

# SoundSteps™ Mobile Privacy Policy

**Effective Date:** June 3, 2026

## 1. Introduction

SoundSteps™ Mobile is a digital health and exercise application provided by Biomedical Music Solutions, Inc. (BMS), located at 44 East Ave, #1807, Austin, Texas. We are committed to protecting the privacy and security of the highly sensitive health and personal data entrusted to us. This Privacy Policy details the data we collect, why we collect it, and how it is used and protected.

## 2. Data Compliance and Security

We are SOC Level 2 HIPAA and Privacy Compliant. Our data handling practices are designed to adhere to stringent privacy regulations, including the U.S. Health Insurance Portability and Accountability Act (HIPAA) and the European Union's General Data Protection Regulation (GDPR).

## 3. Information We Collect

The SoundSteps™ Mobile application collects data essential for supporting rehabilitation services and tracking progress in collaboration with a licensed Physical Therapist (PT).

- **A. Personal Identifiers and Patient Profile Data:**
  - Name and Email Address (used for PT/Patient connection and invitation).
- **B. Health and Movement Metrics (Protected Health Information or PHI):**
  - Movement Data: Distance walked and session duration, along with Pedometer and Accelerometer data.
  - Performance Metrics: Percentage of rehearsal attempts, progress toward established walking time and distance goals.

- Gait Training Metrics: Specific metrics used to engineer audio cueing, such as walking cadence and steps. Individualized Treatment Plans and Goals (created by the PT).

## 4. How Information is Collected and Used

- **Limited, Opt-in Collection:** Data is explicitly gathered **only** when the user actively initiates a session by pushing 'play' in the application. We do not engage in constant, background tracking of the patient.
- **Offline Functionality:** The app functions offline, and data collected during offline rehearsal is securely stored on the mobile device and automatically uploads to our secure, cloud-based platform when an internet connection is available.
- **Purpose of Use:** To deliver personalized, tempo-shifting audio cueing for rehabilitation, to allow the PT and patient to immediately view progress, and to enable the PT to make necessary adjustments to your exercise plan.

## 5. Data Sharing and Disclosure

We do not sell your Personal Identifiers or Health and Movement Metrics to third parties.

- **Sharing with Your Physical Therapist:** The core function of SoundSteps™ Mobile relies on sharing your collected data and individualized plans with your designated PT. This sharing is necessary for continuity, plan adjustments, and assisting with your goals.
- **Data Anonymization:** We may use anonymized and aggregated data for research, product improvement, or business analytics, provided that this data cannot be reasonably used to identify you.
- **Legal and Regulatory Requirements:** We may disclose your information if required to do so by law or in the good faith belief that such action is necessary to comply with legal processes or protect the rights or safety of Biomedical Music Solutions, Inc. or others.

## 6. Data Retention and Your Rights

- **Patient Ownership:** The data generated is the patient's property.
- **Retention:** We retain data as long as necessary to provide the service, maintain the account, and comply with legal and documentation requirements.
- **Deletion:** If your account is deassigned or your physical therapy stops, you have the right to request deletion of your mobile account and personal data not related to your physical therapy. Requests for deletion or access to your data can be sent to the contact information below.

## 7. Changes to this Privacy Policy

We reserve the right to update this policy. We will notify you of any material changes, such as when updates to the software or user agreement are made.

## 8. Governing Law

This Privacy Policy and any disputes related to it will be governed by the laws of the State of Delaware, United States.

## 9. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at:

Biomedical Music Solutions, Inc.

44 East Ave, #1807, Austin, Texas

Email: [it@biomedicalmusic.com](mailto:it@biomedicalmusic.com)

Phone: 512.826.4028