

# PRIVACY POLICY (LORECa / myLORECa)

**Effective Date:** 19 January 2026

**Service Provider / Data Controller:** LORECa – Doğu Medikal Tic. ve San. Ltd. Şti.

(“LORECa”, “we”, “us”, “our”)

**Contact:** support@loreca.com

LORECa recognizes the importance of your personal information. This Privacy Policy (“Policy”) explains how we collect, use, store, share, and protect information when you use our mobile applications and related services, including **myLORECa** and other LORECa hearing aid app services (“Services”). It also explains how you can manage your information and make informed choices.

We respect and protect the privacy of all users. We only process information in accordance with this Policy and applicable laws. Except as described in this Policy, we will not share your personal information with third parties without your consent.

If we need to use your information for purposes not stated in this Policy, we will update this Policy and notify you through reasonable means (such as in-app pop-up notices or prompts). Where required, we will obtain your consent again.

By using the Services, you acknowledge that certain information processing is necessary for providing hearing aid connection, fitting, and support functions.

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## 1. Scope of Application

This Policy applies to all products and services provided by LORECa that reference this Policy.

This Policy does **not** apply to services provided by third parties (such as app stores, operating system providers, payment providers, or external websites). Those services are governed by their own privacy policies.

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## 2. Information We Collect

We follow the principles of **data minimization** and **purpose limitation**, meaning we only collect information necessary to provide and improve the Services.

### 2.1 Information You Provide

Depending on how you use the app, you may provide:

- Name / nickname (optional)

- Contact information such as phone number or email (optional unless needed for support)
- Hearing aid model information
- Audiogram data (if you upload or input it)
- Support requests and feedback

If you choose not to provide optional data, you can still access many functions, but some features (such as remote support or advanced fitting features) may be limited.

## 2.2 Information Collected Automatically (Device & App Information)

To ensure stable and secure operation, we may collect:

- App version
- Device model/manufacturer
- Operating system version
- Language and country/region code
- Network status and connection information
- Diagnostic logs, crash reports, and performance data

## 2.3 Hearing Aid & Connection Data

When connecting hearing aids, we may collect and process:

- Hearing aid device identifiers (e.g., serial number, model, firmware version)
- Bluetooth connection state and pairing information
- Fitting parameters and commands sent between the app and hearing aids
- Firmware update records

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## 3. How We Use Your Information

We use the collected information to:

1. Provide core application functions (hearing aid connection, fitting, and configuration)
2. Generate audiograms and hearing test results (where applicable)
3. Enable remote fitting and support (including audio/video call functions if activated)
4. Improve product quality and user experience
5. Diagnose crashes, errors, and performance issues
6. Maintain system security and prevent fraud/abuse

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## 4. Third-Party SDKs and Services

To ensure stable performance and provide specific features, the app may integrate third-party SDKs (Software Development Kits) or tools that are not owned or developed by LORECa.

We only use third-party SDKs for lawful, necessary, and specific purposes required for service delivery. We perform security and compliance reviews and require partners to protect user information.

Third-party SDKs may collect the following categories of data:

a) Analytics / Crash Diagnostics

- Logs and crash information
- Device identifiers (e.g., Android ID, MAC where applicable)
- OS version, device manufacturer
- Network information

**Purpose:** diagnosing crashes and improving stability.

b) Remote Fitting (Audio/Video Support) – When Enabled

- Network status
- Camera and microphone access (with your permission)

**Purpose:** provide remote fitting and real-time support.

c) Bluetooth & Firmware Updates

- Bluetooth access
- Location/Nearby Device permission (required by Android for Bluetooth scanning)

**Purpose:** hearing aid pairing, sending fitting commands, and hearing aid firmware updates.

LORECa does **not** allow third-party SDK partners to use personal information for their own purposes beyond providing the SDK function.

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## 5. App Permissions

Depending on your device and feature usage, the app may request:

- **Microphone Permission:** ambient sound detection, hearing test, remote support calls
- **Camera Permission:** video call for remote fitting/support
- **Bluetooth Permission:** pairing and controlling hearing aids
- **Location / Nearby Devices Permission:** required on Android to discover Bluetooth devices
- **File & Media Permission:** storing firmware/app update packages locally
- **Network Access:** enabling remote services and updates

You may manage these permissions anytime in your device settings. Refusing certain permissions may prevent related features from functioning.

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## 6. Sharing of Information

We do **not** sell your personal data.

We may share information only in the following cases:

- With service providers strictly necessary to operate the app (e.g., crash reporting / remote support tools)
- To comply with legal obligations or lawful requests by authorities
- To protect rights, safety, and security of users and our Services

Where possible, shared data is minimized and/or anonymized.

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## 7. Data Security

We apply reasonable technical and organizational measures aligned with industry standards to protect information from unauthorized access, use, modification, disclosure, loss, or destruction.

Security Incident Handling

If a security incident occurs, we will:

- activate emergency response procedures,
- take measures to minimize harm,
- notify users and regulators as required by law.

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## 8. Data Retention

We retain information only for as long as needed to:

- provide the Services,
- meet legal and regulatory requirements,
- resolve disputes, enforce agreements, or ensure security.

After the retention period, data will be deleted or anonymized securely.

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## 9. Your Rights and Choices

Depending on your jurisdiction, you may have rights to:

- access your personal information,

- correct or update information,
- request deletion of certain information,
- withdraw consent for optional processing,
- manage app permissions via your device settings.

To exercise your rights, contact us at: **support@loreca.com**

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## **10. Changes to This Policy**

We may update this Policy at any time. Updated versions are effective immediately upon publication in-app or on our platform. We encourage you to review this Policy periodically.

If material changes are made, we may notify you via in-app notice or other means.

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## **11. Contact Us**

For any questions about this Policy, please contact:

<mailto:support@loreca.com>