

# PRIVACY STATEMENT

Last Modified: May 1, 2018

This Privacy Statement explains how Smooth Clinic ("Smooth Clinic Ltd," "we," "us," or "our") collects, uses, and discloses your information. The Privacy Statement applies to all services and products, except those products that have a separate Privacy Statement.

Where applicable, you consent to the use of your information as described in this Privacy Statement each time you use our products or services, so we urge you to read this document in full, and Contact Us if you have any questions.

## COLLECTION AND USE OF PERSONAL INFORMATION

Personal information is information that can be used to directly or indirectly identify you. Personal information also includes anonymous information that is linked to information that can be used to directly or indirectly identify you. Personal information does not include information that has been irreversibly anonymized or aggregated so that it can no longer enable us, whether in combination with other information or otherwise, to identify you.

Here is a description of the types of personal information we may collect and how we may use it:

### What Personal Information We Collect

Depending on the products and services you use, we collect different kinds of personal information from or about you.

**Information you provide:** We collect the personal information you provide—such as your name, username, or email address—when you use our products and services, create an account, Contact Us, participate in an online survey, participate in community discussions or chat rooms, apply for employment, interact with us at in-person events, or otherwise interact with us.

**Information about payments:** If you make a purchase, we collect personal information in connection with the purchase. This information includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping, and contact details.

**Information about use of our services and products:** When you visit our websites or cloud environment, we may collect information about the type of device you use, your device's unique identifier, the IP address of your device, your operating system, the type of Internet browser that you use, usage information, diagnostic information, browsing information, session summary information, file attributes (including attributes for photos, videos, music, and documents), and location information from or about the computers, phones, or other devices on which you install or access our products or services. We may gather some of this information automatically. Where available, our services may use GPS, your IP address, and other technologies to determine a device's approximate location to allow us to improve our products and services.

**Information from third parties:** We may collect information from third parties, including business partners and marketing agencies. This includes your contact information from marketing partners when we engage in joint marketing or co-branding activities, your IP address or location information from service providers to offer certain products and services relevant to your location, and data from your social networks to authenticate your product use with us, or that you grant permission to our products or services to access.

### How We Use Your Personal Information

Generally speaking, we use personal information to provide, improve, and develop our products and services, to communicate with you, to offer you targeted advertisements and services, and to protect us and our users.

Smooth Clinic, Inc. collects, processes, and determines how to process your personal information as data controller for the following purposes:

**Providing, improving, and developing our products and services:** We use personal information to help us provide, improve, and develop our products, services, and advertising. This includes using personal information for purposes such as data analysis, research, and audits. Such processing is based on our legitimate interest in offering you products and services and for business continuity. If you enter a sweepstakes, contest, or other promotion, we may use the personal information you provide to administer those programs. Some of these activities have additional rules, which may contain further information about how we use personal information, so we encourage you to read those

rules carefully before participating.

**Communicating with you:** Subject to your prior express consent, we may use personal information to send you marketing communications in relation to Smooth Clinics's own products and services; communicate with you about your account, transactions, or employment requests; and inform you about our policies and terms. Also subject to your prior express consent, we may share your personal information with third-party partners who may send you marketing communications in relation to their products and services. If you no longer wish to receive email communications for marketing purposes, please Contact Us to opt out. We may use your information to process and respond to your requests when you contact us.

**Offering and measuring targeted advertisements and services:** Subject to your prior express consent, we may use personal information to personalize your experience with our products and services, on third-party websites and applications, and to determine the effectiveness of our promotional campaigns.

For any of the uses of your data described above that require your prior express consent, note that you may withdraw your consent by Contacting Us.

**Promoting safety and security:** We use personal information to help verify accounts and user activity, as well as to promote safety and security, such as by monitoring fraud and investigating suspicious or potentially illegal activity or violations of our terms or policies. Such processing is based on our legitimate interest in helping ensure the safety of our products and services.

## COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies to provide, protect, and improve our products and services, such as by personalizing content, offering and measuring advertisements, understanding user behaviour, and providing a safer experience.

You can remove or reject cookies using your browser or device settings, but in some cases doing so may affect your ability to use our products and services.

Please read our Cookie Statement to learn more about how we use cookies and the choices you have.

## TREATMENT PHOTOS

All photos taken during treatment will be stored on a secure drive, these will only be seen by qualified staff, yourself, legal teams and equipment manufactures if needed, unless you consent us to use them publicly. If you decide not to have photos taken and stored, we will not offer treatment, no refunds will be given.

## DISCLOSURE OF PERSONAL INFORMATION

We make certain personal information available to strategic partners that work with us to provide our products and services or help us market to customers. Personal information will only be shared by us with these companies in order to provide or improve our products, services, and advertising; it will not be shared with third parties for their own marketing purposes without your prior express consent.

### Service Providers

We share personal information with companies that provide services on our behalf, such as website hosting; email services; marketing; sponsoring of sweepstakes, contests, and other promotions; auditing; payment processing; fulfilling customer orders; data analytics; providing customer support; conducting customer research and satisfaction surveys; and other services that assist in selling our products and services. These companies are obligated to protect your information and may be located wherever we operate.

### Corporate Affiliates and Corporate Business Transactions

We may share personal information with all Smooth Clinic Corporation-affiliated companies. In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal information to the relevant third party.

### Legal Compliance and Security

It may be necessary—by law or as a result of legal process, litigation, or requests from public or governmental

authorities within or outside your country of residence—for us to disclose personal information. We may also disclose personal information if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

YOUR RIGHTS

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date. Depending on where you live, you may have the rights described below.

You have the right to access, correct, or delete the personal information that we collect. You are also entitled to object to or restrict, at any time, the further processing of your personal information. You have the right to receive your personal information in a structured and standard format. You may lodge a complaint with the competent data protection authority regarding the processing of your personal information.

To protect the privacy and the security of your personal information, we may request information from you to enable us to confirm your identity and right to access such information, as well as to search for and provide you with the personal information we maintain. There are instances where applicable laws or regulatory requirements allow or require us to refuse to provide or delete some or all of the personal information that we maintain.

You may Contact Us to exercise your rights. We will respond to your request in a reasonable time frame, and in any event in less than 30 days.

CLOSING ACCOUNTS

Please Contact Us to close your account in relation to the following uses of your personal information:

- providing, improving, and developing our products and services;
  - Communicating with you;
  - sharing your personal information with third-party partners for marketing communications;
  - offering and measuring targeted advertisements and services;
  - promoting safety and security; or
  - providing products and services (for such requests, Smooth Clinic will act on behalf of its local affiliates).
- If you close your account, we have no obligation to retain your information, and we may delete any or all of your information without liability. We may retain, however, information related to you if we believe it may be necessary to prevent fraud or future abuse, if required by law, or for legitimate purposes, such as analysis of non-personal information, account recovery, auditing our records, or enforcing our rights and obligations under our agreements.

THIRD-PARTY WEBSITES AND SERVICES

Our products and services, including our websites and digital media properties, may contain links to or the ability for you to access third-party websites, products, and services. We are not responsible for the privacy practices employed by those third parties, nor are we responsible for the information or content their products and services contain. This Privacy Statement applies solely to information collected by us. We encourage you to read the privacy policies of any third parties before proceeding to use their websites, products, or services.

INFORMATION SECURITY, INTEGRITY, AND RETENTION

It is important that you take precautions to protect against unauthorized access to your Smooth Clinic products, account credentials, and computers or other devices. If you feel that the security of your account or personal information has been compromised, please immediately Contact Us. Please be aware that, despite our efforts, no security system is impenetrable. In the event of a security breach, we will promptly notify you and the proper authorities if required by law.

We will retain your personal information for as long as it is necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

CHILDREN

We do not knowingly collect, use, or disclose information from children under 16. If we learn that we have collected the personal information of a child under 16—or the equivalent minimum age depending on the jurisdiction, such as 13 in the United States—we will take steps to delete the information as soon as possible. Please immediately Contact Us if you become aware that a child under 16 has provided us with personal information.

INFORMATION TRANSFERS, STORAGE, AND PROCESSING GLOBALLY

When we share your personal information with our partners, Smooth Clinic-affiliated companies, and service providers, your personal information may be transferred to and/or made accessible from countries out of the European Economic Area. In such circumstances, we will enter into model contractual clauses as adopted by the European Commission, or rely on alternative legal bases such as the Privacy Shield, where applicable, or binding corporate rules where our partners or service providers have adopted such internal policies approved by European data protection authorities.

CHANGES TO THIS PRIVACY STATEMENT

We may periodically change this Privacy Statement to keep pace with new technologies, industry practices, and regulatory requirements, among other reasons. We expect most such changes to be minor. Any non-material changes will take effect immediately upon posting of an updated Privacy Statement. There may, however, be cases where changes to the Privacy Statement may be more significant. In such cases, we will provide you either a prominent notice of such changes before they take effect or by directly sending you a notification.

Your continued use of our products and services after the effective date of the Privacy Statement means that you accept the revised Privacy Statement. If you do not agree to the revised Privacy Statement, please refrain from using our products or services and Contact Us to close any account you may have created.

CONTACT US

If you have any questions regarding this Privacy Statement or its implementation, you may e-mail our team at [accounts@hukgroup.com](mailto:accounts@hukgroup.com). You also may write to us at:

Huk Group  
Corporation Street  
Nuneaton, CV115AB

COOKIE STATEMENT

Last Modified: May 5, 2018

This Cookie Statement explains how Smooth Clinic ("Smooth Clinic Ltd""we,""us," or "our") uses cookies on our websites, applications, and online services, and the choices you have.

DEFINITION OF "COOKIES"

Cookies are small pieces of text used to store information on web browsers. Cookies are widely used to store and receive identifiers and other information on computers, phones, and other devices. We also use other technologies, including data we store on your web browser or device, identifiers associated with your device, and other software, including web beacons and pixel tags, for similar purposes. In this Cookie Statement, we refer to all of these technologies as "cookies."

TYPES OF COOKIES

We use cookies to provide, protect, and improve our products and services, such as by personalizing content, offering and measuring advertisements, understanding user behaviour, and providing a safer experience. We describe below the various types of cookies we use and the purposes they perform. Please note that the specific cookies we may use vary depending on the specific websites and services you use.

Essential cookies: These cookies are strictly necessary to provide you with our websites and services and to enable essential features, such as providing shopping cart or product application functionality. If you disable these cookies, we will not be able to fulfil your requests.

Performance and functionality cookies: These cookies collect information about how you use our websites and services and allow us to remember the choices you make while browsing. The information these cookies collect

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Essential cookies: These cookies are strictly necessary to provide you with our websites and services and to enable essential features, such as providing shopping cart or product application functionality. If you disable these cookies, we will not be able to fulfil your requests.  
Performance and functionality cookies: These cookies collect information about how you use our websites and services and allow us to remember the choices you make while browsing. The information these cookies collect