

Draft Without Prejudice
FLASH Portal Privacy Policy for Orthodontists

Welcome to www.login.flashorthodontics.in (hereinafter referred to as the “**Website**”), a website owned by 3D Future Technologies Private Limited, a company incorporated as per the Companies Act, 2013, having CIN U74999MH2015PTC261114 and having its registered address at Floor-G-5, Plot-6, Ador House, Kakushroo Dubach Marg, Kala Rhoda, Fort, Mumbai 400 001 (hereinafter referred to as “**We**” or “**Our**” or “**Us**”)

We respect the privacy of our Website users, including you as well as your authorized employees, (“**You**” or “**Your**”) and the confidentiality of the information provided by You and have developed this Privacy Policy to demonstrate Our commitment to protecting the same. This Privacy Policy describes the type of information We collect, purpose, usage, storage and handling of such information, and disclosure thereof. We encourage You to read this Privacy Policy carefully when (I) using the Website from any computer, computer device, mobile, smartphone or any electronic device, or (ii) availing any products or services offered on or through the Website. By using the Website, you are accepting the practices described in this Privacy Policy.

1. What information do we collect?

- 1.1. When You use the Website, we collect Your as well as Your Patient’s personal and non-personal information. Your and Your Patient’s personal information help Us to collect information that can directly identify You and Your Patient such as the name, address, email address, phone number. You may also provide Us with Your patient’s information such as details of Your patient, Your patient’s clinical photos, OPG, CEPH and X-rays, Your patient’s clinical and diagnostic details and Your patient’s treatment plans. We also collect Your non-personal information that does not directly identify You. By using the Website, you are authorizing Us to collect, parse, store, process, disclose, disseminate and retain such information as envisaged herein. You’re as well as Your Patient’s personal information shall not be made public or made available to other users without Your permission.
- 1.2. In order to register as a user with the Website, you may be asked to register with the Website by creating a Website account with us. If You do so, you authorize Us to access such account information, any may also be asked to allow Us to collect location information from the device when Our Website is used. In addition, we may collect and store any personal information You provide while using the Website or in some other manner. If You contact Us for customer service or other inquiry, you provide Us with the content of that communication.
- 1.3. We neither knowingly collect any information nor promote the Website to any minor under the age of 18 (eighteen) years. If You are less than 18 (eighteen) years old or a minor in any other jurisdiction from where You access the Website, we request that You do not submit information to Us. If We become aware that a minor has registered with Us and provided Us with personal information, we may take steps to terminate such person’s registration and delete their account with Us.



- 1.4. We use various tools and technologies, including cookies, to collect Your personal information and non-personal information from the device from which You access the Website and learn about Your activities taking place under Your account when You use the Website. Such non-personal information could include Your IP address, device ID and type, your browser type and language, operating system used by Your device, access times, Your device geographic location and the referring website address. We may use web beacons and other similar technologies to track Your use of the Website and to deliver or communicate with cookies.
- 1.5. You represent and warrant that all information You submit upon creation of Your Website account or otherwise, is accurate, complete and truthful and that You will promptly update any information provided by You that subsequently becomes inaccurate, incomplete, misleading or false. You shall be directly responsible for all information provided by Your authorized employees to Us.

2. How we use the information we collect?

We may use information that We collect from You to:

- (a) deliver and improve Our products and services, and manage Our business;
- (b) manage Your account and provide You with customer support;
- (c) perform research and analysis about Your or Your patient's use of, or interest in, Our or other users' products, services, or content or such products, services, or content as may be available on or through the Website;
- (d) jointly develop orthodontic treatment plans for Your patient's;
- (e) communicate with You by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to You either from Us or other users or such products, services, or content as may be available on or through the Website;
- (f) develop, display, and track content and advertising tailored to Your interests on the Website and other sites, including providing Our advertisements to You when You visit other sites;
- (g) website and/or mobile application analytics;
- (h) enforce or exercise any rights in our Website Terms and Conditions available at Terms & Conditions on the portal
- (i) perform functions or services as otherwise described to You at the time of collection; and
- (j) resolve disputes, troubleshoot problems, detect and protect Us against any activity not expressly authorized under the Website Terms & Conditions as available at Terms & Conditions on the portal

3. With whom we share your information?

- 3.1. When you register as a user of the Website, your profile details (information You have provided Us) may be accessible and viewable by other registered Website users.



- 3.2. We may provide Your location and contact details on Our Website for the convenience of Our Website users who may be interested in contacting You to avail Your services.
- 3.3. We do not share Your personal information with others except as indicated in this Privacy Policy or when We inform You and give You an opportunity to opt out of having Your personal information shared.
- 3.4. We may also disclose Your personal information (I) for complying with applicable laws, requests or orders from law enforcement agencies, appropriate authorities (such as without limitation, court officials, expert professional investigative agencies and the like) or for any legal process; (ii) for enforcing the Website Terms and Conditions; (iii) for protecting or defending Ours, any Website member's or any third party's rights or property; (iv) for supporting any fraud/ legal investigation/ verification checks; or (vi) in connection with a corporate transaction, including but not limited to sale of our business, merger, consolidation, or in the unlikely event of bankruptcy.
- 3.5. We may use and share Your non-personal information We collect under any of the above circumstances, including with third parties to develop and deliver targeted advertising on our Website and on websites and/or applications of third parties, and to undertake analysis thereof. We may combine non-personal information We collect with additional non-personal information collected from other sources. We also may share aggregated, non-personal information, or personal information in hashed, non-human readable form, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other business purposes.

4. How can you access or control your information?

- 4.1. If You have a Website account with Us, you can review and update Your personal information by opening and editing Your profile details. In addition, we give You the control to opt out of having Your personal information shared, via the Website settings. If You terminate Your Website account, we may retain certain information associated with Your account for analytical purposes and recordkeeping purposes or as required by law, as well as to prevent fraud, enforce our Website Terms and Conditions, take actions We deem necessary to protect the integrity of Our Website or other Website users, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.
- 4.2. You can choose not to provide Us with certain information; however, this may result in You being unable to use certain features of Our Website. Our Website may also deliver notifications to Your email or mobile device. You can disable these notifications by changing the Website settings.



4.3. You are solely liable and responsible for any information You provide and/or share using the Website.

5. How do we protect your personal information?

We adopt reasonable security practices and procedures to help safeguard Your personal information under Our control from unauthorized access. However, you acknowledge that no Internet transmission or system or server can be 100% secure. Therefore, although We take all reasonable steps to secure Your personal information, we do not promise or guarantee the same, and You should not expect that Your personal information, or other communications while using the Website will always remain secure and safeguarded by Us. You should always exercise caution while providing, sharing or disclosing Your and Your patient's personal information using the Website.

6. Children's Privacy.

We try our best to restrict the use of the Website to individuals aged 18 (eighteen) years and above. We do not knowingly collect, maintain or use personal information from children under the age of 18 (eighteen) years.

7. Changes to this Privacy Policy.

We may occasionally update this Privacy Policy. When We post changes to this Privacy Policy, we will revise the "last updated" date. We recommend that You check Our Website from time to time to keep Yourself updated of any changes in this Privacy Policy or any of Our Other Website related terms and policies.

8. Contact us.

Please contact us by email on info@flashorthodontics.in for any questions or comments regarding this Privacy Policy.

Last Updated on: 4th July 2016.

