

Smile Doctors Privacy Policy

The protection of personal data is very important to Smile Doctors and its affiliates (“Smile Doctors”, “we”, “us” and “our”). This Privacy Policy explains how we collect, protect, use and share your Personal Information (i.e., information about an identified or identifiable natural person) that we gather on our websites and on the Smile Doctors Mobile Application (collectively, the “Sites”).

By using our Sites, you consent to our collection, use, disclosure, transfer and processing of Personal Information in accordance with this Privacy Policy.

Before collecting personal data, Smile Doctors asks for explicit consent and acceptance of the terms of this Privacy Policy.

1. Personal data from visitors

We collect Personal Information of website visitors such as IP address, information about the web-browser, and the date and time of connection to the sites. When the visitor fills in the contact form we also collect the visitor’s message and necessary information to contact the visitor.

Purpose	Legal Basis
Provide information about Smile Doctors’s products and services, news and events	Legitimate interest

2. Personal data from registered practitioners

We collect Personal Information of practitioners from the moment they register to become a member of our Sites. Such information may include: e-mail address, first name, name, practice name and address, phone number, fax number, time zone, gender, academic status, Smile Doctors services used and settings, language, place/event you first met our team, training date, messages, activities on the Smile Doctors platform.

Purpose	Legal Basis
To set up and otherwise manage the registered practitioner member account in our sites	Contractual performance
To allow the registered practitioner to use, purchase, book and/or download products and services	Contractual performance
To provide registered practitioners with information about our products, services, news and events we believe may be of interest to them	Legitimate interest
To provide registered practitioners with information on their patients	Contractual performance
To analyze the use of our services and products, improve them and develop new ones	Legitimate interest
For billing and payments for services	Contractual performance

3. Personal data from patients

Smile Doctors collects data about patients, directly from the patient or from its registered practitioners. Such information may include:

Non-sensitive personal data	Sensitive personal data
<ul style="list-style-type: none">- First Name, Last Name, Age- Email address, Phone number, Mailing address- Type of device used by the Patient- Device Id	<ul style="list-style-type: none">- Pictures of the Patient's mouth- 3D Scan of the Patient's dentition- Medical treatment protocol prescribed by the Doctor- Medical treatment follow-up

This information is processed by Smile Doctors in compliance with applicable regulation, and in order to fulfill the below mentioned purposes.

Purposes	Legal Basis
To set up and otherwise manage patient member account in our Sites	Consent
To provide the registered practitioner with information on patient health	Consent
To analyze the use of our services and products, improve them and develop new ones	Legitimate interest

4. Personal data transfers

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

- Certified dentists and/or orthodontists
- Organizations that employ certified dentists and/or orthodontists
- Certified health data hosting companies
- Companies that distribute Smile Doctors's solution
- Subsidiaries of Smile Doctors
- Companies that assist Smile Doctors in marketing, communications, and sales efforts

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 is setting 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.

For cross border data transfers within Smile Doctors group (e.g. with subsidiaries abroad), Smile Doctors is setting up Binding Corporate rules.

5. Data subject rights

At anytime, data subjects can contact Smile Doctors in order to exercise the following rights:

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

To exercise these rights, data subjects are invited to contact Smile Doctors DPO by email, at contact@smilemate.smiledoctors.com

Data subjects should specify the nature of their request on the email's subject, and specify the details of the request in the email itself. Smile Doctors may request additional information from the data subject, in order to verify her/his identity, before moving forward with the request.

In addition, any information we collect, including Personal Information, may be disclosed if authorized by applicable regulation as part of any potential or actual purchase, reorganization, merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of insolvency, bankruptcy or receivership, in which case Personal Information could be transferred to third parties as one of our business assets if authorized by the applicable regulation.

We may also disclose your Personal Information: if we are required to do so by law, court order or legal process; under the discovery process in litigation; to enforce our legal rights, policies or contracts; to collect amounts owed to Smile Doctors; when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or if in good faith we believe that disclosure is otherwise necessary or advisable necessary.

6. Transparency (Sunshine acts)

Within the framework of the existing regulations relating to transparency, Smile Doctors may have the obligation to make public the existence of agreements and advantages concluded with certain categories of stakeholders in the health sector including health professionals as well as the possible advantages in kind or in cash granted to these same actors.

This mechanism aims at ensuring greater transparency and improve public information on the existence of relationships and links of interest between these health actors.

Any practitioner which data is published in this framework has a right to access and rectify this information. The right to oppose the collection, processing and publication of such data may not be exercised, depending on the applicable law in the data subject's country.

For more information about transparency laws, data subjects can contact Smile Doctors at contact@smilemate.smiledoctors.com

7. Cookies

Although acceptance of cookies is not required to visit Smile Doctors's websites, we do use cookies. Cookies are small text files stored on computer hard drives and are regularly used to analyze individual website activity. By collecting and remembering information about your visit to our website, cookies allow Smile Doctors to authenticate you when you use the service, to collect information about your specific website activity, and to detect software failures. Cookies are also used for audience tracking and crash tracking. If you have provided your contact information as part of your website visit, we may

utilize the cookie file to collect information about your specific website activity. This information will only be used for service continuity and improvement purposes by Smile Doctors. In the end, cookies help us provide users with a better website experience.

If you prefer not to receive cookies on Smile Doctors websites, you can set your browser (such as Internet Explorer, Chrome, Mozilla Firefox, etc.) to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser. If you have set your browser to not allow cookies, the Smile Doctors websites will remain accessible; however, this may affect your full usability of this website.

8. Children's Privacy

At Smile Doctors, we do not intend to collect any information from children under the age of majority, unless the information is collected from a parent or guardian, or otherwise authorized by applicable regulation. While we cannot stop a child from accessing the Sites, we do not collect any Personal Information without making it clear that the person providing the information must be major or authorized. If you are a parent or guardian and believe your minor child has provided us Personal Information which you would like to review or request be deleted, or you have questions about our Sites collecting information from children, please contact us at contact@smilemate.smiledoctors.com

9. Security

Smile Doctors has taken steps so that its customers can confidently transfer Patient Data to Smile Doctors, knowing that both the customer and Smile Doctors are in compliance with the applicable laws in the customer's country. Smile Doctors has applied and is maintaining Binding Corporate Rules (BCR) which are technical and organizational security measures to protect Patient, registered Practitioners and visitors Data Privacy against accidental, unauthorized or unlawful access, disclosure, alteration, loss, or destruction. Smile Doctors has developed its systems under the "privacy by design" principle.

These BCR are managed by the Smile Doctors Quality and Information Security Management System to ensure continuous improvement and adaptation to new technologies regulatory requirements. Smile Doctors compliance team regularly surveys the evolution of regulation, of good practices, and cybersecurity threats, and is continuously questioning to improve its health data privacy.

10. Updates

We may update this Privacy Statement from time to time as we deem necessary at our sole discretion. When we do, we will revise the date of the Privacy Statement. Notice of such update and/or modification will be provided on our Sites or as otherwise required by applicable law. We encourage you to periodically review this statement to stay informed about how we collect, use and share Personal Information. Your continued relationship with Smile Doctors after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Privacy Statement take effect immediately after being posted or otherwise provided by Smile Doctors.

11. Contact our Data Privacy Officer

If you have any question about this Privacy Policy, the privacy practices of our Sites, your information, your rights regarding your information, or your dealings with our Sites, please contact our Data Privacy Officer at contact@smilemate.smiledoctors.com

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