

# PRIVACY POLICY

## I. INTRODUCTION

At Hammtek we prioritize the safeguarding of your personal information. This Privacy Policy pertains to the handling of such personal data carried out by Hammtek.

## II. CONTROLLER CONTACT INFORMATION

We are determined to process personal data pursuant to the rules and requirements of the European General Data Protection Regulation (GDPR).

In case you have any questions, please contact us at [dataprotection@hammtek.com](mailto:dataprotection@hammtek.com)

Or reach out to us via mail at:

Hammtek Oy  
Address: Kuortaneenkatu 2  
Postal code: 00510  
Country: Helsinki  
Website: [www.hammtek.com](http://www.hammtek.com)

## III. PROCESSING PERSONAL DATA

The table below explains what personal data we process, as well as the reasons we do so. As explained in the **terms and conditions**, Hammtek offers a variety of products and services, such as a Dental Device, a connected Mobile Application, and other related software applications and consulting services.

For understanding purposes:

**Personal data**, means any identifiable information that says something about a person, which is the **data subject**.

Throughout its product and services, Hammtek serves as a **controller**, the entity deciding the purpose and means of data collection.

Type of data we process	
<b>Product and Services:</b> <ul style="list-style-type: none"><li>▪ Profile information, such as email, name, date of birth, address (country and city)</li><li>▪ Any information you have inputted in the Application, such as personal or profile</li></ul>	<b>Website visitors, Marketing customers, and Job Applicants</b> <ul style="list-style-type: none"><li>▪ Profile information that is given to us by you or by a third party, for example a recruitment tool or office, or information we have obtained through your connection with another online</li></ul>

<p>information from other members.</p> <ul style="list-style-type: none"> <li>▪ Reports of dental analysis (note that we do not store the videos made – as soon as the dental device has recorded a video, and you have sent the video for a report request, the video is deleted.)</li> <li>▪ The Admin profile of an Mobile Application sees all dental reports from all profiles in its Admin account.</li> <li>▪ Application or Device data, such as IP or part of the IP address and from where or which location you have downloaded the Mobile App, time of sign-ins and log-in attempts</li> <li>▪ User or Consultant provided information if shared in notes, comments, tags, reports or referrals.</li> <li>▪ Information through or via the Third-party integrated service, for example, payment integrations or login profiles.</li> </ul>	<p>service, for example, via an online ad you clicked on, or information you have provided us via the contact form on the website.</p> <ul style="list-style-type: none"> <li>▪ Device or Application data, such as location and, maybe, part of the IP address if applicable.</li> <li>▪ Any commentary, notes, questions, feedback or provided information such as your resume.</li> </ul>
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<b>Purposes for processing personal data</b>	
<p><b>Product and Services:</b></p> <ul style="list-style-type: none"> <li>▪ To provide our services, such as giving you insights about the status of your teeth.</li> <li>▪ To provide you with customer service, managing customer communication, and we would love to help you solve any issues you may have when using our Product and Services.</li> <li>▪ To develop further our product and services, such as updating our Mobile Application and Software, and improving our Product. When feasible we do this with only pseudonymized, aggregated, or non-personally identifiable data.</li> <li>▪ To market our Product and Services. We may collect cookies from you, which are explained further in our <b>Cookie Policy</b>. We</li> </ul>	<p><b>Website visitors, Marketing customers, and Job Applicants</b></p> <ul style="list-style-type: none"> <li>▪ To provide our services, such as giving you insights about the status of your teeth.</li> <li>▪ To process your data for delivery, facilitation of the services, answering questions, and customer communication.</li> <li>▪ To recruit staff to join our Hammtek team.</li> <li>▪ To develop further our product and services, such as updating our Mobile Application and Software, and improving our Product. When feasible we do this with only pseudonymized, aggregated, or non-personally</li> </ul>

<p>may also send you promotional offers and newsletters.</p> <ul style="list-style-type: none"> <li>▪ We process data from third party integrations to provide you access to our services and offer features of our services, or, for example, process your payment or to ensure a secure login.</li> <li>▪ We process data to comply with legal obligations, for example, when it is required by applicable laws and regulations. These include accounting and tax requirements, or legal claims. Hammtek will oppose any request to provide legal authorities with access to user data for surveillance or prosecution purposes and will notify users if we receive any such request to the extent possible.</li> </ul>	<p>identifiable data.</p> <ul style="list-style-type: none"> <li>▪ To advertise and market our services. Hammtek does not target people with online advertising based on their dental information. We create targeted audiences via cookies, online advertisement, and we may send you newsletters if you have requested it, or if you have been an active user. We may also send you promotional material if you are part of our services.</li> <li>▪ To develop further our product and services, such as updating our Mobile Application and Software, and improving our Product. When feasible we do this with only pseudonymized, aggregated, or non-personally identifiable data.</li> <li>▪ We process data to comply with legal obligations, for example, when it is required by applicable laws and regulations. These include accounting and tax requirements, or legal claims. Hammtek will oppose any request to provide legal authorities with access to user data for surveillance or prosecution purposes and will notify users if we receive any such request to the extent possible.</li> </ul>
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**Legal basis for processing personal data**

European law (GDPR) requires that personal data can only be processed pursuant to one of the restrictive legal bases. Hammtek processes the personal data above to the following legal bases:

<b>Consent</b>	In most of the cases, we will process your personal data based on your consent and the data you have inputted and provided to us.
<b>Contract</b>	To deliver your product, process your payment, we rely on our contractual agreement.
<b>Legitimate interest</b>	When we process personal data for customer service purposes or update our internal

	application, we do this based on our legitimate interest to run, maintain, and develop our business and to create and maintain customer relationships. At all times we carefully weigh our interests to your right to privacy under the applicable laws and regulations.
<b>Legal obligation</b>	To comply with statutory obligations, for example, to process payment, tax and accounting, or legal orders and claims.

IV. DATA STORING

Hammtek uses service providers to store all data, including your personal data, via our provider AWS Amazon, in European datacenters. We have set up the highest possible security standards to use and store your data, as further explained in Retention and Security.

Related to other data that needs storing, such as marketing data, customer management claims or assistance and job applicants, we use specifically vetted tools with security mechanisms to ensure data protection.

V. DATA RETENTION

To minimize security risks Hammtek never stores your dental images or videos. As soon as you have uploaded your images, and the report is generated, the video or image is deleted. Other related data, such as the reports attached to your profile data remains stored for as long as you have an account with Hammtek.

If you have not been active for more than three years, Hammtek will send you electronic notifications prior to closing your account.

Once your account has been closed, your personal data, including your reports and attached member profiles are deleted. Note that we cannot restore deleted profiles or personal data, once deleted. You must re-submit your personal information and upload a new dental image or video to generate a report.

Related to other data, such as marketing data or online visitors and job applicants, we review annually the necessity of such data and will determine if data should be kept longer, pursuant the applicable laws and regulations.

VI. DATA SECURITY

Hammtek is very determined to secure your personal data and has implemented serious measures. The Dental device only connects to the application to make a video if it detects a tooth. Hammtek encourages customers to only use the device for the purpose described in the attached product information or on the website. If you find issues, please contact customer services.

Hammtek secures all data via appropriate security measures and safeguards with applicable privacy laws. This includes any safeguards and mitigations in the event of international transfers of personal data through data protection agreements with our service providers.

We require from any of our service providers that they ensure the protection of personal data according to at least the same standards as we do.

This includes, but is not limited to measures such as:

- Security safeguards when storing and keeping the data.
- Security safeguards when transferring data.
- Data access is on a need-to-know basis.
- Where possible anonymize or pseudonymize personal data, and use encryption.
- Regularly testing, and security of systems and other assets for vulnerabilities.
- Strictly data access control, especially related to any sensitive data.

We update our application regularly and recommend you always have the latest app and firmware versions installed in order to maximize the protection of your data.

## VII. DATA SHARING AND DISCLOSURES

Under no circumstances does Hammtek sell or rent your personal information. We only share your personal data with certain trusted service providers to improve our services, to improve or provide our partner services and other offers and to operate our business.

In the event we enter into an agreement with subproviders we make sure they are authorized by us to only use personal data for the specific and limited purposes we have determined. We may use sub-processors, for example, to provide and improve our online website, gather payments, store data, or perform online marketing.

We may share aggregated data with consultants to improve our analysis tools. And only if you have consented to a consultant analyzing your data, such data will be shared with our specifically vetted expert pool of dentists and dental analysts.

We will disclose your personal information only under certain circumstances, such as:

- When we have your consent to do so;
- To protect Hammtek's legal rights and intellectual property;
- To comply with valid legal requirements, with the exemption of legal orders related to surveillance or prosecution purposes.

Any sharing that involves the international transfer of personal data shall be only done so with appropriate safeguards and mitigations per applicable laws and regulations.

## VIII. COOKIES

We use cookies and other online technologies to analyze analytical information when individuals use our site or our products, as well as for personalization and advertising purposes.

Cookies are text files that are transmitted and stored on your device, enabling us to recognize visitors to our website. They aid in simplifying the use of our site and contribute to generating overall visitor insights. This, in turn, assists us in enhancing our services and offering improved support to our customers. Rest assured, cookies pose no harm to your device or files. They play a role in monitoring your online navigation patterns on our products and website. We also employ cookies in our social media accounts within our website's framework.

Please visit our [Cookie Policy](#) for more information and how you can set your cookie preferences.

## IX. YOUR RIGHTS AS A DATA SUBJECT

You, a website visitor, customer or other party, have at all times the right to:

- (i) access your data and request copies of all processing activities concerning your data;
- (ii) withdraw your consent and cancel or delete your account, which you can do from within your application. In the event you delete your account all your data and related profiles will be erased.
- (iii) rectify information concerning any data about you that you believe is inaccurate;
- (iv) request to be forgotten, to which the Company under certain conditions cannot comply, such as when it is following a legal obligation from a National Authority, or reasons for public interest or public health;
- (v) request to restrict or object to processing, to which the Company under certain conditions cannot comply, such as when it is following a legal obligation from a National Authority, or reasons for public interest or public health;
- (vi) request a structured, commonly used and machine-readable format to transfer the data to another controller or directly to you (portability).
- (vii) to object automated decision-making, for example when processing payment information. Please contact our customer service at ([support@hammtek.com](mailto:support@hammtek.com)) to provide assistance.

Should you wish to report a complaint, or exercise your data protection rights, please contact our data protection officer at [dataprotection@hammtek.com](mailto:dataprotection@hammtek.com) If you feel we have not addressed your concerns in a satisfying manner, you may contact the Data Protection Authority in Finland or in your country of residence.

## X. VERSION OF THIS PRIVACY POLICY

This policy was last updated in August 2023. Hammtek will keep this privacy policy continuously under review and reserves the right to modify this document. We recommend you to regularly consult this document for the latest updates, and at least when we have notified you about changes, we made.