

Invisa.ai & Faith Over CP® Joint Privacy Policy

Last updated: June 03, 2025

Thank you for trusting Invisa.ai LLC ("Invisa.ai") and Faith Over CP® ("FoCP," a 501(c)(3) nonprofit) with your family's information. This Privacy Policy explains how we collect, use, and protect personal data—including data pertaining to children under 13—for our orthotic-sizing portal, mobile applications, faithovercp.org, and related donation programs (collectively, the "Services").

1. Scope

This Policy applies to all users of the Services, including parents or legal guardians who create accounts on behalf of children with cerebral palsy (CP) or similar gait conditions.

2. Key Definitions

- Child – an individual under 13 years of age.
- Biometric Data – digital video, images, or sensor streams that can identify gait patterns or other unique physiological traits.
- PHI – "Protected Health Information" under the U.S. Health Insurance Portability and Accountability Act (HIPAA).

3. Information We Collect

- Parent/Guardian Data: name, email, phone, shipping or billing address, payment method.
- Child Profile Data: nickname or first name, age, weight, height, and optional medical notes supplied by you.
- Biometric & Health Data: gait videos, standing photos, sensor streams, shoe-sole images, and calculated metrics (for example, step length or leg length discrepancy).
- Donation & Impact Data: order IDs, donation amounts, and de identified impact stories for FoCP marketing.
- Device & Usage Data: IP address, browser type, referring URLs, cookies, and analytics event logs.

4. Legal Bases & Consent

We process Parent or Guardian Data to perform a contract (GDPR 6(1)(b)); Biometric Data with your explicit consent (GDPR 9(2)(a)); and Donation Data under legitimate interest (GDPR 6(1)(f)) to advance FoCP's mission.

5. How We Use Your Information

- Provide sizing, toe rocker, and leg length discrepancy recommendations.

- Manufacture and ship Invisabrace®, InvisaSole®, and related products.
- Send progress reports, alerts, and fundraising impact emails.
- Conduct identified research to improve adaptive gait technology.
- Comply with legal obligations and enforce our Terms of Service.

6. When We Share Data

We never sell personal data. We share it only:

- With licensed orthotists, physical therapists, or clinics you select.
- With payment processors and logistics partners for order fulfillment.
- With cloud hosting and analytics providers bound by confidentiality agreements.
- When required by law or to protect someone's safety.

7. Children's Privacy (COPPA Compliance)

Our Services are directed to parents, not children. We collect Child Data only after obtaining verifiable parental consent, which we confirm via (i) a small reversible credit card charge or (ii) a signed consent form uploaded through the portal. Parents may view, correct, or delete their child's data at any time in the account dashboard or by emailing ****faithovercp@gmail.com**** or **mike@faithovercp.org****. We do not condition participation on collecting data beyond what is reasonably necessary.

8. HIPAA & PHI

If your healthcare provider uploads PHI through our clinician portal, Invisa.ai acts as a Business Associate under HIPAA. We sign Business Associate Agreements and protect PHI with AES 256 encryption at rest and TLS 1.2+ in transit.

9. Retention & Deletion

Biometric gait videos and images are stored for 24 months from the last account activity or until you delete them. We permanently delete backups within 30 days after a deletion request. Shipping and donation records are retained for seven years to satisfy tax requirements.

10. Security Measures

- SOC 2 aligned controls.
- TLS 1.2+ transport encryption.
- Role based access with least privilege principle.
- Annual penetration testing.
- Kids' biometric buckets segregated with an additional approval layer.

11. Your Privacy Rights

- California (CCPA/CPRA). Request access, correction, deletion, or opt out of data sharing by emailing faithovercp@gmail.com or using our web form. We do not sell personal data.
- EU / UK (GDPR). Right to access, rectify, erase, restrict, object, or port your data. Contact our EU representative at faithovercp@gmail.com.
- Other Regions. We honor applicable local laws.

12. International Data Transfers

Data may be processed in the United States and other countries. When we transfer personal data from the EEA/UK, we rely on Standard Contractual Clauses or adequacy decisions.

13. Marketing Communications

We send fundraising or product update emails only with your opt in consent. You may unsubscribe at any time via the email footer or dashboard preferences.

14. Policy Updates

If we make material changes, we will email parents at least 30 days before the new terms take effect and obtain renewed consent when required.

15. Contact Us

- Email: [**faithovercp@gmail.com**](mailto:faithovercp@gmail.com) or [**mike@faithovercp.org**](mailto:mike@faithovercp.org)
- Mail: 295 Romans Rd, New Vienna, OH 45159, USA
- Phone: +1 (937) 556 8475

If we have not resolved your concern, you may lodge a complaint with your local data protection authority or the U.S. FTC.