

PRIVACY POLICY

GetImplant Management Services, LLC, on behalf of its subsidiaries and divisions (collectively, “**GetImplant**,” “**us**,” “**we**,” or “**our**”) has prepared this Privacy Policy (“**Policy**”) to describe to you, or if you represent an entity or other organization, that entity or organization (in either case, “**you**,” or “**your**”) our practices regarding the personal information that GetImplant collects, uses, and shares through www.getimplant.com (the “**Site**”). Capitalized terms not defined in this Policy shall have the meanings as defined in the GetImplant Terms of Use.

GetImplant reserves the right, at any time, to modify this Policy. If we make revisions that change the way we collect, use, or share personal information, we will post those changes in this Policy. You should review this Policy periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our Policy at the end of this Policy. Your continued use of the Site following posting of changes constitutes your acceptance of such changes.

1. COLLECTION OF PERSONAL INFORMATION

1.1 Personal Information. “**Personal information**” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked to, directly or indirectly, a particular consumer or household. The following are categories (with non-exhaustive examples) of personal information we may collect about you:

CategoriesGetImplant	Examples	Processing Purposes
A. Individual Identifiers and Demographic Information	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, phone number, account name, or other similar identifiers.	<ul style="list-style-type: none"> • To Provide Our Products and Services • To Improve Our Products and Services • To Determine Your Eligibility and Set Up Your Account • To Market Products or Services • To Communicate with You
B. Dental Record	Health information, dental condition, or patient history.	<ul style="list-style-type: none"> • To Provide Our Products and Services • To Improve Our Products and Services • To Communicate with You • To Respond to Your Requests or Questions
C. Commercial Information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, including information about you obtained from third parties. Patient's motivation for wanting implants and future vision of having implants.	<ul style="list-style-type: none"> • To Provide Our Products and Services • To Improve Our Products and Services • To Understand Your Interests • To Determine Your Eligibility and Set Up Your Account • To Market Products or Services • To Communicate with You

D. Internet or Network Activity	Browsing history, search history, information on an individual's interaction with a website, application, or advertisement. Network and device related information. Social media affiliation.	<ul style="list-style-type: none"> • To Improve Our Products and Services • To Market Products or Services • To Secure the Site • To Understand Your Interests
E. Inferences Drawn from Personal Information	Profile reflecting a person's preferences, lead score, purchasing or consuming characteristics, psychological trends, predispositions, behavior, attitudes, or interests	<ul style="list-style-type: none"> • To Improve Our Products and Services • To Determine Your Eligibility and Set Up Your Account

Personal information does not include:

- Publicly Available – Publicly available information from federal, state, or local government records.
- Deidentified or Aggregate information – **“Deidentified Information”** means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular individual, and for which GetImplant has implemented technical safeguards and business processes that prohibit reidentification of the individual. **“Aggregate Information”** means information that relates to a group or category of individuals, from which individual identities have been removed, that is not linked or reasonably linkable to any individual or household, including via a device.
- Excluded Information – Certain laws require separate privacy notices or are exempt from general personal information privacy policy disclosure requirements. Such laws include health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) or clinical trial data; Fair Credit Reporting Act (FCRA); and the Driver's Privacy Protection

Act of 1994. We will notify you separately according to those laws if any of our collection, use, or sharing of personal information falls under any of those laws.

1.2 Sources of Personal Information. We obtain the categories of personal information listed above on or through our Site from the following categories of sources:

- Personal Information You Provide. GetImplant collects personal information when you voluntarily submit it to us. For example, we may collect or receive personal information from a user that uses our “Schedule Free Consultation” service; provides information to our call center in order to schedule a consultation; signs up to receive promotional communications; participates in one of our promotional sweepstakes, contests, or surveys; posts a review on our services; submits a request to our customer service team; interacts with our social media pages; or otherwise interact with us or other users through the Site.
- Automatically Collected Personal Information. In addition to personal information that we may receive directly from you, GetImplant indirectly collects other information from you automatically through the Site. For example, we receive personal information from users when a user visits and navigates our Site on any device. We may also collect personal information about users over time and across different websites, apps, and devices when a user accesses the Site. Third parties also collect personal information this way on our Site. GetImplant collects some personal information automatically using cookies or other online tracking technologies as described in our [Cookie Policy](#).
- Personal Information Obtained from Third Parties. In addition to the personal information that we collect from you directly and automatically, GetImplant may receive personal information about you from other third-party sources. For example, we receive personal information from our business partners, our network of affiliated dental practices, or companies that provide personal information to supplement what we already know about users. We may merge or combine such personal information with the personal information we collect from you directly or automatically.

2. USE OF PERSONAL INFORMATION

GetImplant's primary purpose in collecting personal information is to provide the services that you request on the Site. GetImplant may also use personal information for various purposes, including without limitation to:

- To Provide Our Products and Services. This could include fulfilling your requests for products or services. It could also include processing purchases or other transactions. For example, if you share your personal information to request a quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to arrange a dental procedure, we will use such information to assist in your logistics, process your payment and facilitate delivery of products and services. We may also save your personal information to facilitate new product or service orders.
- To Improve Our Products and Services. We use personal information to understand and analyze the usage trends and preferences of our users to make our Site, Services, or Content better, diagnose technical issues, prevent fraud, schedule appointments more efficiently, refine our product and services offerings, and develop new features and functionality.
- To Understand Your Interests. We use your personal information to personalize your experience on the Site and with our network of affiliated dental practices, and to deliver information about products and services relevant to your interests.
- To Respond to Your Requests or Questions. We use personal information to provide you with support and to respond to your requests for customer support, including to investigate and address your concerns and monitor and improve our responses. This may also include responding to your feedback.
- To Determine Your Eligibility and Set Up Your Account. We may use your personal information, including information about you gathered from third party sources, to verify your identity or determine your eligibility for some of our dental implant products, services, and promotions. For example, this may include verifying your age, date of birth, and place of residence. If you set up an Account

on the Site, we will use the Registration Information you provide in relation to that Account creation to create, maintain, customize, and secure your Account.

- To Market Products or Services. We use your personal information to provide you with information about our products, services, or promotions. For example, we may use cookies or other online tracking technologies to provide customized advertisements, content, and information; to monitor and analyze the effectiveness of marketing activities; and to track your entries, submissions, and status in any promotions. These might be third party offers we think you might find interesting. These communications may come in the form of interest-based advertising using information gathered across multiple websites, devices, or other Sites.
- To Secure the Site. We use personal information to maintain the safety, security, and integrity of our Site, products and services, databases and other technology assets, business, and other users.
- To Communicate with You. We communicate with you about your Account or our relationship with you. We may also contact you about this Policy or the Terms of Service.
- As Required by Law. We use personal information to respond to requests from law enforcement and as required by applicable law, court order, or government investigation.

3. SHARING OF PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this Policy, GetImplant may share your personal information in the following circumstances:

3.1 Related Companies and M&A Transactions. We may share your personal information with companies that are affiliated with us (that is, that control, are controlled by, or are under common control with us). In addition, if we sell all or part of its business or make a sale or transfer of assets or are otherwise involved in a merger

or business transfer, we may transfer your personal information to a third party as part of that transaction, including at the negotiation stage.

3.2 Consent. We may ask if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this policy, and we may do so with your consent.

3.3 Legal Compliance. We may disclose personal information in response to subpoenas, warrants, or court orders, in connection with any legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our rights; to defend against a legal claim; to investigate, prevent, or take action regarding possible illegal activities or fraud; to protect the safety and security of other users; or to prevent a violation of our Terms of Service.

3.4 Service Providers. We may share your personal information with third parties who perform services on our behalf that are necessary for the orderly operation of the Site. Among other things service providers may help us perform website hosting, app design, maintenance services, database management, web analytics, app analytics, billing, payment processing, fraud protection, credit risk reduction, marketing, or any other use set out in this Policy. Access to your personal information by these service providers is limited to the information reasonably necessary for the service provider to perform its limited function.

3.5 Behavioral-Based Advertising. We participate in behavioral-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of our Site so that we can provide advertising about products and services tailored to your interest. That advertising may appear either on our Site, or on other websites. Please see our Cookie Policy for more information.

3.6 Affiliated Dental Practice Offerings. We may jointly offer events, promotions, or any other product or service offerings with our network of affiliated dental practices.

The personal information that you submit through an event, promotion, or other product or service offering offered with any of our network of affiliated dental practices may be combined and transmitted with the Registration Information related to your Account. Third party partners or clients may collect information directly from you, which may be combined with personal information disclosed by us. If you decide to request, enter into, or participate in an event, promotion, or other product or service offering that is offered by us and identified as a joint effort with an affiliated dental practice, the information that you provide may be shared with us and with that identified affiliated dental practice.

3.7 Social Networking. The Site may offer you the ability to share your personal information through a social networking website (e.g., Facebook, Twitter), using such site's integrated tools (e.g., Facebook "Like" button, or Twitter "Tweet" button). The use of such integrated tools enables you to share personal information about yourself with other individuals or the public, depending on the settings that you have established with such social networking site. For more information about the purpose and scope of data collection and use in connection with such social networking site or a site's integrated tools, please visit the privacy policies of the entities that provide these social networking sites.

3.8 Referrals. Users may recommend other users to join the Site or obtain our dental implant products or services by providing their contact information. Users may also provide information about other users of the Site such as reviews of the services or products that he or she received, booking or scheduling information, or reference information.

4. SECURITY OF PERSONAL INFORMATION

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from the risks presented by unauthorized access or acquisition, we cannot guarantee the security of your

personal information. In the event that we are required by law to inform you of any unauthorized access or acquisition of your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

5. YOUR CHOICES

You can make the following choices regarding your personal information:

5.1 Access to Your Personal Information. You may request access to your personal information by contacting us as described below. We will grant you reasonable access to the data that we have about you as required by law.

5.2 Changes to Your Personal Information. We rely on you to update and correct the personal information contained in your Account or contacting us as described below. Note that we may keep historical information in our backup files as permitted by law. If our Site does not permit you to update or correct certain personal information, please contact us as described below.

5.2 Deletion of Your Personal Information. We retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. You may, however, request that we delete your personal information by contacting us as described below. We will grant a request to delete information as required by law, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes. Except as provided above, we will delete, aggregate, or de-identify all of your personal information as described in this subsection within the timeframes required by law.

6. OPTING OUT

You can make the following choices to opt out of certain activities regarding your personal information:

6.1 Promotional E-mails. You may choose to provide us with your e-mail address for the purpose of allowing us to send newsletters, surveys, offers, and other promotional materials related to our Site and dental implant products and services, as well as targeted offers from third parties. You can stop receiving promotional e-mails by clicking the “unsubscribe” links in the e-mails or by contacting us as described below. If you decide not to receive promotional e-mails, we may still send you service-related communications, such as those about your Account, to fulfill orders for products and service you have requested, or deliver notifications directly to you through the Site.

6.2 Behavioral-Based Advertising. We use behavioral-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of our Site so that we can provide advertising about products and services tailored to your interest. That advertising may appear either on our Site, or on other websites. If you wish to limit third parties’ collection of information about your use of our Site, you can opt-out of such at the Digital Advertising Alliance or Network Advertising Initiative. PLEASE NOTE THAT OPTING-OUT OF BEHAVIORAL ADVERTISING DOES NOT MEAN THAT YOU WILL NOT RECEIVE ADVERTISING WHILE USING THE SITE. IT WILL, HOWEVER, EXCLUDE YOU FROM INTEREST-BASED ADVERTISING CONDUCTED THROUGH PARTICIPATING NETWORKS, AS PROVIDED BY THEIR POLICIES AND CHOICE MECHANISMS.

6.3 Do-Not-Track. Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time we do not modify your experience based upon whether such a signal is broadcast.

7. CALIFORNIAN USERS

The following applies to individuals in located in California.

7.1 Categories of Personal Information Disclosed for a Business Purpose or Valuable Consideration. GetImplant must disclose whether the following categories of personal information are disclosed for a “business purpose” or “valuable consideration” as those terms are defined under California law. Note that while a category below may be marked, that does not necessarily mean that we have personal information in that category about you. In the preceding twelve months, we have disclosed the following categories of personal information in the manner described.

Category	Information is Disclosed for a Business Purpose	Information is Disclosed for Valuable Consideration
A. Individual Identifiers and Demographic Information	Yes	No
B. Dental Record	Yes	No
C. Commercial Information	Yes	No
D. Internet or Network Activity	Yes	No
E. Inferences Drawn from Personal Information	Yes	No

7.2 Shine the Light. Under California Civil Code sections 1798.83-1798.84, California residents who have an established business relationship with GetImplant are entitled to ask us for a notice describing what categories of personal information we share about them with third parties for their direct marketing purposes. This notice will identify the categories of information shared with and will include a list of the third parties with which it is shared, along with their names and addresses. If You are a California resident and would like a copy of this notice, please submit a written request to us at the addresses listed below.

8. EXERCISING YOUR PRIVACY RIGHTS

When exercising the rights or options described in this Policy, the following guidelines apply:

8.1 No Fee Usually Required. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.

8.2 What We May Need from You. When exercising your rights or otherwise assisting you, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure we do not disclose personal information to any person who is not entitled to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

8.3 Time to Respond. We try to respond to all legitimate requests within 45 days of your request. Occasionally it may take us longer than 45 days to respond, for instance if your request is particularly complex or you have made a number of requests. In this case, we will notify you of the delay, and may continue to update you regarding the progress of our response.

8.4 No discrimination. You will not be subject to discrimination as a result of exercising the rights described herein. In some cases, when you exercise one of your rights, we will be unable to comply with the request due to legal obligations or otherwise, or we will be unable to provide you certain products or services. These responses are not discrimination and our reasons for declining your request or ceasing services will be provided at that time.

8.5 Authorized Agent. You may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your

behalf, you must provide a valid power of attorney, the requester's identification information and the authorized agent's identification information.

9. CONTACTING US

If you have any questions or concerns about our Policy or any other privacy or security issue, please contact us.