

Privacy policy

Septodont Inc. (“Septodont”) Privacy Policy

For a printable version of this Privacy Policy, please click [here](#).

Septodont due attention to the protection of your Personal Data (as defined hereafter). Septodont has a global privacy program to help ensure that your Personal Data is handled appropriately and protected in compliance with applicable data protection laws.

This policy explains our approach to any Personal Data that we collect from you or that we have obtained about you, and how your Personal Data is used and shared when you visit our Sites, social media pages, or wherever this Privacy Policy is posted (the “Site(s)”).

Septodont reserves the right to update this policy to comply with changes to applicable law. If you have concerns about the way Septodont is handling your personal data, please contact the Data Protection Officer at dataprotection@septodont.com as indicated in Section 11, below.

1. Notice at Collection

We may collect or process different kinds of Personal Data, depending on how you interact with our Sites, products, and services. We retain and store your Personal Data as long as necessary for the intended purposes and in line with our data retention policy.

We may collect: Identifiers; Financial Data; Commercial Data; Internet, Technical, or Other Network Activity; Audio, Electronic, or Similar Information; Social Media Information; Geolocation Data; Content of Communications; Advertising Data; and any other personal data you provide to us, or we and third parties collect when you interact with us. For job applicants, we may also collect Education Data, Employment Data; and any other personal data you provide to us during the application process. We may also collect Sensitive Personal Data, such as: your login information and password when you create an account on our Sites; health data when you provide product feedback or report an adverse event; or, if you are a job applicant, race, ethnicity, gender identity, sexual orientation, or criminal history. We may use any of the data collected to create inferences about you. Personal data collected is used for: internal business purposes; basic business operations; Site, service, or product improvement; advertising and marketing; security; and legal compliance. Job applicant personal data is also used to manage your application, for pre-employment screening, and to provide information to you about additional career opportunities.

We may share the Personal Data collected from you: within the Septodont family of companies; with service providers, vendors or agents; with third parties during a change in ownership, such as a merger or bankruptcy; with law enforcement agencies, courts, regulators, government authorities when required by law; with our social media partners; with advertising and analytics partners and advertising networks; or where we have received your direction or consent to the disclosure of your Personal Data.

For U.S. residents, the “When do we sell, share, or disclose Personal Data?” section tells you how we may sell or share personal data. Please visit Section 14, “What are your rights regarding your Personal Data?”, to ask that we don’t sell or share your personal data for targeted advertising. If you have a general question, including about our collection of your Personal Data, please see the “How can you contact us?” section at the end of this Policy.

2. Definitions

“Personal Data” means any information or pieces of information that that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

“Policy” means this privacy policy.

“Process”, “Processing”, “Processes” and/or “Processed” means any operation on Personal Data, such as collection, recording, organization, storage, alteration, consultation, use, disclosure by transmission, or otherwise making available, restriction, or erasure.

“Septodont Entity(ies)” means Septodont and/or any entity directly or indirectly controlled by Septodont.

“User(s)” means any current, past and prospective Septodont customers, individuals reporting side medical effects related to Septodont products, job applicants, service providers, partners, contractors, subcontractors, Site users, visitors and more generally, anyone who is in contact with Septodont.

3. What are the principles governing the Processing of Personal Data?

We Process your Personal Data in compliance with the applicable legal requirements and, in particular, we undertake to deploy all efforts to:

- Process your Personal Data fairly and lawfully;
- Process your Personal Data for legitimate purposes;
- Process only Personal Data that is relevant and not excessive in relation to those purposes;
- Promptly respond to your questions, requests and concerns regarding the Processing of your Personal Data and ensure that your Personal Data is accurate.

4. Which Personal Data do we collect?

Septodont, or third parties working on its behalf, may collect the following categories of Personal Data:

- **Identifiers**, including your name, address, e-mail address, telephone number, other contact details, or country of residence.
- **Financial Data**, billing and payment information; financial account information.
- **Content of Communications**, such as call recordings or chat history, when you contact our customer service team or use our Sites' chatbot.
- **Audio, Electronic, or Similar Information**: videos or recordings of customer support calls; any videos or images you submit to us.
- **Commercial Data**, including details regarding the products you ordered, details relating to your former orders, data relating to your commercial relationship with Septodont.

- **Social Media Information** you provide by interacting in our social media pages and online forums, or by commenting on content posted on our Sites.
- **Internet, Technical or Other similar network activity**, which may include information related to your use of our Sites (pages you looked at, duration of your visit, etc.); device information, including device properties; information on your interaction with our Sites; RPPS number; or client code.
- **Geolocation Data**, such as your IP address.
- **Advertising data**, including special advertising and other unique advertising identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- **Sensitive Personal Data**, such as your account login information and password when you create an account on our Sites or personal health data you provide when you provide feedback about our products, such as data related to any incident reported about a product (treatments administered, nature of side effects).

If you apply for a position with Septodont, we may also collect:

- **Education Data**, including transcripts or resumes.
- **Employment Data**, such as resume (qualification, previous jobs), etc. or Personal Data collected from professional references.
- **Sensitive Personal Data**, such as race, ethnicity, gender identity, sexual orientation, or criminal history.

Additionally, we may make inferences drawn from any of the Personal Data we collect, which may include using automated means to generate information about your likely preferences or other characteristics. For example, we may infer your general geographic location (such as city and state) based on your IP address.

We do not collect Personal Data from individuals under the age of 16. Please contact us if you believe that we have processed the Personal Data of individuals under the age of 16 and we will take steps to delete that data.

As a User, there are many ways that you might share your Personal Data with us. You may provide your Personal Data to us, either:

- directly: when you contact us via our Sites, when you ask for a quote estimate, when you order our products, subscribe to one of our services, or when you register for a promotion or complete a survey, etc.
- or indirectly: when we use cookies or similar technologies to understand how you use our Sites and our interact with our commercial emails and advertisements, or when we receive your Personal Data from business partners or third party services providers contracted to send out surveys and/or advertising, marketing, promotional, or other messages, etc.

When you visit one of our Sites, or engage with us by email or through other electronic methods (such as filling out a contact form on one of our Sites), we may collect information by automated means, using technologies such as cookies and similar technologies. Please see Section 7 of this Policy for more information about cookies.

5. Why do we collect Personal Data?

Septodont may collect your Personal Data for various purposes, including:

- To conduct its business in order to: process your orders, provide you the product ordered, manage our relationship with you, manage any

request regarding a product, or conclude a specific agreement when you supply us with a product or provide a service.

- To optimize access to our e-platforms in order to: identify you and allow you access to Site services, optimize online browsing, and to protect Septodont, you, and others against fraud or misuse of our Sites.
- To improve our communication and interactions with you in order to: provide you with our newsletters, send you advertising marketing, and promotional communications, keep an up-to-date opt-out list as applicable if you have asked not to be contacted, identify your preferences, recommend products or services that might be of interest to you, and to personalize your experience.
- To improve and grow our Sites and product line, including to develop new products and understand how our Sites are being used, our customer base, purchasing trends, and the effectiveness of our marketing.
- To allow you to apply for a job in order to: manage recruitment processes, review candidates' applications, hire candidates, and other Human Resources purposes.
- To comply with applicable law and regulation in order to: comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements, such as to provide a health surveillance report to the appropriate agency when you report medical side effects related to our products.
- To manage your requests and enquiries, in order to: respond to when you ask questions relating to our products, and to allow you to exercise your rights in compliance with this Policy.

- To protect and secure our Sites, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.

6. When do we sell, share, or disclose Personal Data?

We may disclose your Personal Data as follows:

- Within Septodont, and with any Septodont Entity who may only use your Personal Data for the purposes described in this Policy.
- With our trusted service providers including contractors, subcontractors, agents, advisors, vendors, and suppliers and distributors, who will carry out certain services necessary for the purposes indicated above on our behalf (marketing services, hosting services, database maintenance, etc.).

Additionally, Septodont may disclose your Personal Data with other third parties:

- To respond to legal proceedings of any nature, court orders or implementing enforcement measures that are required by the competent authorities;
- To protect the rights, property, or safety of Septodont or other Septodont Entities and to preserve evidence as required or authorized by applicable law;
- In the event of health surveillance reporting (pharmacovigilance activity), Septodont may share your Personal Data – as required by applicable

regulation – with health professionals, third parties involved in the commercial exploitation of the concerned product, and others.

- For other purposes required by applicable laws or with your prior consent.

We work with advertising and analytics partners, advertising networks, and social media sites, and these partnerships may be considered a “sale” or “sharing” for cross-contextual behavioral advertising / targeted advertising purposes under some U.S. privacy laws, even when no money changes hands. If you want to opt out of this use, please see Section 14 of this Policy for information on how to exercise your rights.

7. How do we use Cookies and similar technologies?

Like many other websites, we use online technologies and code-based tools like cookies, pixels, web beacons, and similar technologies (collectively, “cookies”) to collect Personal Data, such as the server you are logged onto, the domain name of your internet service provider, your browser type and version and your IP address. We may also derive the general geographic area associated with an IP address.

To help facilitate the delivery of relevant content, we use Google Analytics. Google Analytics uses cookies to report on user interactions on our and others’ websites. We use the information collected for optimizing marketing, refining advertising, and/or programming strategies, and generally improving user experience. For more information about Google Analytics please visit: <https://policies.google.com/technologies/partner-sites> and for instructions on

opting out of Google Analytics using a specific plug-in, please visit the following link: <https://tools.google.com/dlpage/gaoptout>. Note that this opt-out is specific to Google activities and does not affect the activities of other companies, including ad networks or other analytics providers that we may use.

We may also use social media pixels, such as the Meta Pixel, to measure your use of our Sites, tailor our Sites to your interests, and improve our Sites. Please note, Facebook can connect this data with your Facebook account and use it for its own advertising purposes, in accordance with Facebook's Data Policy which can be found at [Facebook.com/about/privacy/](https://www.facebook.com/about/privacy/).

For more information about the cookies we use and for choices regarding these cookies and the processing of your Personal Data, please visit our [Cookie Policy](#).

8. How do we use chatbots and session replay technology?

We may use technology, called "session replay technology", to monitor how you interact with our Sites. This may include, without limitation, which links you click on, information that you type into our online forms, and information about your device or browser.

The Sites include an artificial intelligence-powered chatbot service (the "Chatbot"). If you interact with the Chatbot, you are not communicating with a human representative of Septodont; you are communicating with an automated system that generates responses to your inputs based on machine-learning algorithms. The Chatbot is provided for the limited purposes of (a) providing information and answering questions related to Septodont products; (b) collecting user feedback regarding the use of Septodont

products, including feedback related to product quality issues and pharmacovigilance incidents; and (c) otherwise assisting users with their use of the Sites. Entering medical information such as Protected Health Information (“PHI”), as defined by HIPAA, is strictly prohibited when interacting with the Chatbot.

We may record and retain conversations with the Chatbot for the purpose of addressing your inquiries and otherwise assisting you, improving the operation of the Chatbot, and for other purposes, as long as necessary for the intended purposes and in line with our data retention policy, and we may disclose chatbot conversations to third parties, including our chatbot vendor. Please note that our Chatbot is only intended for use by Dental Professionals and Dental Students only, so if you are a patient with questions regarding your treatment or product usage, please discontinue use of the Chatbot and contact your dental professional or physician.

9. Disclaimer Regarding Video Content

The Websites may contain video content, audiovisual content, or content of a like nature (collectively, “**Video Content**”). In connection with our provision of Video Content, the Websites may utilize online tracking technologies and code-based tools, including, but not limited to, Software Development Kits (“**SDKs**”), pixels, and cookies (i.e., advertising or analytics cookies) that track information about your activity and webpage-viewing history on the Websites (collectively, “**Tracking Tools**”). Tracking Tools on the Websites may result in information about your activity on the Websites being transmitted from your browser to GCA and third parties, which, in turn, may result in the display of targeted advertisements on third-party websites, platforms and services, including advertisements for GCA content. In addition, whether Tracking Tools on the Websites result in your browser’s transmission of information to third parties depends on a number of factors that may be outside of GCA’s knowledge or control, including what third-party websites you use, what information you have provided to such third parties, and whether (and the

extent to which) you have limited the use of cookies by the operators of those third-party websites, platforms, and services.

10. Is Personal Data posted on social media pages private?

No. If you post any Personal Data on our social networking pages or other interactive areas, be sure to check the posted rules on those Sites because you will be bound by posted rules, as well as our Site Terms of Use. Rules for participation may establish age and other restrictions, such as posting abusive, offensive or inflammatory content. Anything you post online is public information. We are not responsible for anything you voluntarily post online. Users should use caution when disclosing personal data online.

11. How do we transfer your Personal Data?

Being a global pharmaceutical company that Processes data as part of its ordinary course of business, your Personal Data may be transferred from a country located within the European Economic Area, the UK, or Switzerland to outside those jurisdictions. Transfers of Personal Data from one country to another (or one geographic region to another) will be completed in compliance with applicable Personal Data protection laws and with adequate safeguards (e.g., EU Standard Contractual Clauses).

12. How long is your Personal Data retained?

We deploy all efforts to retain your Personal Data no longer than necessary to fulfil the purposes for which it was collected (e.g. the length of your contract with Septodont). As an exception, we may keep your Personal Data for a longer period of time as required or permitted by law and/or to comply with

applicable statute of limitations periods such as tax and accounting requirements and/or to preserve the evidence of performance of an obligation.

13. How is your Personal Data protected?

It is Septodont's commitment to keep your Personal Data secure. We implement a variety of reasonable organizational and technical measures to ensure the integrity and confidentiality of your Personal Data and to protect your Personal Data against any unauthorized access and modification, disclosure, loss, or destruction.

Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure due to the inherent risks of data transmission over the Internet. Consequently, we cannot ensure or warrant the security of any information you transmit to us, and you understand that any information that you transfer to us is done at your own risk.

14. What are your rights regarding your Personal Data?

Your Account: If you have an account, please visit your account to update your account information.

Email Unsubscribe: If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

SMS or Text Marketing: If you have given permission, we may contact you by SMS or text message about products, promotions, and special offers that

may be of interest to you. You may opt-out of these marketing messages any time by texting STOP or by contacting us.

Cookies Choices: You have options to limit the information that we and our partners collect for online advertising purposes. You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Site functionality, disabling cookies may also disable some elements of our online properties. If you delete your cookies, you may also delete your opt-out preferences. You may remove yourself from the targeted advertising of companies that participate in the Network Advertising Initiative by opting out [here](#), or of companies participating in the Digital Advertising Alliance program by opting out [here](#).

Do Not Track: Your browser or device may include “Do Not Track” functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy regardless of whether a Do Not Track signal is received.

Depending upon your state of residence, you may have certain rights in respect of your Personal Data where required by applicable law and subject to limitations which may apply in consideration of exceptions or legal requirements or policies.

The following rights may be available to residents of California and Texas, subject to certain exceptions:

- A right of access and rectification: you may have the right to obtain confirmation as to whether or not Personal Data concerning you is being Processed, and, where that is the case, to access and correct such Personal Data.

- Right to data portability: you may have the right to get a copy of your Personal Data in readily-usable electronic form. Where possible and allowed by law, we will provide a copy of the personal data we are processing. Where allowed by law, we may charge a reasonable fee. If you make the request by electronic means, and unless otherwise requested, we will provide the data shall in electronic form.
- A right to deletion: in some cases set forth by applicable data protection law, you may have the right to obtain the erasure of your Personal Data.
- The right to revoke your consent: without affecting the lawfulness of the Processing carried out prior to your revocation, you may revoke your consent to the Processing of your Personal Data when such Processing is based on your consent.
- A right to object to Processing: you have the right to object to Processing of your Personal Data where the Personal Data has been processed based on the legitimate interest of Septodont, it being specified that your request has to be justified by your particular situation.
- Right to opt-out of profiling: if we base decisions solely on profiling or automated decision-making that may result in important legal or other effects, you may have the right to opt-out.
- Right to opt-out of sale, sharing, and targeted advertising: you may have the right to opt-out of the sale or sharing of your Personal Data to third parties for targeted advertising.
- Right to limit the use and disclosure of Sensitive Personal Data: You may have the right to limit the use and disclosure of your Sensitive Personal Data if we use such information to infer characteristics about you.

- Right to nondiscrimination: We will not discriminate against you for exercising any of these rights.

You may under certain circumstances authorize another individual or a business, called an authorized agent, to make requests on your behalf.

We must verify your identity before responding to your request. We do this by asking you to provide information that we can match against information we may have about you already. We may need to follow up with you to request more information to verify your identity. We will not use Personal Data we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response. Residents of Texas may have the right to appeal a denial of their request by contacting us as described in the notice of denial.

15. How to contact us?

If you have any question or concern about this Policy or about how Septodont Processes your Personal Data or if you wish to exercise any of your rights set out in Section 10 above, please contact the Data Protection Officer at dataprotection@septodont.com. Individuals who may have certain other rights under local or regional regulation, may also contact us to exercise those rights through the same email address.

You can also send a letter to the following address: Septodont, Data Protection Officer, 127 Boulevard Diderot – Paris 75012 – France.

Last updated: [DATE OF POSTING]

Effective: [DATE OF POSTING + 30 DAYS]