

FSN REF: FSCA REF: IT 2072323

Date: 06-dec-2022

Field Safety Notice

Invisalign system of clear aligners

To whom it may concern,

The purpose of this notification is to inform you that Align Technology has identified a potential issue with a very small number of our Invisalign System aligners, produced between 12-nov-2022 and 02-dec-2022 that may have been shipped to your practice last week.

A technical issue related to selected cases with the Invisalign system was identified that was affected by the new Treatment Planning History feature within ClinCheck® software. There may have potential clinical impact, resulting in unnecessary/unprescribed treatment.

One of more of your order(s) have been impacted, and we deeply apologize for any inconvenience this has caused to you and to your patient(s).

In next few days, we will repost your last approved ClinCheck plan for the impacted case (PID) and kindly ask that you review and approve it. After you approve the reposted ClinCheck plan for the impacted order[s], we will re-manufacture this order[s] and expedite shipment to your practice.

As an immediate action to prevent further issues, we have disabled the ClinCheck feature capability from the Treatment Plan History. Doctors can continue to view their treatment plan history in ClinCheck software.

Even though this issue will most likely not lead to any incidents or serious health threats, Align Technology decided to undertake a voluntary product replacement as a precaution. This action reflects our commitment to delivering the highest quality products to our doctors and their patients.

Types of devices

The Invisalign system aligners are Class IIa patient matched medical devices specifically manufactured for a specific patient for the treatment of malocclusion.

GMDN - 44738 - Orthodontic Appliance system, progressive

Products Align Technology has identified this issue only concerns the Invisalign system of clear aligners concerned the following PID'S (Patient Identification Numbers) in EMEA region:

| PID | Country |
|----------|---------|
| 15463223 | Bahrain |
| 18878883 | Belgium |
| 18636207 | Croatia |
| 18582335 | Cyprus |
| 18749982 | Finland |
| 16148219 | France |
| 18413074 | France |
| 18737011 | France |
| 16480565 | France |
| 18859162 | France |

| PID | Country |
|----------|--------------|
| 18650640 | Italy |
| 9362589 | Italy |
| 18875444 | Italy |
| 9685581 | Italy |
| 18490064 | Italy |
| 16937272 | Kuwait |
| 18864567 | Morocco |
| 18716776 | Qatar |
| 15217540 | Romania |
| 18717579 | Saudi Arabia |

| PID | Country |
|----------|----------------------|
| 18594400 | Sweden |
| 8809932 | Switzerland |
| 15725112 | Turkey |
| 18660968 | Turkey |
| 18728204 | United Arab Emirates |
| 18612626 | United Kingdom |
| 18662118 | United Kingdom |
| 18664505 | United Kingdom |
| 18747012 | United Kingdom |
| 18629083 | United Kingdom |



| PID | Country |
|----------|---------|
| 13804319 | France |
| 13465291 | Germany |
| 18661431 | Germany |
| 18606528 | Germany |
| 18848269 | Germany |
| 15214053 | Germany |
| 18834034 | Germany |
| 12540502 | Germany |
| 9738589 | Germany |
| 15711426 | Germany |
| 18427453 | Germany |
| 18700213 | Israel |
| 18760570 | Israel |
| 12947806 | Italy |
| 18664581 | Italy |
| 18742606 | Italy |
| 16672682 | Italy |
| 18636384 | Italy |
| 18582561 | Italy |

| PID | Country |
|----------|----------|
| 18106843 | Slovenia |
| 18679394 | Spain |
| 10732482 | Spain |
| 18749348 | Spain |
| 15613029 | Spain |
| 16325708 | Spain |
| 18805638 | Spain |
| 12594214 | Spain |
| 13209972 | Spain |
| 18540580 | Spain |
| 18805778 | Spain |
| 15964279 | Spain |
| 18344308 | Spain |
| 18625483 | Spain |
| 18784616 | Spain |
| 18832989 | Spain |
| 18633376 | Spain |
| 18832842 | Spain |

| PID | Country |
|----------|----------------|
| 18725669 | United Kingdom |
| 18585732 | United Kingdom |
| 18758776 | United Kingdom |
| 15343394 | United Kingdom |
| 13737836 | United Kingdom |
| 18749383 | United Kingdom |
| 14989508 | United Kingdom |
| 16281543 | United Kingdom |
| 18607917 | United Kingdom |
| 15078410 | United Kingdom |
| 18835486 | United Kingdom |
| 15247284 | United Kingdom |
| 10112618 | United Kingdom |
| 18834982 | United Kingdom |
| 18820930 | United Kingdom |
| 13611698 | United Kingdom |
| 16740882 | United Kingdom |
| 16860860 | United Kingdom |

Problem explanation:

A technical issue related to selected cases with the Invisalign system was identified that was affected by the new Treatment Planning History feature within ClinCheck® software. As a result, certain Invisalign® aligner orders contained:

- An incorrect treatment plan overview (PDF file printed or online) was included with the Invisalign case. Aligner bags/labels may also be incorrect and wrongly indicate treatment features, such as Interproximal reduction (IPR) and/or extraction.
- In some cases, the number of aligners in the Invisalign case received may differ from your approved treatment plan.

Impact on patients:

 We are not aware of any patients who have been impacted at this time. We have launched the outreach to the doctors immediately, starting Dec. 5 morning EMEA time.

Necessary steps to be taken:

Align is asking doctors to dispose of the aforementioned Invisalign case(s), including the aligners and packaging, and treatment PDF form-printed or online. Please request that your patients discard the impacted aligners, if they have already been provided to them. The impacted product can be discarded as per the Doctor Instructions for Use or Patient Use and Care Instructions.



Contact

EU Authorized-Representative:

Information Align Technology B.V.

Herikerbergweg 312, 1101CT Amsterdam

+31(0)20-5863600

Legal Manufacturer:

Align Technology Inc.

2820 Orchard Parkway, San Jose, CA 95134

United States

Signed by:

Jacco de Wit

Director Regulatory Affairs EMEA-Europe(PRRC)

Align Technology B.V. Herikerbergweg 312, 1101CT Amsterdam The Netherlands