FIRST CIRCLE, INC.™

Internet Privacy Policy

Thank you for visiting **First Circle, Inc.'s™** website. Please read the following policy, which describes how we will handle any Information about you during your visit to our site.

Information Collection and Use:

First Circle, Inc.™ is the sole owner of the Information collected on this site. We do not sell, share or rent this information in any manner different from what is disclosed in this statement. We collect Information when you browse our site, but we do not collect personally identifiable information unless you voluntarily and explicitly provide it. Our system may track or collect anonymous technical information such as browser types, operating systems, and search content so we may constantly improve our site. We place internet data "cookies" on visitors' hard drives to maintain a web session and for our future marketing purposes. If you set your browser software to disable cookies, you may still browse our site, but will be unable to access its Interactive areas. We adhere to any and all applicable federal, state and local laws and regulations governing Internet use and confidentiality.

Any information obtained through Interactive sections of our website is considered confidential. Every person who utilizes the registration process to access these sections is required by law to maintain the confidentiality of the information generated. Information generated from accessing interactive sections of this website is to be used solely for the purpose of conducting business with **First Circle, Inc.™** and may not be copied, shared or distributed to any other party.

Registration

You may browse our website without any registration process. However, Interactive sections require a valid E-mail address, which is used as your User ID, and a password. Our registration process requires you to give us unique information. We use this information to verify that only registered users are accessing our sections containing confidential information. This registration process is specific to our users, and dentists, and not all information is made available to all types of registrants.

User ID / E-mail Addresses and Passwords

User ID and passwords are considered confidential. If you suspect unauthorized use of your User ID and password, notify us immediately, so we may deactivate them. As part of the registration process we will send a confirmation back to the e-mail address you have provided. We will also request that you periodically validate the registration information you have provided.

Facebook Data Deletion Request

If you registered for Chewsi using your Facebook account, **First Circle, Inc.™** saves only your name and email address to communicate with you regarding your Chewsi account. If you no longer wish to use your Facebook account to log in to Chewsi, you may request a *Data Deletion Request* by performing these <u>steps</u>.

Encryption

We take every precaution to protect the confidentiality of any Information about you or any communication that you submit to us. When you submit registration Information or your User ID and password Information to us, it is encrypted. If you request information from us through our secure sections, that information is encrypted and returned to you. All data stored in our environment is encrypted. We utilize 128 bit SSL encryption and industry standard certificate provisioning practices from authorized sources. We continuously review all layers of components and internal processes, including physical security measures, to guard against unauthorized access to systems. We restrict access to personal information collected to employees, contractors and agents who need to know that information, to facilitate processing and who are subject to strict confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

E-mail

Please note that any Information you submit to **First Circle, Inc.™** by e-mail is not subject to the security and encryption procedures of this policy.