



## Smile Doctors Anywhere Privacy Policy

The SMILE DOCTORS ANYWHERE SmileMate software, manufactured and developed by DENTAL MONITORING SAS, is an innovative software in the dental field designed to enable dental practitioners to remotely assess intraoral situations and strengthen the relationship between dental practitioners and their patients.

The protection of personal data is paramount to SMILE DOCTORS. This Privacy Policy explains how we collect, protect, use and share your personal data (i.e., information about an identified or identifiable natural person) that we gather through the SMILE DOCTORS ANYWHERE SmileMate software (“The Service”). SMILE DOCTORS and DENTAL MONITORING are joint controllers for the data processing related to the health monitoring of their Patients performed through the Service.

Please take the time to read this Personal Data Protection Policy, it is important that you understand it perfectly:

- What personal data do we collect?
- Why do we process personal data?
- How do we share personal data?
- How long do we store personal data for?
- How do we protect personal data?
- How can you exercise your rights?

By using our Services, you consent to our collection, use, disclosure, transfer and processing of personal data in accordance with this Privacy Policy.

### WHAT PERSONAL DATA DO WE COLLECT?

SMILE DOCTORS ANYWHERE collect personal data from Patients when they are registered onto one of the Services. Personal data may either be collected directly from the Patient, or indirectly through SMILE DOCTORS dental practitioners.

In the case where SMILE DOCTORS dental practitioners enter a Patient’s personal data into a SMILE DOCTORS ANYWHERE software on the Patient’s behalf, the SMILE DOCTORS dental practitioners are responsible for ensuring they are legally allowed to do so and that the necessary measures have been taken with regards to applicable laws and regulations.

### Personal data we may collect when patients register on the SMILE DOCTORS ANYWHERE platform

Account data	<ul style="list-style-type: none"> <li>· Account credentials (user id, email, password hash)</li> <li>· Patient personal information (first and last name, phone, email, photograph, date of birth, responsible party when applicable address, zip code, country)</li> </ul>
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### Personal data we may collect when patients use the SMILE DOCTORS ANYWHERE platform

Technical data	<ul style="list-style-type: none"> <li>· Device information (type of device, IP address, unique identifier, devicemodel, operating system and version, browser used, cookies or similar technologies, system language)</li> <li>· Information about usage of the software (IP address, connection date andtime, public pages visited)</li> <li>· Data about the internet connection (internet service provider, connection type(4G, 3G, DSL, etc.)</li> </ul>
Usage data	<ul style="list-style-type: none"> <li>· Messages sent</li> <li>· Appointments booked</li> <li>· User preferences</li> </ul>
Medical data	<ul style="list-style-type: none"> <li>· Pictures of the Patient's mouth</li> <li>· Profile picture (picture of the face)</li> <li>· Screening results / Simulation results</li> <li>· Messages exchanges between the SMILE DOCTORS dental practitionersand the Patient containing medical data such as symptoms, reasons to consult and general health information</li> </ul>

### Personal data we may collect when Patients contact Customer Service

Support ticket data	<ul style="list-style-type: none"> <li>· Details regarding the support ticket (date, time, subject and content of yourticket)</li> <li>· Content of the Patient's exchanges with agents (emails, chat)</li> <li>· Any other data that may be necessary to resolve the ticket</li> </ul>
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### CHILDREN'S PRIVACY

At SMILE DOCTORS ANYWHERE, we do not intend to collect any information from children under theage of majority, as defined by the Patient's State of residence, unless the consent is collected from a parent or legal guardian ("Responsible Party"), or otherwise authorized by applicable regulation.

### WHY DO WE PROCESS PERSONAL DATA?

**To deliver the services provided by SMILE DOCTORS ANYWHERE software.**

We process Patients' account data, technical data, usage data and health data for the following purposes:

- To setup and manage Patients' accounts
- To send communications and notifications to patients



- To provide SMILE DOCTORS dental practitioners and their patients with an automated assessment of:
  - teeth health
  - gum health
  - teeth alignment

Processing this personal data is necessary to carry out the services offered by SMILE DOCTORS ANYWHERE software.

**To manage Patients’ tickets (feedback / complaints / questions) with Customer Service**

We use patients’ account data, technical data and support ticket data to provide them with the best help we possibly can when they contact Customer Support:

When Patients contact Customer Support to submit feedback, an issue or a complaint.  
 When Patients exercise their rights with regards to your personal data.  
 To improve the quality and the speed of the customer care we provide to Patients.

Processing these personal data for these purposes is necessary in order to deliver the services, or in the case of exercising Patients’ rights, our obligations set out in the personal data protection laws and regulations applicable to SMILE DOCTORS.

**To improve, secure and monitor SMILE DOCTORS ANYWHERE software**

SMILE DOCTORS ANYWHERE processes patients’ account data, technical data and usage data for the following purposes:

- To improve SMILE DOCTORS ANYWHERE software and develop new features
- To ensure that the security, confidentiality, integrity and availability of the platform is maintained.
- It is SMILE DOCTORS ANYWHERE’s legitimate interest to process these data to deliver the best possible services.

**To improve the quality of the services provided by SMILE DOCTORS ANYWHERE**

We process Patient health data to carry out research and development activities, which in turn improve the performance of the algorithms used to analyze the scans taken by Patients.

**To deliver the services provided by SMILE DOCTORS ANYWHERE**

Carrying out this processing for research purposes is regulated by law and is based on *public interest*. Participation in this research is optional, and patients can opt-out by contacting Dental Monitoring’s Data Protection Officer at [privacy@dental-monitoring.com](mailto:privacy@dental-monitoring.com)

**HOW DO WE SHARE PERSONAL DATA?**

We share personal data with the following categories of third parties:

Technical suppliers	Cloud services and storage suppliers Networking and telecommunication suppliers Maintenance suppliers Security services suppliers
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Partners and subsidiaries	Dental Monitoring holding company Dental Monitoring subsidiaries
Authorities	Legal and administrative authorities

DENTAL MONITORING ensures transfers to these parties are secure by following a strict ISO13485 compliant process to verify they have the necessary organizational and technical measures to comply with relevant data protection legal requirements, security standards and quality standards.

DENTAL MONITORING platform is hosted in Amazon Web Service Inc (AWS) cloud services, with servers located in the United States. The cloud services we use are ISO 27001 and HDS compliant and personal data storage location is compliant with HIPAA regulation.

### **HOW LONG DO WE STORE YOUR DATA?**

DENTAL MONITORING stores Patient personal data for the duration required by the purposes for which it is collected and in compliance with United States laws and regulations.

### **HOW CAN YOU EXERCISE YOUR RIGHTS?**

The General Data Protection Regulation (GDPR) gives citizens of the European Union rights with regards to their personal data. GDPR being globally considered as the reference standard in personal data protection matters, DENTAL MONITORING enables its users across the world to benefit from these rights (some of these rights may be limited by applicable local laws and regulations in certain circumstances), which are:

- Right to access personal data
- Right to modify or erase personal data, subject to United States legal requirements
- Right to restrict personal data processing
- Right to oppose personal data processing
- Right to personal data portability
- Right to lodge a complaint with a supervisory authority or to seek judicial remedies.

### **HOW TO EXERCISE YOUR RIGHTS?**

Patients can correct and amend their data by contacting their dental practitioner.

To exercise their other rights, Patients should contact our Data Protection Officer:

By email: [privacy@dental-monitoring.com](mailto:privacy@dental-monitoring.com)

By post:

Dental Monitoring PRIVACY,  
1717 W 6th St #425,  
Austin, TX 78703, UNITED STATES



Users should specify the nature of their request in the email's subject and specify the details of the request in the email itself. DENTAL MONITORING may request additional information from the user, in order to verify their identity, before moving forward with the request.

## **SECURITY**

We have taken steps so that Patients can rest assured their personal data is safe with DENTAL MONITORING. Technical and organizational security measures are in place to protect Patients', Professionals' data privacy against accidental, unauthorized or unlawful access, disclosure, alteration, loss, or destruction of personal data. DENTAL MONITORING develops its systems under the "Privacy by Design" principle.

DENTAL MONITORING Regulatory Affairs & Quality Affairs team regularly monitors the evolution of regulations, good practices, and cybersecurity threats.

DENTAL MONITORING 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.

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

Notwithstanding the above, should the security of the personal data processed under SMILE DOCTORS ANYWHERE software be compromised, DENTAL MONITORING will take all legally required measures to remedy such an event, which may include notifying the impacted users of the breach in the likelihood of a higher risk to their rights and freedom.

## **UPDATES**

We may update this Privacy Policy document as we and the regulations that apply to us evolve. When we do, we will revise the date of the Privacy Policy document. 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 document to stay informed about how we collect, use and share personal data. 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 Policy take effect immediately after being posted or otherwise provided by DENTAL MONITORING.

## **COMMUNICATION CONSENT**

By providing the phone number(s) to the Practice, I expressly consent to receiving telephone calls and/or text messages from the Practice and its agents and representatives via an automatic telephone dialing system, other computer-assisted technology, or pre-recorded message(s), for any purpose, including, but not limited to, appointment and follow-up health care reminders, scheduling, patient account(s), assignment of benefits, and/or financial responsibility. I understand that, depending on my phone plan, I could be charged for these calls or text



messages. I agree to provide new number(s) if my number(s) change.