

PRIVACY POLICY

DENTOGO is an innovative solution in the field of orthodontics to help the treating dentist/orthodontist in monitoring the oral situation in a patient's mouth over time.

DENTOGO includes four different products:

- DenToGo VitalsCheck, which provides to the Dental Practitioner an instant screening of the patient's oral situation, while in the dental practice
- DenToGo MySmile, which generates a photo realistic simulation of the patient's smile, during and after treatment
- DenToGo Monitoring and DenToGo SmileGuard, which both enable the Professional to remotely control the movement of teeth, health and oral hygiene of his patient and communicate with him or her via secure messaging.

DENTOGO has been developed by DENTAL MONITORING. The platform is jointly operated by DENTAL MONITORING and the STRAUMANN Group ("STRAUMANN"). The platform is accessible at the following URL: <https://dentogo.straumann.com/> for DenToGo Monitoring and DenToGo MySmile, and at <https://dentogovc.straumann.com/> for DenToGo VitalsCheck.

The mention of DENTOGO below refers indifferently to DENTAL MONITORING and to STRAUMANN, who have the status of Joint Controllers of the data processes detailed below.

For the purposes of this Privacy Policy, a « Professional »: means the natural persons health providers qualified to practice orthodontics in the TERRITORY having registered an ACCOUNT in order to access the SERVICES of DENTOGO.

In your quality of Professional, you have the quality of Joint Controller with DENTOGO for the processing related to the health monitoring of your patients performed through DENTOGO. As such, you guarantee that you process the personal data of your Patient in connection with the DENTOGO services in compliance with applicable data privacy laws. Other data processing performed by the Professional in the course of the treatment itself are not shared with DENTOGO, and as such the Professional remains solely and fully liable for such processes and compliance to applicable laws. You acknowledge that you are bound by article 6.2 of the DENTOGO terms and conditions and will hold DENTOGO harmless from and against all claims and damages arising out of your use of the DENTOGO Services in breach of the terms and conditions, this privacy policy and applicable laws.

The protection of personal data is very important to DENTOGO and its affiliates ("Dental Monitoring", "Straumann", "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 DENTOGO 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. You are also bound by the Terms and Conditions which you must accept before you start using the SITES.

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

PERSONAL DATA FROM PROFESSIONALS

DENTOGO collects Personal Information of dental 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, DENTOGO services used and settings, language, place/event the dental practitioner first met our team, training date, messages, activities on the DENTOGO platform.

Purpose	Legal Basis
To set up and otherwise manage the Professional member account in our sites	Contractual performance
To allow the Professional to use, purchase, book and/or download products and services	Contractual performance
To provide Professionals with information about STRAUMANN GROUP products, services, news and events we believe may be of interest to them	Legitimate interest
To provide Professionals 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

PERSONAL DATA FROM PATIENTS

DENTOGO collects data about patients, directly from the patient or from its Professionals. 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 - Picture of the patient's face for the DenToGo MySmile Product 	<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 DENTOGO in compliance with applicable regulation, and in order to fulfill the below mentioned purposes.

Purposes	Legal Basis
To set up and manage patient member account in our Sites	Consent
To provide the Professional with information on the patient's health	Consent
To generate a photo realistic rendering of the patient's smile during or after treatment for the DenToGo MySmile Product	Legitimate interest and Contractual Performance in respect of which the patient is a beneficiary

DENTAL MONITORING also collects patient's data for the following purpose:

Purposes	Legal Basis
To carry out Research and Development activities to improve products and services and develop new ones	Legitimate interest

For all abovementioned purposes, information will be provided to Patients within the DENTOGO Application. Patients must approve such information notice before they can start using the DENTOGO Application.

PERSONAL DATA TRANSFERS

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

- Certified dentists and/or orthodontists;
- Organizations that employ certified dentists and/or orthodontists;
- Third parties which provide services to DENTOGO such as certified health data hosting companies. Such providers acting as Processors are required to protect and secure the Personal Data they process as per our instructions;
- Subsidiaries of the STRAUMANNGROUP and DENTAL MONITORING.

In order to ensure that these transfers are done in the most secure way, DENTOGO verifies that these third parties have taken the necessary measures to comply with 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, DENTOGO 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.

DATA SUBJECT RIGHTS

At anytime, data subjects, including Patients, can contact DENTOGO in order to exercise the following right in respect of the DENTOGO services:

- Right to access personal data;
- Right to modify or erase personal data, subject to the legal requirements applicable in the data subject's country of residence;
- Right to restrict personal data processing;
- Right to oppose personal data processing;
- Right to personal data portability; and
- Right to lodge a complaint with a supervisory authority or to seek judicial remedies.

Some of these rights may be limited by applicable laws and regulations in certain circumstances.

Professionals can access, correct, amend or update their personal information on their account at any time.

In order to exercise all of these rights, the data subject should contact DENTOGO's local Privacy Officer by using the contact details provided below.

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. DENTOGO 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 DENTOGO; 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.

DATA RETENTION

DENTOGO only keeps the Patient's personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal or regulatory requirements, or to exercise or defend legal claims.

TRANSPARENCY (SUNSHINE ACTS)

Within the framework of the existing regulations relating to transparency, DENTOGO 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.

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 DENTOGO 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 DENTOGO. In the end, cookies help us provide users with a better website experience.

If you prefer not to receive cookies on DENTOGO 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 DENTOGO websites will remain accessible; however, this may affect your full usability of this website.

CHILDREN'S PRIVACY

At DENTOGO, we do not intend to collect any information from children under the age of majority, as defined by the Professional's country of residence, 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 the email address stated below.

SECURITY

DENTOGO has taken steps so that its customers can confidently transfer Patient Data to DENTOGO, knowing that both the customer and DENTOGO are in compliance with the applicable laws in the customer's country. There are technical and organizational security measures to protect Patient, Professionals and visitors Data Privacy against accidental, unauthorized or unlawful access, disclosure, alteration, loss, or destruction. DENTOGO has developed its systems under the “privacy by design” principle.

DENTOGO compliance team regularly monitors the evolution of regulation, of good practices, and cybersecurity threats.

DENTOGO also follows data minimization principles and has set up the following measures:

- Pseudonymization and anonymization techniques whenever they are technically feasible; and
- Restricting personal data access to the sole employees that need to access personal data to perform the services described in the Service description, ensured by a regular review of access rights performed by the IT department.

DENTOGO has implemented state-of-the-art IT security measures to protect the Patient’s personal data and regularly performs penetration tests to detect any breach vulnerability.

Notwithstanding the above, should the security of the personal data processed under the DENTOGO services be compromised, DENTOGO will take all legally required measures to remedy such event, which may include notifying the breach or notifying the impacted data subject in the likelihood of a higher risk to their rights and freedom.

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 DENTOGO 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 DENTOGO.

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 privacy.uk@straumann.com or

Straumann Ltd
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RH10 9AY Crawley
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