

PRIVACY POLICY

Processing of Personal Information in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA")

1. INTRODUCTION

This Privacy Policy explains how Dento Design Inc (Pty) Ltd, trading as DDI ("DDI", "we", "us", "our"), collects, uses, stores, and shares personal information in the course of operating our website and our dental laboratory business, in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").

DDI is a dental laboratory. Unlike a dental practice, DDI does not treat patients directly, and in most cases does not have a direct relationship with the patients whose information passes through our systems. This means DDI holds two distinct roles under POPIA, described below, and this policy addresses both.

2. DDI'S TWO ROLES UNDER POPIA

2.1 Responsible Party For personal information DDI collects directly — for example, from visitors to our website, dental practices and practitioners we contract with, suppliers, job applicants, and other business contacts — DDI is the Responsible Party. DDI determines the purpose and means of processing this information and is directly accountable to those individuals for it.

2.2 Operator For patient-identifiable case information submitted to DDI by a referring dental practice or practitioner ("the Referring Practice") — such as patient names, scans, impressions, prescriptions, and any accompanying clinical notes — DDI acts as an Operator on behalf of the Referring Practice, who remains the Responsible Party for that patient's information. DDI processes this information strictly on the instruction of the Referring Practice and solely for the purpose of designing, manufacturing, and supplying the requested dental Product.

If you are a patient with a query about how your personal information has been used in connection with laboratory work done on your case, please contact your dental practice directly in the first instance, as they remain responsible for your information and your consent. DDI will support the Referring Practice in responding to any such query.

3. INFORMATION WE COLLECT

3.1 Via our website and business dealings (as Responsible Party):

- Name, job title, and contact details of practice staff, practitioners, and business contacts
- Practice name, registration/practice number, and billing details
- Enquiries submitted via contact or quote-request forms
- Login credentials for any online case-submission portal
- Technical data such as IP address, browser type, device information, and cookies (see clause 10)
- Supplier, applicant, and employee information collected in the ordinary course of business

3.2 Via case submissions (as Operator):

- Patient name and identifying reference as provided by the Referring Practice
- Digital intra-oral scans, physical impressions, models, photographs, and bite registrations
- Prescriptions, treatment instructions, and any accompanying clinical notes
- Shade, material, and design specifications relevant to the Product

4. PURPOSE OF PROCESSING

We use personal information to:

- Design, manufacture, and supply dental appliances and restorations in accordance with a Referring Practice's prescription
- Operate and maintain our website and any online case-submission portal
- Communicate with practices and practitioners regarding cases, quotes, accounts, and turnaround
- Process invoices and payments, and manage overdue accounts
- Comply with legal, tax, and professional regulatory obligations
- Maintain quality assurance records and case history for warranty and remake purposes
- With appropriate consent, use de-identified/anonymised case data for training, research, quality improvement, or marketing purposes
- Protect the legitimate interests of DDI, the Referring Practice, and, where relevant, the patient

DDI does not use patient-identifiable case data for direct marketing to patients, and does not sell or share personal information with third parties for their own marketing purposes.

5. LEGAL BASIS FOR PROCESSING

Where DDI is the Responsible Party, we process personal information on the basis of: performance of a contract with the Referring Practice; DDI's legitimate business interests (e.g. account management, quality assurance); compliance with a legal obligation; or consent, where required (e.g. website cookies, marketing communications).

Where DDI is an Operator, we process patient personal information solely on the instruction of, and under a data processing arrangement with, the Referring Practice, which is responsible for ensuring it has a valid legal basis (including patient consent, where required) to submit that information to DDI.

6. SECURITY OF PERSONAL INFORMATION

6.1 DDI implements appropriate technical and organisational measures to protect personal information against loss, unauthorised access, alteration, or disclosure, including access controls on case-management systems, secure transmission of digital scan and design files, and restricted physical access to hard-copy case material. Access to case data is limited to DDI staff and manufacturing partners who require it to complete the relevant case.

6.2 In the event of a security compromise where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, DDI will notify the Information Regulator and, where DDI is the Responsible Party, the affected data subjects, as soon as reasonably possible after discovering the compromise, in accordance with section 22 of POPIA. Where DDI is an Operator, DDI will notify the relevant Referring Practice without undue delay so that the Referring Practice can meet its own notification obligations as Responsible Party.

7. RETENTION OF PERSONAL INFORMATION

DDI retains case data (digital and physical) for as long as reasonably necessary for warranty, remake, quality assurance, and record-keeping purposes, and thereafter in accordance with applicable legal, tax, and professional retention requirements, after which it is securely destroyed or de-identified. Physical models and impressions may be disposed of after a shorter defined period once the Product has been supplied, unless the Referring Practice requests otherwise.

8. DISCLOSURE OF PERSONAL INFORMATION

DDI may share personal information with:

- The Referring Practice that submitted the case
- Third-party milling centres, 3D printing partners, and manufacturing facilities engaged to fabricate the Product, including facilities outside South Africa (see clause 9)
- Professional advisers, auditors, and regulators where required by law
- IT service providers and hosting/cloud storage providers who support DDI's systems, under appropriate confidentiality terms

Any such recipient is required to protect personal information to a standard consistent with POPIA.

9. CROSS-BORDER TRANSFER OF INFORMATION

Where DDI engages manufacturing, milling, or design partners located outside South Africa, case files (including digital scans and design data) may be transferred across borders solely for the purpose of fabricating the Product. DDI takes reasonable steps to ensure that any such recipient is subject to a level of data protection substantially similar to POPIA, whether by contractual safeguard or by operating in a jurisdiction with adequate data protection laws.

10. COOKIES AND WEBSITE ANALYTICS

Our website and case-submission portal may use cookies and similar tracking technologies. Cookies fall into the following categories:

- Strictly necessary cookies — required for core website and portal functionality, such as maintaining a secure login session. These cannot be disabled without affecting the portal's operation.
- Functional cookies — remember preferences and settings to improve your experience on the website.
- Analytics cookies — gather anonymised or pseudonymised statistics on website usage to help DDI understand and improve the site.
- Third-party cookies — where DDI uses third-party tools (e.g. website analytics providers), those providers may place their own cookies subject to their respective privacy policies.

Where cookies are not strictly necessary, DDI will request your consent before they are set, in accordance with POPIA. You may withdraw consent, and manage or delete cookies, at any time through your browser settings; note that disabling certain cookies may affect the functionality of the website or portal.

11. YOUR RIGHTS

Subject to the distinction in clause 2, and to the extent DDI is the Responsible Party for your information, you have the right to:

- Request access to the personal information DDI holds about you
- Request correction or deletion of inaccurate, outdated, or unlawfully held personal information
- Object to the processing of your personal information on reasonable grounds
- Withdraw consent previously given, where processing is based on consent
- Lodge a complaint with the Information Regulator of South Africa

Requests should be directed in writing to DDI's Information Officer using the details in clause 13.

12. INFORMATION REGULATOR

If you believe DDI has not complied with POPIA in respect of information for which DDI is the Responsible Party, you may lodge a complaint with the Information Regulator of South Africa (JZ Cuppusamy Building, 27 Stiemens Street, Braamfontein, Johannesburg; complaints.IR@justice.gov.za; www.justice.gov.za/inforeg).

13. CONTACT US / INFORMATION OFFICER

For any question about this Privacy Policy, or to exercise any right described above, please contact:

Information Officer: MC Botha

Email: mc@dentodesign.co.za

Telephone: 072 438 1601

14. CHANGES TO THIS POLICY

DDI may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The updated policy will be reissued to Referring Practices and made available on request, with a revised effective date.

Effective date: 10 July 2026