

Effective Date: 12th February 2024

James R. Glidewell Dental Ceramics, Inc. DBA ORB Innovations (the "**Company**", "**we**", "**our**", or "**us**") may collect information that identifies, describes, or is reasonably capable of being associated with you ("**Personal Information**"). This Privacy Policy helps you understand how we collect, store, use, and share your Personal Information when you visit our website, use our mobile application, or otherwise engage with us online or offline (collectively our "**Services**").

The term "**Website**" refers to orbinnovations.com. The term "**App**" refers to the ORB Innovations mobile application. This Privacy Policy does not apply to any other websites or applications operated by the Company or to any websites or applications operated by third parties.

By using our **Services** and/or providing us with your Personal Information, you signify your acknowledgement of this Policy and our [Terms of Use](#). If any term in this Policy is unacceptable to you, please do not use the Services or submit your Personal Information to us.

TABLE OF CONTENTS

1. [SCOPE OF THIS POLICY](#)
2. [PERSONAL INFORMATION WE MAY COLLECT](#)
3. [HOW WE USE AND SHARE PERSONAL INFORMATION](#)
4. [DISCLOSING YOUR PERSONAL INFORMATION TO THIRD PARTIES AND OTHER RECIPIENTS](#)
5. [HOW WE USE COOKIES AND OTHER TRACKING MECHANISMS](#)
6. [TRACKING AND ADVERTISING CHOICES](#)
7. [THIRD-PARTY WEBSITES](#)
8. [CHILDREN'S PRIVACY](#)
9. [HOW WE RETAIN PERSONAL INFORMATION](#)
10. [LOCATED IN THE UNITED STATES](#)
11. [REVISIONS TO THIS POLICY](#)
12. [CALIFORNIA PRIVACY RIGHTS](#)
13. [CHANGES TO THIS NOTICE](#)
14. [HOW TO CONTACT US](#)

1. SCOPE OF THIS POLICY

Our information practices depend on how you interact with our Services and which webpages you visit. Except as otherwise noted, this Policy applies to the Personal Information that Company collects related to:

- Visitors of our website where this Policy is posted, individuals who download and use our mobile application or any other software or applications we provide, individuals who use our mouthguard product ORB Sport, individuals who otherwise interact or engage with us or the services available through our website, mobile application, or other downloadable content;
- Individuals who subscribe to receive news, information, and marketing communications and materials from us;

- Individuals who register for or participate in our surveys;
- Current, former, and prospective customers, agents, vendors, and business partners; and
- Individuals who communicate with us or otherwise engage with us related to our Services.

For purposes of this Policy, Personal Information does not include publicly available information contained in government records or any data that has been deidentified, aggregated, or otherwise anonymized.

Additional Notices. This Policy does not apply to job applicants and candidates who apply for employment with us, or to employees in the context of our working relationship with them. This Policy also does not apply to the extent we process Personal Information as a service provider or processor on behalf of our business clients. Our processing of business clients' personal information is subject to the terms of our contracts with each business client, who is the business or controller of such Personal Information that we process on their behalf.

2. PERSONAL INFORMATION WE COLLECT

As further described below, we may collect personal information directly from you, automatically through your use of the Services, and from other, third-party sources.

Personal Information We Collect Directly from You. While the personal information we may collect varies depending upon your use of our Services and our interactions with you, in general, we may collect the following Personal Information directly from you or the business you represent:

- **Contact Information.** When you contact us, including if sign up to learn more about our Services, request a demo, or otherwise contact us, we collect your name, email address, phone number, the nature of your inquiry, and any other information you so choose to provide. We may also collect information related to your job title, company name, business email, and business phone number.
- **Activity Information.** When you use our mouthguard and pair it with our mobile application, information such as your exercise, activity, including the number of steps you take, distance traveled, calories burned, weight, heart rate, and active minutes may be collected.
- **Demographic Information.** When you sign up for an account, we collect your age, height, weight, and gender. You also have the option to identify your ethnicity if you choose.
- **Account Information.** When you register for an account with us, we collect your name, email address, password, and any other information used in connection with accessing your account.
- **Purchases and Payments.** If you make purchases through our Services, we collect payment information such as name, payment card details, billing address, payment type, as well as credit card number or other payment account details.
- **Communications and Interactions.** When you email, call, or otherwise communicate with us and with members of our team, we collect and maintain a record of your contact details, communications, and our responses. If you speak with us by phone, we may collect call recordings for quality assurance and training purposes.
- **Responses and Feedback.** If you participate in our surveys or questionnaires, we collect your responses and feedback, such as user satisfaction or other information related to your use of our Services, and any other information you so choose to provide.
- **Marketing and Promotions.** If you agree to receive marketing communications from us, we collect your email, name, phone number, preferences, and if relevant, information about your account and

the Services and features you use. If you participate in promotions we offer, we collect your name and other information related to the activities available through our Services.

- **Events and Other Requests.** We also collect personal information related to your participation in our events as well as other requests that you submit to us related to our Services. For example, if you register for or attend an event that we host or sponsor, we may collect information related to your registration for and participation in such event.
- **Preferences.** We also may collect information about your preferences, including communications preferences, preferences related to your use of Services, and any other preferences or requests you provide when interacting with us.

Personal Information We Collect Automatically. We and our providers may automatically collect personal information related to your use of our Services, including using cookies, pixel tags, software development kits, and other similar technologies. The personal information we may automatically collect includes:

- **Device and Browsing Information.** We collect information such as IP address, unique ID, device type, general location information such as region, which may be derived from your IP address, browser type, browser language, domain names, access times, date/time stamps, operating system, scrolling activity, internet service provider, and other similar device and browsing information.
- **Activities and Usage.** We also collect activity information such as information related to how you interact with the Services, including page views, links and items clicked, features used, time spent within the Services, and other activity and usage information.
- **Location Information.** If you choose to enable location-based sharing with us through your device settings, we may collect precise location information, such as GPS coordinates, to provide content that is more relevant to your location and to otherwise improve your interactions with our Services.

To the extent permitted by law, we may combine this information with other information that we have collected about you. For more information about our use of cookies and other similar technologies, please see the “[Cookies and Other Tracking Mechanisms](#)” section below.

Personal Information We Collect from Other Sources. In addition, we may collect and receive certain personal information from business partners, social media sites, clients and customers, data analytics providers, internet service providers, operating systems and platforms, government entities, public databases, and vendors and service providers who provide services or perform functions on our behalf. For example, we may collect your name, contact information, and certain transaction details from our business partners, vendors, and service providers.

3. PURPOSES FOR COLLECTING AND DISCLOSING PERSONAL INFORMATION

We may use and disclose Personal Information collected from you for the following purposes:

- **Services and Support.** To allow you to maintain your account with us, provide and operate our Services, communicate with you about your use of the Services, provide troubleshooting and

technical support, respond to your inquiries, communicate with you about the Services, and to otherwise run our day-to-day operations.

- **Analytics and Improvement.** To better understand how users access and use the Services and our product and service offerings, and for other research and analytical purposes, such as to evaluate and improve our Services and business operations, to develop our Services and its features, and for internal quality control and training purposes.
- **Communicate With You.** To respond to your inquiries, send you requested materials and newsletters, as well as information and materials regarding our Services and offerings, and to communicate with you through email regarding your order and our Services. We also use this information to send administrative information to you, for example, information regarding the Services and changes to our terms, conditions, and policies.
- **Marketing and Promotions.** For marketing and promotional purposes. For example, to send you information about our Services, such as newsletters and other marketing content, including information about our events and new offerings, as well as any other information that you sign up to receive.
- **Research and Surveys.** To administer surveys and questionnaires, such as for market research or user satisfaction purposes.
- **Planning and Managing Events.** For event and webinar planning, and other management-related purposes, such as registration, attendance, connecting you with other event attendees, and contacting you about relevant events and Services.
- **Security and Protection of Rights.** To protect the Services and our business operations, and to protect our rights or those of our stakeholders; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our [Terms of Use](#).
- **Compliance and Legal Process.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.
- **Auditing, Reporting, and Other Internal Operations.** To conduct financial, tax and accounting audits; audits and assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; our general business, accounting, record keeping and legal functions, and to maintain appropriate business records and enforce company policies and procedures.
- **General Business and Operational Support.** To assess and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions such as financing, and to administer our business, accounting, auditing, compliance, recordkeeping, and legal functions.

4. DISCLOSING YOUR PERSONAL INFORMATION TO THIRD PARTIES AND OTHER RECIPIENTS

In the previous 12 months, we may have disclosed Personal Information to the following categories of recipients for the business purposes described in Section 3 above:

- **Vendors and Services Providers.** We may disclose the personal information we collect to vendors and service providers who perform functions on our behalf, such as IT and website hosting,

marketing, and marketing research providers, customer support, data storage, payment processing providers, data analytics providers, auditors, consultants, and legal counsel.

- **Marketing and Analytics Providers.** We may also disclose your personal information, such as device and browsing, and activities and usage information, to marketing and advertising networks, data analytics providers, and other companies who provide marketing or analytics services on our behalf. For more information, see the “**How We Use Cookies and Other Tracking Mechanisms**” section below.

We may also disclose your personal information in the following circumstances:

- **To Operate Our Business.** We may disclose personal information to our business partners, affiliates, service providers, and other vendors to operate our business and provide our Services.
- **In Support of Business Transfers.** If we are or may be acquired by, merged with, or invested in by another company, or if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may disclose or transfer the personal information we have collected from you with or to the other company. We may also disclose certain personal information as necessary prior to the completion of such a transaction or other corporate transaction such as a financing or restructuring, to lenders, auditors, and third-party advisors, including attorneys and consultants.
- **Compliance and Legal Obligations.** To comply with our legal and compliance obligations and to respond to the legal process. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements.
- **Security and Protection of Rights.** Where we believe doing so is necessary to protect the Services, our rights and property, or the rights, property, and safety of others. For example, we may disclose personal information to (i) prevent, detect, investigate, and respond to fraud, unauthorized activities and access, illegal activities, and misuse of the Services, (ii) situations involving potential threats to the health, safety, or legal rights of any person or third party, or (iii) enforce, detect, investigate, and take action in response to violations of our [Terms of Use](#). We may also disclose personal information related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.
- **Aggregate and Deidentified Information.** Notwithstanding anything else in this Policy, we may use, disclose, and otherwise process aggregate and deidentified information related to our business and the Services with third parties for quality control, analytics, research, development, and other purposes.
- **Other Disclosures.** We may disclose personal information in other ways not described above that we notify you of or that we obtain your consent for.

5. HOW WE USE COOKIES AND OTHER TRACKING MECHANISMS

We and our service providers use cookies, pixels, tags, and other similar tracking mechanisms to automatically collect information about browsing activity, type of device and similar information within our Services. We use this information to, for example, analyze and understand how you access, use, and interact with our Services, as well to identify and resolve bugs and errors in our Services, and to assess, secure, protect, optimize, and improve the performance of our Services.

Cookies. “Cookies” are alphanumeric identifiers we transfer to your device’s hard drive for tracking purposes. Some cookies allow us to make it easier for you to navigate our Service, while others are used to enable and optimize certain Service functions, support the security and performance of the Service, or allow us to track activity and usage data within our Service.

Pixel Tags. Pixel tags (sometime called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. While cookies are stored locally on your device, pixel tags are embedded invisibly within web pages and online content. We may use these, in connection with our Service to, among other things, track the activities of users, and help us manage content and compile usage statistics. We may also use these in our emails to let us know when they have been opened or forwarded, so we can track response rates and gauge the effectiveness of our communications.

Third-Party Analytics and Tools. We use third party tools, such as Google Analytics, which are operated by third party companies. These third-party analytics companies may collect usage data (using cookies, pixels, and similar tools) about our Services to provide us with reports and metrics that help us evaluate usage of our Services, improve our Sites, and enhance performance and user experiences. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>.

6. TRACKING AND ADVERTISING CHOICES

We allow you to manage your preferences and privacy choices, as described below:

- **Cookie Settings.** To prevent cookies from tracking your activity on our Website or visits across multiple websites, you can set your browser to block certain cookies or notify you when a cookie is set; you can also delete cookies. The “Help” portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Website who disable cookies will be able to browse the website, but some features may not function.
- **Industry Solutions for Opting Out of Interest-based Advertising.** Notwithstanding the above, you may follow the steps provided by initiatives that educate users on how to set tracking preferences for most online advertising tools. These resources include the Network Advertising Initiative (<https://thenai.org/about-online-advertising/>) and the Digital Advertising Alliance (<https://digitaladvertisingalliance.org/>). The Digital Advertising Alliance also offers an application called AppChoices (<https://youradchoices.com/appchoices>) that helps users to control interest-based advertising on mobile apps.
- **Marketing Communications.** You may consent or withdraw your consent to our use of your Personal Information for marketing at any time by following the instructions to unsubscribe included in each marketing-related email sent to you. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you administrative messages relevant to any specific services you may have signed up for.
- **Google Analytics.** You can download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

7. THIRD-PARTY WEBSITES

The Website and App may contain links or references to other websites outside of our control. Please be aware that this Policy does not apply to these websites. The Company encourages you to read the privacy statements and terms and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data regarding your use of the website or solicit Personal Information. The Company does not control and is not responsible for what third parties do in connection with their websites, or how they handle your Personal Information. Please exercise caution and consult the privacy policies posted on each third-party website for further information.

8. CHILDREN’S PRIVACY

Our Website is intended for users who are 13 years old or older. Children under 13 may only use our App with parental consent. If you are a parent or legal guardian and think your child under 13 has given us information without your consent, you can call us at [\(888\) 530-1066](tel:8885301066) or email us at privacy@glidewell dental.com. If we learn that we have collected the information of a child under 13 without parental consent, we will delete such information from our records.

9. HOW WE RETAIN PERSONAL INFORMATION

We retain your Personal Information for as long as needed, or permitted, based on the reason why we obtained it (consistent with applicable law). When deciding how long to keep your information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period of time before we can delete them) or whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information). From time to time, we may also deidentify your Personal Information, retain it and use it in compliance with applicable laws.

10. LOCATED IN THE UNITED STATES

The laws and regulations in different countries impose requirements on the Internet and data protection. The servers that make the Website and App available worldwide are located in the USA. All matters relating to the Website and App are governed by the laws of the State of California. Please note that any information you provide will be transferred directly to the USA, and by using the Website and App or providing us with your Personal Information, you authorize this transfer.

11. REVISIONS TO OUR POLICY

We will continue to review and revise our privacy practices and policies as our technology, services, and use of data evolves. We will not use or share data in a manner that is materially different from this policy without first providing you notice. This Notice is reviewed and updated annually, and we will use reasonable means to inform you of any changes.

12. YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may have rights to the information we collect that identifies, describes, or is reasonably capable of being associated with you (“Personal Information”). To the extent you are a resident of California, you may have the following rights:

Right to Request More Information. You may have the right to request information about how we have processed your Personal Information, including:

- The categories of Personal Information we have collected;
- The categories of sources from which we collected that information;
- Our business or commercial purpose for collecting that information;
- The categories of third parties with whom we shared that information; and
- The specific pieces of Personal Information we collected about you.

Right to Delete. You have the right to request that we delete the Personal Information we collected about you. Not all requests to delete can be fulfilled. If we are unable to comply with your request, we will provide a response explaining why your data cannot be deleted.

Right to Correct. You have the right to request that we correct inaccuracies in your Personal Information.

Right to Opt-Out of Sales/Sharing. California residents may have the right to opt-out of “sales” or “sharing” of their Personal Information under the CCPA. CCPA defines a “sale” as disclosing or making Personal Information available to a third-party in exchange for monetary or other valuable considerations. CCPA also defines “sharing” as disclosing or making available Personal Information to a third party for purposes of cross-context behavioral advertising. While we do not disclose Personal Information to third parties in exchange for monetary compensation, we may “sell” or “share” (as defined by the CCPA) personal information, such as identifiers and internet and electronic network activity information to third-party ad networks. We do so to improve and evaluate our advertising campaigns and better reach customers and prospective customers with more relevant ads and content.

To opt out of the sharing or sale of Personal Information collected through advertising cookies, please click on the “Do Not Sell or Share My Personal Information” Link on the bottom of the website homepage. Please note that submitting an opt out request will only opt you out of disclosures that are considered “sales” or “sharing” under the CCPA, but it will not opt out of other disclosures, such as to our service providers.

You may also opt-out of “sales” and “sharing” of your Personal Information using an opt-out preference signal. If our website detects that your browser or device is transmitting an opt-out preference signal, such as the “global privacy control” or “GPC” signal, we will opt that browser or device out of cookies on our website that result in a “sale” or “sharing” of your Personal Information. Please note, if you come to our website from a different device or a different browser on the same device, you will need to opt out, or use an opt-out preference signal, for that browser and/or device as well.

We do not sell or share sensitive Personal Information, nor do we sell or share any Personal Information about individuals who we know are under sixteen (16) years old. We do not provide your Personal Information to third parties for their direct marketing purposes.

Right to Limit the Use and Disclosure of Sensitive Personal Information. We do not use or disclose sensitive Personal Information for any purpose that would require us to provide you with a right to limit the use of your sensitive Personal Information under the CCPA.

Right to Non-Discrimination. We will not discriminate against you for exercising any of the rights described in this section.

Exercising Your Rights. If you want to exercise any of these rights, please use one of the following methods:

Submit a [data privacy request](#) online
Phone: [1-888-530-1066](tel:1-888-530-1066)

Verification. Before we can respond to your request, we must first verify your identity using your Personal Information. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

Response Timing and Format. We will endeavor to respond to your request within forty-five (45) days of receipt. If we require more time (up to 90 days total), we will inform you of the reason and extension period in writing. If we cannot respond to your request, either fully or partially, we will also explain our reasons. For data access requests, we will deliver the data in a readily, usable format. Where permitted under the CCPA, we may charge you a reasonable fee to process your request.

Designating an Authorized Agent. You may designate someone to submit requests and act on your behalf (an “Authorized Agent”). To do so, the Authorized Agent must submit a data privacy request [using this form](#) and provide us with written consent signed by you to act on your behalf. We may also ask you directly to verify that you have authorized your authorized agent to act on your behalf.

13. CHANGES TO THIS NOTICE

We will continue to review and revise our privacy practices and policies as our technology, services, and use of data evolves. We will not retroactively use or share data in a manner that is materially different from this policy without first providing you notice. This Notice is reviewed and updated annually, and we will use reasonable means to inform you of any changes.

14. HOW TO CONTACT US

If you have questions or concerns regarding your information or your rights, please contact us at [1-888-530-1066](tel:1-888-530-1066) or submit a [data privacy request](#) online.