

Align Technology

Doctor's Privacy Notice – Last Updated January 1, 2020

This California Consumer Privacy Act (“**CCPA**”) privacy notice (this “**CCPA Notice**”) is included in our Privacy Policy and applies to Align Technology, Inc. and its affiliates (‘we’ or "Align") processing of ‘personal information,’ as defined in the CCPA, of California residents (collectively, “**Consumers,**” “**you,**” or “**your**”). Any capitalized terms or other terms not defined herein shall have the meaning ascribed to them in the Privacy Policy or, if not defined herein or in the Privacy Policy, the CCPA. To the extent of any conflict between this CCPA Notice and the rest of our Privacy Policy, this CCPA Notice shall control only with respect to Consumers and their personal information.

General

This CCPA Notice provides further detail regarding (a) how we have processed Consumers’ personal information within the past twelve (12) months and (b) your rights under the CCPA.

Personal Information We May Collect and How We Use It

When you register as a certified Invisalign provider with Align , we store and use your personal data such as your name, address, phone number, practice details, your use of our services (including such information as orders placed and your treatment planning preferences), and qualifications ("personal data") in order to:

- Set up and otherwise manage your account;
- Allow you to use, purchase, book and/or download products and services;
- Provide you with information about our products, services, news and events;
- Provide details about you and your practice to patients and potential patients and allow them to submit contact requests to you;
- Invite you to take part in our surveys;
- Analyze the use of our services and products, develop new or existing services and products, and customize our products, services and other information we make available.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Categories of Personal Information

Categories of Personal Information	Examples	Source of Personal Information
Identifiers	<ul style="list-style-type: none">• Name• Alias• Postal address• Online identifier• Internet Protocol address• E-mail address• Account name• Social security number	Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services

	<ul style="list-style-type: none"> • Driver's license number, passport number or other similar identifiers. • Unique personal identifier (i.e. – persistent identifier such as device identifier, cookies, beacons, pixel tags, mobile ad identifiers or similar technology; customer number, unique pseudonym or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers) 	<p>(information collected directly from user)</p> <p>Other Sources (Social Media, Public Databases, or Other Third Parties)</p>
<p>Legally Protected Characteristics</p>	<ul style="list-style-type: none"> • Gender • National origin 	<p>Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services (information collected directly from user)</p> <p>Other Sources (Social Media, Public Databases, or Other Third Parties)</p>
<p>Commercial Purchasing Information</p>	<ul style="list-style-type: none"> • Products or services purchased, obtained, or considered • Other purchasing or consuming histories or tendencies 	<p>Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services (information collected directly from user)</p> <p>Other Sources (Social Media, Public Databases, or Other Third Parties)</p>
<p>Internet or Network Activity</p>	<ul style="list-style-type: none"> • Browsing history • Search history • Interaction with an internet website, application, or advertisement 	<p>Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services (information collected directly from user)</p>

		Other Sources (Social Media, Public Databases, or Other Third Parties)
Geolocation	<ul style="list-style-type: none"> Physical location of personal or mobile device 	Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services (information collected directly from user) Other Sources (Social Media, Public Databases, or Other Third Parties)
Inferences drawn from any of these personal information categories	<ul style="list-style-type: none"> Preferences Characteristics Predispositions Behavior Attitudes 	Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services (information collected directly from user) Other Sources (Social Media, Public Databases, or Other Third Parties)
Financial Information (information described in CA Code §1798.80)	<ul style="list-style-type: none"> Bank account number Credit card number Debit card number Other financial information Credit Score 	Websites, Mobile Applications, Invisalign Provider Member Registration, On-line Forms, Transactions, Verbal or Written Correspondence, or Services (information collected directly from user) Other Sources (Social Media, Public Databases, or Other Third Parties)

Who We Share Your Personal Information With

We partner with other businesses who provide services to us such as the provision of technology or to assist us in our marketing, communications, and sales efforts, and may share information about you for these purposes. These partners are not allowed to use your information for any purpose other than doing business with Align.

In addition, any information we collect, including personal information, may be disclosed to a third party (and their agents and advisers) as part of any actual or potential merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of insolvency, bankruptcy or receivership in which personal information could be transferred to third parties as one of our business assets.

We may also disclose personal information about you to any competent law enforcement body, regulatory, government agency, court or other third party if we believe that doing so is legally required or is necessary to protect our property or other legal rights (including but not limited to enforcement of our agreements or the rights of others).

We may also share your information if you consent to us doing so.

Retaining and Deleting Your Personal Information

The Align Group will retain your personal data for only as long as it has an ongoing legitimate need to do so, for example, to provide you with goods and services, and to comply with regulatory obligations. The personal data will then be either deleted or anonymized or, if this is not possible (for example, because your personal data has been stored in backup archives), then they will be securely stored until deletion is possible.

Your CCPA Rights

Access

You may request that Align disclose certain information regarding our use of your personal information over the past twelve (12) months. You may only make such requests twice per twelve (12) months.

Upon verifying your request (see below), we will disclose to you:

1. The categories of personal information we collected about you.
2. The categories of sources for the personal information we collected about you.
3. The specific pieces of personal information we collected about you.
4. Our business purpose for collecting that personal information.
5. The categories of third parties with whom we share personal information.

Deletion

You have the right to request that Align delete any of the personal information collected from you and retained by us, subject to certain exceptions. Once your request is verified (see below) and we have determined that we are required to delete that information in accordance with applicable law, we will delete and direct our service providers to delete your personal information from our records. Your request to delete your personal information may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA. Please note that a record of your deletion request may be kept

pursuant to our legal obligations.

Exercising Your Rights

To exercise any of the rights described above, please submit a request to us by either:

- Email us at privacy@aligntech.com

Please note that Consumers have a right to not receive discriminatory treatment for the exercise of their rights under the CCPA.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access twice within a 12-month period. Your verifiable consumer request must:

- Provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf; and
- Describe your request with sufficient detail to properly understand and respond to it.

We will only use the personal information that you have provided in a verifiable consumer request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Making a verifiable consumer request does not require you to create an account with us. We consider a request made through your password-protected account sufficiently verified when the request relates to personal information associated with that specific account.

Verifying Your Request

Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child. *In all cases, your request must be verified before we take action* (and shall take such action pursuant to the timing permitted under the CCPA). Verifying your request may require you to:

- Provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf; and
- Describe your request with sufficient detail to properly understand and respond to it.

We will only use the personal information that you have provided in a verifiable request in order to verify your request. As stated above, we cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Making a verifiable request does not require you to create an account with us. We consider a request made through your password-protected account sufficiently “verified” when the request relates to personal information associated with that specific account and you have complied with any of our existing authentication practices.

Response Timing and Format

We aim to respond to customer requests within forty-five (45) days of receipt. If we are unable to deliver a response to verifiable consumer requests within this timeframe, we will inform you of the reason and

estimated extension period in writing.¹ We will deliver a response to your existing account with us, if applicable, or a written response by mail or electronically, at your option.

Any disclosures will cover only the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. Data portability requests will be issued in a format that is readily useable, we do not charge a fee unless your request is excessive, repetitive, or manifestly unfounded.² If the request warrants a reasonable fee, we will tell you why and provide you with a cost estimate before completing your request.

Fees

Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

Changes to this Privacy Statement

We may update this notice from time to time. When we do, we will list the last updated date at the beginning of the statement. Notice of such update and/or modification will be provided on our Invisalign Doctor Site or to you directly if required by law. We encourage you to periodically review this notice to stay informed about how we collect, use and share personal information.

Further information

If you have any queries, questions, concerns or require any further information in relation to the Privacy Statement or you wish to exercise any of your rights, please do not hesitate to contact Align at:

Align Technology Inc.
Attention: Henry W. Schober III
2820 Orchard Parkway
San Jose, CA 95134
United States
Privacy@aligntech.com

¹ The response period may be extended up to forty-five (45) additional days where necessary, taking into account the complexity of your request.