# Talenpal User Privacy Policy

**Effective Date:** September 20, 2025  
**Last Updated:** September 20, 2025

## 1. Introduction

Welcome to Talenpal! This Privacy Policy explains how Talenpal HK Limited (“Talenpal,” “we,” “us,” or “our”) collects, uses, and protects information through our mobile application (“App”) and related services. Our App is designed for children aged under 13 in the United States and works with Talenpal interactive storytelling devices.

**Important Notice for Parents:** Our services are directed to children under 13 years of age. We comply with the Children’s Online Privacy Protection Act (COPPA). Please read this policy carefully and contact us if you have any questions.

## 2. Company Information

**Company Name:** Talenpal HK Limited  
**Address:** UNIT 903D 9/F CAMERON COMM CTR 458-468 HENNESSY RD CAUSEWAY BAY, Hong Kong  
**Email:** privacy@talenpal.com  
**Data Protection Officer:** dpo@talenpal.com

## 3. Information We Collect

**3.1 Information Collected from Children**  
We may collect the following personal information from children when they use the device or App:

* **Child’s Name:** The first name of your child, used to personalize AI voice interactions and storytelling experiences.
* **Family Background Information:** Basic family context (such as favorite activities, pets, or interests) to enhance personalized interactions.
* **Voice Data:** Audio **recordings** and acoustic features of the child’s voice, used for speech recognition and interaction with the device.
* **Usage Preferences:** Information such as preferred story categories, favorite tasks, or content preferences, used to improve personalization. If this information is not provided, it will not affect access to basic functions.
* **Unique User ID:** An automatically generated identifier used to match the child’s account with device content and maintain session continuity.

**3.2 Information Collected from Parents/Guardians**We may collect the following information from parents or guardians:

* **Contact Information:** Email address and phone number for account management and communication.
* **Login Credentials:** Username, email, and password for parent account access.
* **Payment Information:** Processed by third-party payment processors for purchases. We do not store credit card information.
* **Account and Order Data:** Information related to transactions, subscription history, and product orders.

**3.3 Automatically Collected Information**  
When the device or App is used, we may automatically collect the following information:

* **Device Information:** Device name, device model, brand, CPU specifications, serial number, operating system version, software version, battery level, storage data, SD card data, memory usage, and sensor data.
* **Network Information:** Wi-Fi status, internet connection details, Bluetooth connection information, and network type.
* **Technical and Operational Logs:** Device and App log files, settings (including history of changes), usage history, device configurations, and device operational status.
* **Usage Data:** Records of how the App and device are used, including features accessed, session duration, runtime status, and behavior data.
* **Technical Identifiers:** IP address, device identifiers (such as MAC address and IDFV for iOS users), used only for technical support and security purposes.

**3.4 Optional Information Provided by Users**  
Some information is optional and not required for the basic functionality of the App:

* **Profile Information:** Nickname and avatar set by the user.
* **Communication Information:** Any information voluntarily provided by users when contacting customer service, including name, email, descriptions of issues, requests, and submitted images or videos.

****3.5 Platform-Specific Data****  
Depending on the operating system, additional technical data may be collected:

* **Android Users:** Phone model, brand, Android OS version, Android API level, manufacturer system version, CPU architecture, root status, disk usage, SD card usage, memory usage, network type, and current running process names and PIDs.
* **iOS Users:** Device model, OS version, Wi-Fi status, CPU attributes, available memory, disk capacity and available disk space, runtime status (process memory usage, virtual memory), IDFV, jailbreak status, and regional code.

## 4. How We Use Information

### 4.1 For Children’s Information

We use the collected information for the following purposes:

* **Account and Authentication Services:**

To provide the correct App version for your mobile phone or tablet.

To enable account registration and login services in order to identify and verify user identity.

To complete parental verification as required under COPPA.

* **Product Features and Services:**

To provide storytelling and interactive features of the product.

To process voice commands and enable AI voice conversations with characters.

To create personalized storytelling experiences using the child’s name and background information.

To help users connect the App with devices, manage device settings, and operate the device.

To match and sync content between the App and the physical storytelling device using the unique user ID.

* **Communication and Support:**

To communicate with parents/guardians and respond to feedback or requests submitted through our service center or App feedback channel.

To provide troubleshooting and technical support for crash issues, device operation, and other technical errors.

* **Safety, Security, and Compliance:**

To enhance product stability and improve performance.

To maintain network and data security, including the prevention, detection, and mitigation of fraud, abuse, criminal activity, or other abnormal activity.

To comply with legal obligations, including parental consent and record-keeping requirements under COPPA.

* **Service Improvement:**

To analyze usage patterns in order to improve product functionality and storytelling algorithms.

Only anonymized or aggregated data will be used for these purposes.

### 4.2 Data Minimization Principle

We collect only the minimum amount of information necessary to provide our core services. We do not collect information for marketing purposes or to create profiles for commercial use.

## 5. COPPA Compliance and Parental Consent

### 5.1 Verifiable Parental Consent

Before collecting any personal information from children, we obtain verifiable parental consent through one of the following FTC-approved methods:

1. **Credit Card Verification:** A small refundable charge to a credit card
2. **Digital Signature:** Electronic signature with government-issued ID verification
3. **Video Conference:** Direct conversation with trained staff
4. **Phone Verification:** Toll-free number with identity verification

### 5.2 Parental Rights

As a parent or guardian, you have the right to:

* **Review:** Access the personal information we have collected from your child
* **Refuse:** Decline to permit further collection or use of your child’s information
* **Delete:** Request deletion of your child’s personal information
* **Withdraw Consent:** Revoke your consent at any time

To exercise these rights, contact us at privacy@talenpal.com.

## 6. Voice Data and AI Processing

### 6.1 Voice Data Collection

When your child uses voice features:

* Voice recordings are encrypted during transmission using TLS 1.3
* Recordings are processed to understand commands and enable conversations
* Voice data may be temporarily stored to improve response accuracy
* We do not create permanent voice prints or biometric identifiers

### 6.2 AI Voice Processing Compliance

Our AI voice processing complies with:

* **COPPA requirements** for children’s voice data
* **State biometric privacy laws** (Illinois BIPA, Texas and Washington state requirements)
* **Data retention limitations** - voice recordings are automatically deleted after 30 days unless needed for technical support

### 6.3 Voice Data Security

* All voice data is encrypted using AES-256 encryption at rest
* Access is limited to authorized personnel for technical support only
* Voice data is never used for advertising or commercial profiling
* We do not sell, rent, or share voice data with third parties

## 7. Data Sharing and Third Parties

### 7.1 Limited Sharing

We may share personal information only in the following circumstances:

* **Service Providers:** With trusted third parties who help us operate our services (cloud hosting, customer support) under strict contractual agreements
* **Legal Requirements:** When required by law or to protect the safety of children
* **Safety Emergencies:** To address immediate threats to a child’s safety

### 7.2 Third-Party Services

Our product may integrate with:

* **Cloud Storage Services:** For secure data storage with COPPA-compliant contracts
* **Analytics Services:** Using anonymized data only, with no personal identifiers
* **Customer Support Tools:** For technical assistance (access limited to specific support cases)
* **AI Processing Services (Tuya AI System):** To enable AI-driven voice interactions, natural language processing, and personalized storytelling features. Access to personal data through Tuya AI is limited to what is necessary for providing these functions and is subject to strict confidentiality and security measures.

All third-party services are contractually required to comply with COPPA and our privacy standards.

### 7.3 No Advertising or Marketing

We do not:

* Share children’s information for advertising purposes
* Use children’s data for behavioral advertising
* Allow third-party advertising in our App
* Create marketing profiles of children

## 8. Data Security

### 8.1 Technical Safeguards

* **Encryption:** AES-256 encryption for data at rest, TLS 1.3 for data in transit
* **Access Controls:** Multi-factor authentication and role-based access for staff
* **Regular Audits:** Quarterly security assessments and penetration testing
* **Secure Infrastructure:** SOC 2 compliant cloud hosting with AWS

### 8.2 Physical and Administrative Safeguards

* Limited physical access to servers and systems
* Employee background checks and privacy training
* Incident response procedures for potential data breaches
* Regular security policy updates and staff training

## Data Correction

## When your data is changed, or when you find that data collected and processed by us is inaccurate or incomplete, you have the right to ask us to make corrections or additions. You can directly correct or modify some of your data on the relevant product/service function pages. For Personal Data that we have not provided you with a channel for correction, you can request that it be corrected or deleted by contacting privacy@talenpal.com.

## 10. Data Retention and Deletion

### 10.1 Retention Periods

* **Child’s Name and Background:** Retained until parent requests deletion or account closure
* **Voice Recordings:** Automatically deleted after 30 days
* **Usage Data:** Anonymized all the time, retained for service improvement
* **Account Information:** Retained until account deletion

### 10.2 Automatic Deletion

* Inactive accounts are automatically reviewed after 12 months
* Parents receive notification before any automatic deletion
* All associated data is permanently deleted from all systems, including backups

### 10.3 Data Deletion Process

When you request data deletion:

1. We will confirm your identity as the parent/guardian
2. All personal information will be deleted within 30 days
3. You will receive confirmation of deletion
4. Some anonymized usage statistics may be retained for service improvement

## 11. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in our practices or legal requirements. When we make changes:

* We will notify parents via email at least 30 days before changes take effect
* We will obtain new parental consent if required by COPPA
* The updated policy will be posted in our App and on our website
* Continued use of our services constitutes acceptance of the updated policy

## 12. State-Specific Rights

### 12.1 California Residents (CCPA/CPRA)

Under California law, parents of children under 16 have additional rights:

* Right to know what personal information is collected
* Right to delete personal information
* Right to opt-out of the sale of personal information (we do not sell children’s information)
* Right to non-discrimination for exercising privacy rights

### 12.2 Biometric Information (Illinois, Texas, Washington)

If our App collects voice prints or other biometric identifiers:

* We will provide separate written notice
* We will obtain specific written consent for biometric data collection
* We will not sell, lease, or trade biometric information
* We will establish a retention and destruction schedule for biometric data

## 13. Contact Information

### 13.1 Privacy Questions

For privacy-related questions or concerns:

**Email:** privacy@talenpal.com  
**Address:**UNIT 903D 9/F CAMERON COMM CTR 458-468 HENNESSY RD CAUSEWAY BAY, Hong Kong

**Data Protection Officer:** dpo@talenpal.com

### 13.2 Exercising Your Rights

To exercise your parental rights:

1. **Email:** Send a request to privacy@talenpal.com with your account information
2. **Mail:** Send written requests to our Hong Kong address

### 13.3 Response Time

We will respond to your requests within:

* **Verification:** 2 business days
* **Information Access:** 10 business days
* **Data Deletion:** 30 days
* **Complaint Resolution:** 14 business days

## 14. Dispute Resolution

If you have concerns about our privacy practices:

1. **Contact Us First:** Reach out to our privacy team
2. **FTC Complaint:** You may file a complaint with the Federal Trade Commission
3. **State Attorneys General:** Contact your state’s consumer protection office
4. **Legal Counsel:** Consult with privacy law attorneys if needed

## 15. Emergency Procedures

In case of a data security incident:

* We will notify affected parents within 72 hours
* We will provide details about what information was involved
* We will offer credit monitoring services if applicable
* We will take immediate steps to secure the data and prevent further incidents

**This Privacy Policy complies with:** - Children’s Online Privacy Protection Act (COPPA) - California Consumer Privacy Act (CCPA/CPRA) - Illinois Biometric Information Privacy Act (BIPA) - Texas and Washington State Biometric Privacy Laws - Federal Trade Commission (FTC) Guidelines

**For Parents:** If you have any questions about this Privacy Policy or your rights, please contact us at privacy@talenpal.com. We are committed to protecting your child’s privacy and providing a safe, educational experience.

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