

## PRIVACY POLICY

### INTRODUCTION

THIS PRIVACY POLICY SETS OUT HOW “SmileBuddy” USES AND PROTECTS ANY INFORMATION THAT YOU GIVE US WHEN YOU USE THIS application.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint.

### How to contact us:

When we say "we" or "us" in this privacy policy, we mean “SmileBuddy”. Please contact us if you have any questions about our privacy policy or information that we hold about you:

**Email: [info@whitesmileclear.com](mailto:info@whitesmileclear.com)**

**Phone: +60-3-2771-1607**

**WhatsApp: +60-18-664 7433**

### Personal Information

We may use personal information submitted by you only for the following purposes: help us develop, and improve our products and services and supply higher quality service; manage online surveys and other activities you’ve participated in.

Therefore, in using the Services, you may be asked to provide us with personal data such as health information about teeth alignment or geographical location from time to time, and we may collect your personal data either directly from you, your personal representatives, and/or through our third-party service providers (e.g. partners or third-party applications) to personalize your experiences and improve our Services.

The security of your Personal Information is important to us. We maintain appropriate technical and physical safeguards to protect your Personal Information against accidental or unlawful destruction or loss, alteration, unauthorised disclosure or access, use and all other unlawful forms of processing of the data in our possession. We use the same level of skill in protecting your Personal Information as other similar applications developers. However, since the internet is not a completely secure environment we cannot

guarantee that information you transmit via our applications will not be accessed, disclosed, altered or destroyed by breach of any of our safeguards. By accessing or using our Services or otherwise providing us with your personal data, we shall be entitled to assume that you understand and agree to the terms of this Privacy Policy and consent to the collection, use and disclosure of your personal data by us. If you do not consent to any of these terms, please do not access or use any of our Services, or provide us with any of your personal data.

### Non- Personal Information

We may collect and use non-personal information to have a better understanding in user's behaviour. If non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

Ad identifiers are non-permanent, non-personal, device identifiers such as the Android advertising ID and/or Apple ID for advertising, or IDFA. When we advertise our applications on mobile devices, we may use your devices advertising identifier and other information associated with it, which we may hold ourselves or may be provided to us by our advertising network partners, to help us to deliver ads that relate to your interests and to improve and measure the effectiveness of ad campaigns. You can choose to prevent your devices ad identifier from being used for interest based advertising, or you can reset your devices ad identifier, by changing the settings of your device. Settings vary from device to device but if you are using an Apple device with iOS 7 you can find the ad identifier settings under Settings>Privacy>Advertising, and if you are using a Google Android device running Android 2.3 or later you can find the ad identifier settings under Settings>Google>Ads.

### Confidentiality statement

"SmileBuddy" will only use the information given to us in accordance with the General Data Protection Regulations. We have a legal duty to keep all information supplied by service users confidential. As a confidential service, we will ask service users for their permission if we must contact other agencies, except where there are significant issues of risk such as child protection issues or harm to self or others. Anyone who receives information from us is also under a legal duty to keep it confidential.

### Marketing

We do not send your details to any other organisation other than those service providers who provide your direct care, for example Primary Care services, and then only to meet the minimum requirements of the referral process.

### Cookies

We may collect information from you (or others on your behalf) de-identified information to help us in our business and provide you with the relevant Services. Such anonymised and de-identified information may be transferred, disclosed, assigned, leased, licensed, sold and otherwise shared with and by our partners, service providers, advertisers and/or other third parties for purposes permitted under law.

Cookies (small text files placed on your device that record information about your preferences and enable log-ins, provide interest-based advertising, analyse how our Services are performing) are an example of such anonymised data which we collect. While compiling information about your browsing habits, cookies can also enhance your user experience. There may also be third party cookies on our Websites and Channels.

You can control cookies through your web browser settings. This allows you to determine which cookies to allow and which to refuse. If you disallow the use of cookies on our Website or Channels, please note that you may not be able to access the full range of functions that our Website or Channels offer.

Our advertising partners may also transmit cookies to your browser or device when you click on advertisements that appear on the Services. Further, if you click on a link to a third-party website or service, a third party may also transmit cookies to you. For the avoidance of doubt, this Privacy Policy does not cover the use of cookies by any third parties, and we are not responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honour 'Do Not Track' requests that you have set using your browser or device.

If you do not consent to our use of cookies, you should adjust your browser settings accordingly or not use any of the Services.

### Changes to This Privacy Policy:

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the

Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Site.