**PRIVACY POLICY**

Dattatraya Corporation recognizes the importance of handling Personal Information safely and in accordance with applicable laws. Our Global Privacy Notice explains how we collect, use and disclose Personal Information.  If you have any questions  relating to this Notice please contact [info@vamsadental.com](mailto:info@vamsadental.com).

PRIVACY NOTICE

LAST UPDATED: 05.10.2024.

This Privacy Notice (“Privacy Notice”) explains how Dattatraya Corporationm, India("Dattatraya Corporation") and its allied companies(“Affiliates”) collect, use and disclose your personal information and what rights you have in relation to your personal information. Overall Dattatraya Corporation and its Affiliates own the brand name VAMSA. Dattatraya Corporation and its Affiliates will handle your personal information when you are an existing or prospective customer or business partner, when you sign up to receive marketing communications from us or if you are using one of our websites, mobile sites, mobile applications, social media sites and other digital services and products (“Dattatraya Corporation Services”) that link to this Privacy Notice. We may also collect information from you if you are a dental patient or a potential patient. For more information relating to this use please read our section on “How do we use patient’s personal information?”

Please note that this Privacy Notice does not apply to candidates who are applying for a role at Dattatraya Corporation or one of its Affiliates.

We also have supplemental privacy notices that provide additional information as required by local law which can be accessed in our section “Where do I find additional information about local laws?”

Please take a moment to familiarise yourself with this notice and let us know if you have any questions.

**1. Who is responsible?**

The Dattatraya Corporation Affiliate that you are interacting with will be responsible for the handling of your personal information. Please find more details here. If you are unsure which Dattatraya Corporation Affiliate is responsible in your case, please contact us at [info@vamsadental.com](mailto:info@vamsadental.com).

**2. How can you contact us?**

If you would like to get in touch with us with regards to your personal information or if you would like to speak to the data protection officer (where appointed), please contact us at [info@vamsadental.com](mailto:info@vamsadental.com).

**3. What types of personal information do we collect?**

We collect various types of personal information about you. Please note that the types of personal information that are relevant to you will vary depending on the relationship we have:

Contact information:

Name, address, email address, telephone number, organisation details (e.g. your place of work, job title and organisation contact information).

Identity and other regulatory information:

Date of birth, identification information (e.g. passport, utility bill and/or bank statement), details of whether you are a politically exposed person (PEP).

Business and financial information:

Details relating to our business relationship, including business related communications with you, information about other people (e.g. your customers, suppliers, vendors and/or staff) that you share with us in connection with our business relationship, information you provide to us when you come to our premises (e.g. for an event or meeting), you/your organisation’s billing, payment and banking details, registration information such as your username and password.

Marketing preferences:

Service and product interests, marketing communication choices, usage of our marketing communication (including whether you open them and click through to access their contents) and responses to surveys.

Usage and device information:

Information automatically generated through your use of Dattatraya Corporation Services such as your user ID, your IP address or other device identifier (e.g. MAC address), technical information about your device and operating system (e.g. CPU speed), your location and your actual usage of and interaction with Dattatraya Corporation Services (e.g. usage of scanner).

Cookies and similar technologies:

For more information about how we use cookies and similar technologies in connection with your use of Dattatraya Corporation Services, please read our Cookie Policy.

**4. What do we do with your personal information, and why?**

We use your personal information for a number of different purposes. Please note that the purposes that apply to you will vary depending on the relationship we have.

Doing business with you:

Responding to your queries; Establishing you/your organisation in our systems; Providing you/your organisation with products and services you have requested from us; Managing orders; Processing payments in respect of our products and services; Hosting you at our premises; Registering your products; Troubleshooting; Sending you product or service related communication; Managing and administering the user accounts and profiles you have with us; Managing our business relationship; Resolving any complaints from or disputes with you.

Legal and regulatory compliance:

Performing identity, financial and credit searches, screening and checks; Keeping records; Maintaining the security and integrity of our systems, platforms, premises and communications (and detecting and preventing actual or potential threats to the same); Monitoring our systems and processes to identify, record and prevent fraudulent, criminal and/or otherwise illegal activity; Complying with instructions, orders and requests from law enforcement agencies, any court or otherwise as required by law; Complying with our general regulatory and statutory obligations (including our responsibilities under codes of conduct); Obtaining legal advice, establishing, defending and enforcing our legal rights and obligations in connection with, any legal proceedings (including prospective legal proceedings).

General business requirements:

Continuously reviewing and improving our products and services (including by seeking and obtaining your feedback) and developing new ones; Business and commercial analysis; Scientific research; Monitoring and producing statistical information regarding the use of the Dattatraya Corporation Services and analysing and improving their functionality; Training our staff; Purchasing, maintaining and claiming against our insurance policies; Managing the proposed sale, restructuring, transfer or merging of any or all part(s) of our business, including to respond to queries from prospective buyer or merging organisation.

Marketing:

Managing, planning and delivering our business and marketing strategies (including recording and reporting on our business development activities); Sending you information about similar and/or related products and services; Sending you marketing communication; Analysing how our marketing communication is used by you; Conducting surveys for benchmarking, continuous improvement and marketing purposes.

**5. With whom do we share your personal information?**

We only share your personal information with other parties if this is necessary for the purposes described above, you have given us your consent, or we are obliged to do so by law.

Recipients who are not Affiliates:

We have relationships with various companies who help us operating our business and who may need access to your personal information for doing so, including the following: IT service providers, customer support service providers, marketing service providers, social media platforms, business partners and joint ventures, professional advisors and consultants (e.g. law firms) and insurers. We may also have the obligation or the right to share your personal information with government authorities (e.g. tax authorities), courts, court-appointed persons/entities or with receivers and liquidators. If we decide to reorganize or divest our business through sale, merger, or acquisition, we may share personal information about you with actual or prospective buyers.

Affiliates of Dattatraya Corporation:

Dattatraya Corporation has a number of Affiliates and each Affiliate may work with other Affiliates for business and operational purposes. Personal information is only shared with other Affiliates if we have a legal basis for doing so and if this is necessary for one of the purposes described above. Dattatraya Corporation and its Affiliates have concluded a group-wide agreement on the handling of personal information for this purpose.

Other recipients:

We also share your personal information with other recipients if you ask us to do so. For example if you are a potential dental patient who is searching on our websites for doctors with particular expertise we will share the contact details you provide with a dental provider with the necessary expertise to facilitate setting up an appointment.

**6. What are our legal justifications?**

We only collect and use your personal information if we have a valid legal reason to do so.

Your consent:

You have provided consent for us to collect and use your personal information for a specific purpose. For example, you have consented to receiving marketing communication.

Contract between us:

We need your personal information to comply with our obligations or to exercise our rights under a contract with you, or you have asked us to take specific steps before entering into a contract. For example, we need your contact details to respond to your queries.

Our legal obligation:

We need your personal information to comply with the law. For example, we need your payment details to comply with tax laws.

Legitimate business interests:

We need your personal information for a specific business interest and we do not see significant impacts on you that are stronger than our business interest. For example, we need your usage details to maintain the security and integrity of our systems, platforms, premises and communications.

**7. Do we transfer your personal information internationally?**

Dattatraya Corporation and its Affiliates operate globally and may transfer your personal information to other countries where we are located. If, we transfer your personal information to other countries, we will ensure that the level of data protection that is guaranteed under local law will travel with your personal information. This means we will only transfer your personal information to recipients in countries that have an adequate data protection level or to recipients that sign appropriate data transfer agreements with us (e.g. the EU Standard Contractual Clauses) or where applicable data protection laws allow us to do so. By providing us with your personal information you are agreeing to such transfers and processing and storage of your information outside of your own country of residence. If you would like to have further information about international data transfers or copies of our safeguards, please contact us at the contact addresses listed above.

**8. For how long do we keep your personal information?**

We will keep your personal information only for a limited period of time and for no longer than we need it for the purposes described above. In particular, we set our retention periods carefully under consideration of different general principles, including the following:

whether we are obliged to keep your personal information (e.g. for tax purposes);

whether you have asked us to stop using or instructed to keep your personal information;

whether we have an existing business relationship with you;

whether we will likely use your personal information in the future;

whether your personal information is relevant to future legal claims;

whether your personal information is particularly sensitive; or

whether keeping your personal information would have a significant impact on you.

Once the applicable retention periods are expired, we will securely delete or anonymize your personal information. If you would like to have further information about our retention practices, please contact us at the contact addresses listed above.

9. Where do we collect your personal information from?

Primarily, we collect your personal information directly from you in the course of our business relationship, when you sign up for marketing communication or when you use one of the Dattatraya Corporation Services. In some cases, we also collect personal information from publicly accessible sources (e.g. the Internet, the press, trade and association registers) or from other Dattatraya Corporation Affiliates or from other third parties (e.g. a credit agency).

**10. Do you have to provide your personal information to us?**

We may ask you to provide certain personal information to us. You are not required to provide us with your personal information. However, if you choose not to do so, we may not be able to enter into or continue a business relationship with you/your organisation or to provide you with marketing communication or to make specific content at the Dattatraya Corporation Services available to you.

**11. Do we use fully automated decision-making?**

We do not use fully automated decision-making that has legal or other similar significant effects on you.

**12. How do we keep your personal information secure?**

We have implemented various appropriate safeguards to keep your personal information secure and to protect it from unlawful or unauthorised processing and accidental loss, destruction or damage.

However, please be aware that no system is ever completely secure. There is always some risk that an unauthorized third party could intercept an Internet transmission, or that someone will find a way to undermine our security systems. Please be cautious when sharing your personal information over the Internet, especially your financial-related information.

**13. How do we protect children’s personal information?**

We do not knowingly collect or use any personal information from children unless the information is collected from a parent or guardian. If you are a child, please do not provide your personal information to us. If you are a parent and become aware that your child has provided personal information to us, please contact us at the contact addresses listed above and we will help you to resolve this issue. If we learn that we have collected personal information of a child, we will take reasonable steps to delete that personal information.

**14. How do we use patient’s personal information?**

When you are a dental or orthodontic patient, your doctor may treat you with the assistance of Dattatraya Corporation Services (such as our Spark application). In these circumstances, your doctor will be responsible for the handling of any personal information that you provide during your treatment. If you have any questions about your personal information, you should read your doctor’s privacy notice or consult with your doctor.

Whereas we primarily act as a service provider on behalf of your doctor, we may also process your provided personal information to comply with the law, to establish or defend legal claims or to perform (on an anonymized basis only) research and development in relation to our Dattatraya Corporation Services. In such cases, we will be responsible for the handling of your personal information for these purposes.

If you are a prospective patient and have used one of our Dattatraya Corporation Services (such as our websites) to find a provider for dental or orthodontic treatment we will provide your contact details to the relevant provider to enable them to contact you and arrange an appointment. If you have indicated that you would like to receive a newsletter or other marketing communication we will also use your personal information to send this to you.

If you use Social Media (including Facebook, Twitter or Instagram) and you use one of our public campaigns as a hashtag or use one of our product names (such as #Vamsa A-Line and Vamsa Y-FLX) we may use your reviews of our products or services from these sites and re-post them on our own social media sites. If you do not wish this to happen, please do not use these hashtags. By posting or otherwise making available any content about your experience of an Dattatraya Corporation Service (such as Vamsa) and responding “yes” if we ask for your permission to re-post content on our own social media sites you are confirming that you are 13 years or older and that you agree to the terms and conditions listed on our social media sites.

**15. What rights do you have in relation to your personal information?**

You have various rights in relation to your personal information. Depending on the applicable data protection laws, you may have the right to:

withdraw your consent;

access your personal information and be provided with certain information in relation to it, such as the purpose for which it is used, the recipients or categories of recipient to whom it is disclosed and the period for which it will be stored;

ask us to correct any inaccuracies in your personal information;

ask us to erase your personal information;

ask us to restrict the use of your personal information;

receive the personal information which you have provided to us, in a machine readable format;

object to the use of your personal information; and

instruct us how to handle your personal information after your death.

If you would like to exercise these rights, please contact us at the contact addresses listed above. Please understand that your rights can be restricted in certain cases. Should this be the case, we will inform you of the reason.

We encourage you to let us know if you have any concerns about how we are handling your personal information so we can try to resolve your concerns. However, if you think that we have not complied with data protection laws, you have the right to submit a complaint with your data protection supervisory authority.

**16. Where do I find additional information about local laws?**

We have various supplemental privacy notices that provide additional information as required by local law:

For additional information as required by the Indian law, please read our Indian Addendum.

**17. How do we keep this Privacy Notice up to date?**

We will update this Privacy Notice from time to time and we encourage you to review it regularly. Whenever we make changes, we will revise the “last updated” date at the top of this Privacy Notice. If the changes are significant, we will provide you with a more prominent notice as appropriate.