



Privacy Policy

2024

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1. Our contact details

- Name: Toothreferralcom LLC
- Address: 13220 Strickland Rd, STE 166 Raleigh, NC 27613
- Email: info@toothreferral.com
- Website/mobile application: www.toothreferral.com
- Contact Person name: Vejay K. Ravindran

2. Introduction

We are dedicated to protecting your personal information. This Privacy Policy specifies how we collect and process personal information about you when you use our website, mobile application (the “**Platform**”) and/or our online products and services (collectively with the Platform, “**Services**”). This Privacy Policy applies to all users of our Services.

“**You**” or “**user**” refers to any of the following persons interacting with or utilizing our Services:

(A) Potential or Actual Patients Seeking Dental Services or Guest Users:

- Individuals who are seeking dental services, including routine or urgent dental care.
- Users who want to find dental providers with specific skill sets, membership plans, or who are in-network with their insurance.
- Patient who prefers to schedule appointments directly through our website/application without making a phone call.
- Individuals with an existing referral.

(B) General Dentists:

- Dental Professionals that have earned either a DDS, or DMD and hold a valid dental license.
- Dental professionals who offer a range of general dental services.
- Dentists who want to advertise their membership plans to attract new patients.
- General dentists who need to refer patients to dental specialists for specialized treatments.
- General dentists who want to manage and track their referrals to specialists, check referral statuses, and communicate securely with other dental offices.

(C) Dental Specialists:

- Dental Specialists are dental professionals that have earned a DDS, or a DMD and completed an ADA recognized dental specialty program.
- Dental Specialists can also be dental professionals that have earned a DDS, or a DMD and completed additional training in a non-recognized ADA dental specialty.
- Dental professionals who specialize in various areas of dentistry, including orthodontics, endodontics, oral surgery, periodontics, prosthodontics, dental anesthesiology, oral pathology, oral radiology, and pediatric dentistry.

- Specialists who want to advertise their membership plans and unique skill sets to attract referrals from general dentists.
- Dental specialists who need to customize referral templates, provide real-time status updates to referring dentists, and communicate with other providers or office team members.
- Users who want to list their same-day availability, track referral sources and growth, and offer self-referral options for patients seeking specialized care.

We may collect certain health-related information in order to provide the Services. This may encompass a variety of health-related data such as dental preferences, dental treatment history, and insurance information. Additionally, it may include information related to health and wellness, medications, tests ordered and results, and other health issues. The health information collected, transmitted, and stored through our Services may also include medical records containing details about conditions, treatments, and diagnoses. We collect this health-related information to facilitate the search for dental providers, membership plans, and appointment scheduling tailored to the user's preferences and needs as more specifically detailed herein.

By registering for or using our Services, you consent to the collection, transfer, processing, storage, and other uses of your information (including your health-related data) as described in this Privacy Policy.

3. Personal Information collection

Information collected from Potential or Actual Patients Seeking Dental Services:

We collect and process the following information:

- Full name
- Email address
- Mobile phone number
- Referral ID (if available)
- Password
- Details of your tooth problem
- Details of membership plan selected
- Dental preferences
- Scheduling preferences

Information collected from General Dentists:

We collect and process the following information:

- Full name
- Office Name
- Office Image or your personal photo
- Dental Specialization Area
- Email address
- Mobile phone number

- Referral ID (if available)
- Password
- Details of membership plans offered by you
- Skills information such as Same Day Crown provider, Same Day Dentures, Tongue Tie treatment, Same day dental treatment, In House Dental Lab, General Dentist
- Appointment scheduling information
- Insurance provider details
- Referral Information i.e. when General Dentist sends a referral to the Dental Specialist
 - Patient's Name
 - Patient's Date of Birth
 - Sex
 - Contact Number
 - Patient's Email
 - Parent / Guardian details (if applicable)
 - Reason for Referral
 - Details of dental issue
 - Details of treatment plan
 - Details of medical history
 - Details of any surgery performed
 - Details of pathology reports
 - Types of dental services requested
 - Name of referral doctor
 - Practice area of the referral doctor
 - Email of referral doctor
 - Phone of referral doctor
 - Scanned images of radiographs
 - Scanned images of treatment plan
 - Details of insurance
 - Referral ID

Information collected from Dental Specialists:

We collect and process the following information:

- Full name
- Office Name
- Office Image or your personal photo
- Dental Specialization Area
- Email address
- Mobile phone number
- Password
- Details of membership plans offered by you
- Skills information such as Gentle Wave®, LNAP®, Hospital Privileges, Tongue Tie Treatment, surgical Extractions, implant placements, sleep apnea provider, TMJ. Note that Gentle Wave® and LNAP® are registered trademarks of their respective owners. The use of these trademarks is solely for descriptive purposes to indicate

specific skills or treatments provided by dental specialists, and their inclusion in our Privacy Policy does not imply any endorsement or affiliation with us.

- Appointment scheduling information
- Insurance provider details
- Referral Information i.e. when Dental Specialist receives a referral from the General Dentists:
 - Patient's Name
 - Patient's Date of Birth
 - Sex
 - Contact Number
 - Patient's Email
 - Parent / Guardian details (if applicable)
 - Reason for Referral
 - Details of dental issue
 - Details of treatment plan
 - Details of medical history
 - Details of any surgery performed
 - Details of pathology reports
 - Types of dental services requested
 - Name of referral doctor
 - Practice area of the referral doctor
 - Email of referral doctor
 - Phone of referral doctor
 - Scanned images of radiographs
 - Scanned images of treatment plan
 - Details of insurance
 - Referral ID

Paid Membership:

If you choose to use any membership plan, we may collect in addition to information as stated above also payment information such as credit card details. We utilize the services of Stripe, a third-party payment processor, to securely process payments for membership plans or other services offered through our website/application. When you make a payment through our Platform, your payment information is collected directly by Stripe and is subject to their privacy policy. This may include your credit card or bank account information, billing address, and other transaction details necessary for processing payments. Please note that Stripe may collect and process certain information about your payment transactions, including personal and financial data, in accordance with their own privacy practices. We encourage you to review Stripe's privacy policy to understand how they handle your information. By using our payment services, you consent to the collection, processing, and storage of your payment information by Stripe as described in their privacy policy.

Interactions:

When you communicate with other users or healthcare providers through the Services, we collect information related to those interactions.

This may include:

- **User-Generated Content:** Any content, messages, or information that you choose to share or post within the Services when communicating with other users such as text, images, videos, or files. Users may provide feedback, ratings, and reviews on their experiences with dental providers, membership plans, and appointment scheduling processes.
- Information may be collected based on user interactions with the application, such as search queries, filter selections, and appointment scheduling actions.
- **User Identifiers:** Information that may identify you or other users involved in the communication, such as usernames, profile pictures, or unique identifiers associated with your account.
- **Communication Metadata:** Metadata associated with your communication activities, such as timestamps, sender and recipient information, message length, and interaction frequency.
- **Transactional Information:** Information related to transactions or activities conducted within the Services during the communication process, such as appointment scheduling, referrals, or requests for information.

We may collect information from you when you:

- register or sign up with us,
- interact with us through phone, text, email, chat, or otherwise,
- provide feedback,
- respond to surveys,
- interact with other users.

Data Privacy and Confidentiality: We are committed to protecting the privacy and confidentiality of all data collected for analytics and reporting purposes. Any data shared with subscribers will be aggregated and anonymized to the extent possible to protect individual privacy and confidentiality.

Opt-Out Option: If you prefer not to have your data included in analytics and reporting, you may opt out by contacting us at contact details provided herein. However, please note that opting out may limit your access to certain features or functionalities of our Platform.

You shall provide us with personal information which is accurate and true and inform us of any changes. If you are providing information regarding someone else, you represent that you have the authority to act for them and to provide the information.

In addition to the information outlined above, please note that certain health-related information collected from you may constitute protected health information (PHI) under HIPAA regulations. This may encompass a variety of health-related data such as dental preferences, treatment history, insurance information, and any other health-related information that users may provide. Additionally, when you communicate with other users through the Platform, certain interactions may involve the sharing of PHI. This may include user-generated content, user identifiers, communication metadata, and transactional information related to appointments, referrals, or requests for information. We collect this health-related information for purposes described in Section 4 (How the information is used).

We are committed to protecting the privacy and confidentiality of minors' PHI in accordance with the HIPAA and other applicable laws. Minors' PHI will be handled with the utmost care and sensitivity to ensure compliance with privacy regulations. Parents or legal guardians have the right to access and obtain copies of their minor children's medical records, including PHI, maintained by our services. Requests for access to minors' PHI should be submitted at our contact details stated herein. Except in limited circumstances permitted by law, we will obtain the consent of a parent or legal guardian before disclosing a minor's PHI. This includes disclosures for treatment, payment, healthcare operations, and other permissible purposes outlined in HIPAA regulations. Minors may have certain privacy rights under HIPAA, including the right to request restrictions on the disclosure of their PHI for certain sensitive healthcare services. We will honor any valid requests for restrictions on the use or disclosure of a minor's PHI, subject to applicable legal requirements.

4. How the information is used

We use the information we collect to:

- Facilitate communication between users and healthcare providers.
- Facilitate direct scheduling of appointments with dental providers, based on the user's preferences and availability.
- Create and manage your accounts.
- Develop searchable databases or Personalized search results: User preferences for dental providers and appointment scheduling are used to generate personalized search results, presenting relevant options that match the user's criteria and preferences.
- Make Appointment Matching: Scheduling preferences such as preferred appointment times and urgency level are used to match users with available appointment slots that best fit their needs and constraints.
- Make Membership Plan Recommendations: Dental membership plan preferences are used to recommend suitable plans tailored to the user's age group, dental needs, and insurance coverage, helping users make informed decisions about their dental care options.
- Enable you to as a General Dentist to check your Referral Status: Scheduled, Not Scheduled, Completed.
- Enable you as a Dental Specialist to receive referrals.
- Enable you as a guest user to change an existing referral to find a different provider.
- Enable you as a Dental Specialist to customize your referral template to allow General Dentists to send quick referrals to you.

- Enable you as a Dental Specialist to obtain real time status updates to your referrals.
- Enable you to use our calendar to list your same day availability.
- Enable you to track referral sources, frequency, and growth.
- Allow simplified interactions such as allow your patients to modify their own referrals on their time such as when their contact information has changed.
- Allow dental office staff to send messages to other dental offices. For the avoidance of doubt, any guest users do not have access to contact dental providers via instant messaging or chat features. Guest users can only access the database to search for dental providers and leave ratings based on their experience.
- Data Analytics and Reporting: We collect certain data to develop analytics and reports that provide insights and information to our users. This may include aggregating and analyzing information such as referral numbers, user interactions, and usage patterns within our Platform. The data collected is used to generate analytics and reports that enable us to improve and enhance our Services, identify trends, and measure the effectiveness of our Platform. For example, we may analyze referral numbers to track the growth of our user base and assess the impact of our referral system. Analytics and reports generated from the collected data may be presented to subscribers of our service. This allows subscribers to track and monitor the performance of the software, including metrics such as new referrals generated and the overall impact on their practice or business.
- Provide, maintain, operate and improve our Services.
- Send administrative information, updates, and promotional materials.
- Assist us in internal record keeping.
- Respond to inquiries/offer support.
- Manage and implement billing.
- Comply with applicable laws, regulations, or legal processes, or to respond to lawful requests from governmental authorities.

5. Sharing the information

With other users:

For General Dentists and Dental Specialists: Certain information, such as your name, photo and profile information, may be visible to other users of the Service. For instance, business address, fax number, phone number, email, and website of dental providers will be made available to the patients so that the patients can contact the dental providers.

User preferences and scheduling information may be shared with dental providers to facilitate appointment scheduling and to ensure that user preferences are accommodated.

With Service Providers

We may disclose your information to third parties for business purposes such as third parties who provide services to us, such as payment processing, appointment scheduling platforms, customer service, data processing, hosting service providers, fraud detection, research, and

telemarketing including the provider Apponword Technologies Pvt. Ltd. Your information will also be shared with Amazon Web Services (AWS), and Cloudflare, who stores data on our behalf in secure data centers.

We do not store payment information such as credit card details on our servers. All payment transactions are processed securely through a third-party payment processor “Stripe”. Your payment information is encrypted and securely transmitted to the payment processor for processing. We do not have access to, nor do we store, your full payment information.

Insurance Providers: Insurance information provided by users may be shared with insurance providers to verify coverage and eligibility for in-network providers and membership plans.

Cloudflare integration:

In order to enhance content delivery and security on our website, we utilize services provided by Cloudflare. To enable Cloudflare services, we are required to create an account on the Cloudflare platform and add our website to our Cloudflare account. As part of the Cloudflare integration process, Cloudflare will provide us with two nameservers. We are required to update our domain's nameservers with the ones provided by Cloudflare. This is typically done through our domain registrar's dashboard. Once our domain is active on Cloudflare, we have the ability to configure SSL settings for enhanced security. This includes enabling SSL/TLS encryption to protect data transmitted between our users' devices and our website. Through the Cloudflare dashboard, we have access to configure settings related to the Content Delivery Network (CDN). These settings enable us to optimize content delivery, improve website performance, and enhance user experience.

Corporate Transactions:

We may share information with our affiliates and subsidiaries. We may also share your information in connection with a corporate transaction, such as corporate restructuring, sale of the business, merger, or asset sale.

Legal Requirements:

We may share information in connection with the performance of any contractual obligations. We may disclose your information if we believe it is necessary to: (a) comply with applicable laws, regulations, or legal processes; (b) protect the rights, property, or safety of our company, our users, or others; or (c) enforce our terms of service or other agreements.

Except as stated herein, we do not share, sell, rent, transfer or disclose to any third party, any information collected unless you provide us with your consent or as required by applicable law.

We do not sell personal information for monetary consideration.

6. Lawful Bases

Under the applicable data privacy laws, the lawful bases we rely on for processing this information are:

- (a) Your consent. You can remove your consent at any time. You can do this by contacting us at the contact details stated herein. However, if you withdraw your consent, you may be unable to use our Services or any portion of the Services.
- (b) We have a contractual obligation. This includes fulfilling any obligations under any contract that we enter with you about the Services provided to you.
- (c) We have a legal obligation. This includes processing your information to comply with any legal obligation such as to give information, including your personal information, to any regulatory authorities on their request or to prevent any fraud.
- (d) We have a legitimate interest. This includes processing information when there is a legitimate interest such as to protect the rights of any party including protecting your interests where we find it necessary to do so.

7. Children's Information

Our Services are not meant for any children under the age of 13. We do not knowingly collect any personal information from children under the age of 13. However, we recognize that referrals may be made for patients under the age of 13 with the involvement of a parent or legal guardian. In cases where a referral is made for a patient under the age of 13, we may collect personal information as necessary to facilitate the referral process. This may include collecting the patient's name, age, and contact information, as well as information about the referring individual as well as any other information as specified in Section 3 above. We require parental consent for the collection and processing of personal information for patients under the age of 13. Parents or legal guardians must explicitly consent to the collection and use of their child's personal information before any data is collected. Parental consent may be obtained through various methods, including online forms, email verification, phone confirmation, or paper consent forms. The consent process will include a clear explanation of the information being collected, how it will be used, and the right to withdraw consent. We will maintain records of parental consent, including the method of consent provided, the date and time of consent, and any relevant contact information for the parent or legal guardian. We will implement procedures to verify the authenticity of parental consent, such as confirming the identity of the parent or legal guardian.

If you are a parent or legal guardian and believe that your child under the age of 13 has provided personal information to us without your consent, please contact us immediately. We will make reasonable efforts to promptly remove such information from our accounts and take appropriate steps to ensure compliance with applicable regulations.

8. Opt-Out

When you sign up for our Services, you have the option to opt-in to receive emails from us, including newsletters, updates, and promotional offers. By providing your email address, you consent to receive emails from us for these purposes. These communications may include important updates about your account, appointment reminders, or notifications regarding

changes to our services. However, we do not make phone calls or send text messages for marketing purposes. Please note that while we may send emails for marketing and service-related purposes, we do not use automatic dialing systems or prerecorded voice messages to make phone calls or send text messages. You have the option to opt out of receiving marketing emails at any time by following the unsubscribe instructions included in the emails. However, please note that you may continue to receive service-related communications even if you opt out of marketing emails.

9. Retaining your information

We will retain your personal information only for as long as necessary. We will retain your information as long as we have a continuing relationship with you such as if you are availing Services from us. We will retain the information to comply with any of our legal or contractual obligations. On the expiry of any foregoing stated periods, as applicable, we will either delete or de-identify your personal information.

10. Security and Storage

We utilize several AWS services to operate and maintain the Service securely. These include but are not limited to:

- Amazon Elastic Compute Cloud (EC2): EC2 instances are used to host and run our application, ensuring reliable and scalable performance.
- Amazon Relational Database Service (RDS): RDS is used to store and manage relational databases securely, ensuring the integrity and availability of your data.
- Amazon Simple Storage Service (S3): S3 buckets are used to store and retrieve data such as files and images uploaded by users, with built-in redundancy and data protection features.
- Elastic Public Address: Elastic public addresses are used to provide public access to our application and services hosted on AWS, ensuring connectivity and availability.
- Amazon Secret Manager: Secret Manager is used to securely store and manage sensitive information such as API keys, passwords, and encryption keys, ensuring the confidentiality and integrity of your data.
- AWS CloudWatch: CloudWatch is used to monitor and track the performance of our infrastructure and applications, enabling us to identify and address any issues proactively.

We employ robust security measures to protect the confidentiality, integrity, and availability of your personal information stored on AWS. These measures include encryption of data in transit and at rest, access controls to restrict unauthorized access, regular security audits, and compliance with industry standards and best practices.

Cloudflare provides robust security features to protect our website from various online threats, including Distributed Denial of Service (DDoS) attacks, malware, and unauthorized

access. These security measures help safeguard the confidentiality and integrity of user data.

We shall take reasonable measures to prevent unsanctioned access, misuse, loss, destruction, or alteration of your personal information under our control by putting in place necessary security measures. However, please note that no method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

11. Your data protection rights

As per the applicable data protection law, you may have the following rights:

- (a) The right to access your personal information. You have the right to ask us for copies of your personal information. You may also login to your account to see what information you have disclosed to us.
- (b) The right to rectification. You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. You may also login to your account and change the information.
- (c) The right to erasure. You have the right to ask us to erase your personal information in certain circumstances. You may also login to your account and change the information.
- (d) The right to restrict processing under certain conditions. You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- (e) The right to object to processing. You have the right to object to the processing of your personal information in certain circumstances.
- (f) The right to data portability. You have the right to ask that we transfer the personal information you gave us to another organization, or you, in certain circumstances.
- (g) The right to withdraw your consent.

If you make a request, we have one month to respond to you. Please contact us at the contact details stated herein if you wish to make a request. We may ask you to provide any additional information to verify you. If we ask for personal information to verify your identity, we will only use that information for this verification purpose.

We will not discriminate against a user if the user has exercised any of the rights as stated above.

12. Changes

We may modify the Privacy Policy at our discretion. The changes will be posted on this page and we will email you with a link to the updated privacy policy.

If you have any concerns about our use of your personal information, you can make a complaint to us at the contact details stated above.

You have the right to complain to your privacy regulatory authority if you are unhappy with how we have used your information.

Last Updated: March 2024