

## LINKED SEGMENTS FOR ONLINE PRIVACY NOTICE

### **SEGMENT 1** UNDER Section Entitled INFORMATION WE COLLECT:

When you create an account, you provide us with at least your login credentials, as well as some basic details necessary for the Service to work, such your professional goals, practice philosophy, and location or location preference. You are also required to report the results of a personality assessment.

- You are required to provide a photo of yourself. Some subscribers may add additional photos, such as a photo of a dental practice that is hiring or for sale. To add a photo, you may allow us to access your camera or photo album.
- Some of the information you choose to provide us may be considered “special” or “sensitive” in certain jurisdictions. By choosing to provide this information, you consent to our processing of that information.
- When you make a payment to us (for example, by subscribing to our Service), you provide us or our payment service provider with information such as your debit or credit card number or other financial information.
- When you participate in surveys or focus groups, you give us your insights into our Services, responses to our questions, and testimonials.
- If you contact us, we may collect the information you give us during the interaction. Sometimes, we monitor or record these interactions (for example, for training purposes and to ensure a high quality of service).
- If you provide information of other people, we collect the information about others that you give us; for example, if you ask us to provide information about you to another subscriber on your behalf, or if you opt for periodic “check-ins” with an ADA Practice Transitions advisor after a match has been completed and you provide information about the match.
- We process your communication with other subscribers through our service as part of the operation of the services; for example, we may disclose your practice philosophy and other information about you to another subscriber for matching purposes.
- We may collect device information, such as IP address, location or provider, usage information and browsing history, such as information about how you navigate within our Services, your browsing history and which elements of our Services you use the most.
- We collect demographic information, such as your contact information.
- We collect information about you, such as your interests, goals, job status, and contemplated or consummated transactions. This information may be added to the ADA member database, where it is available to the ADA and its affiliates, as well as to state and local dental societies that are in the tripartite.

**SEGMENT 2** under Section Entitled *Information we receive from others*

- **Other Subscribers**

Other subscribers may provide information about you as they use our services. For instance, we may collect information about you from another subscriber if he or she wishes to obtain more information about you as a possible match, or if he or she opts for periodic “check-ins” with an ADA Practice Transitions advisor after completing a transaction with you, such as employment.

- **Third Parties**

We may receive info about you from third parties such as our service providers. In addition, we may collect information about you, such as your name, contact information, dental school, graduation date and degree, from the American Dental Association’s association management database.

**SEGMENT 3** under Section Entitled *Information collected when you use our Services*

- **Usage Information**

We collect information about your activity on our services, for instance how you use them (e.g., date and time you logged in, features you've been using, searches, clicks and pages which have been shown to you, referring webpage address, advertising that you click on), and how you interact with other subscribers. We track the opening of emails and attachments in the emails we send.

- **Device Information**

We collect information from and about the device(s) you use to access our services, including:

- hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google's AAID and Apple's IDFA, both of which are randomly generated numbers that you can reset by going into your device' settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address);
- information on your wireless and mobile network connection, like your service provider and signal strength;
- information on device sensors such as accelerometers, gyroscopes and compasses.

## **SEGMENT 4** under Section Entitled COOKIES AND OTHER SIMILAR DATA COLLECTION TECHNOLOGIES

### **Cookie Policy**

#### **Introduction**

Our Cookie Policy explains what cookies are, what types of cookies may be placed on your device when you visit our website and how we may use them.

#### **What are cookies?**

Cookies are small text files that are sent to or accessed from your web browser or your device's memory. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your device, such as subscriber settings, browsing history and activities conducted while using our services.

#### **Are there different types of cookies?**

##### *First-party and third-party cookies*

There are first-party cookies and third-party cookies. First-party cookies are placed on your device directly by us. For example, we use first-party cookies to better understand your use of our website. Third-party cookies are placed on your device by our partners and service providers. For example, we use third-party cookies to measure subscriber numbers on our website.

##### *Session and persistent cookies*

There are session cookies and persistent cookies. Session cookies only last until you close your browser. We may use session cookies for a variety of reasons, including to learn more about your use of our website during one single browser session and to help you to use our website more efficiently. Persistent cookies have a longer lifespan and aren't automatically deleted when you close your browser. These types of cookies are primarily used to help you quickly sign-in to our website again and for analytical purposes.

#### **What about other tracking technologies, like web beacons?**

Other technologies such as web beacons (also calls pixel tags or clear gifs), tracking URLs or software development kits (SDKs) are used for similar purposes. Web beacons are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our service or opened an e-mail that we have sent them. Tracking URLs are custom generated links that help us understand where the traffic to our webpages comes from. SDKs are small pieces of code included in apps, which function like cookies and web beacons.

For simplicity, we also refer to these technologies as "cookies" in this Cookie Policy.

#### **What do we use cookies for?**

Like most providers of online services, we use cookies to provide, secure and improve our services, including by remembering your preferences, recognizing you when you visit our website and

personalizing and tailoring ads to your interests. To accomplish these purposes, we also may link information from cookies with other personal information we hold about you.

When you visit our website, some or all of the following types of cookies may be set on your device.

Cookie type	Description
Essential website cookies	These cookies are strictly necessary to provide you with services available through our website and to use some of its features, such as access to secure areas.
Analytics cookies	These cookies help us understand how our website is being used, how effective marketing campaigns are, and help us customize and improve our websites for you.
Advertising cookies	These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, selecting advertisements that are based on your interests and measuring the number of ads displayed and their performance, such as how many people clicked on a given ad.
Social networking cookies	These cookies are used to enable you to share pages and content that you find interesting on our website through third-party social networking and other websites. These cookies may also be used for advertising purposes too.

### How can you control cookies?

There are several cookie management options available. Please note that changes you make to your cookie preferences may make browsing our website a less satisfying experience. In some cases, you may even find yourself unable to use all or part of our website.

#### *Browser and devices controls*

Some web browsers provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer. The procedure for managing cookies is slightly different for each internet browser. You can check the specific steps in your particular browser help menu.

You also may be able to reset device identifiers by activating the appropriate setting on your mobile device. The procedure for managing device identifiers is slightly different for each device. You can check the specific steps in the help or settings menu of your particular device.

#### *Interest-based advertising tools*

You can opt out of seeing online interest-based advertising from participating companies through the Digital Advertising Alliance, the Interactive Digital Advertising Alliance or Appchoices (apps only).

Opting out does not mean you will not see advertising - it means you won't see personalized advertising from the companies that participate in the opt-out programs. Also, if you delete cookies on your device after you opted out, you will need to opt-out again.

### **Social Cookies**

To allow you to share content on social media, some features of this website use social media plug-ins (e.g., Twitter™ “Share to Twitter” or LinkedIn™ “in” buttons). Depending on your social media account settings, we automatically receive information from the social media platform when you use the corresponding button on our website.

To learn more about social media cookies, we suggest you refer to your social media platform's cookie policy and privacy policy.

### **Google™ Cookies**

*Information from Google about Google's Data Collection Technology*

#### *Google Analytics*

We use Google Analytics, which is a Google service that uses cookies and other data collection technologies to collect information about your use of the website and services in order to report website trends.

You can opt out of Google Analytics by visiting [www.google.com/settings/ads](http://www.google.com/settings/ads) or by downloading the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout>.

**SEGMENT 5** under Section Entitled HOW WE USE INFORMATION

We use information in the following ways:

*To administer your account and provide our services to you*

- Create and manage your account
- Provide you with customer support and respond to your requests
- Complete your transactions
- Communicate with you about our services, including billing

*To help you connect with other subscribers*

- Analyze your profile and that of other subscribers to help suggest matches
- Show subscribers' profiles to one another

*To promote a consistent experience across your devices*

- Link the various devices you use so that you can enjoy a consistent experience of our services on all of them. We do this by linking devices and browser data, such as when you log into your account on different devices or by using partial or full IP address, browser version and similar data about your devices to help identify and link them.

*To serve you relevant offers and ads*

- Administer discounts or other offers
- Develop, display and track content and advertising tailored to your interests on our services and other sites
- Communicate with you by email, phone, or mobile device about products or services that we think may interest you

*To improve our services and develop new ones*

- Administer focus groups and surveys
- Conduct research and analysis of subscribers' behavior to improve our services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on subscribers' behavior)
- Develop new features and services

*To prevent, detect and fight fraud or other illegal or unauthorized activities*

- Address ongoing or alleged misbehavior on and off-platform
- Perform data analysis to better understand and design countermeasures against these activities
- Retain data related to fraudulent activities to prevent against recurrences

*For legal compliance*

- Comply with legal requirements
- Assist law enforcement
- Enforce or exercise our rights, for example our [Terms of Use](#)

To process your information as described above, we rely on the following legal bases:

- *Provide our service to you:* Most of the time, the reason we process your information is to perform the contract that you have with us. For instance, as you go about using our service, we use your information to maintain your account and your profile, to make it viewable to other subscribers and suggest other subscribers to you.
- *Legitimate interests:* We may use your information where we have legitimate interests to do so. For instance, we analyze subscribers' behavior on our services to continuously improve our offerings, we suggest offers we think might interest you, and we process information for administrative, fraud detection and other legal purposes.
- *Consent:* From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Notice.



**SEGMENT 6** under Section Entitled HOW WE SHARE INFORMATION

- **With other subscribers**

You share information with other subscribers when you voluntarily disclose information on the service (including your practice philosophy). Please be careful with your information and make sure that the content you provide is limited to information that you're comfortable being shared with other subscribers. For example, never provide sensitive or regulated data such as a social security number or identifiable patient information on the service.

In some cases, we share your data with other subscribers without revealing certain identifying information such as your name. For example, we may share your practice philosophy with another subscriber to suggest a connection without any additional information from your profile. If the subscriber clicks on the suggestion, we may share other information about you, such as your work history or current employment, without revealing certain identifying information such as your name. Note that even if we don't reveal your name, the other subscriber may be able to determine your identity from the information we provide, such as your work history or current employment. If both you and the other subscriber wish to talk to each other, then we will reveal your full profiles and profile photos to both of you to connect you.

- *With our service providers and partners*

We use third parties to help us operate and improve our services. These third parties assist us with various tasks, such as data hosting and maintenance, analytics, marketing, advertising, payment processing and security operations.

We may also share information with third parties who distribute and assist us in advertising our services. For instance, we may share limited information on you in hashed, non-human readable form to advertising partners.

All of our service providers must agree to confidentiality obligations.

- *With ADA and its Affiliates*

ADA Business Innovation Group, Inc. is wholly owned subsidiary of the American Dental Association. We may share your information with the American Dental Association (ADA) and its affiliates, such as the American Dental Association Foundation and American Dental Association Business Enterprises, Inc., which administers the ADA Member Advantage program. For example, ADA may assist us in processing your information, such as data hosting and maintenance, marketing and targeted advertising, finance and accounting assistance, better understanding how our service is used and subscribers' behavior to improve our service, securing our data and systems and fighting against spam, abuse, fraud, infringement and other wrongdoings. ADA and its affiliates may also use your information; for example, to notify you of opportunities, products and services that may interest you.

We may also share information with ADA and its affiliates for legitimate business purposes such as corporate audit, analysis and consolidated reporting as well as compliance with applicable laws. We may also share subscriber information with ADA and its affiliates concerning subscribers who violate our terms of use.

The ADA uses an association management database to collect, maintain, use, and share information about member and nonmember dentists who have attended a U.S. dental school, as

well as individuals who interact with the ADA. Information in the database is generally accessible to ADA and its affiliates (including ADA Business Innovation Group, Inc.), and state and local dental societies of the ADA “tripartite.” A “person record” may be created in the database for such dentists and other individuals. For example, a person record may be created when a dentist or other individual interacts with the ADA by becoming a member, purchasing an item or service, attending a meeting, volunteering, attending a continuing education or other course, or communicating with the ADA.

A person record contains information about the individual such as name, contact information, demographics, membership history, a record of purchases and meetings attended, volunteer positions held, and communications with the ADA and state and local dental societies. Person records are retained indefinitely. ADA may use a person record for any permissible purpose under the applicable privacy notice. ADA has entered into agreements with participating state and local dental societies of the ADA tripartite that permit the society to use a person record for any permissible purpose if the individual is eligible for membership in the society; however, if the individual is not eligible for membership in the society, the society may use the person record only for registration of the individual at society sponsored meetings, for determining dues owed, for updating the data (e.g., with correct contact information), to assist with order fulfillment, to create de-identified aggregated data solely for internal use, and for any other purpose for which the ADA has provided express written permission. Person records may not be used or disclosed in a way that would violate the [ADA.org Privacy Notice](#).

When you provide information to us or use our Services, we may disclose information about you to the ADA for inclusion in the ADA association management database, which is accessible to ADA, its affiliates, and state and local dental societies that are part of the tripartite. For example, we may communicate to ADA that you are seeking employment or seeking to sell your practice, and ADA may enter that information to your record in the ADA association management database.

- *For corporate transactions*

We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

- *When required by law*

We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

- *To enforce legal rights*

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our subscribers, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

- *With your consent or at your request*

We may ask for your consent to share your information with third parties.

## SEGMENT 7 under Section Entitled **YOUR RIGHTS**

If you do not want to receive postal mail or telephone calls from us in the future, or if you do not want us to share your contact information, please provide us with your exact name and postal addresses, phone and fax numbers and, if applicable, your ADA number to [ADAPT@ada.org](mailto:ADAPT@ada.org). It may take up to four weeks for your opt out to become effective. While we will continue to share information we maintain about you with the American Dental Association and its affiliates, and with state and local dental societies that are members of the ADA tripartite, we will take reasonable steps to ensure that any other specific contact information you so identify is removed from lists that ADABIG share with other organizations. We have instituted opt-out capabilities to help you avoid receiving unwanted commercial email messages from ADABIG. We will honor such requests within ten business days.

On request we may provide you with access to information that you submitted via our website, such as certain transaction information (e.g., dates on which you made purchases, amounts and types of purchases), communications that you have directed to our site (e.g., emails, subscriber inquiries), and contact information (e.g., name, address, phone number).

On request we may also offer the ability to have inaccuracies corrected in contact information, financial information, unique identifiers, transaction information and certain other data.

In addition to the other rights we note in this Privacy Notice, you also have the right to contact us to obtain the following information:

1. What personal information about you we hold;
2. For what purposes do we process your information;
3. To what third parties (and in what jurisdictions) have or may we disclose your personal information;
4. How long will we maintain your data (and how that period of time has been calculated);
5. How to request correction or deletion of specific portions of your personal data held by us that you believe are incorrect; and
6. The source(s) from which we have obtained your personal data.

You may provide consent to additional uses and disclosures; for example, in connection with a product or service offered by us, the ADA or an affiliate, or a third party. These rights are not absolute and they do not always apply in all cases.

In response to a request, we may ask you to verify your identity and to provide information that helps us to understand your request better. If we do not comply with your request, whether in whole or in part, we will explain why.

In order to exercise your rights, or if you believe your information is being used improperly, please contact us at the address above.