

RealTalk | Privacy Policy (20260430)

RealTalk: Learn Chinese | Privacy Policy

Effective as of 30 April 2026

Thank you for using our mobile application **RealTalk: Learn Chinese** ("RealTalk"), visiting our website at <http://realtalk.geniustech.ai/> and/or communicating with us via email or text or our social media accounts, if any (collectively, the "Services").

For the purposes of data protection and privacy laws, **Tiya Pte. Ltd.** and **Genius AI Labs Pte. Ltd.** ("we" or "us") are joint controllers in the processing of your personal information. We are committed to protecting your privacy through our data practices described in this Privacy Policy.

This Privacy Policy describes:

- The ways we collect personal information about you and the purposes for doing so;
- How we or our Authorized Partners use your personal information;
- The choices and rights you have regarding your personal information; and
- How we protect and secure your personal information.

For the purposes of this Privacy Policy, the terms "personal information" and "personal data" are used synonymously. This Privacy Policy does not apply to our data collection activities offline or otherwise outside of the Services (unless otherwise stated below or at the time of collection).

Residents of certain U.S. states have additional privacy rights detailed in our [Privacy Notice to US Residents](#). To the extent that there is a conflict between this Privacy Policy and the Privacy Notice to US Residents, the latter shall prevail.

BY USING THE SERVICES, YOU CONSENT TO THE COLLECTION, USE, AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY. We reserve the right to change and may periodically update this Privacy Policy by posting the

updated version on our website. Where required, we will endeavour to notify you of material changes to this Privacy Policy by posting a notice on RealTalk. Your continued use of our Services following the posting of changes to the Privacy Policy or any notification to you shall constitute your acceptance of those changes. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

1. Contact Us

The designated joint controller representative is **Genius AI Labs Pte. Ltd.**, which is entitled to act on behalf of **Tiya Pte. Ltd.** and is responsible for processing and responding to data requests made by you or any government authority.

If you have questions about how we collect, use, process or protect your personal information, or if you have any requests in respect of your personal information, we encourage you to contact us through the feedback function within the RealTalk app so we can respond more quickly. Alternatively, you may contact us as follows:

Joint Controller Representative: Genius AI Labs Pte. Ltd.

Address: 6 Shenton Way, #37-03, OUE Downtown, Singapore 068811

Attn: Data Protection Officer

Email: realtalk.support@geniustech.ai

We will respond to your requests in accordance with applicable laws and may take additional steps to verify your identity before fulfilling your request. These steps may include verifying your account details. You may also designate an authorized agent to act on your behalf but we reserve the right to verify the agent's identity and authority, and may deny any requests in appropriate circumstances.

We endeavour to respond to all requests in a timely manner. For complex or excessive requests, we may charge a reasonable fee for processing your request, as permitted by law. We will inform you of such fees before proceeding with your request. If you have any unresolved concerns about your privacy rights or personal data protection that we could not address adequately, you may contact your local privacy and personal data protection authority for further assistance.

2. Collection of Personal Information

(I) Information You Provide

Category	Description
User Data	<p>You do not need to provide any personal identifiers (such as name or phone number) to start using RealTalk.</p> <p>When you use RealTalk, we will collect information such as your country, device information and subscription status in order to enable you to use the features. We collect some of this data from your device. For more information about how we collect and use this data, see ‘Your general (non-precise) location’ in the Usage Data category.</p> <p>When you send us feedback or request, we may collect your name and email address etc as well as the contents of those feedback or requests.</p>
User Content	<p>All text, audio recordings, or voice media that you input, upload, or transmit with RealTalk ("Submitted Content") will be securely processed to provide our services.</p> <p>Specifically regarding audio: For core curriculum features, your audio is securely transmitted to our Authorized Partners for real-time transcription and analysis via encrypted APIs. We do not store these audio recordings on our servers. For the onboarding process, we use Apple's on-device speech recognition to process your voice locally on your device. The results generated from your Submitted Content ("Output") will be returned to us, stored securely on our servers, and delivered to your device for local access.</p> <p>We may process your Submitted Content and Output for purposes of enabling you to use the mobile application, monitoring for and preventing abusive or harmful use of our Services, or for training and analytics purposes.</p> <p>For detailed information about our partners, please see Section 4.</p>
Optional personal data you may choose to share with us	
Category	Description
Survey and User Research Data	<p>When you respond to a survey or take part in user research, we collect and use the personal data you provide for product improvement and research purposes.</p>

(II) Information We Get When You Use Our Services

When you use our Services, we may automatically collect information about you and how you use our Services. We only use pseudonymized or anonymised data that have gone through a privacy-enhancement process to protect and improve the functionalities of the Services.

Category	Description
Usage Data	<p>These are personal information collected and processed when you're accessing or using the Services. They include:</p> <p>Information about how you use RealTalk. They include information about your activities using the Services (including date and time), such as:</p> <ul style="list-style-type: none">• account settings• interactions with the Services and their features <p>Your technical usage data. They include:</p> <ul style="list-style-type: none">• online identifiers such as IP addresses• information about the devices you use such as:<ul style="list-style-type: none">◦ Device brand and IDs◦ Network connection type (e.g. WiFi, 5G/4G, LTE, Bluetooth)◦ Operating system◦ RealTalk application version◦ Crash logs◦ Fraud prevention data <p>Your general (non-precise) location. They include country, region, state or timezone. We may learn about this from technical data (e.g. network type, language setting of your device). We need this for:</p> <ul style="list-style-type: none">• Load and network balancing• Security services• Enabling you to use the app's features

(III) Information We Collect from Third Parties

Categories of Third Parties	Description	Data Categories

<p>Payment and transaction fulfillment providers</p>	<p>When you pay subscription fees (where applicable) to access the features on RealTalk, the Apple App Store (where you downloaded RealTalk) is responsible for handling any and all payments of In-App purchases. They will collect your payment information such as credit card details and other identification information such as name, billing address, email address. After you provide the requisite information and complete the transaction, a purchasing account will be created and maintained by Apple. Apple will use your personal information to process any purchases, to confirm your orders via email, to make future purchases more convenient for you and to handle, where applicable, refunds. We do not collect or process any personal information save that Apple will provide us with high-level records of non-sensitive transaction information and subscription data (such as order number, time of order, user ID, subscription type etc.) so that we can activate the paid features for your use or improve the performance of our RealTalk app.</p>	<p>Pseudonymised Payment Transaction Information</p>
<p>Technical Service Partners</p>	<p>We work with technical service partners that give us certain data. This includes mapping IP addresses to non-precise location data (e.g., country or region, city, state). This makes it possible for RealTalk to provide the RealTalk Service, content, and features. We also work with security service providers who help us protect user accounts.</p>	<p>User Data Usage Data</p>
<p>Marketing partners</p>	<p>When you download RealTalk through our marketing partners, they provide information about their channel.</p>	<p>Usage Data</p>
<p>Law Enforcement Agencies</p>	<p>We may receive information from law enforcement about potential violations of our Terms of Use.</p>	<p>User Data User Content</p>

3. How Do We Use Your Information

DO NOT SELL. We do not sell your personal information. We also do not transfer, disclose or share your personal information with third parties, except where the information is necessarily transferred, disclosed and shared with our authorized third-party partners who must use and process your information solely to provide you with the Services on our behalf.

We use your personal information for the following purposes only when it is necessary to do so for valid reasons (such as with your consent, to comply the law, to provide you with the Services, to protect your rights and interest or to fulfil our legitimate business interests) and in accordance with applicable laws:

Purpose	Legal basis	Personal Information
<p>Account Management: To allow you to use the Services and generally manage your account.</p>	<p>They are necessary to provide you the Services.</p>	<p>Account Information: Pseudonymised Device ID & Storage Capacity</p>
<p>Core Service Delivery: To deliver and facilitate the delivery of the Services and to allow you to use the RealTalk features, specifically voice-to-text conversion and multi-modal data structuring.</p>	<p>They are necessary to provide you the Services.</p> <p>You have provided your consent when you take steps to provide us with certain information or continue to use the features.</p>	<p>User Content: Voice inputs (processed in real-time), text-based transcripts</p>
<p>Subscription Services: To allow you to subscribe to paid Services and manage premium benefits.</p>	<p>They are necessary to provide the paid Services.</p> <p>You provide consent when you take steps to upgrade to the paid Services or take steps to provide us with certain information to use the premium features.</p>	<p>Pseudonymised Payment Transaction Information: Transaction ID</p>
<p>Service Optimization: To better understand how RealTalk users use and interact with the Services.</p> <p>To identify and work on areas for improvement.</p> <p>To optimize the user experience.</p>	<p>We have legitimate interests to develop and improve our products and features for our users.</p>	<p>Activity Information: Activity logs, timestamps, country</p>
<p>AI Optimization: We may synthesize user content to train & improve our AI services.</p>	<p>We have legitimate interests to develop and improve our products and features for our users.</p>	<p>Training Data: Synthetic or anonymized user content</p>

<p>Synthetic Data being artificially generated and not linked to personally identifiable information (PII), does not contain any identifiable or sensitive personal information.</p>		
<p>Security & Fraud Prevention: To detect and prevent fraudulent activities, software and tools within the Services and/or employed by end users.</p> <p>To identify a banned account or a device.</p>	<p>It is in our legitimate interests to ensure the security of the environment of our Services and safety of our users.</p>	<p>Fraud Detection Information:</p> <ul style="list-style-type: none"> • Basic device information (eg:brand, model, device system version settings) • Device identification information (eg: IMEI, ICCID, IDFV, OAID, bluetooth, MAC) • Device network information (Eg: WIFI, IP address, network connection status) • Installed application information (Eg: SDK host application package name and version number, application list)
<p>Legal Compliance: To comply with our legal obligations, respond to legal requests, respond to requests from law enforcement authorities (such as police, prisons, courts) as well as exercise, establish or defend our legal rights.</p>	<p>Compliance with legal obligations</p>	<p>User Data Usage Data User Content Device Address Book Survey and User Research Data</p>
<p>Intellectual Property Protection: To take appropriate action in respect of intellectual property infringement</p>	<p>Legitimate interest to protect our legal rights</p>	<p>User Data Usage Data</p>

claims or reports of inappropriate content or activity.		User Content
<p>Technical Troubleshooting: To diagnose, troubleshoot and fix issues with the service.</p> <p>To discover error frequency and trends to ensure a high level of functionality for the Services.</p>	They are necessary to provide you the Services.	<p>Crash Reporting Information: Crash/Error information collected from your usage with the RealTalk app</p>
<p>Customer Support: To provide you with customer and technical support when you have enquiries, provide feedback, when you need troubleshooting, to fix bugs and to assist with any issues you might experience using the Services.</p>	With your consent to resolve your questions.	<p>Customer Support Information: Email, details of the request</p>
<p>User Research: When RealTalk users respond to a survey or take part in user research, we collect and use the personal information as described in the survey or user research.</p>	You provide consent for processing personal information.	Survey and User Research
<p>Business Planning: To conduct business planning, reporting, and forecasting. For example, when we look at aggregated user data like the number of new sign ups in a country in order to plan new locations to launch our products and features in.</p>	<p>Legitimate Interest</p> <p>Our legitimate interests here include researching and planning so that we can keep running our business successfully.</p>	Aggregated usage data
<p>Service Development: To evaluate and develop new features or technologies.</p>	Legitimate interest to improve our products, improve user experience and develop new products for our users.	Synthetic User Content

4. Who Else Can Use Your Information

We may share your information with other entities in the following situations:

A) Our Related Entities

We might share your personal information within our corporate group to assist us in:

- **Technical Operations:** Data hosting, analytics, maintenance, and enhancing security against spam, abuse, fraud, or infringement.
- **Corporate Functions:** Finance, legal, HR, accounting, and strategic planning.
- **Corporate Transactions:** Mergers, acquisitions, sales of company assets, or financing.
- **Compliance:** Adherence to applicable laws and internal audits.

Each entity within the group may only use your personal information in accordance with this Privacy Policy.

B) Our Authorised Partners

We work with third-party vendors to support the infrastructure and growth of RealTalk. These partners process your information solely according to our instructions.

Vendor	Purpose
Firebase	Crash analytics and performance monitoring.
iShumei	Fraud detection and prevention, Risk control.
Appsflyer	Mobile attribution and marketing analytics.
SensorsAnalytics	Data statistics and behavioral analysis.

C) AI Service Providers and Data Processing

To provide our core language learning features, we partner with specialized AI providers. Your Submitted Content (such as voice or text) is transmitted via encrypted APIs for real-time processing.

Provider	Model/Feature & Purpose
OpenAI	GPT-4 series: Used for analyzing overall course progress, generating conversational responses, and linguistic feedback.

Microsoft Azure	Speech Service: Used for voice detection and analyzing the quality of user pronunciation.
Sonix	ASR Model: Used for high-precision automatic speech-to-text (ASR) conversion.
BytePlus	Seed-TTS: Used for high-quality text-to-speech (TTS) to provide natural voice examples for learning.

Regarding these AI partners, we further disclose:

- **Explicit Consent:** We only transmit audio recordings or Submitted Content to these AI partners with your explicit consent, obtained at the time of feature activation.
- **Limited Purpose:** Data is used solely for the automated processing required to generate linguistic feedback and learning content.
- **No Model Training:** We have configured our API integrations to ensure that these AI partners **do not** retain or use your personal data or Submitted Content to train, improve, or refine their own base models.
- **Data Security:** All data is transmitted via secure, encrypted channels. Audio recordings are processed in real-time and not permanently stored on our servers.
- **User Control:** You may withdraw consent by disabling microphone access in your device settings.

D) Government Agencies

In order to verify payments of In-App purchases and combat fraud and illegal activity, we may process and disclose information to other organizations or provide information to government agencies in response to any lawful request. If required by any government authority or courts for any purposes such as the enforcement of any laws or to prevent their contravention, we may release your personal information as is legally required or permitted.

5. Data Storage and Cross Border Data Transfers

By default, your personal data is stored in the United States.

In order to provide you with the full range of Services efficiently, we are working with authorized third party partners as well as related entities within our corporate group around the world. Accordingly, your personal information may be accessed by our authorised personnel around

the world and/or your personal information may be lawfully transferred at our instructions for limited access, use or processing by our authorised personnel around the world.

Because the data protection and privacy laws in other countries may be different from those of your home country, we will take rigorous steps to ensure that adequate safeguards are in place to protect your personal information as explained in this Privacy Policy. These safeguards include:

- **Standard Contractual Clauses (SCCs):** Relying on approved contractual frameworks to ensure data receives a comparable level of protection to that in your home jurisdiction (including requirements under the Singapore Personal Data Protection Act).
- **Technical Security:** Implementing industry-standard encryption (TLS/SSL) during transit and at rest.
- **Access Control:** Limiting data access to authorized personnel on a "need-to-know" basis.

We are entitled to do the above in order to perform our contractual obligations to you. By using our Services and providing information to us, you also consent to the storage, transfer and processing of the information to jurisdictions outside your home country and, unless otherwise stated in this Privacy Policy, we use this consent as one of the legal grounds for such data transfer.

6. Your Rights and Choices

A) Device Settings

We will ask for your permission to access the microphone where necessary so that you can use the App's voice-interactive features, such as real-time oral practice and pronunciation analysis. You may opt-out or revoke this permission at any time by adjusting the settings on your mobile device; however, doing so may limit your ability to use certain features of RealTalk.

B) Access to Your Information

Upon your written request and successful verification of your identity, we will provide you with a copy of your personal information we hold about you in a structured, electronic format. Under applicable laws, you may also have the right to obtain a transferable version of your personal information to move to another service provider.

C) Personal Information Rights and Consent Withdrawal

You may, at any time, withdraw your consent for us to collect, use, disclose or transfer your personal information to third parties. You also have the right to rectify or delete your personal information, or limit the processing of your personal information.

- **Processing Time:** Upon receipt of your written request, we require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences regarding the same. In general, we shall seek to process your request **within thirty (30) calendar days** of receiving it.
- **Consequences:** Depending on the nature and scope of your request, you may not be able to access some or all features on RealTalk, and we may have to terminate the [End-User License Agreement](#) we have with you. We will notify you before completing the processing of your request. Should you decide to cancel your request, please inform us immediately.
- **Exceptions:** Withdrawal of consent does not affect the lawfulness of processing performed before the withdrawal, nor our right to retain data where required by law or for security purposes.

D) Cancelling your subscription plan

You may cancel your paid subscription plan any time. If you decide to cancel your paid subscription, you will enjoy the paid features as per the full billing cycle. If you decide to delete your RealTalk account before the paid subscription expires, you may lose your subscription status, your personal information or other related information associated with the account. You will be informed and required to acknowledge the consequences of deleting your account. However, we may retain some information to the extent necessary to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

E) Deleting your RealTalk Account

You may delete your RealTalk account at any time via the account settings within the App. If you decide to delete your RealTalk account, we will deactivate your account and delete your information from our active databases. You may lose your personal information or other related information associated with the account. You will be informed and required to acknowledge the consequences of deleting your account.

F) Data Retention After Deletion

Even if you delete your RealTalk account or request data deletion, we may still retain certain data to the extent necessary to serve our legitimate business interests. This includes complying with legal obligations, resolving disputes, preventing fraud, troubleshooting, and enforcing our agreements. Where required by applicable laws (such as for residents of Japan), we will provide a detailed explanation if we are unable to fulfill a specific deletion request.

G) Exercise of Rights

To exercise your personal information rights, please contact us via the feedback function in the App or at realtalk.support@geniustech.ai (see Section 1 above). You will not be subject to any discriminatory treatment for exercising your rights.

7. How Do We Protect Your Personal Information

A) Security

In order to help ensure a secure environment for the Services and safe experience for our users, we are continuously developing and implementing reasonable administrative, technical and physical security measures to protect your personal information from unauthorized use or access and against loss, misuse or alteration.

While we try our best, we cannot warrant the security of any information transmitted to us through or in connection with the Services, that we store on our or our authorised partners' systems.

Any improper collection or misuse of personal information is a violation of this Privacy Policy and our Terms of Use and should be reported to realtalk.support@geniustech.ai.

B) Pseudonymisation, Anonymisation and Aggregation Techniques

We employ privacy-enhancing techniques that involve modifying or removing certain identifying information from your personal data and information to make it significantly more difficult to link the data or information back to you. We only use information that has gone through this privacy-enhancement process if we are using them to improve functionalities of the Services.

C) Personal Information Retention

Generally, we will store your personal information only for the time period necessary:

1. to fulfil the purposes for which such personal information was collected;
2. for as long as you have an active subscription or as needed to provide you the Services; or
3. as required or permitted by applicable laws (such as tax, accounting, or other legal requirements).

Once we determine that the retention of your personal information is no longer necessary for the intended purposes, or that retention is no longer necessary for any legal or business purpose, we will cease to retain your personal information, or anonymise the personal information so that it can no longer be used to identify any particular individual.

Logs are pseudonymized and retained for a year, after which we may delete or anonymize it.

8. Protecting Children's Privacy

We take our responsibilities to the RealTalk community very seriously. We also believe in protecting children's privacy online. RealTalk app is not meant for use by persons under the age of 18 years old. If you are under the age of 18, please do not use our RealTalk app in any manner. If you are a minor, you may only access and use RealTalk app with the consent and under supervision of your parent or legal guardian. Please note that you must be of legal age according to the laws of your home country to make any In-App purchases on RealTalk.

We do not knowingly collect personal information and data from anyone under the age of 18 and the RealTalk app is not directed at children under the age of 18. Any person who provides their personal information to us through our Services explicitly represents that they are 18 years of age or older. If we become aware that someone under 18 years of age provided us with their personal information, we will close the account of that person and promptly delete their information or remove their information to the extent required by law, save when we are under a legal obligation to keep certain information.

If you are a parent or legal guardian of a minor, and wish to review any personal data that may have been collected by us from your child or ward for security reasons, or request that their

RealTalk account or personal information be modified or deleted for security or accuracy reasons, you may contact us at realtalk.support@geniustech.ai. We will respond to your requests after verifying the identities of the relevant users and their parents or legal guardians, and obtaining consent (if required under the laws) from the relevant users.

You are responsible for any and all account activity conducted by a minor on your RealTalk account.

9. Cookies and Tracking Technologies

We use third-party services such as Google Firebase and AppsFlyer to help us understand how RealTalk is used and to improve performance and user experience. These services may collect and analyze certain device and usage data, including mobile identifiers, app usage statistics, and crash reports.

These technologies may function similarly to cookies and may involve the collection of personally referable information under applicable laws. This data may be shared with or accessed by the respective service providers to perform analytics, attribution, or to optimize RealTalk's performance.

We will ask for your prior consent before enabling such tracking technologies, except where they are strictly necessary for the operation or security of RealTalk. You may withdraw your consent any time by adjusting your device settings.

10. Notice to US Residents

Residents of certain U.S. states have privacy rights detailed in our [Privacy Notice to US Residents](#). To the extent that there is a conflict between this Privacy Policy and the Privacy Notice to US Residents, the latter will control.

11. Notice to EU or UK Residents

Pursuant to the General Data Protection Regulation (GDPR) and the UK Data Protection Act, we now explain the valid legal bases we rely on in order to process your personal information.

- a. **Consent.** We may process your information if you have given us permission to use your personal information for a specific purpose. You can withdraw your consent at any time.

- b. **Performance of a contract.** It is necessary for us to process your information in order to allow you to register a RealTalk account and grant you a license to access, use or navigate our Services (or continue to do so at your choice).
- c. **Compliance with Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- d. **Legitimate Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

12. Notice to Canadian Residents

We may process your information if you have given us specific permission to use your personal information for a specific purpose, or in situations where your permission can be inferred. You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- a. If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way.
- b. For investigations and fraud detection and prevention.
- c. For business transactions provided certain conditions are met.
- d. If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim.
- e. For identifying injured, ill, or deceased persons and communicating with next of kin.
- f. If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse.
- g. If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.
- h. If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.

- i. If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced.
- j. If the collection is solely for journalistic, artistic, or literary purposes.
- k. If the information is publicly available and is specified by the regulations.

13. Notice to Malaysian Residents

This section applies to you if you reside in Malaysia. In this section, the term “processing” shall have the same meaning as prescribed in the Malaysian Personal Data Protection Act 2010 (“MY PDPA”).

Personal Information of Minors – In respect of personal information relating to a minor (i.e. individuals under the age of 18), you confirm that you are the parent or legal guardian or person who has the parental responsibility for the said minor to consent on his/her behalf to the processing of his/her personal information in accordance with this Privacy Policy.

Obligatory Personal Information – It is obligatory that you supply us your details for fields marked as compulsory (where applicable) when you register an account or use our Services (collectively, “Compulsory Personal Information”). If you fail to supply us with any of the Compulsory Personal Information, we may refuse to, or may be unable to, process your personal information for any of the purposes specified in this Privacy Policy.

Language – In the event of any inconsistency between the English version and the Bahasa Malaysia version of this Privacy Policy, the English version shall prevail over the Bahasa Malaysia version.

** End of Document **