

Dynavox Group Privacy Notice

General Privacy Policy for Dynavox Group AB (Publ) – last updated on the 26th of June 2025

We appreciate the trust you place in us by choosing our communication and accessibility solutions. As we embark on this journey together, your privacy and data security are of utmost importance to us.

Tobii Dynavox, part of Dynavox Group AB and its affiliates ("we," "us," or "our"), is committed to safeguarding your privacy. This Privacy Notice outlines how we collect, process, and protect your personal data when you interact with us, use our products and services, or visit our website.

Please note that this policy only covers Dynavox Group AB (Publ)'s use of personal data. Sometimes, other companies buy or license our technology and use it to handle personal data as part of their service offering. In such cases you should refer to the privacy policies of those respective businesses.

Thank you for choosing us!

1. Who are we?

Tobii Dynavox, a part of Dynavox Group AB and its affiliates ("we," "us," or "our"), is dedicated to providing accessible communication solutions while safeguarding your privacy. Dynavox Group AB acts as the Data Controller for the personal data collected from you when you use our products and services or interact with our website.

For questions about this Privacy Notice or how we handle your personal data, please contact us at privacymanager@tobiidynavox.com.

2. What personal data do we collect?

We collect personal data in connection with your use of our services. The types of data we collect include:

- **User Profile Information:** This includes information you provide when setting up your account, such as your name, contact details, and any additional information relevant to your communication needs.
- **Communication Preferences:** Customizations you make to the app, including personalized vocabulary, layouts, and settings.
- **Usage Data:** Information about how you interact with the Service/Product, such as features used, duration of usage, and frequency of access. This data helps us improve our services.

- **Device Information:** Details about the device used to access the app, including device type, operating system, and unique device identifiers.
- **Location Data:** If you enable location services, we may collect information about your location to enhance your experience with relevant content or services.
- **Health Data (where applicable):** if you use our assistive technologies, we may process health-related data only to the extent necessary to provide the service. This processing is done based on explicit consent.

3. Data collection from third-party sources

In addition to personal data, you provide directly, we may collect information from third-party sources to enhance our services or provide a more personalized experience. For example, if you interact with us through social media or other platforms, we may collect personal data from those services in accordance with your privacy settings on those platforms.

4. Why do we process your personal data?

We process personal data to deliver, maintain, and improve our products and services, as well as to comply with legal obligations. Specifically, we may process your data for:

- **Service delivery:** Ensuring our products and services function correctly and meet your needs.
- **Communication:** To enable and enhance your communication experience through the application, including the customization of vocabulary and settings.
- **Product Improvement:** To analyze usage data and feedback to improve the app's functionality, user experience, and overall performance.
- **Customer Support:** To provide support and assistance in using the application, including responding to inquiries and resolving issues.
- **Compliance:** To comply with legal obligations, such as data protection laws, and to protect our rights and interests.

Legal Basis for Processing: We process personal data based on the following lawful grounds:

- **Performance of a Contract:** for the performance of terms of service agreement between you and our company.
- **Consent:** Where you have given explicit consent, particularly for sensitive data.
- **Legitimate Interests:** For purposes such as fraud prevention, ensuring network and data security, and improving our products and services. We ensure these interests do not override your privacy rights by balancing our interests with your expectations.
- **Legal Obligations:** When required by law to process data, such as for regulatory compliance.

5. Data sharing and transfers

We may share personal data with trusted third parties to support our business operations, including but not limited to:

- **Service Providers:** Partners who help us operate and improve our products and services.
- **HealthCare Providers:** Such as Recommenders, Insurance Companies and other similar institutions to assist with the funding or evaluation process of our Products.
- **Affiliates within Dynavox Group:** For administrative and customer support purposes.
- **Legal Authorities:** When required by law, we may share data in compliance with legal obligations or for the defence of legal claims.

We may transfer personal data outside the European Economic Area (EEA) only when adequate protections are in place, such as Standard Contractual Clauses, ensuring your data receives the same level of protection as within the EEA.

6. Use of sub-processors

To provide our services effectively and securely, Tobii Dynavox engages certain trusted third parties ("Sub-Processors") to process personal data on our behalf. These Sub-Processors support a range of business functions, including product development, technical support, cybersecurity, sales, finance, marketing, and internal operations such as HR and IT services.

We ensure that all Sub-Processors are contractually bound to adhere to data protection obligations that are consistent with the requirements of the GDPR and other applicable privacy laws. Where required, we implement appropriate safeguards, such as the use of Standard Contractual Clauses, to protect personal data transferred outside the EU/EEA.

A current list of our Sub-Processors, including the type of services they provide and their processing locations, is available [here](#). This list is reviewed and updated regularly to reflect any changes.

7. How long do we retain your data?

We retain personal data only as long as necessary to fulfill the purposes outlined in this Privacy Notice, considering legal, regulatory, or contractual obligations. For instance:

- **Account Information:** Retained as long as your account is active and for a period afterward to comply with legal requirements.
- **Health Data:** Retained only for the duration necessary to deliver assistive services, subject to your consent. Once personal data is no longer required, it will be securely deleted or anonymized to ensure continued privacy.

Once data is no longer required, we securely delete or anonymize it, in line with data protection regulations.

8. Your rights

You may wish to exercise the right to obtain information about yourself, or to correct, update, or delete that information. Some of these rights may be subject to some exceptions or limitations in local law. Please note that your rights and choices vary depending on your location. We will take reasonable steps to verify your identity, and we will respond to your request to exercise these rights within a reasonable time, subject to the below for specific categories of person.

Under the General Data Protection Regulation (GDPR), you have the following rights regarding your personal data:

- **Access:** You have the right to request access to the personal data we hold about you.
- **Rectification:** You may request that we correct inaccurate or incomplete personal data.
- **Erasure:** You have the right to request that we delete your personal data under certain conditions.
- **Restriction of processing:** You may request that we limit the processing of your personal data in certain circumstances.
- **Data portability:** You may request a copy of your personal data in a structured, commonly used format.
- **Objection:** You may object to the processing of your personal data in certain situations, such as for direct marketing purposes.

To exercise any of these rights, please contact us at privacymanager@tobiidynavox.com.

9. Children's privacy

Many of our products and services are intended for children under 13 years of age, and we do not knowingly collect personal data from children under this age without verifiable parental consent. If we discover that we have inadvertently collected such data, we will delete it promptly. If you believe that we have collected data from a minor, please contact us at privacymanager@tobiidynavox.com.

10. Data security

We prioritize the security of your personal data. To prevent unauthorized access, loss, or misuse, we use a combination of technical and organizational measures, including encryption, access controls, and secure servers, to protect your information. These measures are continuously reviewed to ensure they meet evolving security standards.

11. Changes to privacy notice

We periodically revise this Privacy notice to comply with applicable laws or to improve our services. All changes will be posted on our website and notified through in-app notifications. Changes become effective immediately upon posting unless otherwise stated. It is your responsibility to review this notice regularly. Your continued use of our services after any changes means you accept and agree to those changes.

12. How to contact us

If you have any concerns or questions about our use of your personal information, you can contact us via the following contact information.

Website: www.tobiidynavox.com

Email: privacymanager@tobiidynavox.com

Postal Address: Löjtnantsgatan 25, 115 15, Stockholm, Sweden

Attn: Data Privacy Team

The Data Privacy Team for Dynavox Group AB can always be contacted at privacymanager@tobiidynavox.com. You also have the right to lodge a complaint with the Swedish lead supervisory authority, [Integritetsskyddsmyndigheten](https://www.integritetsskyddsmyndigheten.se).