist.

Personal Data We collect during your use of the Services: during your use of the Website and/or Services, We also collect your IP address, in order to verify that you are the one using the Website and/or Services, as well as the type of browser from which you log in. and the time in which you were recently active

Personal Data We receive from you: any Personal Data you provide to Us of your own free will when contacting Us. We may record and/or document in writing your calls.

Personal Data We collect upon each browse of the Website: interests, user behavior, device info, operating system info, browser info, screen resolution, flash version, current and previous webpages browsed, entry and exit page, IP address, and device ID.

6. The Purposes Of The Processing Of Personal Data And Their Legal Basis

The Company processes your Personal Data for one or more of the purposes outlined in this section 6 and according to the appropriate legal basis.

The Company will not process Personal Data about you unless there is a legal basis for such processing. The legal bases according to which the Company may process Personal Data about you are as follows:

- a. **Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.** By way of example, for registering you to the Website for the purpose of analyzing speech and language pattern, such as disfluency, for producing an analysis session report, and for providing you with customer support.
- b. **Processing is based on your specific consent (if requested and provided).** We may contact and update you about various developments in our Services and make additional offers.

- c. **Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party.** By way of example, for the exercise or defense of legal claims.

Whenever the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, the processing is conditional upon such interests not overriding your interests or fundamental rights and freedoms that require protection of Personal Data about you. At any time, you may approach Us by sending a notice to the email address privacy@salsa-research.com, in order to receive information concerning the review performed by Us. This is so you can conclude that We may process the Personal Data about you on account of such processing being necessary for the purposes of the legitimate interests pursued by the Company or by a third party.

The following list outlines the purposes for which We may process Personal Data about you and the legal basis for any such processing:

Purpose	Legal Basis
<p>1 In order to register you with Our services</p> <p>Upon your request to open an account on the Website, We will process Personal Data about you in order to allow Us to perform such request.</p>	<ul style="list-style-type: none">• Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
<p>2 In order to respond to your queries, requests, and/or complaints</p> <p>Processing of Personal Data about you is required in order to respond to queries you have concerning your User Account on the Website.</p>	<ul style="list-style-type: none">• Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
<p>3 In order for you to pay Us the consideration in connection with your use of the Website and Services</p>	<ul style="list-style-type: none">• Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
<p>4 In order to improve Our services</p> <p>We may use Personal Data about you in order to improve Our services. Such processing will include, inter alia, any comments and complaints received in respect of Our services, as well as any errors and malfunctions.</p>	<ul style="list-style-type: none">• Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

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| <p>5 In order to offer new services</p> <p>We may use personal information about you in order to research your past uses of the Services, measure your user experience, identify weaknesses points and try to improve them.</p> | <ul style="list-style-type: none"> • Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party. |
| <p>6 In order to perform analysis, including statistical analysis</p> <p>We use various analytical measures (including statistical ones) to make decisions on various issues.</p> | <ul style="list-style-type: none"> • Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party. |
| <p>7 In order to protect Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal claims</p> <p>We may process Personal Data about you in order to protect Our interests, rights, and assets, or those of third parties, according to any law, regulation, or agreement, including any of Our terms and conditions and policies.</p> | <ul style="list-style-type: none"> • Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party. |

7. Your Right To Object To The Processing Of Personal Data About You Where Such Processing Is Necessary For The Purpose Of The Legitimate Interests Pursued By The Company Or By A Third Party

If the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, you have the right to object to such processing for this purpose by sending a notice to the following email address: privacy@salsa-research.com. The above applies unless We demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

8. Transfer Of Personal Data To Third Parties

The Company shares Personal Data with companies within the group of companies of which the Company is a part, for the purpose of supporting the activities of the Company and the offering of the Company's services.

The Company may also share Personal Data about you with third parties that provide Us with the following services:

- a. Storage and hosting providers, including cloud computing services (Vultr hosting service; the Website traffic will go through CloudFlare's CDN);

- b. Payment clearing;
- c. IP address information;
- d. Research, analytical, technical, and diagnostic services.

The Company may also share Personal Data about you with its business partners, which provide it with resources that enable the Company to enrich and improve the level of services it provides to its users.

The Company may share Personal Data about you with governmental, local, official, and regulatory authorities, as well as if such disclosure is required to protect Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal claims.

In addition, We may disclose Personal Data about you to potential purchasers or investors of, or lenders to, the Company and/or any company within the group of companies of which the Company is a part, or in the event of any similar transaction (including the sale of assets of the Company and/or of any company within the group of companies of which the Company is a part), and/or in connection with any merger, reorganization, consolidation, or bankruptcy of the Company and/or any company within the group of companies of which the Company is a part.

9. Your Rights In Respect Of The Personal Data About You

You are entitled to the following rights in respect of the Personal Data about you. To exercise such rights, you may send a request to exercise your rights to the following email address: privacy@salsa-research.com.

Right of access

You have the right to receive from the Company confirmation as to whether or not Personal Data about you is being processed, and, if that is the case, access to the Personal Data and the following information: (1) the purposes of the processing; (2) the categories of Personal Data concerned; (3) the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular recipients in third countries outside the European Economic Area (EEA) or international organizations; (4) if possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (5) the existence of the right to request from the Company rectification or erasure of Personal Data or restriction of processing of Personal Data about you or to object to such processing; (6) the right to lodge a complaint with a supervisory authority; (7) if the Personal Data is not collected from you, any available information as to its source; (8) the existence of profiling; and (9) if Personal Data is transferred to a third country outside the EEA or to an international organization, the appropriate safeguards relating to the transfer.

The Company shall provide a copy of the Personal Data undergoing processing and may charge a reasonable fee for any further copies requested by you. If you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form.

The right to obtain a copy of the Personal Data shall not adversely affect the rights and freedoms of others. Therefore, if the request harms the rights and freedoms of others, the Company may not fulfill your request or do so in a limited manner.

Right to rectification

You have the right to obtain from the Company the rectification of inaccurate Personal Data about you. Taking into account the purposes of the processing, you have the right for incomplete Personal Data about you to be completed, including by means of providing a supplementary statement.

Right to erasure

You have the right to obtain from the Company the erasure of Personal Data about you if one of the following grounds applies: (a) the Personal Data is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) you withdraw your consent on which the processing is based and there is no other legal ground for the processing; (c) you object at any time, on grounds relating to your particular situation, to the processing of Personal Data about you that is based on the legitimate interests pursued by Us or by a third party, and there are no overriding legitimate grounds for the processing; (d) you object to the processing of Personal Data about you for direct marketing purposes; (e) the Personal Data has been unlawfully processed; or (f) the Personal Data about you has to be erased for compliance with a legal obligation in European Union or Member State law to which the Company is subject.

This right is not applicable to the extent that the processing is necessary (a) for compliance with a legal obligation that requires processing by European Union or Member State law to which the Company is subject; or (b) for the establishment, exercise, or defense of legal claims.

Right of restriction of processing

You have the right to obtain from the Company the restriction of processing of Personal Data about you if one of the following applies: (a) the accuracy of the Personal Data is contested by you, for a period enabling the Company to verify the accuracy of the Personal Data about you; (b) the processing is unlawful and you oppose the erasure of the Personal Data about you and request the restriction of its use instead; (c) the Company no longer needs the Personal Data about you for the purposes of processing, but the Personal Data is required by you for the establishment, exercise, or defense of legal claims; (d) if the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, unless We demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims; or (e) if the Personal Data about you is processed for direct marketing purposes, including profiling, to the extent it is related to such direct marketing.

If the processing of Personal Data about you has been restricted following your request, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

Right to data portability

You have the right to receive the Personal Data about you, which you have provided to the Company, in a structured, commonly used, and machine-readable format, as well as the right to transmit such Personal Data to another controller, if (a) the processing is based on your consent or on a contract to which you are a party, and (b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right for the Personal Data about you to be transmitted directly from the Company to another controller, where technically feasible.

The exercise of your right to data portability is without prejudice to your and the Company's rights under your right to erasure. In addition, the right to data portability shall not adversely affect the rights and freedoms of others.

Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of Personal Data about you that is based on the legitimate interests pursued by the Company or by a third party, including profiling based on such legitimate interests. In such case, We shall no longer process the Personal Data about you, unless We demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

You have the right to object at any time to the processing of Personal Data about you for direct marketing purposes, including profiling, to the extent it is related to such direct marketing.

Right to withdraw consent

You may withdraw your consent provided to Us for the purpose of processing Personal Data about you at any time, without affecting the lawfulness of processing based on your consent before its withdrawal.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority established by a Member State to protect the fundamental rights and freedoms of natural persons in relation to the processing of Personal Data within the European Union.

Your rights in respect of Personal Data about you as outlined in this section 9 may be restricted by European Union or Member State law to which the Company is subject.

We shall provide you with the information requested according to your rights outlined in this section 9 without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We shall inform you of any such extension within one month of receipt of your request, together with the reasons for the delay.

The information requested according to your rights outlined in this section 9 shall be provided free of charge, unless stated otherwise in this section 9. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, We may either (a) charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

The Company may require you to provide additional information necessary to confirm your identity in order to fulfill your request according to your rights outlined in this section 9, if We have reasonable doubts concerning the identity of the natural person making the request.

10. Tracking And Cookies

When you visit or access the Website, a cookie file (which is a small text file) is installed on the device via which you visit or access the Website. The cookies allow Us to collect information about you and your behavior, in order to improve your user experience, to remember your preferences and settings, and to customize and offer you services that may interest you. Cookies are also used to collect statistics and perform analytics.

Some of the cookies We use are session cookies, which are downloaded temporarily to your device and last until you close your web browser, while others are persistent cookies, which

last on your device after you cease browsing the Website and are used to help the Website remember you as a returning visitor when you return to the Website.

Types of cookies:

The cookies We use have been classified according to their functionality, as follows:

Type of Cookie	Purpose	Additional Information
Strictly Necessary Cookies	These cookies are strictly necessary to enable you to navigate the Website and use features you have requested. They are used to provide you with Our content and services that you have requested. Such cookies are essential to help your device download or stream information so that you can navigate around the Website, use its features, and return to pages you have previously visited.	These cookies collect Personal Data about you, such as user name and last login date, and identify you as being logged in to the Website. These cookies are deleted when you close your web browser (session cookies).
Functionality Cookies	These cookies are used to recognize you when you return to the Website and allow Us to remember your choices and preferences.	These cookies survive the closing of your web browser, and last until their applicable expiry time.

Blocking and removal of cookies

You can change your browser settings to block and delete some or all cookies. Please see below links to instructions on how to do this in respect of some of the most popular web browsers:

- [Firefox](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)

Please note, however, that if you do so, some or all of the Website's features and functionalities might not perform as intended.

11. Retention Of Personal Data About You

The Company shall retain Personal Data about you for as long as is required to fulfill the purposes of the processing of the Personal Data as outlined in this Policy, or for a longer period as required according to the legislation, regulation, policies, and orders that apply to Us. In order to ensure that Personal Data about you is not retained for longer than is required, We periodically review Personal Data retained by Us to examine whether any Personal Data can be erased.

12. Transfers Of Personal Data To A Third Country Or An International Organization

Personal Data about you may be transferred to a third country (i.e. jurisdictions outside the European Economic Area) or to international organizations. In such circumstances, the Company shall take appropriate safeguards to ensure the protection of Personal Data about you and to provide that enforceable data subject rights and effective legal remedies for data subjects are available.

These safeguards and protection will be available if any of the following are met:

- a. The transfer is to a third country or an international organization that the EU Commission has decided provides an adequate level of protection to the Personal Data that is transferred to it pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**GDPR**"), including any transfer in accordance with the EU-US Privacy Shield Framework;
- b. The transfer is according to a legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or
- c. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR. The clauses adopted by the EU Commission can be viewed at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

You may request that the Company provide you with details concerning the safeguards employed by it to protect the Personal Data about you that are transferred to a third country or an international organization, by sending an email to the following address: privacy@salsa-research.com.

13. Protection Of Personal Data About You

We implement appropriate technical and organizational measures to ensure an appropriate level of security to Personal Data, taking into account the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored, or otherwise processed.

We may be required, due to legal or other obligations outside Our control, to transfer Personal Data about you to third parties, such as public authorities. In such circumstances, We have limited control over the level of protection provided to the Personal Data about you by such third parties.

Any transfer of Personal Data via the internet cannot be fully secured. Therefore, the Company cannot ensure the protection of Personal Data about you when transferred via the internet to Us (including, but not limited to, via the Website and/or the Services).

14. Links To Websites of Third Parties

The Website and the Services may provide links to websites and/or applications of third parties. The Company does not control such websites and applications, nor the collection and/or processing of Personal Data about you by such websites and applications, and We are not responsible for such websites and applications, nor for their privacy and data protection policies and activities. This Policy does not apply to any actions taken via such websites and/or applications.

Whenever you access such third parties' websites and/or applications, We recommend that you carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data about you.

15. Changes To This Policy

We may amend, from time to time, the terms of this Policy. Whenever We amend this Policy, We will notify you of such amendments by publishing the updated Policy on the Website and the Services. In addition, when We make significant amendments to this Policy, We will strive to inform you about such amendments via means of communication We believe are reasonably appropriate to inform you of such amendments and by publishing a notice about such amendments on the Website and the Platform. Unless stated otherwise, all amendments will enter into force upon publication of the updated Policy on the Website and the Services.