

**Dentist on Demand  
Website Privacy Policy**

**Last Revised: May 28th 2020**

**Version 1.0**

**Introduction**

Enamel Developments Ltd., and our affiliates and subsidiaries, as applicable (“**Company**” or “**We**”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes how we collect, use, disclose, and protect the Personal Information of our customers and website users (“**you**”), describes the types of information we may collect from you or that you may provide when you visit the website, <https://dentistondemand.com/> (the “**Website**”).

We will only use your Personal Information in accordance with this policy unless otherwise permitted or required by applicable law. We take steps to ensure that the Personal Information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy laws in Canada generally define “personal information” as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person. For the purposes of this policy, “**Personal Information**” means personal information that is subject to applicable Canadian privacy laws. Personal Information therefore may not include, for example, business contact information, including your name, title, or business contact information.

The Website may include links to thirdparty websites, plugins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a thirdparty website or engage a third party, please note that these third parties may have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third parties, and we encourage you to read any further applicable privacy policies.

This policy does not apply to information collected by:

- us offline or through any other means, including on any other website operated by us or any third party (including our affiliates and subsidiaries, as applicable); and
- any third party (including our affiliates and subsidiaries, as applicable), through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, must not use the Website. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time (see “**Changes to Our Privacy Policy**”). Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates. We will notify you in advance of any material changes to this policy and, if required by law, will obtain your consent to any new ways that we collect, use, and disclose your Personal Information.

## **Information We Collect About You**

We collect and use several types of information from and about you, including:

- **Personal Information**, that can directly or indirectly identify you, such as your name, mailing address, email address, telephone number, date of birth, occupation, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information (including credit card number), location, photographs or other media that you upload, and registration number (for dentists registered on the Website (“**Dental Professionals**”)), any other identifier we may use to contact you online or offline and other reasonably necessary information about you for the purpose of providing the services and for the Dental Professionals to provide certain services. If you provide to us the Personal Information of a minor, you warrant to us that you are the parent or legal guardian of that minor. We may add to our records Personal Information about you that we collect from other sources, including from Dental Professionals or any third party providers.
- **NonPersonal Information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plugin types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website, and usage details.
- **Nonpersonal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods used to browse away from the page, or any phone number used to call our customer service number.

## **Protected Health Information**

In connection with your use of the Website (including in your interaction with Dental Professionals), you may provide Personal Information that is also health-related information (“**Protected Health Information**”). Protected Health Information may be subject to additional data protection laws and regulations that govern providers’ use and disclosure of that information. Notwithstanding anything in this policy, we do not collect, use or disclose, and cannot access, Protected Health Information. All matters relating to any Protected Health Information are between you and the Dental Professional to whom you provide that information. Dental Professionals control that information, and such information (and other Personal Information that you provide to a Dental Professional) may be subject to additional policies from the applicable Dental Professional.

## **How We Collect Information About You**

### **Collection Methods**

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email, or otherwise.

- **User contributions.** You may also provide information for us to publish or display on public Website areas or transmit to other Website users or third parties (including Dental Professionals).
- **Automated technologies or interactions,** as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies, as applicable.
- **Third parties or publicly available sources,** for example our business partners.

### Information You Provide to Us

The information we collect directly from you on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, and/or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Personal information you provide to a Dental Professional or other user in connection with the Website in the course of soliciting and receiving dental services.
- Records and copies of your correspondence (including email addresses), if you contact us or a Dental Professional (or any other user).
- Your responses to surveys that we might ask you to complete.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

You may only provide to us Personal Information that relates to you. You must not provide us with the Personal Information of any other individual.

You may also provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your Personal Information. Therefore, we cannot and do not guarantee that unauthorized persons will not view your Personal Information.

### Information We Collect Through Cookies and Other Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We may also use these technologies to collect information about your online activities over time and across thirdparty websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include Personal Information, and we may maintain it or associate it with Personal Information we collect in other ways. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Website according to your individual interests;
- speed up your searches; and
- recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.
- **Web Beacons.** Pages of our Website and any of our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and singlepixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **Third Party Use of Cookies and Other Tracking Technologies**

Some content or applications on the Website, including advertisements, are served by thirdparties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across

different websites and other online services. They may use this information to provide you with interestbased (behavioural) advertising or other targeted content.

You can optout of several third party ad servers' and networks' cookies simultaneously by using an optout tool created by the Digital Advertising Alliance of Canada. You can also access these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on your device. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

We do not control these third parties' tracking technologies or how they are used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For more information about how you can opt out of receiving targeted advertising from many providers, see Choices About How We Use and Disclose Your Information.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us for a number of purposes, including to provide, maintain, protect and improve our services, to develop new services and to protect our users. Specifically, we use your Personal Information:

- to present our Website and its contents to you;
- to provide you with information, products, or services that you request from us, Dental Professionals or third parties in connection with the Website;
- to assess and recommend dental services or products that may be relevant to your needs;
- to facilitate the operation of the Website;
- to respond to your inquiries and fulfill your requests;
- as part of
- to send administrative information to you, for example, information regarding the services and changes to our terms, conditions and policies;
- to send you communications that we believe may be of interest to you, including marketing materials from us and/or third parties;
- to improve current and future delivery of services (for example, to monitor and evaluate how services are used);
- to help Dental Professionals understand how their services are used and how they could be improved, such as by analyzing the Personal Information to determine what Dental Professionals can do to improve their services, respond to customer preferences (such as location and specific services);
- to fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it;

- to carry out our obligations and enforce our rights, including for billing and collection or to comply with legal requirements;
- to notify you about changes to our Website or any products or services we offer or provide through it;
- to improve our Website, products or services, marketing, or customer relationships and experiences;
- to allow you to participate in interactive features, social media, or similar features on our Website;
- to measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you;
- for our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying the services, identifying usage trends, determining the effectiveness of promotional campaigns and operating and expanding our business activities, including an actual or potential business transaction;
- as we determine necessary or appropriate: under applicable law, including laws outside your country of residence; to comply with legal process; to respond to requests from public and government authorities, including public and government authorities outside your country of residence; to enforce our terms and conditions; to protect our operations or those of any of our affiliates; to protect our rights, privacy, safety or property, and that of our affiliates, you or others; and to allow us to pursue available remedies or limit the damages that we may sustain;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

### **How We Disclose Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect or you provide as described in this privacy policy:

- To the Dental Professionals or other users that you interact with in connection with the Website, as reasonably necessary..
- To our subsidiaries and affiliates, as applicable.
- To our suppliers, agents, or other organizations or individuals contracted to us to perform services or functions on our behalf where they require the information to serve you.
- In accordance with applicable law, to a buyer or other successor in the event of an actual or potential merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Enamel Development Ltd.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Enamel Development Ltd. may be among the assets transferred.

- To advertisers and advertising networks that require the information to provide relevant advertisements to you and others.
- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization).
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the “email a friend” feature of our Website, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- As required or permitted by law.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our terms of use <https://dentistondemand.com/terms-conditions/> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect our rights, property, or safety, our customers, suppliers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may process, store, and transfer your Personal Information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your Personal Information through the laws of the foreign country.

You are welcome to contact us to obtain further information about Company policies regarding service providers outside of Canada. See Contact Information and Challenging Compliance.

If we disclose any Personal Information to you, you may only process that Personal Information for the purpose for which it was disclosed, and for no other reason. You must further comply with all applicable laws relating to Personal Information, and cooperate with us to ensure that we comply with all such applicable laws.

By submitting your Personal Information or engaging with the Website, you consent to this transfer, storage, and processing.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you

can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly..

- **ThirdParty Advertising.** If you do not want us to share your Personal Information with unaffiliated or nonagent third parties for promotional purposes, you can optout by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [info@dentistondemand.com](mailto:info@dentistondemand.com).
- **Promotional Offers from the Company.** If you have opted in to receive certain emails from us but no longer wish to have your email address or contact information used by the Company to promote our own or third parties' products or services, you can optout by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [info@dentistondemand.com](mailto:info@dentistondemand.com). If we have sent you a promotional email, you may unsubscribe by clicking the unsubscribe link we have included in the email.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' targetaudience preferences, you can opt out by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [info@dentistondemand.com](mailto:info@dentistondemand.com). For this optout mechanism to function, you must have your browser set to accept browser cookies.

We do not control third parties' collection or use of your information to serve interestbased advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of several third party ad servers' and networks' cookies simultaneously by using an optout tool created by the Digital Advertising Alliance of Canada. You can also access these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on your device. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

### **Electronic Communications**

Occasionally, in compliance with Canada's Anti-Spam Law (CASL), we may send electronic communications to you with information that may be useful to you, including information about us and other third parties with whom we have a relationship. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future communications from us. You can also change your subscription by emailing us at the details set out below with your name and your electronic addresses. Even where you unsubscribe, the law still allows us to send you some kinds of electronic messages, such as invoices, without your consent.

### **Data Security**

The security of your Personal Information is very important to us. We use physical, electronic, and administrative measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are



responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards, which any Website visitor can view.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted in connection with our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, business or reporting requirements. Under some circumstances we may anonymize your Personal Information so that it can no longer be associated with you. We reserve the right to use such anonymous and deidentified data for any legitimate business purpose without further notice to you and without your consent.

### **Individuals Under the Age of 18**

Our Website is not intended for individuals under 18 years of age. No one under age 18 may provide any Personal Information to or on the Website. We do not knowingly collect Personal Information from individuals under 18, except with the express consent of the individual's parent or guardian. If you are under 18, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Information from an individual under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about an individual under 18, please contact us at [info@dentistondemand.com](mailto:info@dentistondemand.com).

### **Accessing and Correcting Your Personal Information**

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes. By law you may have the right to request access to and to correct the Personal Information that we hold about you.

You may be able to review and change some of your Personal Information by logging into the Website and visiting your account profile page.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the Personal Information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the Personal Information that we hold about you, or we may have destroyed, erased, or made your Personal Information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If you are concerned about our response or would like to correct the information provided, you may contact us at [info@dentistondemand.com](mailto:info@dentistondemand.com).

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use <https://dentistondemand.com/terms-conditions/>.

### **Withdrawing Your Consent**

Where you have provided your consent to the collection, use and disclosure of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [info@dentistondemand.com](mailto:info@dentistondemand.com). Please note that if you withdraw your consent, we may not be able to provide you with particular products or services. We will explain the impact to you at the time to help you with your decision.

### **Changes to our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. We include the date the privacy policy was last revised at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

### **Contact Information and Challenging Compliance**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

[info@dentistondemand.com](mailto:info@dentistondemand.com)

We have procedures in place to receive and respond to complaints or inquiries about our handling of Personal Information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact us using the contact information listed above.