

PRIVACY POLICY

Last Updated: January 20, 2026

Summit Orthopedics, Ltd. and its affiliated entities ("Summit," "we," "our," or "us") value transparency and privacy. In this Privacy Policy, we describe how we collect, use, and disclose information that we obtain through our website: <https://www.summitortho.com/> (our "Website"). By accessing or using our Website, you agree that we will collect and handle information as described in this Privacy Policy.

1. Scope of this Privacy Policy

This Privacy Policy applies to information we collect from you or about you through our Website or which you otherwise provide to us. It does not apply to information that would be considered "protected health information" under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Protected health information is subject to our [Notice of Privacy Practices](#). Please refer to our [Notice of Privacy Practices](#) to understand how protected health information is used and disclosed by Summit.

2. Disclaimer

The contents and information included on our Website are for your informational use only. Our Website is not intended to be a substitute for professional medical advice, diagnosis, or treatment. Always seek the advice of your physician or other qualified healthcare provider with any questions you may have regarding a medical condition.

3. Information We Collect

For purposes of this Privacy Policy, "Personal Information" will include all personally identifiable information that is specific to you which meets the definition of applicable data protection laws as "personal information," "personal data," or "personally identifiable information" (e.g., name, address, phone number, email address, etc.).

We collect only limited information necessary to operate, maintain, and improve our Website. We may collect the categories of Personal Information identified below from the following sources: (1) directly from you, including when you submit a contact form, use the chat function, request information or services, and communicate with us via our Website; (2) through your use of our Website; (3) through Internet or other network activity; and (4) from our affiliated parties or other third-party services providers or business partners as described in Section 6.

We may collect the following Personal Information:

- **Identifiers:** We may collect information that personally identifies you when you use our Website, schedule an appointment, use our live chat function, or otherwise contact us. If you schedule an appointment through our Website, we will collect certain Personal Information from you, including first and last name, date of birth, address, gender, phone number, and email address.
- **Geolocation Information and Internet or Other Network Activity:** We may automatically collect the following information about your use of our Website through cookies, web beacons, log files, and other technologies; domain name; browser type and operating system; pages viewed, links clicked and other activities on our Website; IP address; the length of time using our Website; access time; device ID or other identifier; location and language information. Please see the “Cookies and Other Tracking Mechanisms” section below for more information.
- **Registration/Account Information:** To create a patient account through our Website, you will need to register through our [Patient Portal](#), which is hosted by FollowMyHealth. FollowMyHealth may collect certain Personal Information from you which is subject to FollowMyHealth’s privacy policy. Please refer to FollowMyHealth’s privacy policy to learn more about how it uses and discloses Personal Information here: <https://www.followmyhealth.com/UseDocuments/PrivacyPolicy>.
- **Payment Information:** Although we may collect payments for our services, we do not collect or store credit card or bank information. We use a third party payment processor, Veradigm, who collects your credit card, debit card, and billing information directly from you, and which is subject to Veradigm’s privacy policy. Please refer to Veradigm’s privacy policy to learn about its privacy practices.
- **Survey Responses/Feedback:** If you choose to complete a survey about your experiences with Summit, we will collect your responses to the survey and may use such responses for research, development, and marketing purposes. We do not post any survey feedback on our Website that includes Personal Information or protected health information. In addition, our Website allows users to submit and share their story and experience with Summit. All information you submit through our comment features (if any) should be public and non-confidential. You should never submit protected health information through such comment features.
- **Health Information:** We may collect certain health information such as medical condition or any other information you supply when scheduling an appointment and any other health information you choose to submit via the Website or when you contact us.

We may combine information we collect with any other information we have about you, including, if you are a patient of Summit, any protected health information we have about you. If we combine this information with your protected health information, we will treat all of that information as protected health information and will only use or disclose such protected health information as set forth in our [Notice of Privacy Practices](#).

Any information you submit through the [Patient Portal](#) on our Website will be treated by Summit as protected health information subject to our [Notice of Privacy Practices](#).

4. Cookies and Other Tracking Mechanisms

We use cookies and other tracking mechanisms to track information about the use of our Website.

- **Do Not Track.** Some systems recognize browser “do-not-track” requests, should you have this enabled on your browser. You may disable certain tracking as discussed in this section (e.g., by disabling cookies), and opt-out of certain ad networks.
- **Cookies.** Cookies are alphanumeric identifiers that we transfer to your computer’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Website, while others are used to enable a faster log-in process or to allow us to track activities on our Website. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. Certain features of our Website may not function if you disable cookies.
- **Third Party Cookies.** In addition to the cookies Summit delivers to your computer or mobile device through our Website, certain third parties may deliver cookies to you for a variety of reasons. For example, the services that may place third party cookies for analytical purposes include:
 - [Google Analytics](#) – Used to understand how visitors interact with our Website so we can improve performance and user experience. Data is aggregated and used for analytical purposes only. You can learn about Google’s privacy practice by going to: <https://policies.google.com/privacy>, and you may opt out by downloading an opt-out browser add-on at: <https://tools.google.com/dlpage/gaoptout>.
 - [Google Maps](#) – Enables interactive maps and location-based features on our Website.
 - [Google Translate](#) – Provides language translation functionality for improved accessibility.
 - [Talkative CDN](#) – Ensures secure and efficient delivery of Website content.

- Our Privacy Policy does not cover these third-party companies. Please contact these third-party companies directly for more information about their privacy policy and your choices.
- **Clear GIFs, pixel tags and other technologies.** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Website to, among other things, track activities on our Website, help us manage content, and compile statistics about usage of our Website.
- **Analytics Information.** We may use various technologies to learn more about how visitors use our Website and to collect information about your interaction with our features and other users for analytics purposes. We may also use analytics services and technologies to monitor your activities on our Website, for better understanding of how our Website is used, and ways to improve it.

5. How We Use Personal Information

We may use the information we collect about you, including Personal Information, to:

- Operate and maintain our Website
- Operate, evaluate, and improve our business
- Provide our services
- Establish and manage your accounts with us
- Communicate with you about your account, special events, and surveys
- Manage your requests
- Improve Website functionality and user experience
- Monitor and analyze Website usage and performance
- Respond to inquiries or requests you submit
- Ensure security and prevent misuse
- Conduct research and analysis
- Market and advertise products and services, including tailoring advertisements and offers to you based on your interactions with us and our Website
- Better understand how users access and use our Website, both on an aggregated and individualized basis, to improve our Website and respond to user desires and preferences, and for other research and analytical purposes
- Track use of our Website, investigate suspicious activity, and enforce our terms and policies, to measure and improve the operation and security of our Website, and your Personal Information
- To disclose your Personal Information to the extent permitted or required by law

We do not use your Personal Information for targeted advertising or profiling.

6. Sharing of Personal Information with Third Parties

We do not sell your Personal Information. We may share limited Personal Information of the categories described in Section 3 and 4, with the following third parties:

- **Third-Party Service Providers:** We may disclose your Personal Information to trusted third-party service providers who perform functions on our behalf as necessary to provide our Website and related functionality and the reasons set forth in Section 5. For example, third-party service providers may include payment processors, data hosting providers, wireless network providers, and digital marketing providers. These third-party service providers are under contract with us and are only permitted to use your Personal Information as necessary to perform the permitted functions on our behalf.
- **Business Partners:** We may share your Personal Information with trusted business partners to offer you certain products, services, or promotions.
- **Affiliates:** In addition, we may disclose Personal Information to our affiliated entities, including Summit Health ASO Corp. and Minnesota Occupational Health. Use and disclosure of your Personal Information by our affiliates and subsidiaries is subject to this Privacy Policy.

Except for the third parties listed above, we will not share Personal Information with an unaffiliated third party without your prior authorization, unless doing so is necessary (1) to enforce this Privacy Policy, to comply with law, regulation or other legal processes or to protect the rights, property, or safety of us or others, (2) to comply with a valid order or process from a public authority, (3) to protect against misuse or unauthorized use of our Website, (4) to detect or prevent criminal activity or fraud, or (5) in the event that Summit or substantially all of our assets are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation, or liquidation, in which case such information may be one of the transferred assets.

Please note, any use of Personal Information that includes protected health information will comply with our [Notice of Privacy Practices](#) and any authorization you have provided.

7. Data Retention

We retain Personal Information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

You have the right to ask us to delete your non-patient Personal Information at any time. Please note that deleting your Personal Information may affect your right to use

our Website. While we will use reasonable efforts to delete your Personal Information, we may be required to retain such Personal Information as required by our systems or our legal requirements. Until we have deleted all your Personal Information, we will continue to honor our privacy and security obligations related to your Personal Information.

Please note that if we elect to de-identify your Personal Information, such de-identified information is no longer your Personal Information, and we may use such de-identified information, alone or in an aggregated basis to analyze our Website, or as we otherwise deem appropriate.

8. Data Security

We implement appropriate administrative, technical, and physical safeguards to protect your Personal Information from unauthorized access, disclosure, alteration, or destruction. We restrict access to your Personal Information to our authorized employees, agents, affiliated entities, and certain of our authorized third-party service providers as appropriate or necessary to provide our Website.

Please be aware that despite our best efforts, no data security measures can guarantee 100% security, and no website, database, or system is completely secure or “hacker proof.” You are also responsible for taking reasonable steps to protect your Personal Information against unauthorized disclosure or misuse, including your username and password used for our [Patient Portal](#).

9. Your Rights

Depending on where you live, you may have certain legal rights under applicable law with respect to non-patient Personal Information, including the following:

- **Access Personal Information:** You can ask us to confirm whether or not we are processing Personal Information concerning you and access the categories of Personal Information.
- **Correct Inaccurate Personal Information:** You can ask us to correct your inaccurate Personal Information.
- **Delete Personal Information:** You can ask us to delete your Personal Information, and we will be happy to do so unless we are prevented from doing so by law or regulation.
- **Right to Portability:** You can ask us to provide you with a copy of your Personal Information in a portable and machine readable format.
- **List of Third Parties:** You have a right to obtain a list of the third parties to whom we have disclosed your Personal Information.

Please contact us (as specified below) to request any of the above rights. You will be required to verify your identity before we are able to fulfill your request. Upon confirmation that you are making a lawful request, we will confirm our obligations under applicable law. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us. We will acknowledge your request and respond to your request (upon verification) in accordance with the response time required by applicable law. Depending on where you live, you may have the right to appeal our action regarding your request for any of the above rights by contacting us at the email specified below.

If you are a patient of Summit, you can access the patient-related information, including protected health information, that we maintain about you through your [Patient Portal](#). For more information about your rights related to your protected health information, please see our [Notice of Privacy Practices](#).

10. Children's Privacy

In compliance with the Children's Online Privacy Protection Act, 15 U.S.C. § 6501.06 and 16 C.F.R. §§ 312.1 – 312.12, we do not knowingly collect information from children under the age of 13, nor does our Website target children under the age of 13. By using our Website, you represent that you are not younger than 13. Please contact us if you know or suspect that we have collected information from children under the age of 13, and we will take prompt measures to remove such information.

11. Marketing Choices

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in any such email. If you opt-out of receiving marketing emails about recommendations or other information we think may interest you, we may still send you transactional e-mails about the services we provide to you and information related to your [Patient Portal](#) account.

12. Third Party Sites

Our Website may contain links to or appear on third-party websites. Any access to and use of such third-party websites is not governed by this Privacy Policy but instead is governed by the privacy policies of those third-party websites, and we are not responsible for the information practices of such third-party websites.

13. Information for Users Outside the United States

Personal Information collected by us is primarily stored in the United States, or if applicable, any other country where our third-party service providers maintain facilities. If you are located outside of the United States, please be aware that information we collect, including Personal Information, may be transferred to, processed in, and stored in the United States. By accessing our Website or providing us with Personal Information, you consent to the transfer, processing, and storing of Personal Information in the United States. We take steps to ensure that the Personal Information we collect under this Privacy Policy is processed according to the provisions of this Privacy Policy and the requirements of applicable law wherever the data is located.

14. GDPR

If you are an individual resident in EEA or the UK, you have the data protection rights regarding personal data as specified in the General Data Protection Regulation (GDPR) as enacted in the EU, UK, or Switzerland.

15. Changes

By accessing and using our Website, you agree to the information use and collection terms of this Privacy Policy. We have the right to revise this Privacy Policy at any time. We may not notify users individually if we change this Privacy Policy, unless material changes are made. Any changes will be effective when posted. We encourage you to check this Privacy Policy frequently for changes.

16. Contact Us

If you have questions about the privacy aspects of our Website, please contact us at: marketingdept@summitortho.com

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