DD GROUP PRIVACY NOTICE

Effective Date: 5 October 2026

1. Introduction

This Privacy Notice explains how the DD Group ("DD Group", "we", "our" or "us") collects, uses, shares, stores and otherwise processes personal information in connection with our Group-level activities and when you interact with the DD Group website.

The DD Group comprises a number of companies operating across the dental, aesthetics and related healthcare markets. The particular DD Group company responsible for your personal information will depend on the company, website, product, service or activity with which you interact. Where appropriate, a business-specific or activity-specific privacy notice will identify the relevant data controller and provide additional information about that processing. The DD Group website is operated by DD Products and Services Ltd, which is the data controller responsible for personal information collected directly through this website and for certain central activities carried out on behalf of the DD Group.

This Group Privacy Notice is intended to provide the common framework applying across the DD Group. It should be read together with any specific privacy notice provided to you by a DD Group company. Where a specific notice applies, it supplements this Group Privacy Notice in relation to that activity.

We are committed to protecting your privacy and processing personal information fairly, lawfully and transparently in accordance with applicable data protection legislation, including the UK General Data Protection Regulation ("UK GDPR") and Data Protection Act 2018 where applicable.

2. Who does this Privacy Notice apply to?

Depending on the circumstances, this Privacy Notice may apply to personal information relating to:

- customers and prospective customers;
- healthcare professionals and other users of our products and services;
- suppliers, manufacturers, brand partners and other business contacts;
- users of the DD Group website;
- individuals who contact or correspond with us;
- job applicants and prospective employees;
- attendees at Group events, exhibitions or training; and
- other individuals whose personal information is processed as part of our Group-level business activities.

3. Different ways we process personal information

DD Group companies may process personal information as controllers in their own right, jointly with another organisation where appropriate, or as processors acting on behalf of another controller. The role we perform depends on the relevant activity.

Where you deal directly with a particular DD Group business—for example by creating an account, purchasing products or services, attending an event or contacting that business—the relevant Group company will generally act as the data controller for that relationship. Its specific privacy notice may provide further information.

Certain Group functions and systems are operated centrally or shared between DD Group companies. Personal information may therefore be processed across the Group for purposes such as finance, IT support, legal and regulatory compliance, information security, reporting, governance and business management, subject to appropriate access controls and data protection arrangements.

4. Personal Information We Collect and How We Collect It

We collect personal information directly from individuals, automatically when our websites and digital services are used and, where appropriate, from DD Group companies and third parties. The information collected depends on the nature of your relationship with us.

Depending on the circumstances, this may include:

- your name and contact details;
- your employer, organisation or place of work;
- billing, delivery and correspondence addresses;
- professional title, role, registration details and speciality;
- account details and communications with us;
- information relating to orders, deliveries, returns and services;
- marketing and communication preferences;
- information provided when attending events or training, completing surveys, entering competitions or promotions, or otherwise interacting with us; and
- other information reasonably required for the relevant business relationship or activity.

Where required by law, regulation or the nature of the products or services provided by a Group company, additional information may be collected or verified. The relevant business-specific privacy notice will provide further detail where appropriate.

Website information

When you visit a DD Group website, we may automatically collect certain technical information, such as your IP address, browser type, device information and website usage data through cookies and similar technologies. Further information will be available in the relevant Cookie Policy.

Recruitment

If you apply for a role with a DD Group company, we may process personal information provided as part of your application and recruitment process. This may include your contact details, CV, employment and education history, qualifications, application and interview information, references and information relating to your right to work.

Where relevant and permitted by law, we may also process information concerning reasonable adjustments, equal opportunities monitoring, health information or criminal convictions. We will only process this information where we have an appropriate lawful basis and, where required, an additional condition for processing special category or criminal offence information.

We use this information to manage the recruitment process, assess your suitability for a role, communicate with you about your application, carry out appropriate pre-employment checks and comply with our legal obligations.

We may share recruitment information where necessary with DD Group companies involved in the recruitment process and with recruitment agencies, background-check providers, professional advisers and other service providers supporting our recruitment activities. We retain recruitment information only for as long as reasonably necessary for the recruitment process and related legal or business purposes.

Information from third parties

We may receive personal information from third parties where they are lawfully permitted to provide it to us. This may include other DD Group companies, business partners, professional or regulatory registers, service providers and organisations with which we have a commercial relationship.

5. How We Use Your Personal Information and the Lawful Basis for Processing

We will only use personal information where we have an appropriate lawful basis under applicable data protection legislation. Depending on the circumstances, we may use personal information to:

- manage our relationship with customers, suppliers, partners and other business contacts;
- administer accounts and support the supply of products and services;

- respond to enquiries and provide customer or business support;
- verify professional or other eligibility where required;
- send service and operational communications;
- manage events, exhibitions and training;
- comply with legal and regulatory obligations;
- operate, administer and improve our businesses, products, services, systems and websites;
- carry out internal reporting, governance, finance, audit and business management activities;
- prevent fraud, manage risk and maintain the security of our systems, premises and information; and
- send marketing communications where permitted by law or with consent where required.

We rely on one or more of the following lawful bases:

- performance of a contract, or taking steps at your request before entering into a contract;
- compliance with a legal obligation;
- our legitimate interests, where these are not overridden by your rights and freedoms. These may include operating and improving our businesses, maintaining business and customer relationships, administering the Group efficiently, protecting our systems and information, preventing fraud, managing risk and complying with applicable law and industry standards; and
- your consent, where required.

Where a DD Group company processes special category personal information, it will also identify an appropriate condition for that processing where required by law. More specific information may be provided in the privacy notice for the relevant activity.

6. Marketing Communications

Where permitted by law, DD Group companies may send information about products, services, events or other matters that may be of interest to you. Where consent is required, it will be obtained before marketing communications are sent.

You can opt out of marketing at any time using the unsubscribe mechanism in our communications, updating your preferences where available or contacting the relevant DD Group company. Opting out of marketing will not prevent us from sending service-related or other non-marketing communications where appropriate.

We may also use secure hashed identifiers with advertising platforms to measure advertising effectiveness and improve the relevance of marketing. Where this occurs, you may object to this processing at any time. Further information may be provided in the privacy notice or cookie information for the relevant website or business.

7. Sharing Your Personal Information

We only share personal information where necessary for the purposes described in this Privacy Notice or a relevant supplementary notice, where required by law or where we otherwise have an appropriate lawful basis. Where organisations process personal information on our behalf, we require them to protect it appropriately and comply with applicable data protection legislation.

DD Group companies

We may share personal information between DD Group companies where necessary for purposes such as customer and supplier administration, finance, IT support, legal and regulatory compliance, information security, internal reporting, governance and business management. Access is limited to those with a legitimate business need.

Service providers

We use third-party providers to support our businesses, which may include providers of website hosting, cloud services, IT support, logistics, payment processing, customer relationship management, marketing, document storage, professional verification, security and fraud prevention services. Where these organisations process personal information on our behalf, they do so under appropriate contractual arrangements.

Manufacturers, suppliers and business partners

Where necessary to supply or support products or services, administer our commercial relationships, verify professional eligibility, provide

technical or warranty support, manage product safety or recalls, deliver training or meet regulatory requirements, DD Group companies may share limited personal information with manufacturers, suppliers, brand partners or other business partners. Where those organisations receive personal information as independent controllers, they will process it in accordance with their own privacy information.

Regulators, professional advisers and others

We may disclose personal information where required by law or regulation, in response to lawful requests from regulators or public authorities, to establish, exercise or defend legal claims, in connection with corporate transactions or reorganisations, or to obtain professional advice.

8. International Transfers of Personal Information

The DD Group operates internationally and some DD Group companies, suppliers, service providers and other organisations with whom we share personal information may be located outside the country in which the information was originally collected.

Where personal information is transferred internationally, the relevant DD Group company will ensure that an appropriate transfer mechanism or safeguard is used where required by applicable data protection legislation. For transfers subject to UK data protection law, this may include UK adequacy regulations, the UK International Data Transfer Agreement or the UK International Data Transfer Addendum to the EU Standard Contractual Clauses. For transfers subject to EU data protection law, this may include an adequacy decision or the EU Standard Contractual Clauses.

9. How Long We Keep Your Personal Information

We retain personal information only for as long as necessary for the purposes for which it was collected, including to comply with legal, regulatory, tax, accounting and reporting obligations and to establish or defend legal claims. Different categories of information are retained for different periods depending on the nature of the processing and applicable local requirements. DD Group companies apply the Group's data retention framework, supplemented where necessary by local or activity-specific requirements.

10. Keeping Your Personal Information Secure

We implement appropriate technical and organisational measures designed to protect personal information against unauthorised or unlawful access, use, alteration, loss, misuse or disclosure. Access to personal information is restricted according to business need and appropriate security requirements.

11. Your Privacy Rights and Complaints

Depending on the data protection laws that apply to you, you may have rights in relation to your personal information, including rights of access, correction, erasure, restriction, objection, data portability and rights relating to consent and automated decision-making. These rights are subject to the conditions and exemptions set out in applicable law.

To exercise your rights, please contact the relevant DD Group company or the DD Group Data Protection Officer using the details below. We may need to verify your identity before responding to a request.

We hope that we can resolve any questions or concerns you may have about the way we process personal information. You may also have the right to complain to the data protection supervisory authority in the country in which you live or work, or where you consider an infringement has occurred. In the UK, the supervisory authority is the Information Commissioner's Office (ICO).

12. Contact Us

If you have questions about this Privacy Notice, wish to exercise a privacy right or have a concern about how personal information is processed, please contact us at:

Email: **marketing@ddgroup.com.**

Address: **6 Perry Way, Witham, Essex, CM8 3SX, United Kingdom**

Alternatively you can contact the DD Group Data Protection Officer at: **GDPR@ddgroup.com**

Where your query relates to a particular DD Group company, product or service, you may also use the contact details in the relevant business-specific privacy notice.

We will respond to privacy requests in accordance with applicable data protection legislation.

13. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes to the DD Group, our activities, applicable laws or regulatory guidance.

The latest version will be available on the DD Group website and will show the date on which it became effective. Where we make material changes, we will take appropriate steps to notify affected individuals where required by applicable law.