

# ClearCorrect Patient Privacy Notice

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## **About clear aligners:**

The purpose of this Privacy Notice is to strictly inform you about how your personal data will be processed by ClearCorrect Operating, LLC ("ClearCorrect") should you choose to undergo clear aligner therapy.

Clear aligner therapy is an orthodontic treatment in which the Patient wears a series of clear, removable aligners that gradually move the teeth to improve bite function and/or aesthetic appearance.

You (the "Patient" or "You") should ensure that you have discussed all orthodontic alternatives available to you with your doctor prior to beginning treatment. For any information relating to the clear aligner therapy and its risks and benefits, please refer to Your doctor and the patient informed consent form he communicated to You. You should always contact Your doctor (and not ClearCorrect) regarding Your expectations, difficulties, results, or any other aspects of Your medical treatment. Please read this Privacy Notice carefully, and ask Your doctor to explain anything you do not fully understand.

If You choose to undergo clear aligner therapy, ClearCorrect will manufacture aligners customized for Your teeth based on your doctor's prescription. Your doctor (not ClearCorrect) is responsible for delivering and managing Your medical care.

## **The categories of personal data which may be collected are:**

Identifying information such as name, age, contact details Health related information such as impressions, intraoral scans, digital model scans, radiographs (x-rays), and/or photographs for diagnosis and professional review.

You understand that these will be included in Your medical records, and may include "personal data" as that term is defined and protected by applicable data protection laws and regulations. Such personal data may be submitted by Your doctor to ClearCorrect, in order to create customized aligners for Your orthodontic treatment based on Your doctor's prescription, which is derived from the medical contract You have with him.

This personal data may be disclosed to Your doctor, other consulting dentists and orthodontists, and ClearCorrect's Affiliates and other parties such as services providers, some or all of whom may be located outside of the European Union and Your country of residence, for the purpose of treatment, payment, health care operations and further processing as described below. Data protection standards and legislation in such countries may differ from those in Your country of residence. For such transfers, ClearCorrect will protect the personal data in compliance with what is required under applicable data protection laws and ensure that an adequate level of protection is satisfied under such laws.

ClearCorrect will be the controller for such data processes that are necessary to the manufacturing of aligners according to Your doctor's prescription, based on ClearCorrect's legitimate interest in fulfilling such prescription and enabling Your doctor's provision of preventive or occupational medicine services. You have the right to object to such processing of Your personal information, however ClearCorrect may then be unable to render and fulfill the aligner services Your doctor prescribed to You. For other data processes relating to Your health and treatment Your doctor is

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the controller for such purposes and You should contact him for any questions related to Your personal data in that respect.

There may also be situations where ClearCorrect is under a duty to further process and share Your information, due to a legal obligation or court order, such as regulatory obligations aimed at protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.

ClearCorrect may for its legitimate interest also further process Your personal data for research and statistical purposes, including the development and improvement of new products and services, without directly identifiable personal identifiers such as name or address. You have the right to oppose such further processing.

ClearCorrect takes technical and organizational security measures to protect personal data against accidental or intentional manipulation, loss, destruction or access by unauthorized persons. The measures are designed to ensure the confidentiality and integrity of the data and to ensure the continued availability and resilience of the systems and services processing them. ClearCorrect's security measures include encryption of personal data, firewalls and password protection. The personal data will be retained for as long as is necessary to fulfil the purpose for which it was collected, or to comply with legal or regulatory requirements and defend legal claims. Unless otherwise permitted or required by law, other uses and disclosures of my medical records, including advertising or marketing by either Your doctor or ClearCorrect, shall be made only with Your prior written authorization (for which You acknowledge Your doctor or ClearCorrect may use Your contact information to seek to obtain).

Under applicable data protection laws and regulations, You may have the right to access, rectify, delete, restrict, or object to the processing of Your personal data, and in some instances ask for the portability of such data. Where You have given Your consent to the processing of Your personal data, You can withdraw it at any time. The aforementioned rights' scope may be limited by applicable laws and regulations.

You are informed that You can forward any concerns, inquiries or information requests to [privacy@clearcorrect.com](mailto:privacy@clearcorrect.com), or at the following postal address: ClearCorrect Privacy, 21 Cypress Blvd., Suite 1010, Round Rock, Texas 78665. Should You be dissatisfied with how ClearCorrect handled a complaint or a request relating to data protection, You may contact Your local Data Protection Authority to file a complaint.

# ClearCorrect 患者隐私声明

## 关于隐形矫治器：

本隐私声明的目的是郑重告知您，在您选择接受隐形矫治器治疗后，ClearCorrect Operating, LLC（以下简称“ClearCorrect”）将如何处理您的个人数据。

隐形矫治器治疗是一种正畸治疗，患者戴上一系列可摘式隐形矫治器后，牙齿在其作用下逐渐移动，从而改善咬合功能和/或美学外观。

在开始治疗前，您（“患者”或“您”）应该确保已经与您的医生讨论过各种正畸方案。有关隐形矫治器治疗及其风险和益处的任何信息，请咨询您的医生并参阅他/她与您提及的患者知情同意书。您应该始终同您的医生（而非 ClearCorrect）讨论您的期望、困难、结果、或治疗的任何其他方面。请仔细阅读本隐私声明，并请您的医生为您解释任何有疑问的地方。

如果您选择接受隐形矫治器治疗，ClearCorrect 将根据您的医生设计的矫治方案为您定制牙齿矫治器。您的医生（而非 ClearCorrect）负责交付矫治器并管理您的医疗护理。

## 可能收集的个人数据类别如下：

姓名、年龄、联系详情等可识别个人身份的信息，以及健康相关信息，如用于诊断及专业审核的印模、口内扫描、数字模型扫描、射线照片（x光片）和/或照片等资料。

您理解这些信息将纳入您的医疗记录，并将包含由适用数据保护法律和法规规定和保护的“个人数据”。您的医生可能会将这些个人数据提交给 ClearCorrect，以便其根据医生设计的矫治方案（您与医生的医疗合同中已注明）为您的正畸治疗打造定制的矫治器。

可能会出于治疗、付款、医疗护理运营和下述的后续处理等目的而将您的个人数据披露给您的医生、其他口腔咨询师和正畸医生、ClearCorrect 附属公司和其他相关方，如服务提供商（部分或全部可能位于欧盟和您的居住国家/地区以外）。这些国家/地区的数据保护标准和法规可能与您的居住国家/地区不同。对于此类数据转移，ClearCorrect 将根据适用数据保护法律的要求保护个人数据，并确保达到这些法律要求的足够保护水平。

基于 ClearCorrect 在实现医生设计的矫治方案和确保医生可提供预防或职业医疗服务方面的合法权益，ClearCorrect 将负责控制在制造医生矫治方案规定的矫治器期间所必需的此类数据处理。您有权拒绝对您

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的个人信息进行此类处理，但是 ClearCorrect 可能因此无法提供并履行您的医生为您设计的矫治器服务。您的医生负责控制与您的健康和治疗目的有关的其他数据处理，您在此方面对个人数据有任何疑问时应该与医生联系。

也可能在某些情况下，由于法律义务或法院命令，例如旨在防范重大的跨境健康威胁或确保医疗护理、医药产品或医疗器械达到质量和安全高标准的监管义务，ClearCorrect 有义务进一步处理和分享您的信息。

ClearCorrect 也可能出于其合法权益而进一步处理您的个人数据以用于研究和统计目的，包括开发和改进新产品和服务，但不会披露姓名或地址等可直接识别身份的个人标识信息。您有权拒绝进行此类处理。

ClearCorrect 将采取技术和组织安全措施来保护个人数据，以免数据被无意或有意篡改、丢失、销毁或受到未经授权的访问。这些措施旨在确保数据的机密性和完整性，并确保处理这些数据的系统和服务长期可用并具备恢复能力。ClearCorrect 的安全措施包括个人数据加密、防火墙和密码保护。这些个人数据将保留至实现数据收集目的所必需的期限，或法律或法规规定的期限，以及为法律申索进行辩护所需的期限。除非另有法律允许或要求，否则您的医生或 ClearCorrect 必须获得您的事先书面授权（您明白医生或 ClearCorrect 可以通过您的联系信息寻求授权）方可使用和披露您的医疗记录以用作其他目的，包括将此记录用于广告或营销。

根据适用的数据保护法律法规，您有权查阅、更正、删除、限制或拒绝对您个人数据的处理，并在某些情况下要求数据迁移。即使您已经同意对您的个人数据进行处理，您也可以随时撤销同意。上述权利的范围可能受适用法律、法规的限制。

特此通知，您可以将任何问题、咨询或信息索取发送到 [privacy@clearcorrect.com](mailto:privacy@clearcorrect.com)，或发送到以下邮寄地址：ClearCorrect Privacy, 21 Cypress Blvd., Suite 1010, Round Rock, Texas 78665。如果您对 ClearCorrect 处理有关数据保护的投诉或请求的方式不满意，可以联系您当地的数据保护机构提出投诉。