

SERVICE DESCRIPTION

Smile Doctors, powered by SmileMate, offers a virtual orthodontic consultation application that enables a patient to submit records to an orthodontist using a smartphone, tablet, or any electronic device with internet access. All images taken will automatically upload to the Smile Doctors virtual consultation doctor platform. The virtual consultation, under orthodontist's oversight, does not provide clinical diagnosis. To discuss your treatment in detail, please talk with your provider.

BENEFITS

Patients

- Objective and comprehensive consultation report of orthodontic needs
- Overview of possible treatment options

Orthodontists

- Engagement tool to discuss possible treatment options with the patient
- Comprehensive consultation report of patients' orthodontic needs

RISKS AND INCONVENIENCES

Similar to other virtual consultations, the use of this Smile Doctors application may involve the risk of technical difficulty where some photos may not upload.

PERSONAL DATA PROCESSING

Smile Doctors takes the protection of the Patient's personal information very seriously and complies applicable local, state and federal regulatory guidance. To ensure a successful virtual consultation experience, Smile Doctors processes the following Patient's personal data:

- Patient Full Name, Date of Birth, and Age
- Patient Mailing Address, Email Address, and Phone Number
- Type of Device and Device ID of Device Used
- Pictures of the Patient's Mouth

Smile Doctors does not collect nor process the personal data from children under the age of 18, without the explicit consent from a parent or guardian.

Smile Doctors processes the Patient's personal data for the following purposes:

- Perform the services described in the service description
- Implement validation tests to ensure service continuity
- Improve quality of service
- Implement clinical studies
- Develop new functionalities to increase the Patient's benefits in using SmileDoctors

Smile Doctors follows data minimization principles, and has set up the following measures:

- Pseudonymization and anonymization techniques whenever it is technically feasible
- Personal data access is restricted to the sole employees that need to perform the services described in the service description. A regular review of access rights is performed by the IT department to ensure that Smile Doctors has implemented state of the art IT measures to protect the Patient's personal data, and regularly performs penetration tests to detect any breach vulnerability.

In order to achieve the abovementioned purposes, Smile Doctors shares the Patient's personal data with the following third parties:

- Certified orthodontists
- Organizations that employ certified orthodontists
- Research centers
- Certified health data hosting companies
- Subsidiaries of Smile Doctors
- Companies that provide processing tools to Smile Doctors

In order to ensure that these transfers are done in the most secure way, Smile Doctors verifies that these third parties have taken the necessary measures to comply with the data privacy legal requirements.

Some of these third parties may be located abroad or may host the Patient's data abroad. For these specific cross-border data transfers, Smile Doctors has set up specific data privacy contractual clauses, to ensure that these third parties apply protective measures to the Patient's personal data that respect the Patient's country's legal requirements.

At any time, the Patient can contact Smile Doctors in order to exercise the following rights:

- Right to access to Patient's personal data
- Right to modify or erase the Patient's personal data, subject to the legal requirements applicable in the Patient's country
- Right to restrict personal data processing
- Right to oppose personal data processing
- Right to personal data portability

Smile Doctors only keeps the Patient's personal data for the duration set by the legal requirements enforced in the Patient's state and/or country, whichever is longer.

INFORMED CONSENT FOR VIRTUAL CONSULTATION

I have been given adequate time to read and have read the preceding information describing dental consultation using the Smile Doctors system. I understand the benefits, risks, alternatives and inconveniences associated with the consultation as well as the option of not participating in the consultation. I understand that I have the opportunity to ask questions and discuss concerns about the virtual consultation with my orthodontist.

I acknowledge that Smile Doctors and SmileMate has not and cannot make any guarantees or assurances concerning the outcome of my consultation and treatment recommendations.

I authorize my orthodontist to release my medical record and medical information in their possession to the following:

- Other licensed dentists/orthodontists and organizations employing licensed dentist/orthodontist
- Smile Doctors, its representatives, employees, successors, assigns, and agents for the purposes of providing a more accurate consultation and/or treatment recommendation, and/or
- For educational and research purposes.

I understand that use of my Medical Records may result in disclosure of my “individually identifiable health information” as defined by the Health Insurance Portability and Accountability Act (“HIPAA”). I hereby consent to the disclosure(s) as set forth above. I will not, nor shall anyone on my behalf seek legal, equitable or monetary damages or remedies for such disclosure. I acknowledge that use of my Medical Records is without compensation and that I will not, nor shall anyone on my behalf have any right of approval, claim of compensation, or seek or obtain legal, equitable or monetary damages or remedies arising out of any use such that comply with the terms of this Consent.

CURRENT PROMOTIONS TERMS AND CONDITIONS

New patients only. Applicable to full or partial orthodontic treatment only. Monthly payment determined by initial investment. AutoPay may be required. Some restrictions or exclusions may apply. Valid through August 31, 2020.