

## PATIENTS PRIVACY NOTICE

Angelalign Technology Pte. Ltd. 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.

This privacy notice addresses the processing of personal data of the patients (hereafter "**you**") by Angel Aligner in connection with the use of Angel Aligner's products by your treating orthodontist, dentist or doctor ("**Medical Professional**"). The purpose of this privacy notice is to explain how Angel Aligner collects, uses or otherwise processes your personal data in connection with the use of Angel Aligner's products by your Medical Professional 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.

Any information that is about you or that can be used to identify you is personal data. This includes, for instance, your name, address, email address, and your health data ("**Personal Data**").

### 1. 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 the use of our products by your Medical Professional:

- Identification data: name, gender, date of birth, photo
- Health data: doctor's diagnosis and treatment, photos of patient's teeth, face, full body, CBCT scan, X-ray photos and scan data

These categories of Personal Data are strictly necessary for the purposes mentioned in Section 2 below and in their absence, the use of Angel Aligner's products may be impaired.

### 2. How and why Angel Aligner use your Personal Data

Your Personal Data will be processed by Angel Aligner acting as a data processor of your Medical Professional for the following purposes:

- to provide you with orthodontic and related treatment;
- to produce Angel Aligner's orthodontic products for distribution to you (including to label the products with identifying information);
- to provide you with relevant information about Angel Aligner products, services;

- to help your Medical Professional to establish and manage your information and files registered with Angel Aligner, and produce and customize products and services according to your treatment plan;
- to facilitate the implementation and use of Angel Aligner products, technical services and related software as well as for storage purposes; and
- to contact you or the relevant Medical Professional in relation to the design, manufacture or distribution of Angel Aligner products you have selected.

Angel Aligner will process your Personal Data, including your health data, for the aforementioned purposes on the basis of the performance of a contract between you and your Medical Professional for the provision of a medical diagnosis and health treatment.

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

- to analyse the performance and use of Angel Aligner's products, technical services and related software in order to understand the use of the products and software for the purpose of statistics and improvement of the products, technical services and related software; and
- for research and training purposes and for academic exchange of dentistry and orthodontic products and technologies.

Angel Aligner will not use your health data as part of the aforementioned purposes as data controller. Angel Aligner will process your Personal Data for the aforementioned purposes as data controller on the basis of Angel Aligner's legitimate interests with respect to statistics, training purpose and products and services improvement. 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.

Angel Aligner will also use your de-identified Personal Data for statistical analytic purposes and in order to develop, improve, register and monitor its products, technical services and related software. These data will be anonymized before such processing and will no longer constitute Personal Data

### **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;
- 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**

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 Angel Aligner's 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.

For example, with respect to the processing of your Personal Data referred to in Section 2, where Angel Aligner acts as data processor of your Medical Professional, Angel Aligner keeps your Personal Data based on the duration of the treatment approved by your Medical Professional involving the use of Angel Aligner's products and services.

For the processing related to statistics, training purpose and products and services improvement, Angel Aligner will keep your Personal Data for the duration of the studies, analysis and trainings. For the processing related to Angel Aligner news and events, Angel Aligner will keep your Personal Data until you oppose the data processing or 3 years after your last contact with Angel Aligner.

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.

Also please note that you may exercise all of the aforementioned rights directly with your Medical Professional when Angel Aligner acts as your Medical Professional's data processor and that in such a case, Angel Aligner may pass your rights requests directly to your Medical Professional with whom you have a contractual relationship.

#### **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](mailto: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.

#### **9. Product disclaimer**

All information provided by Angel Aligner is for informational purposes only and should not be taken as medical advice. Angel Aligner is not a medical service provider and they do not engage in orthodontic, dental or any other type of medical consultation. To the extent permitted by law, Angel Aligner does not provide any guarantee or warranty regarding any treatment outcome.