

## Privacy Policy

Dentsply Sirona Implants, as the owner of the Product Ordering System, recognizes the importance of protecting your privacy and our policy is designed to assist you in understanding how your personal information is collected, stored, used, protected and safeguarded by Dentsply Sirona Implants. The Product Ordered can either be fully completed online by using the Software, or can be completed as an offline version. In the event of any conflict between the English and other language versions of this Privacy Policy, the English version shall prevail.

### 1. SCOPE OF THE POLICY AND WHO THE DATA CONTROLLER IS

This Privacy Policy ("Privacy Policy") between you (the "User") and Dentsply Sirona Implants applies to your use of the Product Ordering System for purchasing the Simplant products and the Atlantis products, including any related products and services available through the Product Ordering System (collectively the "Service").

The part of the ordering system providing Simplant services, is operated by DENTSPLY Implants NV, Research Campus 10, 3500 Hasselt, Belgium who is the Data Controller ("Simplant Data Controller"), and the part of the ordering system providing Atlantis services, is operated by DENTSPLY IH AB, P.O. Box 14, 431 21 Mölndal, Sweden who is the data controller for those services (the "Atlantis Data Controller"). The Simplant Data Controller and the Atlantis Data Controller is collectively referred to as Dentsply Sirona Implants throughout this Privacy Policy.

### 2. LEGAL GROUND FOR PROCESSING

In order to handle the order and give adequate support within the Service Dentsply Sirona Implants processes the personal data (excluding special categories of personal data) on the legal ground of legitimate interest in accordance with Article 6.1 (f) of the EU Regulation 2016/679 (the "GDPR").

The legal ground for sending out newsletters and information about products, services and promotions through email is consent, GDPR Article 6.1 (a).

When it comes to special categories of personal data, our legal ground is performance of a contract, GDPR Article 6.1(b), in combination with the processing of special categories of personal data, GDPR Article 9.2 (i).

It is the responsibility of the Customer as set out in the Terms of Service to give appropriate notices to the patient to meet the requirements of applicable data protection law in respect of the disclosure of personal data to Dentsply Sirona Implants to enable Dentsply Sirona Implants to process the personal data for the provision of the Service.

The notice shall furthermore include all relevant information that is required according to GDPR Article 13.

Additionally, if valid consent from the patient has been obtained, Dentsply Sirona Implants may process special categories of personal data in a deidentified (pseudonymized) form, for the purposes of scientific research, product development and marketing. In this case the legal ground is legitimate interest, GDPR Article 6.1 (f), in combination with GDPR Article 9.2 (j) and GDPR Article 89.1. It is the responsibility of the User, as set out in the Terms of Service, to obtain valid consent from the patient to meet the requirements of applicable legislation in respect of the disclosure of personal data to Dentsply Sirona Implants to enable Dentsply Sirona Implants to process the personal data for the purposes of scientific research. Dentsply Sirona Implants has implemented adequate organizational and IT security measures to protect the personal data from being re-identified.

In the case of email marketing where the processing of personal data is based on consent, You have the right to at any time withdraw your consent and if so, please contact Dentsply Sirona Implants (contact information below). Furthermore, you may always opt out of receiving information about our products and services.

### 3. INFORMATION COLLECTED

#### 3.1 PERSONAL DATA

Dentsply Sirona Implants collects personal data from you through the use of on-line forms and every time you e-mail us your details. We also collect information about the transactions you undertake including details of payment cards used.

When you register and create your customer account in the Service you will be asked to submit personal data about yourself such as your name, billing address, phone number and e-mail address which is then retained by us. We may also collect personal data from you when you correspond with us, for example when you send us e-mail messages, letters or otherwise make inquiries about the services.

#### 3.2 SPECIAL CATEGORIES OF DATA/ SENSITIVE DATA

In order to deliver the Service, Dentsply Sirona Implants need you to submit patient specific scans and other order specific details and treatment related data that we will handle in compliance with the GDPR.

#### 3.3 NON-PERSONALLY IDENTIFIABLE INFORMATION

When you visit the Service we may also gather certain non personally identifiable information

regarding the means you use to access the Service. This information may include the type and version of your browser, your service provider and any search engine you may have used to locate the Service.

In addition, Dentsply Sirona Implants gathers certain navigational information about where you go in the Service. Dentsply Sirona Implants will make reasonable efforts to avoid excessive or irrelevant collection of data.

### 4. HOW THE PERSONAL DATA WILL BE USED/ PURPOSE FOR PROCESSING

Dentsply Sirona Implants processes personal data for the purpose of operating and improving the Service and thereby connected services, provide and personalize our services, deal with your inquiries and requests, deliver products, administer orders and accounts, provide customer services, administer customer records, allow you to participate in interactive features in the Service, send you newsletters and information about products, services and promotions, and to communicate with you. In case valid consent has been obtained from the patient, personal data may also be used to perform scientific research, product development and marketing.

Dentsply Sirona Implants uses the non-personally identifiable information to help diagnose problems with our server, administer the Service, and compile broad statistical data. The navigational information collected enables us to determine which areas of the Service are most frequently visited and helps us to tailor the Service to the needs and interests of our online visitors. In addition, this tracking data may be used to tailor information presented to you in our Service based on your previous use of the Service and your interests in particular topics.

### 5. DATA RETENTION

When you provide your personal data to us, we will retain it and it may be held by us or any third party that processes it on our behalf for the purposes of providing the services or information which you have requested. Your personal data will be stored by us for as long as is necessary in order to fully be able to comply with all of Dentsply Sirona Implants obligations and commitments towards you or obligations put on Dentsply Sirona Implants, and will thereafter be deleted.

#### 5.1 FIND PARTNER LABORATORY

The *Find a partner laboratory* feature is a voluntary feature on the Case Management Portal (<https://www.orderdigitalsolutions.com>) site. Information about the feature and its functionality is available here (<https://www.dentsplysirona.com/en-us/solutions/topics/azento.html>). The feature functions as an on-line Community, accessible only for individuals who have chosen to join.

Should you choose to join the *Find a partner laboratory* feature (the "Community") your personal contact information (name, email address, postal address, phone number, location on map) will be visible to, and shared with, other individuals ("Members") who have joined the Community. Other Members may search for your dental laboratory by business name and location within the Community and send you a contact invitation email through the Community.

Should you choose to join the Community, you consent to your personal contact details being shared as described above. You may withdraw from the Community at any time, by contacting customer support (<https://www.orderdigitalsolutions.com/Help/ContactUs>).

## 6. DISCLOSURE OF PERSONAL DATA

Dentsply Sirona Implants will not share, transfer or otherwise disclose your personal data to anyone without your consent other than to provide the service or information that you have requested, or as required by law or for regulatory purpose. Your personal data will be transferred to a third party located outside of the EEA which will store and process your personal data in order for Dentsply Sirona Implants to provide the Service.

Dentsply Sirona Implants has entered into adequate agreements with its data processors that ensures that they have adopted adequate organizational and IT security measures to protect the personal data from unauthorized access.

## 7. EXTERNAL LINKS

The Service may contain links to other websites. Dentsply Sirona Implants is not responsible for the privacy practices or the content of such websites. To help ensure the protection of your privacy, Dentsply Sirona Implants recommends that you review the privacy policy of any website you visit via a link from the site.

## 8. CHANGES TO THE PRIVACY POLICY

We may at any time in our sole discretion revise or update this privacy policy by updating this posting. All changes are effective immediately when they are posted and apply to all access to and use of the Service thereafter. Your continued use of the Service following the posting of revised privacy policy means that you accept and agree to the changes. You are expected to check this page from time to time so you are aware of any changes, as they are binding.

## 9. USE OF COOKIES

Dentsply Sirona Implants may use a browser feature known as a "cookie." Cookies are small files placed on your hard drive that assist Dentsply Sirona Implants in providing you with a customized browsing experience. Dentsply Sirona Implants uses cookies to provide you with the convenience of not having to re-enter information, such as user IDs and passwords, multiple times during your visits to the Service. Cookies can also be utilized to help Dentsply Sirona Implants provide you with information targeted to your interests, based upon your prior browsing in the Service. The "help" section of the toolbar on most browsers will inform you on how to prevent your browser from accepting new cookies, how to have the browser notify you upon the receipt of a new cookie, or how to disable the use of cookies completely. As the Service has been designed to take advantage of the use of cookies, should you configure your browser to decline their use, certain features of the Service may not function correctly and you may be required to reenter any user IDs and passwords more frequently.

## 10. INTERNET BASED TRANSFERS

The Internet is a global environment and using the Internet to collect and process personal data necessarily involves transmission of data on an international basis. Therefore, by using the Service, and communicating electronically

with us, you acknowledge and agree to our processing of personal data in this way. We will however endeavor to protect your personal data collected through the Service in accordance with strict data protection standards.

## 11. ACCESSING, RECTIFYING AND UPDATING PERSONAL DATA

Dentsply Sirona Implants supports and respects the individual's right to protect their privacy. Accordingly, you have the right to access, rectify, erase, restrict, object to the personal data that you have submitted or that we hold about you. You also have the right to receive a copy of your personal data in an appropriate format. Contact the Group Data Protection Officer if you wish to exercise any of these rights (Compliance-EUPrivacyOffice@dentsplysirona.com or Compliance-USPrivacyOffice@dentsplysirona.com).

## 12. CONTACT

If you have questions or concerns around this privacy policy or the processing of your personal data held by Dentsply Sirona Implants, you may contact the Group Data Protection Officer at Compliance-EUPrivacyOffice@dentsplysirona.com or Compliance-USPrivacyOffice@dentsplysirona.com or contact the below entities:

- For issues relating to Simplant products at the following address: Attn: Group Data Protection Officer, DENTSPLY Implants NV, Research Campus 10, 3500 Hasselt, Belgium
- The Atlantis Data Controller for purchases or services relating to the Atlantis products at the following address: DENTSPLY IH AB, Attn: Personuppgiftsombudet, Dentsply IH AB, P.O Box 14, 431 21 Mölndal, Sweden

If you are not satisfied with the answer you get from Dentsply Sirona Implants and wish to complain you may contact your relevant supervisory authority.

[www.dentsplysirona.com](http://www.dentsplysirona.com)