



## TDO WEBSITE PRIVACY POLICY

**We have revised our procedures to fully comply with the European Union General Data Protection Regulation, and our Privacy Policy is being revised to incorporate GDPR principles.**

1. INTRODUCTION. Dogbreath Software, Inc. d/b/a TDO is committed to respecting the privacy rights of its customers, visitors, and other users of the Company Website (“the Site”). We created this Website Privacy Policy (“Privacy Policy”) to give you confidence as you visit and use the Site, and to demonstrate our commitment to fair information practices and the protection of privacy. This Privacy Policy is only applicable to the Site, and not to any other websites that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy.

### 2. INFORMATION COLLECTION PRACTICES

#### 2.1. TYPES OF INFORMATION COLLECTED

(a) TRAFFIC DATA COLLECTED. We automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you but is helpful for marketing purposes or for improving your experience on the Site. We also use “cookies” to customize content specific to your interests, to ensure that you do not see the same advertisement repeatedly, and to store your password so you do not have to re-enter it each time you visit the Site.

(b) PERSONAL INFORMATION COLLECTED. In order for you (that includes our licensees and their authorized patients, customers, employees and contractors) to access certain premium services and functionality that we offer via the Site (the “Service”), we require you to provide us with certain information that personally identifies you (“Personal Information”). Personal Information includes the following categories of information: (1) Contact Data (such as your name, mailing address, and e-mail address); (2) Financial Data (such as your account or credit card number); and (3) Demographic Data (such as your zip code, age, names of dentists and doctors, and income). If you communicate with us by e-mail, post messages to any of our chat groups, bulletin boards, or forums, or otherwise complete online forms, surveys, or contest entries, any information provided in such communication may be collected as Personal Information.

#### 2.2. USES OF INFORMATION COLLECTED

(a) COMPANY USE OF INFORMATION. We use Contact Data to send you information about our company or our products or services, or promotional material from some of our partners, or to contact you when necessary. We use your Financial Data to verify your qualifications for certain products or services and to bill you for products and



services. We use your Demographic Data to customize and tailor your experience on the Site, displaying content that we think you might be interested in and according to your preferences.

(b) SHARING OF PERSONAL INFORMATION. We share certain categories of information we collect from you in the ways described in this Privacy Policy. We share Demographic Data with advertisers and other third parties only on an aggregate (*i.e.*, non-personally-identifiable) basis. We share Contact Data with other companies who may want to send you information about their products or services, unless you have specifically requested that we not share Contact Data with such companies. We also share Contact Data and Financial Data with our business partners who assist us by performing core services (such as hosting, billing, fulfillment, or data storage and security) related to our operation of the Site. Those business partners have all agreed to uphold the same standards of security and confidentiality that we have promised to you in this Privacy Policy, and they will only use your Contact Data and other Personal Information to carry out their specific business obligations to Company. If you do not want us to share your Contact Data with any third parties, please email us at [webadmin@tdo4endo.com](mailto:webadmin@tdo4endo.com) or select the “opt out” box on our online forms, but please understand that such a request will likely limit your ability to take advantage of all of the features and services we offer on the Site. In addition, we maintain a procedure for you to review and request changes to your Personal Information; this procedure is described in Section 3.1, below.

#### (c) ANALYTICS AND CONVERSION TRACKING

(1) We may use analytics services that use cookies, Javascript and similar technologies to help us analyze how users use the Service. The information generated by these services about your use of the Service (including your IP address or a truncated version of your IP address) is transmitted to and stored by analytics service providers on their servers. Those service providers will use this information for the purpose of evaluating your, and other users', use of the Service, compiling reports for us on website activity and providing other services relating to website activity and Internet usage.

(2) We may collect information about your computer, including your IP address, operating system and browser type, for system administration and in order to create reports. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. For example, we use cookies on our site for Google Analytics (the “Analytics Service”). The Analytics Service is a web-based analytics tool that helps website owners understand how visitors engage with their website. The Analytics Service customers can view a variety of reports about how visitors interact with their website so that they can improve it.

(3) Like many services, the Analytics Service uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors



use our site. We then use the information to compile reports and to help us improve our site.

(4) Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

(5) The Analytics Service collects information anonymously. They report website trends without identifying individual visitors. You can opt out of the Analytics Service without affecting how you visit our site. For more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>.

(6) We may also use Google conversion tracking and/or similar services to help us understand your and other users' use of the Service.

(d) **USER CHOICE REGARDING COLLECTION, USE, AND DISTRIBUTION OF PERSONAL INFORMATION.** You may choose not to provide us with any Personal Information. In such an event, you can still access and use much of the Site; however you will not be able to access and use those portions of the Site that require your Personal Information. If you do not wish to receive information and promotional material from us or from some of our partners, you may select the appropriate "opt-out" option each time we ask you for Personal Information.

**3. CONFIDENTIALITY AND SECURITY OF PERSONAL INFORMATION.** Except as otherwise provided in this Privacy Policy, we will keep your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect our rights or property; or (c) enforce our Terms of Service. Your Personal Information is stored on secure servers that are not accessible by third parties. We provide you with the capability to transmit your Personal Information via secured and encrypted channels if you use a similarly equipped web browser.

**3.1. LOST OR STOLEN INFORMATION.** You must promptly notify us if your credit card, user name, or password is lost, stolen, or used without permission. In such an event, we will remove that credit card number, user name, or password from your account and update our records accordingly.

**3.2. PUBLIC INFORMATION.** The Site contains links to other websites. We are not responsible for the privacy practices or the content of such websites. We also make chat rooms, forums, message boards, and news groups available to you. Please understand that any information that is disclosed in these areas becomes public information. We have no



control over its use and you should exercise caution when deciding to disclose your Personal Information.

4. **UPDATES AND CHANGES TO PRIVACY POLICY.** We reserve the right, at any time and without notice, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site.

5. **SITE TERMS OF USE.** Use of this Service is governed by, and subject to, the Terms of Use (the “Terms”). This Privacy Policy is incorporated into the Terms. Your use, or access, of the Service constitutes your agreement to be bound by these provisions. **IF YOU DO NOT AGREE TO THE TERMS AND THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE THE SERVICE.**

6. **SERVERS.** Our servers are maintained in the United States. By using the Service, you freely and specifically give us your consent to export your personally identifiable information to the United States and to store and use it in the United States as specified in this Privacy Policy. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States.

7. **GOVERNING LAW.** This Privacy Policy and our legal obligations hereunder are subject to the laws of the State of California regardless of your location. You hereby consent to the exclusive jurisdiction of and venue in the courts located in the State of California, County of San Diego, in all disputes arising out of or relating to this Privacy Policy.

8. **CONTACT.** For questions or concerns relating to privacy, we can be contacted at [webadmin@tdo4endo.com](mailto:webadmin@tdo4endo.com)