

DOCTORS PRIVACY NOTICE

Angelalign Technology Inc. together with its affiliates ("Angel Aligner") manufactures and supplies orthodontic devices utilising clear aligner technology. Angel Aligner partners with medical practices and doctors to design and distribute custom products to patients in the European Economic Area, the United Kingdom, or Switzerland. Angel Aligner and the doctors and/or the doctors' assistants (hereafter "**Medical Professional**" or "**you**") have entered into the Terms and Conditions for the provisions of these services and of the products to you (the "**Agreement**").

This privacy notice addresses the processing of your personal data by Angel Aligner in connection with your use of Angel Aligner's products and services. The purpose of this privacy notice is to explain how Angel Aligner collects, uses or otherwise processes your personal data in connection with your use of Angel Aligner's products and services so that you understand what Angel Aligner does with your personal data, why Angel Aligner uses it and the options available to you. Angel Aligner will treat your personal data in accordance with applicable EU and UK privacy and data protection laws, including but not limited to the GDPR (including as implemented in the UK), as applicable.

1. Any information that is about you or that can be used to identify you is personal data. This includes, for instance, your name, address, or your email address, ("**Personal Data**"). **What categories of your Personal Data will be processed by Angel Aligner**

Angel Aligner processes the following categories of your Personal Data in connection with your use of Angel Aligner's products and services:

- Identification data: name, gender, ID number, avatar
- Contact details: mobile phone, city, fixed-line phone, email address, contact address
- Financial data: bank account number
- Professional data: physician practice certificate, physicianship, education experience and other relevant qualification certificates, name, address, phone number, email, and bank account number of the clinic or hospital that the Medical Professional belongs to

Only the following Personal Data are processed with respect to doctors' assistants: name and mobile phone.

2. How and why Angel Aligner use your Personal Data

Your Personal Data will be processed by Angel Aligner acting as a data controller for the following purposes:

- i. to be able to conduct anti-corruption due diligence and periodically renew due diligence on you in order to enable Angel Aligner to maintain the highest standard of quality and integrity in everything that Angel Aligner does;
- ii. if applicable, for Angel Aligner to handle disputes and/or litigation with the Company in which you may be involved;
- iii. in case certain laws or regulatory obligations require disclosure of information for Angel Aligner to comply with such laws and disclose such information as required;
- iv. for Angel Aligner to carry out legal obligations pursuant to which Angel Aligner is obliged to process your Personal Data, such as processing invoices with your name on them for administration and tax purposes;
- v. to manage Angel Aligner's contractual relationship with you, including the following examples: payment of honoraria and taxes and monitoring such payments for compliance with Angel Aligner's internal procedures relating to engagements with healthcare professionals and experts; management of your travel and accommodation arrangements, if applicable; book-keeping; submission to public authorities under any applicable law; and for Angel Aligner's own internal evaluation and business overview purposes;
- vi. to contact you about opportunities for collaboration with Angel Aligner and about information on Angel Aligner's products, based on your area of expertise;
- vii. to assess and rank your level of expertise and skills against public sources (such as publications and conferences) and your prior engagements with Angel Aligner;
- viii. in the event that Angel Aligner reasonably determines that you are in breach of (i) your obligations as set out in the Agreement (i.e. which may be you or the Company), or (ii) with the applicable laws and regulations relating to, for instance, fraud, anti-bribery or anti-corruption, Angel Aligner may include your Personal Data on a restricted persons list, created for information and control purposes to protect Angel Aligner and to be used internally within the companies of Angel Aligner's group and by its third parties suppliers and/or collaborators, to the extent permissible by the applicable laws and regulations.

Angel Aligner will process your Personal Data:

- for the aforementioned purposes referred to in v of this Section on the basis of the performance of the Agreement for the provision of Angel Aligner's products and services. The provision of these Personal Data will be necessary for Angel Aligner to perform the Agreement entered with you;
- for the aforementioned purposes referred to in i, ii, vi, vii and viii of this Section on the basis of Angel Aligner's legitimate interests, where Angel Aligner has a legitimate business reason to process your Personal Data in relation to the services provided to you, which includes where Angel Aligner takes steps to protect its business from risks such as litigation, fraud, corruption and bribery. Angel Aligner puts in place robust safeguards to ensure that your privacy is protected and to ensure that

our legitimate interests are not overridden by your interests or fundamental rights and freedoms. In certain circumstances when Angel Aligner is relying on its legitimate interests to process your Personal Data, you have the right to object to Angel Aligner using it – see Section 6 for more details; and

- for the aforementioned purposes referred to in iii and iv of this Section to comply with Angel Aligner's legal obligations.

3. Disclosure of your Personal Data

Some or all of your Personal Data may be disclosed, for the purposes listed above and on a strict need to know basis, to:

- Angel Aligner's related corporate affiliates;
- third party service providers which provides services to Angel Aligner such as IT and financial services providers;
- government authorities, law enforcement agencies or other third parties if required by law or reasonably necessary to protect the rights, property and safety of others or of Angel Aligner;
- auditors and consultants to verify Angel Aligner's compliance with external and internal requirements; and
- Angel Aligner's successor in title: Angel Aligner may share your Personal Data with any third party that purchases, or to whom Angel Aligner transfers, all or substantially all of its assets and business.

4. Transfer of your Personal Data outside the EU/UK

For the purposes referred to in Section 2, Angel Aligner will need to transfer and disclose your Personal Data to overseas recipients located in China with whom they have contractual relationships (including corporate affiliates, cloud hosting and storage providers).

The transfer of your Personal Data to China will be carried out in compliance with EU and UK data protection laws. As China has not been deemed to provide adequate protection by the EU Commission or the UK Parliament, the transfer of your Personal Data will be done pursuant to the Standard Contractual Clauses established by the EU Commission of which you will find a copy [here](#), and in accordance with UK laws. In compliance with EU and UK data protection laws, Angel Aligner will implement reasonable technical and organisational measures to safeguard the security of your transferred Personal Data.

5. Security and retention of your Personal Data

Angel Aligner will take reasonable steps to safeguard the privacy of your Personal Data. In particular, Angel Aligner will implement appropriate technical, logical and physical security measures to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to your Personal Data.

Angel Aligner will erase or de-identify your Personal Data once they are no longer required for the purposes set out in this privacy notice. As an example, your Personal Data needed for the performance of the Agreement with the Company is based on the duration of the treatment approved by the Medical Professional involving your use of Angel Aligner's products and services. However, Angel Aligner may need to retain certain of your Personal Data to comply with its legal and regulatory obligations and to meet any requests made by regulators or other relevant authorities and agencies.

Angel Aligner may further keep certain of your Personal Data to establish, exercise and defend our legal rights and claims or for other legitimate business reasons.

6. Your rights regarding your Personal Data

Angel Aligner has set out your rights about your Personal Data below. If you have any questions about your rights or you wish to exercise any of your rights, please contact Angel Aligner using the contact details set out in Section 7 of this privacy notice. You should understand that these rights do not apply in all circumstances and are subject to exceptions including under local laws:

- Access. You have the right to be provided with information about the Personal Data Angel Aligner has about you and details of how Angel Aligner processes it, as well as the right to receive a copy of such Personal Data.
- Rectification. You have the right to obtain from Angel Aligner the rectification of inaccurate Personal Data concerning you and, taking into account the purpose of the processing, to have incomplete Personal Data completed.
- Erasure. You have the right to request that your Personal Data be erased in certain circumstances. Angel Aligner may continue to store your personal data if Angel Aligner is entitled or required to retain it.
- Restriction of processing. You can request that Angel Aligner restricts processing of your Personal Data in certain circumstances. There may be situations where Angel Aligner is entitled to continue using your Personal Data and/or to refuse your request.
- Data Portability. You can ask Angel Aligner to receive your Personal Data that Angel Aligner holds on you in a structured, commonly used and machine-readable format, so you can pass it to a third party, or – where technically feasible – to have such data transmitted directly to a third party by Angel Aligner. This right applies if Angel Aligner is using your Personal Data based on your consent or on a contract with you and if Angel Aligner is using an automated method to process it.
- Object. If Angel Aligner uses your Personal Data where it is within Angel Aligner's legitimate interests to do so, you have the right to object to Angel Aligner using your Personal Data in this way. There may be situations where Angel Aligner is entitled to continue processing your Personal Data and/ or to refuse your request.

- **Withdrawal of consent.** Where Angel Aligner relies upon your consent to use your Personal Data, you have the right to withdraw consent at any time, without affecting the lawfulness of the processing based on your consent before the withdrawal.
- **Automated decision-making.** You have the right not to be subject to an automated decision in scenarios where the statutory requirements are not fulfilled. Angel Aligner does not carry out any automated decision-making processes.
- **Complaints.** We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, for any reason you're not satisfied with Angel Aligner's approach to using your Personal Data, you have the right to complain to your local data protection authority.

7. Contact

If you have any questions or concerns about how Angel Aligner uses your Personal Data, please get in touch with us.

You can contact Angel Aligner at iorthoservices@angelalign.com.

8. Privacy notice update

Angel Aligner privacy notice may change from time to time. Angel Aligner will update this privacy notice to reflect changes in the processing of your Personal Data wherever necessary and Angel Aligner will give you notice of any significant changes.