

Privacy Policy

Effective Date: October 16, 2025

1. Introduction

Lung Games International Inc. ("LungGames") is a Canadian-based company that provides *breathing-powered interactive gaming*,™ using a spirometer as the game controller, that is designed to support inclusive respiratory health in children and adults. These games are made to teach proper spirometry technique and breathing exercises while providing a tool that allows for patients, parents, caregivers and healthcare providers to monitor lung function and assist in lung rehabilitation for peace-of-mind.

Our Vision is a world where lung health is Accessible, Affordable and Fun!

At Lung Games International Inc. ("LungGames," "we," "our," or "us"), we value your trust and are committed to respecting and protecting your and your child's personal information that you share with us. This Privacy Policy explains how we collect, use, disclose, share, transfer, and store your personal information when you use our Services, which include our website, mobile games, applications, and any related offerings.

LungGames is guided by a strong commitment to transparency and user control. We design our systems to minimize data collection, protect your data with advanced encryption and access controls, and provide clear, simple tools to manage your privacy. Our practices align with leading privacy standards including those outlined by the General Data Protection Regulation (GDPR), the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Health Information Protection Act (PHIPA), and the Health Insurance Portability and Accountability Act (HIPAA).

It is important that you carefully read the information provided in this Privacy Policy as well as our [Terms of Use](#). If you do not agree with this policy, please do not use our Services.

If you have questions or concerns, please contact us at privacy@lung-games.com.

2. Personal Information We Collect and How it is Used

Personal Information is defined as information that relates to an identifiable person and/or that can be linked to that person. Personal Health Information is a sub-category of Personal Information. Aggregate information that cannot be linked to an identifiable person is not considered Personal Information.

LungGames has been designed in alignment with Privacy-by-Design and data minimization principles. This means we only collect the minimum information needed for our intended use and to provide you and your Registered Users with our Services.

We collect personal information you provide directly when you register, use our Services, communicate with us, or otherwise engage with our platform. This includes:

Account and Registration Information	This includes information that is identifiable and needed to maintain your account and provide Services to you, such as your name, address, email and phone number. We may also use this information to communicate with you about changes to our Services or Policies, assist you with your queries and technical support, accept survey information, or share information about other services that may be helpful to you. Changes to Services and Policies will also be communicated on our website.
Payment and Claim Information	This includes information that is used to process payment for Services, such as billing address, payment methods, bank information, credit, debit and other payment types or payment card information, place of employment and insurance carrier and plan coverage. Where governments are paying for services, this may also include government health identification cards.
Health Information	We collect health information from Registered Users on their respiratory health metrics (through the spirometer) to assist you with your lung health management, and personal data to ensure correct calculations for target predicted values for lung function to enable game operation. This includes information on birth date, sex at birth, height, weight. We may collect and maintain information on health conditions and usage of health resources, such as emergency room and hospital admissions and medication interventions and other usage information to assist you with managing lung health. We may also receive information from third parties when you authorize sharing. We request information on ethnicity (which you may refuse to provide) that we use in aggregate form (see below) to understand the burden of disease in various communities. We are committed to equitable access to our technology and services. NOTE that we encourage usage of Nicknames or initials for Registered Users to protect their identity.
Technology Information	This includes information about the spirometer brand, type and serial number that you have connected the LungGames Services to, the device on which you are accessing Services such as identification and type, operating system, connection information, IP address, standard audit log information such as when you access the Services, page views and site traffic. This information is collected to contact you if there is ever a recall of the technology and for support purposes to ensure proper operation of your system.
Legal Requirements	We will also use your personal information to comply with laws, such as legal reporting requirements, or to comply with legal government or law enforcement requests.

Business and Service Improvement and analysis for patient and health system improvement	Information for this purpose is only used in Aggregate form. Data in Aggregate form is NOT classified as Personal Information as it has been stripped of identifying information. We may also request survey information from you from time to time for analysis in aggregate form. This information may be used to improve our business and our Services to you. We may also use this information for research purposes or to generate clinical insights on health outcomes and improvements to the health system.
WE WILL NEVER SELL YOUR PERSONAL INFORMATION	

3. How We Share Personal Information

LungGames does not and will not sell your Personal Information. We may share your or your Registered Users' Personal Information only in the following circumstances, and only if they follow the privacy and security standards consistent with this Privacy Policy:

- With trusted third-party service providers who assist with infrastructure, analytics, storage, and customer support, subject to strict contractual obligations
- With healthcare professionals, if authorized by you or your legal representative
- With trusted non-profit patient support organizations, with your consent
- When required by law or lawful request from authorities or regulators

4. Children's Privacy

LungGames creates products specifically for children and their caregivers. All Accounts must be created and managed by a parent or legal guardian, and we obtain their consent before collecting or processing any data from a child. We do not knowingly collect personal data directly from children without consent.

To avoid identifying children, login is required, the game app maintains anonymity through the use of only nicknames, there is no Personal Information saved in the app, and all in-game health data is encrypted at rest and in transit. LungGames maintains full compliance with the *US Children's Online Privacy Protection Act*, *GDPR Article 8* and all Canadian and US Privacy laws and safeguards for minors.

5. Cookies and Similar Technologies

We use cookies and other similar technologies to understand how users interact with our website and Services and to ensure Service functionality and management. This helps us improve usability and performance. Cookies may collect technical data such as IP address, browser type, site usage statistics and session data. If you refuse cookies, the website may not provide full functionality. We do NOT use third-party advertising cookies. Cookie settings are controlled through your browser preferences, and you also have the option to deny access directly when you navigate to our website.

6. Data Storage, International Transfers and Retention

All Personal Information collected through LungGames Services is stored in Canada. If international data transfer is necessary, we take steps to ensure that your personal data is protected in accordance with applicable laws. These steps include contractual safeguards, data protection impact assessments, and adherence to recognized standards.

We retain your personal information only for as long as necessary to provide our Services and fulfill the purposes described in this policy or as required by law. When no longer needed, your personal information is securely deleted or de-identified. You may also request deletion at any time.

7. Your Rights

You have the right to:

- Access a copy of your Personal Information or receive it in a portable format
- Correct inaccuracies in your Personal Information
- Refuse, restrict or withdraw consent for processing your Personal Information
- Request deletion or restriction of your data disclosures
- Be informed of any Personal Information breaches within 72 hours
- Request a copy of our Privacy Practices
- File a complaint with the privacy regulator in your jurisdiction

Parents or legal guardians may exercise these rights on behalf of children. We provide tools within our Services to update your information and manage preferences. You may also contact us directly at privacy@lung-games.com to exercise your rights.

8. Data Security and Storage

We are committed to protecting your data using technical, administrative, and physical safeguards. These include:

- End-to-end encryption for sensitive data
- Access controls and authentication mechanisms such as role-based access and multifactor authentication
- Secure cloud infrastructure located in Canada
- Regular audits and monitoring
- Regular mandatory privacy and security training for staff

LungGames systems are designed to prevent unauthorized access, ensure data integrity, and provide rapid incident response in the event of a breach.

9. Third-Party Services

Our Services may include links to third-party websites or integrations. These entities may have their own privacy practices, which we do not control. We encourage users to review the privacy policies of all third-party services before engaging with them.

10. Changes to This Policy

We may update this Privacy Policy periodically to reflect new features, legal requirements, or changes in our practice which will be posted to our website with an updated “Effective Date.” Material changes will also be communicated by email or pop-up notice. Continued use of our Services after such changes signifies acceptance of the revised policy.

11. Contact Information

If you have any questions, concerns, or requests related to this Privacy Policy or your Personal Information, please contact:

Privacy Officer

Lung Games International Inc.

Email: privacy@lung-games.com

Website: <https://lung-games.com>

You may also contact the privacy regulator in your jurisdiction if you believe your rights have been breached.