

# Paragon 28, Inc.

## Privacy Policy

*This policy is effective June 19, 2020 (rev)*

Paragon 28 is committed to protecting your privacy and collecting only the minimum amount of information needed to provide our products and services (referred to as “Services”) and to make our website useful. Your use of the Services indicates you agree to this policy.

### Summary

Nothing in this policy contradicts the following statements:

1. We do not collect any of your Personal Information, including your IP address, other than information you voluntarily provide.
2. We do not sell your personal information to advertisers or other third parties.
3. We share your personal information only when legally required, or when reasonably necessary to prevent harm in an emergency situation.
4. We protect your privacy and keep your Personal Information safe.
5. We retain your Personal Information, excluding information you make public, for no more than 30 days after you request deletion.
6. We have never received any legal or government demands for user information.
7. We will notify you of any breach of your personal information as required.

### Complete terms

As used in this policy, “Personal Information” is data that can identify a particular person. Aggregate data isn’t considered Personal Information.

#### **1. Paragon 28 never collects your personal information except to communicate with you**

Our servers don't collect any of your Personal Information. Unlike most websites, our site does not collect your IP address. We do detect non-personally identifiable geo-location information to optimize our services, but we do not collect your precise geo-location or associate geo-location information with a particular user.

Because we do not collect information about your online activities over time and across third-party websites or online services, there is no need for us to respond to a browser’s Do Not Track settings, although we strongly support a consumer’s right to set such a preference and encourage all website operators to honor this consumer choice.

We may request your email address or a username to communicate with you. This information is used only as you would expect and deleted upon request. Optionally, you may choose to provide your email address and communicate with us via email. You can unsubscribe from our newsletter

by clicking on the unsubscribe link provided at the end of the newsletter. You can also email [support@Paragon28.com](mailto:support@Paragon28.com) to update your email address, or to request that we delete your email.

To improve the Services and your experience on our site, we may collect aggregate usage data from the Services and our website, including number of page views, visitor browser types, operating systems, or the links clicked to navigate to and from our site. Our cookies don't track you.

Our Website and any similar electronic communications we make available to the public (including mobile or desktop applications) are not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13.

## **2. Paragon 28 never sells your email address or any other personal information you volunteer**

We do not receive payment in cash or in kind from third parties in exchange for your Personal Information. Further, we do not allow third parties to collect information about you on our site through cookies or other means.

## **3. Paragon 28 shares your personal information only in specific circumstances**

There are a few, rare circumstances when we may have to share your Personal Information either to obey the law or protect our rights. We will share your Personal Information only to comply with laws or legally enforceable requests, to enforce our own rights and contracts with users or third parties, or to prevent harm to others and their property in an emergency situation.

In all instances, we will share the minimum information necessary to meet the immediate need and inform you of our disclosure when legally and practically possible.

## **4. Paragon 28 retains the Personal Information you volunteer for one month or less**

We remove your Personal Information from our records within 30 days of any request to do so.

## **5. Transparency report**

As explained above, we will comply with a request for user data when the law requires it, but we require valid legal process to compel the disclosure of user data to the government; such as a legitimate and properly scoped court order, or a search warrant issued by an appropriate law enforcement authority.

Recipients of National Security Requests can only publish reporting bands instead of specific figures.

## **6. Right to Lodge a Complaint**

If you have any problems or concerns with your privacy rights or how we use your data you may contact our Privacy Officer at [support@Paragon28.com](mailto:support@Paragon28.com).

If for some reason we cannot resolve your concern, you may also file a complaint with the federal government at the Department of Health and Human Services, DHHS. We will not penalize you or retaliate against you in any way for filing a complaint with us or the federal government.

## Residents of the European Economic Area

If you are a resident of the European Economic Area, you have certain rights and protections under applicable law regarding the processing of your personal data. The term “personal data” has the meaning given to it by the EU General Data Protection Regulation. When we process your personal data as described in this Privacy Policy, we will only do so when we have a legitimate interest in processing your personal data (for example, our legitimate interest in providing the Services and responding to your inquiries), when the processing is necessary for the performance of a contract between you and us, when the processing is necessary for compliance with a legal obligation to which we are subject, or when we have your consent to process your personal data. When processing is based on consent, you have the right to revoke such consent at any time. You also have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you may contact us as indicated below. If you have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

## California Residents

If you are a resident of the state of California, you have certain rights and protections under applicable law regarding the processing of your personal data. When Paragon 28 processes your personal data as described in this Privacy Policy, we do not sell any personal data collected from any persons registering for our events. You have the right to request Paragon 28 delete your data we have collected, exceptions include data being processed and retained to complete a consumer-requested transaction, specific research purposes, limited analytical uses, and other regulatory and contractual exceptions.

## Changes to this policy

We may make small, inconsequential changes to this policy with or without notice to you, so you are encouraged to review the policy from time to time. Substantive changes to this policy will be emailed to users who subscribe to Paragon 28 marketing materials or to those who submit a request to [support@Paragon28.com](mailto:support@Paragon28.com).

## Contact

You can contact us at [support@Paragon28.com](mailto:support@Paragon28.com) if you have any questions about this policy.