



PRIVACY POLICY

1. IN GENERAL

1.1. The concept of the cfs.clubfootsolutions.com platform and clubfootsolutions.org website is based in part on the publication of details regarding individual users by making such details accessible to admin users via the cfs.clubfootsolutions.com app.

1.1.1. The collection, administration and use of personal details by CFS complies with applicable data protection laws by ensuring that each user is able to decide themselves, which personal details shall be made accessible to Admin users.

1.1.2. Special notice regarding the Brace Wearing Timer -feature: the CFS app has a Brace Wearing Timer Feature which, if activated by a user in their own discretion, enables third parties to use statistics about brace wearing and time out of braces as part of statistical analysis reports. Use of the Brace Wearing Timer Feature is entirely voluntary. By using the feature, the user accepts the responsibility for such use at their own risk. If the user does not want to give third parties access to their data as part of compilation statistical reporting then they can opt not to track events in the brace wearing section of the app. This site/app is not intended for children under the age of eighteen to use without adult supervision.

2. CATEGORIES OF PERSONALLY IDENTIFIABLE INFORMATION COLLECTED BY CFS

2.1. When you Use the Software & Services, we automatically collect and store the following types of information:

User Provided Data. Each Application obtains information that you provide when you download and register the Application. Registration with us is not optional in the CFS App System. Please keep in mind that you are not able to use the features offered by the Applications unless you register with us. When you register with us and/or use an Application, you generally provide (a) your name, email address, and other registration information; (b) gender of your child; (c) Brace you are using during treatment; and (d) information that is entered into our system when you use the Applications, such as breaks and videos watched. We may also use the information that you provide to us to contact you from time to time to provide you with important information and, required notices.

Automatically Collected Data. In addition, the Application may collect certain information automatically, such as the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and

information about the way you use the Application. The Application does collect precise information about the location of your mobile device.

Information Collected from Social Networking Sites. Our Applications may collect Personal and/or Anonymous Data about you from a social networking site (“SNS”), in accordance with the terms of use and privacy policy of the third-party provider of such SNS, if you log on with your login credentials from the SNS. We may add this information to the information we have already collected from you.

How the Company Uses Your Information.

The Company uses the information it collects for analytical, business and operational purposes in the following ways:

- a. to operate and update the Software & Services and provide you with existing and new functionality and features;
- b. to improve and customize the Software & Services;
- c. to provide you personalized content, including through the delivery of targeted interest-based advertisements from us or our partners;
- d. to maintain and improve the quality and operation of the Software & Services;
- e. to notify you of Software & Services updates;
- f. to provide you with support and handle your complaints and/or feedback;
- g. to take any action in case of a dispute involving you in connection with the Software & Services;
- h. to enforce the terms and conditions applicable to the Software & Services and to prevent unlawful activities and misuse thereof;
- i. to comply and satisfy any applicable law regulation, legal process or enforceable governmental request.

Sharing Information with Third Parties.

We may share with third parties the information collected in any of the following events:

- a. If we are required by law to disclose your information, we may share your information with law enforcement or other competent authorities and any third party, as may be required (e.g., to detect, prevent or otherwise address fraud, security, or technical issues; to respond to claims or satisfy any legal process, subpoena, or governmental request; or to protect the rights, property, or personal safety of the Company’s users, its partners, or the general public);
- b. In the event the Company goes through a business transition such as a merger or acquisition by another company, consolidation, change of control, reorganization, or sale of all or a portion of its assets, your information will be among the assets transferred;
- c. We may share your information with certain third parties (including, without limitation, search engines, content providers, and advertising networks and platforms) that provide various services (such as advertising, marketing, analysis, content, and search) in connection with the Software & Services. We

take appropriate measures to ensure that no user can be individually identified from the disclosure of such information, and we require these third parties (i) to keep the data secured, (ii) not to use the data for any other purpose other than to provide us with services, and (iii) to use the data solely in compliance with this Privacy Policy;

d. We may also share PII and non-personally identifiable information with our subsidiaries, affiliated and parent companies but their use of such information must comply with this Privacy Policy. In any case other than the above, we will not share your PII with third parties without your prior consent.

3. PRIVACY SETTINGS

3.1. Every user can change the privacy settings applicable to their account. In this way, the user can opt out at any time from the CFS website and CFS App.

4. USE AND SHARING OF PERSONALLY IDENTIFIABLE AND NON-PERSONALLY IDENTIFIABLE INFORMATION WITH THIRD PARTIES

4.1. By registering, the user explicitly agrees that CFS shall have the right to use all automatically collected personally identifiable information, in accordance with the privacy settings of such user, for purposes of the CFS applications and mailing lists. CFS does not pass on personally identifiable information (see Section 2, above) to third parties, except as required by law or with the explicit consent of the user. CFS implements all reasonable measures to prevent the unauthorized access by third parties to saved details.

4.2. Health data will never be shared with advertisers or similar agencies.

5. PLUGINS AND WIDGETS FOR SOCIAL MEDIA

5.1. The CFS platform does use plugins from social media

6. COOKIES

6.1. The CFS app management web site and CFS website does not use cookies and only administrators have access to the content.

7. GOOGLE ANALYTICS

7.1. The CFS does use Google Analytics for both the website and CFS App

8. CHANGES TO PRIVACY POLICY

8.1. If CFS decides to change its privacy policy, it will post those changes on this page.

9. YOUR CONSENT

9.1. By using our website and app, you consent to our privacy policy. Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at <http://www.clubfootsolutions.com/privacy.html>