



Procedure for K Line User Data Deletion Policy

1 PURPOSE

This procedure sets out the K Line policy for responding to requests for deletion of data under the German data protection law and the requirements of the European General Data Protection Regulation (GDPR). And to inform all individuals about how we use personal data in relation to data deletion and the responsibilities and roles in responding with a request as our aim that all individuals feel comfortable on our website and The protection of their privacy and their personal rights are therefore very important to us.

2 SCOPE

This policy applies to all employees, contractors, and third-party vendors who have access to customer data within K-line Europe.

1. when they register on our website or log into an existing customer account or when they order products. The collection and use of their personal data takes place regularly only with their consent.
2. An exception applies in those cases in which prior consent is not possible for practical reasons and the processing of the data is permitted by law
3. These principles also apply to companies that process and use data on our behalf and in accordance with our instructions.

3 RESPONSIBILITIES

Role	Responsibilities
Kline IT Team	Responsible for the implementation and following up of this Policy.
Chief Quality Officer	Responsible reviewing/approving them for the purpose of this policy
Data Processor	<ol style="list-style-type: none"> 1. To use personal data being object of processing, or those being collected for its incorporation, only for the purpose which is object of this order. In no case he shall be entitled to use data for own purposes. 2. To process data according to the Data Controller’s instructions. If the Data Processor considers that any of the instructions might be infringing any EU regulations regarding GDPR or any other disposition as for the protection of the personal data of any of the Member States, the Data Processor shall inform immediately to the Data Controller. 3. To keep, in writing, a record of all categories of treatment activities carried out on behalf of the controller (where applicable).
Data Controller	<ol style="list-style-type: none"> 1. Deliver to the Data Processor the data referred to in clause 2 of this document. 2. Carry out an analysis of the possible risks derived from the data processing to determine the appropriate security measures to guarantee the security of the data and the rights of the interested parties and, if it is determined that there are risks, carry out an Impact Evaluation so that appropriate security measures are implemented. 3. Make the appropriate prior consultations. 4. Ensure, before and throughout the treatment, compliance with the RGPD by the Data Processor. 5. Supervise the data processing, this includes the carrying out of inspections and audits.



4 REFERENCE DOCUMENTS

Reference Item	Title
GDPR	European General Data Protection Regulation

5 DEFINITIONS

Reference Item	Title
Personal Data	Any information related to an identified or identifiable natural person
Data Subject	An identifiable individual to whom the personal data relates

6 PROCEDURE

1.

6.1 Data protection notice

6.1.1 Kline Europe's aim is that all individuals feel comfortable on our website. The protection of privacy and all personal rights are therefore very important to us. And to inform the all about how we use their personal data according to the German data protection law and the requirements of the European General Data Protection Regulation (GDPR).

6.2 Processing record and legal basis for solving the personal data

6.2.1 K line Europe collects, process, and uses the personal data for the following purposes:

1. Establishment and implementation of contractual relationships
2. Sending newsletters Marketing measures
3. Customer service and customer support Provision of Telemedia, such as to process orders for our online range of goods and services

6.2.2 The processing of personal data can be based on the following legal bases:

1. Art. 6 para. 1 point. a GDPR serves as the legal basis for processing operations in which we obtain customer consent for a specific processing purpose.
2. Art. 6 para. 1 point. b GDPR, insofar as the processing of personal data is necessary to fulfill a contract, e.g. when you purchase a product. The same applies to such processing operations that are necessary to carry out pre-contractual measures, for example in the case of inquiries about our products or services.
3. Art. 6 para. 1 point. c GDPR, insofar as we are subject to a legal obligation that requires the processing of personal data, such as to fulfill tax obligations.
4. Art. 6 para. 1 point. d GDPR if the vital interests of any natural person require the processing of personal data.



5. Art. 6 para. 1 point. f GDPR applies on the basis of our legitimate interests, e.g. when using service providers in the context of order processing, such as shipping service providers or when carrying out statistical surveys and analyses as well as logging registration procedures.

6.2.3 We are interested in the use of a user-friendly, appealing and secure presentation and optimization of our website, which serves both our business interests and meets the customer expectations.

6.3 Data Classification

6.3.1 Customer data shall be classified based on its sensitivity, with specific attention to personal data under the GDPR.

6.4 Duration of storage and routine deletion of personal data

6.4.1 Kline processes and stores the personal data only for the period necessary to fulfill the storage purpose or if this has been provided for in laws or regulations.

6.4.2 Customer data will be retained for a period of three months (<https://clearxaligners.com/data-policy>) after the formal end of the contract between the customer and K-Line.

6.5 Data Deletion Procedures

6.5.1 Customer data will be securely and permanently deleted from all systems and databases within three months of the formal termination of the contract.

6.5.2 Data deletion will be carried out using industry-standard methods to ensure irreversibility.

6.6 Collection of general data and information, so-called log files

6.6.1 Our website records each time it is accessed based on Art. 6 Para. 1 point. f DS-GVO a series of general data and information that are temporarily stored in log files on a server.

6.6.2 A log file is created in the course of an automatic protocol of the processing computer system. The following can be recorded:

1. Access to the website (date, time and frequency)
2. How you got to the website (previous page, hyperlink etc.)
3. Amount of data sent.
4. Which browser and which browser version you are using
5. The operating system you are using.



6. Which internet service provider you are using
7. Your IP address, which your Internet access provider assigns to your computer when you connect to the Internet.

6.6.3 The collection and storage of this data is necessary for the operation of the website to ensure the functionality of the website and to correctly deliver the content of our website. In addition, we use the data to optimize our website and to ensure the security of our IT systems. For this reason, the data is stored for a maximum of 7 days as a technical precaution.

6.6.4 We use this data for the purpose of advertising, market research, and the needs-based design of our services by creating and evaluating usage profiles under pseudonyms, but only if the individuals have not exercised their rights to object to this use of their data .

6.6.5 This also includes the so-called "Remember Me" function, which they can also turn off in their customer account under "Personal data".

1.

6.7 Passing on personal data to third parties

When forwarding personal data, we always ensure the highest possible level of security. Therefore, the individuals' data will only be passed on to previously carefully selected and contractually bound service providers and partner companies. In addition, thier data will only be forwarded by us to bodies that are obliged to maintain an appropriate level of protection.

6.8 Use of the IT chat advisor function in accordance with Art. 6 para. 1 lit. f GDPR

We offer the individuals the "IT chat advisor" function to make our service even more convenient for them. they have the opportunity to get advice in the chat on our website before they shop.

The entire chat process takes place anonymously without their name or other personal data being displayed or logged or the customer advisor being able to see customer data.

To continuously improve the quality of our customer service in the chat, we record this chat history for training purposes. These records are deleted by us after evaluation.

6.9 Individual rights

The individuals have rights concerning the collection of their data, which we would be happy to explain to them. If they would like to avail themselves of one of the following free rights, a simple message to us is sufficient.



For their own protection, we reserve the right to request further information that is required to confirm their identity and, if identification is not possible, to refuse to process the request.

6.9.1 Right to information

they have the right to request information from us about the personal data stored about them.

6.9.2 Right to rectification

They have the right to request an immediate correction and / or completion of their personal data.

6.9.3 Right to restriction of processing

They have the right to request that the processing of their personal data be restricted if they dispute the correctness of the data, the processing is unlawful, but they refuse to delete it and we no longer need the data, but they do so to assert or exercise it or defense of legal claims or they have lodged an objection to the processing.

6.9.4 Right to cancellation

You have the right to request the deletion of their personal data stored by us, unless the exercise of the right to freedom of expression and information, processing to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims is required.

6.9.5 Right to be informed

If they have asserted the right to correction, deletion, or restriction of processing, we will notify all recipients to whom the personal data concerning they have been disclosed of this correction or deletion of the data or restriction of processing, unless this proves to be impossible or is associated with a disproportionate effort.

6.9.6 Right to Data Portability

they have the right to have personal data that they have made available to us or to a third party in a structured, common and machine-readable format. If they request the direct transfer of the data to another person responsible, this will only be done if it is technically feasible.



6.9.7 Right to object

If their personal data is based on legitimate interests in accordance with Art. 6 Para. 1 point. f GDPR are processed, they have the right to object to processing at any time in accordance with Art. 21 GDPR.

6.9.8 Right to withdraw consent

They have the right to withdraw their consent to the collection of data at any time with effect for the future. The data collected up to the legal force of the revocation remains unaffected. And it is important to understand that the implementation of their revocation may take a little time for technical reasons and they may still receive messages from us during this time.

7 Attachments:

7.1.1 Data Processing Agreement with the individuals