# Privacy Policy Riverside Oral Surgery.com Rev. 2023-01-19

Please read this Privacy Policy carefully. This Privacy Policy applies to the Website RiversideOralSurgery.com, and any mobile applications, all of which are owned and operated by Riverside Oral Surgery Management, LLC, and any of its affiliated entities (collectively, "Riverside", "we" "us" or "our"). We refer to these Websites and mobile applications (the "Apps"), collectively as the "Platform" and together with the information, goods and/or services made available to users of the Platform, relevant news, content, applications, and sponsored programs, advertising, email communications, and discussion forums, ("Services.") References to "we" or "us" mean Riverside Oral Surgery Management, LLC, including any company we control.

To protect your privacy and help you to make informed choices, this Privacy Policy explains our information practices, how you can choose how we use your data, and your rights regarding your data. If you do not agree with our policies or practices, regarding our treatment or use of your information, your choice is not to use the Riverside App or Platform.

If you do choose to access the Platform and use the Services, you must agree to our <u>Terms of Use</u> which is the contract between us and you. By accepting our Terms of Use, you also confirm that you have read, understand, and accept this Privacy Policy. If you do not want us to collect, use or share information about you and your use of the Services as described in this Privacy Policy, then you should not use the Services. By using the Services, you acknowledge that we will store, use and otherwise process your information in the United States, where we are located. Except as may be otherwise be noted in this Privacy Policy, we are the data controller responsible for the processing of your personal information as described in this Privacy Policy.

#### **UNDER 18 YEARS OF AGE?**

YOU MUST OBTAIN WRITTEN PARENTAL CONSENT TO ENROLL IN OR USE THIS PLATFORM, WHICH INCLUDES PARENTAL CONSENT FOR RIVERSIDE TO USE YOUR INFORMATION FOR THE PURPOSES SET FORTH IN OUR TERMS OF USE AND IN ACCORDANCE WITH THE DISCLOSURES OF YOUR INFORMATION AS SET FOR IN THIS PRIVACY POLICY.

Riverside (alternatively, the "Company," "we", "us" or "our") respects the privacy of visitors to our website, and respect the interest that visitors to our website have in understanding how we collect, use, and disclose their information through this website, or other online services which are or may be linked to this Privacy Policy.

In summary, we will only use your information:

- To optimize our website performance; or
- With your consent.

This is explained in more detail below.

By accessing or using this Site and the Riverside Platform, and/or accepting our <u>Terms of Use</u>, you agree to this Privacy Policy. We may change this Privacy Policy from time to time (see Changes to Our Privacy Policy). Your continued use of this website after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

If you have any inquiries about this Privacy Policy or how we use your personal information, please contact us at <a href="mailto:dataprivacy@riversideoralsurgery.com">dataprivacy@riversideoralsurgery.com</a>.

## **Privacy Quick Look**

- Anyone may browse our website, Services, and the Riverside Platform, but you must provide personal information in order to register with the us and take full advantage of the Platform and its features.
- We may contact you by email or SMS text, and by registering with us, you expressly consent to receiving email, or text messages from us.
- When you visit or use the Platform, we set cookies on your Web browser so that we can recognize you and personalize our site to your preferences.
- You can control the placement of cookies on your Web browser by your Web browser settings.

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#### 1. About Us

This website <a href="https://riversideoralsurgery.com">https://riversideoralsurgery.com</a> is operated by Riverside Oral Surgery Management, LLC, also referred to as the "Riverside", "we", "us" and "our"), a limited liability company organized under the laws of the state of New Jersey. We are a data controller.

Our offices are located at:

Riverside Oral Surgery Management, LLC 1857 Oak Tree Road Edison, New Jersey 08820

You may contact us about any questions you have regarding this Privacy Policy at either our postal address above, or by e-mail directed to dataprivacy@riversideoralsurgery.com.

## 2. Children Under the Age of 13

Our Site is not intended for children under 13 years of age. No one under age 13 may use or direct any information to the Site. We do not knowingly collect personal information from children under 13. If you are under 13, <u>do not</u> use or provide any information on the Site, use any of its features, subscribe to our mailing list, use any of the interactive links or post anything on the Site, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use, or otherwise use the Platform. If we learn we have collected or received personal information from a child under 13 without verified parental consent, we will delete that information. If you believe we may have any information from or about a child under 13, in connection with the access or use of this Site, please contact us at dataprivacy@riversideoralsurgery.com

## Children Under the Age of 18

The information we collect, use and share necessarily includes information about you that may be subject to a various state and federal privacy and/or information disclosure laws and regulations and which require express consent by you, or if you are under the age of 18, by your parent or legal representative.

## 3. What Information We Collect and How We Collect It.

The type of information we collect depends on how you use the Site and our Services and how you interact with us. "Personal Information" means any data, including Protected Health Information (PHI) which can be associated with you as an individual, either directly or indirectly, and is collected on a voluntary basis from you.

The Personal Information we collect via the Site may include:

• <u>Identity information</u>, such as your name, organization name and position, postal address, e-mail address, telephone number, biographical data, education and/or academic information, social media links, and/or any other identifier by which you may be contacted online or offline.

- <u>Technical data</u>, such as your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and/or platform, and other technology information relating to the devices you use to access the Site.
- <u>Usage data</u>, which includes information about your use of the Site, and any communications we may receive from you.
- Marketing and communications data, including your preferences in terms of receiving marketing and other communications from us.

The Site is <u>not</u> intended to store or transmit "special categories" of Personal Information, such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information, or criminal convictions and offenses.

#### 4. How We Collect Personal Information

We collect information from you in three different ways.

# a) Personal Information you provide to us.

If you subscribe (sign up) to the Riverside Platform, which includes without limitation, our mailing list, inform us of your marketing and communications preferences, or post or submit any text, comments, photo, video, communication, information (including academic profile information), submit care requests or inquiries, or other material ("User Content") on or through the Site, you will provide us with your identity, contact information, and IP address. This data is collected through direct solicitation and your voluntary submissions. You will also provide us with Personal Information when you correspond with us. We may embed tracking codes in our regular daily email correspondence.

## b) Personal Information we collect automatically as you navigate the Site.

The Site presently does not, but reserves the right in the future, to use third-party advertising providers to display advertisements based on your visits to the Site and other web sites you have visited, which allows targeted advertisements to be delivered to you for products and services about which you may be interested. The Site may also use a third-party traffic measurement service to analyze how visitors use the Site, Third party advertising providers and advertisers (whose ads are displayed via the advertising provider) may use cookies, web beacons, embedded scripts (described below) or other similar mechanisms to automatically collect web site usage information, to, among other purposes, deliver advertisements, in which you might be interested, prevent you from seeing the same advertisements too many times, and to conduct research regarding the usefulness of certain advertisements to you. Cookies, web beacons and embedded scripts and other similar mechanisms used to collect web site usage information from advertising providers and advertisers, are governed by their respective privacy policy and not this Privacy Policy. We do not, however, share any Personal Information with these third parties in connection with the services they perform on the Site.

In addition, as you use the Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including your browser type, the Internet Protocol (IP) address used to connect your computer to the internet, and your usage habits, patterns and preferences. We collect this data using cookies, beacons and similar technologies. We use Google Analytics to help us analyze user habits while visiting our Site. The data gathered from cookies may be transmitted to Google servers in the United States. We employ IP address anonymization to ensure that there is no direct reporting of individual user IPs as part of this process. The information will be used by Google only for the purpose of evaluating website use, creating website activity reports, and other services relating to website activity and internet usage on our behalf. The IP address that your browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google.

We may use any of the following cookies individually or in combination:

<u>Cookie name</u> <u>What it is used for</u>

Google Analytics website analytics and visitor tracking Wordfence website security and access control

YouTube user viewing preferences

You can remove cookies from your computer through the browser settings. Please note however that doing so may affect, limit or degrade your ability to use of some features on the Site and other websites. Management of cookie settings varies from one browser to another, and the "Help" menu of your web browser should provide instructions how to manage cookies. For your convenience, the links below are to instructions provided by major web browsers relating to such management in those specific browsers:

- Chrome (<a href="http://support.google.com/chrome/bin/answer.py?hl=en&amp;answer=95647">https://support.google.com/chrome/search?q=hot+to+delete+cookies&from\_promoted\_search?q=hot+to+delete+cookies&from\_promoted\_search=true</a>)
- Internet Explorer (https://support.microsoft.com/en-gb/kb/278835)
- Firefox (http://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored)
- Opera (https://help.opera.com/en/latest/security-and-privacy/)
- Safari (http://support.apple.com/kb/PH5042)
- Safari for iPad and iPhone (http://support.apple.com/kb/HT1677)
- c) Information You Provide to Third Parties. If you use the Site's interactive features (where available) to communicate with other users, or to access a third-party site that is linked to the Site, the other user(s) or third-party site may provide us, directly or indirectly with your Personal Information. For example, another user may post your email address and name, or a third-party website may report a purchase you made from that site.

## 5. How and Why We Use Personal Information

a) You have given us permission to do so.

If you subscribe to the Riverside Platform, and our mailing list, we will send you updates and marketing information that you have consented to receive. Similarly, if you contact us with a question or comment, we may need your contact, identity, technical and/or usage information to respond.

# b) We have a legitimate interest (reasonable business purpose) for doing so.

We will use your information for our legitimate business reasons where doing so will not unduly affect your rights. As such:

- We will use your identity, profile and contact information for our general business purpose, which is to facilitate dental health; and
- We will use your identity, contact and usage information to keep our records up to date.
- We will use your technical information to:
  - o Make the Site available, to improve it, to conduct system maintenance, support, troubleshooting, reporting and to host data;
  - o Ensure that the Site is secure;
  - o Analyze how users interact with the Site; and
  - o Address technical issues you may experience with the Site.

If you feel that your interests and fundamental rights outweigh our business purposes, and that we should therefore stop processing your data, please let us know.

## c) We need to comply with a legal or regulatory obligations.

In certain circumstances, we may need to retain or use your data to comply with laws or regulations to which we are or may become subject.

#### 6. How We Share Personal Information

We may share your information with our trusted third-party service providers (including information technology providers such as website and mailing list hosts). We may provide your account information to companies that help us with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us.

When we share your information with our service providers, we will take commercially reasonable steps to help ensure that your data is kept secure and used only in accordance with this notice.

We may share Personal Information when we believe it is necessary to comply with the law, regulation or legal request (including a court order or government investigation or inquiry), to detect, investigate and defend against fraudulent or unlawful activity and violations of our <u>Terms of Use</u>, to enforce or apply our <u>Terms of Use</u> or other agreements, in the context of a Company reorganization, or to protect the rights, property, or safety of the Company, our employees, users, or others.

**Investigations**. We may use your information to detect, investigate and defend against fraudulent or unlawful activity and violations of our <u>Terms of Use</u>.

# 7. Data Security

The safety of your Personal Information is important to us, and we use various technical and organizational measures to secure it.

We employ commercially reasonable encryption (TLS technology), data security, and intrusion prevention technologies to protect and secure all personal information in our possession. Our data environment is monitored 24/7 for malicious activity and/or anomalous behavior either of which triggers our incidence response. However, the transmission of information via the Internet is not completely secure, and unfortunately, no method of transmission over the internet or method of electronic storage is completely secure. Although we take commercially reasonable measures to safeguard against unauthorized disclosures of information, we cannot guarantee the security of your data. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security, and any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site. You acknowledge and agree that you are solely responsible for maintaining the security and confidentiality of your account username and password.

## 8. How Long We Keep Personal Information

We will retain your personal information only for as long as it necessary to fulfill the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of that Personal Information, the purposes for which we processed the data and whether we those purposes may be achieved by another means, and the applicable legal requirements

We will retain your Personal Information only for as long as it necessary to fulfill the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements.

#### 9. Third Party Links

This Site may contain links to other websites whose information practices may be different than ours. Please consult all third-party Sites' privacy notices. We have no control and disclaim any and all responsibility and liability in connection with information that is submitted to, or collected by, third parties.

#### 10. Accessing or Correcting Your Information

You can review and change your personal information by logging into the Site and visiting your account profile page, or by sending an email to us at <a href="mailto:dataprivacy@varsitylink.com">dataprivacy@varsitylink.com</a> to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Site, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Site users. Proper access and use of information provided on the Site, including User Contributions, is governed by our Terms of Use.

## 11. Legal Disclosures

We may need to share your data when we believe it is required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, We will attempt to notify you about legal demands for your personal information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

## 12. Changes to this Privacy Policy or your data

We may amend this Privacy Policy from time to time. We will post any update to this Privacy Policy on the Site. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes. We reserve the right to modify this Privacy Policy at any time and any changes will be effective upon posting of the modified Privacy Policy unless we advise otherwise. If we make any material changes to this Privacy Policy we will notify you by email (sent to the email address included in your account profile) and/or by means of a notice on the Sites before the change becoming effective. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. By continuing to use the Services after changes are made to this Privacy Policy, you agree to such changes.

# 13. Contacting Us

If you have general questions about your account or the Services, contact us at <a href="mailto:dataprivacy@varsitylink.com">dataprivacy@varsitylink.com</a>. For questions about this Privacy Policy or how your personal information may be used when you use the Services, please contact our Privacy Office by email at <a href="mailto:dataprivacy@varsitylink.com">dataprivacy@varsitylink.com</a> or at the following address:

Riverside Oral Surgery Management, LLC 1857 Oak Tree Road Edison, New Jersey 08820

#### **Contact Us**

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection, storage, disclosure and use practices, please email or contact us at:

Riverside Oral Surgery Management, LLC 1857 Oak Tree Road Edison, NJ 08820

or email us at dataprivacy@riversideoralsurgery.com.

Any personal information you provide to the above email or postal mail addresses will not be used to send you promotional materials, unless you request it.

I HAVE READ AND AGREED TO RIVERSIDEORALSURGERY.COM'S PRIVACY POLICY AND TERMS OF USE (COLLECTIVELY, "POLICIES") AND EXPRESSLY CONSENT TO AND APPROVE ITS COLLECTION, USE AND DISCLOSURE OF THE INFORMATION TYPES SET FORTH IN THOSE POLICIES, THE PURPOSE FOR SUCH INFORMATION DISCLOSURES, AND THE PARTIES WHO MAY RECEIVE SUCH DISCLOSURES AS SET FORTH IN THOSE POLICIES.