

Privacy Policy

Effective Date: September 18, 2026

Applies to: Stug – Your Speech Companion! (iOS)

This Privacy Policy (“Policy”) explains how JDIV Studios LLC (the “Company,” “we,” “us,” or “our”) handles information in connection with its child-directed speech therapy application (the “App”).

The App is designed for children to practice and improve speech and language skills, and may be used only with the involvement and consent of a parent or legal guardian (“Parent”). Protecting children’s privacy is a core principle of the App’s design.

Our Approach

Almost everything the App knows about a child is stored only on the device it is installed on. It is not uploaded, not backed up to us, and not visible to us.

Specifically, all of the following stay on the device and are never transmitted to the Company:

- The child’s name, date of birth, speech focus and favourite colour
- Any profile photograph
- Every voice recording and everything the microphone hears
- All progress, scores, stars, streaks, credits and high-score lists
- The Parent PIN

Deleting the App from the device removes all of it.

We do not sell information, we show no advertising, and the App contains no advertising or behavioural-tracking SDKs and no advertising identifier.

Definitions

- **“Personal Data”** means any information relating to an identified or identifiable individual.
- **“Services”** means the App’s speech-therapy features, including microphone use for speech practice and the optional AI Speech Tutor.
- **“Parent”** means the parent or legal guardian who consents to a child’s use of the App and accepts the Terms.
- **“Child”** means a user under the age defined as a child by applicable law (including under 13 in the United States).
- **“AI Speech Tutor”** means the optional, PIN-protected chat feature in which a child’s typed message is sent to our service for an AI-generated reply.

Children’s Privacy Notice

The App is directed to children and subject to children’s privacy laws, including the U.S. Children’s Online Privacy Protection Act (COPPA) and GDPR-K in the EU and UK.

We:

- Keep children's information on the device wherever it is technically possible to do so
- Transmit the minimum necessary, and only for the optional feature described below
- Do not permit advertising or behavioural tracking
- Give Parents control over their child's information

If we become aware that we have received Personal Data from a child without required parental consent, we will delete it promptly.

Information Held on the Device

The App stores the following on the device so it can work. We do not receive any of it.

Set up by the Parent

- Child's first name and last initial — used to personalise greetings, progress screens and reminders
- Child's date of birth — used to decide whether parental consent is required and to set age-appropriate content
- Speech focus — for example stuttering, articulation, apraxia, dysarthria, cluttering or lisp. This is health-related information about a child and is treated as sensitive. It selects the exercises and word banks the child sees
- Favourite colour — a cosmetic preference
- Optional profile photograph
- Parent or guardian name and confirmation of consent
- Parent PIN — stored in the device Keychain

Created by using the App

- Completed exercises, levels and mini-games
- Session frequency and duration
- Progress indicators, scores, stars, streaks and in-app credits
- Local high-score lists, which are never shared or combined with other users

Information We Do Not Collect

- Advertising identifiers
- Behavioural or targeted advertising data
- Precise geolocation data
- Social media account information
- A child's email address, postal address or telephone number
- Voiceprints or biometric identifiers
- Contact information collected directly from children

Microphone and Speech Recognition (On-Device Only)

The App uses the device microphone so children can practise saying sounds and words.

- Speech recognition is configured to run on the device only — the App requires on-device recognition rather than a network service
- Audio is turned into text on the device; the audio itself is not stored after the exercise and is never transmitted to us or to anyone else
- Audio is never used for advertising, profiling or marketing
- The App does not create, store or analyse voiceprints or biometric identifiers

Only the resulting text is used, and only to tell the child whether the target word was said.

Camera and Photographs

Two optional features use the camera or photo library. Neither is required, and neither sends anything anywhere.

- **Profile photograph.** If added, it is stored only in the App's protected storage on the device.
- **Talking Photo.** A mini-game that animates a photograph of the child's face in time with their speech. The photograph is held in memory only while the game is open and is discarded when the child leaves it. It is not saved to the device and not uploaded.
- **Saving progress images.** If a child or Parent chooses to save an achievement image, the App writes it to the device photo library at their request. Nothing is read from the photo library for this.

The AI Speech Tutor — The One Feature That Sends Anything

The App includes an optional AI Speech Tutor in which a child can type a message and receive a written reply. This is the only part of the App that sends information off the device, and it is worth reading closely.

The Parent controls whether it is used at all

- It sits behind the Parent PIN and cannot be opened without it
- Use is limited to a fixed number of messages per day, which resets daily
- Every other part of the App works fully without it ever being opened

What is sent, and only when a message is sent

When a child sends a message, the following is transmitted over an encrypted connection to a service operated by the Company on Cloudflare Workers, which passes it to our AI model provider to generate the reply:

- The text of that message, and up to the twenty most recent messages in the conversation, so the reply makes sense in context
- The child's first name, so the tutor can address them by name
- The child's speech focus, so the guidance is relevant to what they are practising
- An age band — a broad range, never the exact age or date of birth — so the reading level fits

- A random installation identifier, used only to apply the daily message limit

What is never sent

- Audio, or any recording of the child's voice
- Photographs, including the profile photograph
- The child's date of birth, exact age or last initial
- The Parent's name or PIN
- Any advertising identifier, device identifier or location data

Safeguards

- Messages are screened on the device before anything is sent. A message about a sensitive or upsetting subject is answered on the device with a supportive reply encouraging the child to talk to a trusted adult, and is not transmitted at all
- The tutor is instructed to stay on the subject of speech and language practice
- Replies are generated by an AI model and may occasionally be wrong. They are not medical advice — see the Terms and Conditions

Retention

The conversation shown in the App is stored on the device and is removed when the App is deleted. We do not keep user accounts and do not build a profile of any child from these messages.

Messages are processed by Anthropic's Claude API solely to generate the reply. Anthropic does not use commercial API data to train its models, and under its standard commercial policy prompts and responses for that API are not retained once the reply has been returned.

Our own service stores no message content at all. It keeps only a per-installation counter, used to apply the daily message limit, which expires within 48 hours.

Notifications

With the Parent's permission, the App sends practice reminders — currently two per day — and optional birthday and inactivity reminders. These are local notifications: the device schedules and delivers them itself. The child's first name appears in the reminder text, but no notification information is sent to us or to anyone else. Notifications can be turned off at any time in the device Settings.

Crash Diagnostics

If the App stops unexpectedly, technical diagnostic information is sent to Firebase Crashlytics (Google) so that we can find and fix the fault.

- A crash report contains technical information such as the device model, the iOS version and the point in the code where the App stopped
- It does not contain the child's name, date of birth, speech focus, voice, photographs, progress or messages
- Diagnostic messages written by the App itself contain only technical values such as asset and file names

- Crash reports are not used to identify any individual, and are not used for advertising or profiling

Crash reporting exists solely to keep the App stable.

Service Providers

The App relies on the following, and on nothing else:

- **Firebase Crashlytics (Google).** Crash and stability diagnostics, as described above.
- **Cloudflare Workers.** Hosts the Company's own service, which handles AI Speech Tutor requests.
- **Anthropic (Claude API).** Generates AI Speech Tutor replies from the information listed above.

Apple provides on-device speech recognition as part of iOS. Because the App requires on-device recognition, no speech audio is sent to Apple.

Sharing

The Company:

- Does not sell children's Personal Data
- Does not share audio or photographs — neither ever leaves the device
- Does not use advertising or tracking SDKs and displays no advertising
- Does not use children's information to train AI models on our own account

Information may be disclosed only to the service providers named above, for the purposes described, and where required by law or legal process, or to protect the safety, rights or security of users or the App.

Retention and Deletion

- Audio: not retained — converted to text on the device and discarded
- Photographs, profile, progress and conversation history: held on the device until deleted by the Parent or child, reset in the App, or the App is deleted
- Crash diagnostics: retained by Firebase Crashlytics under Google's retention schedule
- **Installation identifier:** stored in the device Keychain. On iOS, Keychain items can survive deletion of an app, so this random identifier may persist if the App is reinstalled on the same device. It is not linked to a name and is used only for the daily message limit. A Parent may ask us to reset it, or erase the device.

Because we hold no user accounts, deleting the App is in almost every case a complete deletion.

Security

- On-device processing of speech and photographs, so the most sensitive information never leaves the device
- Device Keychain storage for the Parent PIN and the installation identifier
- Encrypted connections for every network request
- Access controls and secure infrastructure
- Regular security assessments

No system is completely secure, but we continuously work to safeguard user information.

Parental Rights

Parents and legal guardians have the right to:

- Review the information the App holds about their child — all of it is visible in the App itself
- Delete the child's profile and all associated information, by deleting the App or resetting it in Settings
- Decline the AI Speech Tutor entirely, by not setting or not sharing the Parent PIN, while continuing to use the rest of the App
- Withdraw consent at any time
- Contact us with any privacy question or concern

If you would like the installation identifier reset, or have any question about crash diagnostics, contact us at the address below.

Requests may be submitted to: support@jdivstudios.com

International Use

The App may be used globally. Because speech and photographs are processed on the device and never transmitted, children's speech and image data is not transferred across borders.

AI Speech Tutor messages and crash diagnostics may be processed on servers outside your country. Where required, such transfers are protected using legally recognised safeguards.

Modifications to This Policy

The Company may update this Policy from time to time. Material changes will be reflected by updating the effective date and, where required, providing notice through the App or app-store listing. Where a change materially expands what is transmitted from a child's device, we will seek fresh parental consent as required by law.

Contact

If you have questions or concerns about this Policy or children's privacy, please contact:

JDIV Studios LLC

support@jdivstudios.com