

Privacy Policy

SmileMinder helps users of clear aligners to track their orthodontic treatment (“Service” or “Company Service”) via the SmileMinder mobile application (the “App”). The Company Service is owned and operated by Visivest Corporation (M) Sdn Bhd (“Company” “we” or “us”).

Your use of the Company Service is subject to the terms and conditions set forth in this Privacy Policy (the “Privacy Policy”).

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING THE COMPANY SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY ALL THE TERMS OF THIS PRIVACY POLICY AND OUR TERMS OF SERVICE. IF YOU DO NOT AGREE TO SUCH TERMS, EXIT THIS PAGE AND DO NOT ACCESS OR USE THE COMPANY SERVICE.

We are committed to respect and protect the privacy of the personal information we obtain from you through the Company Service and we have created this Privacy Policy to inform you about how we collect, use and share your personal information, and about our privacy practices in general, which are always ready to address your questions and concerns regarding this policy and our privacy practices. If you would like to contact customer service, please contact us at the email address at the end of this Privacy Policy. We continually strive to find new ways to enhance your experience with the Company Service and we may modify this Privacy Policy periodically that reflect changes in our privacy practices. You are encouraged to review this Privacy Policy periodically and to check the “Last Updated” date at the top of the Privacy Policy for the most recent version. If we make changes to this Privacy Policy, we will notify you here, by email, or by means of notice through the Website, the Application, or any other part of the Company Service.

1: Types and Uses of Collected Information.

The company collects two types of information about you:

1.1: Personally Identifiable Information.

Personal Identifiable Information is information that identifies a specific person. When you engage in certain activities via the Company Service, including but not limited to creating an account, sending feedback, or otherwise participating in the Company Service (collectively, “Identification Activities”), we may ask you to provide certain information about yourself. If you elect to engage in an Identification Activity we may ask you to provide us with certain personal information about yourself, including but not limited to, your: name, email address, postal address, user name and password, telephone and/or faxnumber, date of birth, photographs, other household information about you and your family, such as gender or product use preferences and/or behaviors, health information, such as health information related to product usage and medical or dental history, demographic information, and/or any other

information you provide to us, to process your transaction, send communications about them to you, and populate forms for future transactions. When you enroll in the Company Service, we may also ask you to provide us with additional information, such as credit card information. Depending on the Identification Activity, some information we ask you to provide may be identified as mandatory and some identified as voluntary. If you do not provide the mandatory information for an Identification Activity, you will not be permitted to engage in that Identification Activity with the Company Service. Depending on the Identification Activity, Company might not re-ask you for Personally Identifiable Information if such are already stored with us. If you enroll in the Company Service through a third party (such as Facebook or Google) then Company may receive Personally Identifiable Information from such third party and by using the Company Service, you consent to such receipt of Personally Identifiable Information and its use pursuant to this Privacy Policy by Company. We may use or share Personally Identifiable Information to provide products and/or services to you, to enable Third-Party advertisers to provide products and/or services to you, administer sweepstakes and contests, enhance the operation of the Company Service, improve our marketing and promotional efforts, analyse use of the Company Service, improve the Company Service, and tailor your experience with third parties as provided below in this Privacy Policy. We may also use Personally Identifiable Information to troubleshoot, resolve disputes, accomplish administrative tasks, contact you, enforce our agreements with you, including our Terms of Service and this Privacy Policy, comply with applicable law, and cooperate with law enforcement activities.

1.2: Non-Personally Identifiable Information

Non-Personally Identifiable Information is information that does not identify a specific person. This type of information may include things like the Uniform Resource Locator (“URL”) of the website you visited before coming to the Company Service or otherwise participating in the Company Service, the URL of the website you visit after leaving the Company Service, the type of browser you are using, your Internet Protocol (“IP”) address, mobile carrier information, mobile device information, or general and/or aggregated location data that does constitute Personally Identifiable Information. We, and/or our authorized Third-Party Service Providers, may automatically collect this information when you visit or use the Company Service using electronic tools like Cookies and Web beacons or Pixel tags, as described below in this Privacy Policy. Most of the other information we collect for mobile, such as your mobile device identification and mobile device type, the request type, your mobile carrier, your mobile carrier user identification, and the content of your request does not by itself identify you to Company, though it may be unique or consist of or contain information that you consider personal. We use Non-Personally Identifiable Information to troubleshoot, administer the Company Service, analyze trends, gather demographic information, comply with applicable law, and cooperate with law enforcement activities. We may also share this information with our authorized Third-Party Service Providers to measure the overall effectiveness of our products and services. As related to the App, we may collect additional information automatically, such as advertising ID or similar identifier, information about your device’s operating system, and

information about the way you use the application. The App may collect precise location information from your mobile device if you consent to the collection of this information. We may use third-party service providers to provide location services using the location data you provide. You may opt-out at any time to the continued collection of this information by adjusting the settings on your device.

2: Public Content.

The information that you contribute through the Company Service is intended for public consumption, including your reviews, tips, photos, videos, check-ins, comments, likes, bookmarks, friends, lists, compliments, and account profile. We may display this information through the Company Service, share it with businesses, and further distribute it to a wider audience through third party sites and services.

3: Communications.

When you sign up for an account or use certain features, you are opting to receive messages from other users of the Company Service, businesses, and Company itself. You cannot opt-out of Administrative Emails. "Administrative Emails" relate to your activity on the Company Service and include but are not limited to emails regarding your account, requests or inquiries, and purchases of products and services, if applicable. If you do not want to receive promotional emails from us, you may elect to opt-out of receiving promotional emails at any time after registering by e-mailing us at the email listed at the end of this Privacy Policy or by hitting the "unsubscribe" button at the bottom of our e-mails. We may track your actions in response to the messages you receive from Company or through the Company Service, such as whether you deleted, opened, or forwarded such messages. If you exchange messages with others through the Company Service, we may store them to process and deliver them, allow you to manage them, and we may review and disclose them in connection with investigations related to the operation and use of the Company Service. We may not deliver messages that we believe are objectionable, such as spam messages or requests to exchange reviews for compensation. We may also store information that you provide through communications to us, including from phone calls, letters, emails, and other electronic messages, or in person. If you are a representative of a business listed on the Company Service, we may contact you, including by phone or email, using the contact information you provide us, make publicly available, or that we have on record for your business.

4: Release of Personally Identifiable Information.

We will not sell or share your Personally Identifiable Information with other parties, except as may be required by law. We reserve the right to disclose your Personally Identifiable Information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on us, enforce or apply this Privacy Policy, Terms of Service or other agreements or protect the rights, property or safety of the Company Service, users of the Company Service or others.

5: Release of Non-Personally Identifiable Information.

We may disclose or share Non-Personally Identifiable Information with Third Party Service Providers and the public. For example, we may share aggregated demographic information (which does not include any Personally Identifiable Information) or use Third Party Service Providers to track and analyze Non-Personally Identifiable usage and volume statistical information from our users to administer the Company Service. We may also publish this aggregated information for promotional purposes. Such data is collected on our behalf and is owned and used by us. We may use Third Party Service Providers to serve ads when you participate in the Company Service. These companies may use Non-Personally Identifiable Information about your visits and use of the Company Service, and visits to other websites or locations to provide, through the use of network tags, advertisements about goods and services that may be of interest to you.

6: Choices on Collection/Use of Information.

You can always choose not to provide certain information, although a certain level of information is required to engage and participate in the Company Service. Other users may be able to identify you or associate you with your account if you include personal information in the content you post publicly. You can reduce the risk of being personally identified by using the Company Service pseudonymously, though doing so could detract from the credibility of your contributions to the Company Service. Please also note that the messages you send or receive using the Company Service are only private to the extent that both you and the person you are communicating with keep them private. For example, if you send a message to another user, that user may choose to publicly post it. Also, the Company may access and disclose such messages during investigations relating to the use of the Company Service.

7. Data Tracking

Cookies

To facilitate and customize your experience with the Company Service, we may store cookies on your computer or other similar devices through which you access the Company Service. A cookie is a small text file that is stored on your computer or other devices for record-keeping purposes that contains information about you. We use cookies to save you time while using the Company Service, remind us who you are, and track and target your interests to provide a customized experience. Cookies also allow us to collect Non-Personally Identifiable Information from you, like which pages you visited, what links you clicked on, and how you used the Company Service. We may use Third Party Service Providers to display advertisements on the Company Service. As part of their service, they may place separate cookies on your computer or similar device. We have no access to or control over these cookies. This Privacy Policy covers the use of cookies by the Company Service only and does not cover the use of cookies by any Third-Party Service Provider. Most browsers automatically accept cookies; however, you may be able to modify your browser settings to decline cookies. Please note that if you decline or delete these cookies, some parts of the Company Service may not work properly.

8: This Privacy Policy only addresses the use and disclosure of information we collect from you via the Company Service. Other websites or services that may be accessible through the Company Service may have their own privacy policies and data collection, use, and disclosure practices. If you use, link, or visit any such website, we urge you to review the website's privacy policy. We are not responsible for the policies or practices of third parties.

9: Privacy Settings

As a user, you may have limited access to privacy settings. These settings help hide information you wish to share with other users and/or the public. It is up to you to select the appropriate privacy settings. If you don't agree with the available privacy settings, please stop using the Company Service.