

URO AI – Website & App Privacy Policy

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1. Introduction

This Privacy Policy explains how **[Entity Name]** (“URO AI”, “we”, “us”, or “our”) collects, uses, discloses, and protects information in connection with your use of the URO AI mobile applications, websites, and related services (the “**Service**”).

By using the Service, you agree to the practices described in this Privacy Policy and our Terms of Use.

2. Data Controller and Scope

- The data controller responsible for your personal data is **[Entity Name]**, with its registered address at **[Address]**.
- This Policy applies to:
 - visitors to our website(s),
 - users of the URO AI mobile apps and web dashboards, and
 - institutional users to the extent they interact with the Service.

If you use URO AI through an institution (e.g., hospital or university), additional contractual terms may apply.

3. Types of Information We Collect

We collect the following categories of information. These broadly align with the categories disclosed in the Apple App Store “App Privacy” section for the URO AI app.

3.1 Information You Provide to Us

- **Account and profile information**
 - Email address
 - Password (stored in hashed form)
 - Optional name, title, institution, role (student/resident/consultant), exam goals, country/region
- **Educational profile and preferences**
 - Selected topics and learning goals
 - Exam preferences (e.g., fellowship, board exam)
 - Optional self-assessment data you provide
- **Content you submit**
 - Questions, prompts, and text you type into the AI
 - Notes, bookmarks, and personal annotations
 - Feedback, survey responses, error reports, support requests
- **Payment and subscription information**
 - Subscription plan, status, and transaction metadata (we do **not** store full payment card numbers; payments are handled by app stores or payment processors).

3.2 Information Collected Automatically

- **Device and app information**
 - Device model and operating system
 - App version, language, time zone
 - A **device or app instance identifier** (used for authentication, analytics, single-device binding, and security)
- **Usage and interaction data**

- Screens and pages viewed
- Features used (e.g., AI chat, MCQ sessions, video views)
- Taps, scrolls, and navigation events
- Session start/end times and durations
- In-app search queries (not web search history)
- **Diagnostics and performance**
 - Crash reports and error logs (e.g., via Firebase Crashlytics)
 - Performance metrics (loading times, failures)

3.3 AI Interaction and Learning Data

- **AI interaction logs**
 - Questions and prompts you provide to the AI
 - AI-generated responses and follow-up context
- **MCQ and progress data**
 - Questions served, responses, scores, and explanations viewed
 - Progress tracking and performance history

We discourage the submission of **identifiable patient information**. If you choose to provide such data despite this warning, you are responsible for ensuring you have a lawful basis and appropriate permissions.

3.4 Voice, Speech, and Audio (If You Use Voice Features)

If you opt into voice-based features:

- We may collect audio input from your device’s microphone when you actively use voice features (e.g., by tapping a microphone icon).
- Audio is processed to convert speech to text or provide other requested functionality, either on your device, on our servers, or via trusted speech partners.
- We do **not** record audio in the background when voice features are not active.

We aim to limit retention of raw audio data and may instead store text transcripts and derived logs.

3.5 Website Data and Cookies

When you visit our website(s):

- We may use cookies and similar technologies to remember your preferences and analyze site usage.
- We may collect standard web log information (IP address, browser type, pages visited, timestamp) for security and analytics.

You can control cookies through your browser settings, but disabling them may affect some website features.

4. How We Use Your Information

We use the information we collect for the following purposes, to the extent permitted by applicable law:

1. **Provide and operate the Service**
 - Authenticate users and manage accounts
 - Deliver educational content, AI explanations, MCQs, videos, and dashboards
 - Sync your progress across sessions and devices (within device binding limits)
2. **Personalize your experience**
 - Recommend topics and modules based on your activity

- Adapt question difficulty, explanations, and content ordering
- Show you progress, performance metrics, and learning insights
- 3. **Improve the Service and our models**
 - Analyze product interaction and `activity_log` data to understand how features are used
 - Improve quality, accuracy, and safety of AI responses
 - Train, fine-tune, and evaluate internal models and algorithms using **aggregated, pseudonymized, or de-identified** interaction data
- 4. **Security, fraud, and misuse prevention**
 - Enforce single-device binding and licensing rules
 - Detect and prevent unauthorized access, sharing, and suspicious activity
 - Protect the Service and our users from abuse and attacks
- 5. **Communications**
 - Send administrative, transactional, and security-related messages (e.g., verification emails, password reset, policy updates)
 - Where permitted, send educational updates, tips, and marketing communications (you can opt out at any time)
- 6. **Legal and compliance**
 - Comply with applicable laws, regulations, and legal processes
 - Enforce our Terms of Use and protect our rights, property, and safety, and that of our users and the public

We do **not** use your personal data for cross-app tracking or third-party targeted advertising.

5. Legal Bases for Processing (Where Applicable)

Depending on your jurisdiction, we process personal data on the following legal bases:

- **Performance of a contract:**
To provide the Service and fulfill our obligations under the Terms of Use.
- **Legitimate interests:**
To operate, maintain, and improve the Service; ensure security; gain product insights; and develop new features—balanced against your privacy rights.
- **Consent:**
For certain optional uses (e.g., some marketing communications, specific analytics or research uses) where consent is required.
- **Legal obligation:**
To comply with legal and regulatory requirements, court orders, or governmental requests.

6. How We Share Your Information

We may share information as follows:

1. **Service providers and processors**
 - Cloud hosting and database providers (e.g., Firebase/Firestore)
 - Analytics and crash reporting providers (e.g., Firebase Analytics, Crashlytics)
 - Payment processors and app store platforms
 - Email, authentication, and communication providers

These parties process data on our behalf under written agreements and are not permitted to use your personal data for their own unrelated marketing.

2. **Institutional customers (if applicable)**
 - If you access URO AI via an institutional arrangement (e.g., a hospital or university), we may share:
 - aggregated statistics and usage reports, and
 - in some cases, account-level progress information,

as defined in our agreement with the institution and subject to applicable law.

3. Legal obligations and protection

- We may disclose information to law enforcement, regulatory authorities, or other third parties when required by law or when we believe disclosure is reasonably necessary to:
 - comply with applicable laws, regulations, or legal processes,
 - protect the rights, property, or safety of URO AI, our users, or others, or
 - prevent or address fraud, security, or technical issues.

4. Business transfers

- In the event of a merger, acquisition, reorganization, or sale of our business or assets, personal data may be transferred to the acquiring entity, subject to continued protections consistent with this Policy.

We do **not** sell your personal data to third-party advertisers.

7. International Data Transfers

We may store and process your information in countries where we or our service providers maintain facilities. These locations may have data protection laws that are different from those in your country.

Where required, we take appropriate safeguards (such as contractual clauses) to ensure your personal data receives an adequate level of protection.

8. Data Retention

We retain personal data:

- for as long as your account is active,
- as needed to provide and improve the Service,
- as required by our legal obligations (e.g., financial and tax records), and
- as necessary to resolve disputes and enforce agreements.

When your account is deleted or becomes inactive:

- We will delete or de-identify personal identifiers from active systems within a reasonable time, subject to technical and legal constraints.
- We may retain **aggregated, pseudonymized, or de-identified** data (including statistics, model parameters, and analytics) that cannot reasonably be used to identify you, for purposes such as research, product development, and service improvement.

9. Cookies and Similar Technologies (Website)

On our website(s), we may use:

- **Essential cookies** – necessary for basic site functionality and security.
- **Analytics cookies** – to understand website usage and improve design and content.

You can control cookies through your browser settings. Some features may not function properly if cookies are disabled.

10. Data Security

We implement reasonable technical and organizational measures to protect your information, including:

- encryption in transit (HTTPS) when communicating with our servers,
- access controls and role-based permissions,

- secure storage by reputable cloud providers,
- logging and monitoring for unusual or suspicious activity,
- regular updates and security patches.

Despite these measures, no system is completely secure. You are responsible for:

- keeping your password confidential,
- using strong and unique passwords, and
- informing us promptly of any suspected unauthorized access.

11. Your Rights and Choices

Depending on your jurisdiction, you may have rights including:

- **Access:** request a copy of the personal data we hold about you.
- **Rectification:** request correction of inaccurate or incomplete data.
- **Erasure:** request deletion of certain data (“right to be forgotten”) where retention is not required by law.
- **Restriction:** request restriction of certain processing activities.
- **Portability:** request a copy of data you provided in a structured, commonly used, machine-readable format, where technically feasible.
- **Objection:** object to certain processing (for example, some forms of analytics or marketing).
- **Withdraw consent:** if processing is based on consent, you may withdraw that consent at any time.

You can exercise these rights by:

- using in-app controls where available; and/or
- contacting us at support@toowoombaspecialists.com.

We may need to verify your identity before responding. Some rights may be limited or unavailable in certain circumstances (for example, when we must keep data for legal reasons).

Where permitted by law, you may also have the right to lodge a complaint with a data protection authority in your country.

12. Children’s Privacy

The Service is intended for **adult professional and academic users (18+)**.

We do not knowingly collect personal data from children under 18. If you believe a child has provided us with personal data, please contact us and we will take appropriate steps to delete such data where required.

13. AI Training, Models, and Derived Data

We build and improve our AI systems using:

- curated educational resources and structured medical knowledge;
- de-identified or pseudonymized content derived from trusted sources;
- **aggregated and/or de-identified interaction data** from users (such as question patterns, error rates, and usage trends);
- internal performance and evaluation metrics.

We do **not**:

- upload full copyrighted books or PDFs directly to general-purpose public AI platforms for training, or
- redistribute full third-party works through the Service without appropriate rights.

We may continue to use aggregated or de-identified data and model parameters derived from your use of the Service for any lawful purpose, even after your account is closed, provided that such data cannot reasonably be linked back to you.

14. No Third-Party Tracking and Advertising

We do **not**:

- use your data to track you across other companies' apps and websites,
- use Apple's **App Tracking Transparency** (ATT) IDFA for advertising, or
- share your data with third parties for their independent targeted advertising.

Any analytics we conduct are for our internal purposes and, where possible, use aggregated or de-identified data.

15. Voice, Microphone, and Audio

When you enable voice features:

- The app will request microphone access via the operating system and explain the purpose (speech-to-text for educational queries).
- Microphone access is active only while you use voice features; we do not record audio in the background.
- Audio may be sent to our servers or a trusted speech provider for processing and may be logged in limited form for security, diagnostics, and quality control as described in this Policy.

You can disable microphone access at any time in your device settings.

16. Account Deletion

You can request deletion of your account:

- via in-app options (where available), or
- by emailing us at support@toowoombaspecialists.com from the email associated with your account.

Upon receiving a valid request and verifying your identity, we will:

- delete or anonymize personal data in active systems, subject to legal and technical limitations;
- retain only the data necessary to comply with legal obligations, enforce our rights, or maintain aggregated/de-identified datasets.

17. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do:

- we will update the "Last updated" date at the top; and
- where appropriate, we will provide additional notice (for example, via the app or website banner).

Your continued use of the Service after the revised Policy becomes effective constitutes your acceptance of the changes.

18. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact:

 **Email:** support@toowoombaspecialists.com