

OVR-POL-017 — Robotic Readiness Privacy Policy

Application: Robotic Readiness (package com.ORamaVR.XRSurgicalTraining)

Publisher and controller: ORamaVR SA, 34 route de la Galaise, c/o Fongit, CH-1228 Plan-les-Ouates, Geneva, Switzerland — commercial register no. CHE-478.871.980

Contact: support@oramavr.com

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1. Who we are and what this policy covers

Robotic Readiness (the "App") is developed and published on Google Play by **ORamaVR SA** ("ORamaVR", "we", "us"), 34 route de la Galaise, c/o Fongit, CH-1228 Plan-les-Ouates, Geneva, Switzerland, commercial register number CHE-478.871.980. ORamaVR SA is the controller of the personal data described in this policy. You can reach us at **support@oramavr.com**.

This policy applies only to the App — a hands-on demonstration of a robot-assisted surgical training simulation for XR headsets and smart glasses. It supplements the ORamaVR Privacy Policy at oramavr.com/privacy, which covers our website, platform and other products; if the two differ on a point concerning the App, this policy prevails for the App.

The App requires no account and no registration. You do not give us your name, email address or any login details to use it.

2. The short version

No accounts, no advertising, no sale of data, and nothing stored by ORamaVR after your session. Motion and environment sensing, and the App's own usage statistics, stay on your device and are deleted when you close the App. If you choose to use the voice assistant, your speech is processed live by our speech and language providers and is not stored by ORamaVR.

3. What the App uses and collects

What	Do we receive it?	Why	What happens to it
Eye, face and body tracking, and scanning of the area around you	No — used by the App on your device during the session	So the App can respond to your movements and place the simulation in your space	Processed on your device in real time. Not stored, not sent to us, and not used to identify you
Your voice, through the microphone (optional)	Yes, in real time	So you can talk to JARIA, our AI voice assistant	Streamed to Microsoft Azure Speech to turn speech into text. Processed live; not stored by ORamaVR or by Microsoft. See sections 7–9
The text of what you said	Yes, in real time	So JARIA can understand you and answer	Processed by OpenAI to produce JARIA's answer. Not stored by ORamaVR;

			OpenAI's limited retention is described in section 9
JARIA's spoken answers	Generated in real time	So JARIA can talk back to you	Produced by Microsoft Azure Speech text-to-speech. Not stored by ORamaVR
Usage analytics (for example, which steps of the simulation are used)	No — kept on your device during the session	To operate and improve the simulation	Stays on your device, is deleted when the session ends, and is never transmitted to ORamaVR

The App does not collect your location, does not create accounts, shows no advertising, uses no third-party advertising or analytics tools, and does not sell your data.

4. Permissions the App asks for

When you first use the relevant features, your device asks for:

- 1. Tracking of eyes, face and body, and scanning of your surroundings.** The App needs this permission to run the simulation, so if you do not allow it you cannot use the App.
- 2. Microphone ("Record audio").** Optional. Without it the App still works in full — you just cannot speak to JARIA. The App asks for it only when you first use the voice assistant.

You can change either choice at any time in your device settings.

5. Why we process this data (legal bases)

Purpose	Legal basis
Letting you speak to JARIA (voice and transcript processing)	Your consent , which you give by allowing microphone access and which you can withdraw at any time in your device settings (Art. 6(1)(a) GDPR)
Running the simulation with eye, face, body and environment tracking	Your consent to the permission in section 4. This data is not stored, does not leave your device, and is not used to identify you
Session usage statistics (on your device only); keeping the App secure	The statistics stay on your device and are not received by ORamaVR. In so far as we are considered to process them, and for securing the App, our legitimate interests in operating, demonstrating, improving and securing the App (Art. 6(1)(f) GDPR)

As a Swiss company we also comply with the Swiss Federal Act on Data Protection (FADP).

6. JARIA, our AI assistant

JARIA is an artificial intelligence system — you are talking to software, not a person. Its answers can be wrong or incomplete; it is part of the demonstration and is not a source of medical or other advice, and it makes no automated decisions about you.

The App is a simulation and uses no real patient data. Please do not say any real patient's name or other identifying details to JARIA.

We do not use what you say to JARIA to train or improve AI models. Use of the App, including JARIA, is governed by the App's Terms of Use at oramavr.com/legal/robotic-readiness-terms.

7. Who receives data

Two service providers process voice data on our behalf and on our instructions: **Microsoft** (Azure Speech for speech-to-text and text-to-speech; processing by Microsoft Corporation in the United States) and **OpenAI** (the language model behind JARIA's answers; OpenAI Ireland Ltd, with processing by OpenAI OpCo, LLC in the United States).

We do not sell personal data and do not share it with advertisers or data brokers. We may disclose data where the law requires it.

The App is distributed through Google Play on devices running Google's software. Google processes data (such as your Google account, downloads and device telemetry) as an independent controller under Google's own privacy policy at policies.google.com/privacy.

8. International transfers

Voice data is transferred to the United States under appropriate safeguards: the European Commission's Standard Contractual Clauses, together with the adaptations recognised by the Swiss Federal Data Protection and Information Commissioner, are in place with both providers; for Microsoft Corporation we additionally rely on the EU-US Data Privacy Framework, under which Microsoft is certified.

9. How long data is kept

Data	Retention
Eye, face, body and environment tracking data	Not stored
Microphone audio	Not stored by ORamaVR or by Microsoft
The text of what you said and JARIA's answers	Not stored by ORamaVR. OpenAI may retain inputs for up to 30 days solely for abuse monitoring, after which they are deleted
Usage analytics	Deleted on your device at the end of the session; never sent to ORamaVR

ORamaVR therefore stores no personal data from the App, during or after your session.

10. Security

Data sent from the App is encrypted in transit. ORamaVR holds no session data from the App.

11. Your rights

Under the GDPR and the Swiss FADP you can ask us for access to your data, correction, deletion, restriction or portability; you can object to processing based on our legitimate interests; and you can withdraw consent at any time in your device settings.

Because the App has no accounts, we generally cannot link the limited data we hold to you personally; where that is the case, Article 11 GDPR limits what we can act on, but we will always respond. Write to **support@oramavr.com** with the subject "Robotic Readiness data request" and tell us when you used the App and on which device, so we can try to locate anything we hold.

You also have the right to complain to a data protection authority — in Switzerland the Federal Data Protection and Information Commissioner (www.edoeb.admin.ch), or the authority in your own country.

12. Children

The App is a professional demonstration intended for adults. It is not directed at children, and we do not knowingly collect data from children.

13. Changes to this policy

If we change this policy in a material way — for example by collecting a new kind of data — we will update this page and the effective date above and, where the law requires, tell you in advance.

14. Contact

ORamaVR SA, 34 route de la Galaise, c/o Fongit, CH-1228 Plan-les-Ouates, Geneva, Switzerland — **support@oramavr.com**.