

ClearCorrect Patient Privacy Notice - EU

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, 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.