

## Privacy Policy

This policy applies to all users of the Looking for ElderCare™ “Senior Housing Locator”, “Senior Service Finder”, or other similarly named service through LookingforElderCare.com or any other affiliated or partner website. Your privacy is important to us. We recognize that when you provide us with information about yourself, or on behalf of a third party (the “Principal”) as their advocate (“Advocate”), you trust us to use this information responsibly. We believe this information should only be used to help us provide you with better service. That’s why we have a policy to protect your personal information.

### Our Commitment To Your Privacy

Your privacy is important to us. To better protect your privacy, we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. We recognize that our service is sometimes used by Advocates on behalf of family members or other third parties. If you are an Advocate, you represent and warrant that you are fully authorized to provide the information you enter into Looking for ElderCare™ by the person or persons for whom you are an Advocate, and that you have, in each instance, permission or authority to forward the Principal’s information to a service provider. You also represent that the individual for whom you are an Advocate, or his or her duly authorized lawful guardian, is aware of your intentions to seek a service provider on their behalf and that they have authorized you to do so. If you are an Advocate, you further agree to indemnify, defend, and hold harmless Looking for ElderCare™, each Looking for ElderCare™ Alliance Partner and their officers, directors, employees, agents, contractors and shareholders (including attorneys’ fees and costs) from third party claims or actions that allege you were not permitted or authorized to use or disclose a third party’s information to us for use on the Looking for ElderCare™ services.

### The Information We Collect

This notice applies to all information collected on or submitted through Looking for ElderCare™ or any affiliate site. If you register to create an account to access certain features of Looking for ElderCare™, we may collect personally identifiable information (about you or the Principal) from you that may include your, or the Principal’s name, age, zip code, e-mail address, and credit card billing information. Any personal and billing credit card info will be kept confidential and will not be sold, disclosed or used for any unauthorized purpose.

We may automatically collect IP addresses and website usage information from you when you visit a site within Looking for ElderCare™ or any affiliate site. We use non-identifying and aggregate information to better design our website and to gather intelligence related to general market trends. This information helps us evaluate how our visitors and subscribers use and navigate the Looking for ElderCare™ site, including the number and frequency of visitors and subscribers, and the length of their visits.

## Phone and Call Tracking

Senior housing facility listing data on the Looking for ElderCare™ website and/or any websites, print guides or data services that utilize listing data from Looking for ElderCare™, may, from time to time, contain contact phone numbers for individual facilities that are integrated with third-party call tracking software. This tracking software may provide the facility(ies) and/or Looking for ElderCare™ with information related to calls placed to those numbers. This information, if tracked, is aggregated by third-party call-tracking service providers and may include the phone number of the caller, the time of call, the date, the duration of the call, and other summary and aggregate usage data. The ability to record individual telephone conversations is possible with this technology, but is not permitted without clear verbal notification preceding the call to inform the caller that the call may be monitored or recorded and to describe the purposes for which recordings may be used. Looking for ElderCare™ and/or its facility partners may utilize call recording capabilities only under these required notifications and in compliance with all applicable State and Federal laws.

## How We Use Information

We may use the information you provide about you, the Principal, and your senior housing facility needs and wants in the following ways:

- to better understand the needs of our customers.
- to enable us to help you use Looking for ElderCare™'s services more effectively
- to conduct market analysis and improve our service. In doing so, we may combine your information, on an aggregated basis, with data collected from third party services, Looking for ElderCare™ sites and affiliate sites.
- to send you e-mail notifications about new or existing products and services, special offers, or to otherwise contact you.

The disclosure of personally identifiable information by Advocates is governed by the agreements and relationships between Advocates and their clients and is subject to the representations and warranties—and indemnification provisions—of this privacy policy.

We use cookies, beacons and other technologies to offer a personalized experience of our site and to manage our email programs. Cookies are small text files that are sent to your browser and stored on your computer's hard drive. Cookies are placed by a site or by a third party with a presence on this site, such as an advertiser. Cookies can be used to customize services, personalize features, target advertising and remember your site preferences. You can set your browser to refuse all cookies or to indicate when a cookie is being sent to your computer. A Web beacon consists of a small string of software code that represents a graphic image request on a Web page or email. There may or may not be a visible graphic image associated with the Web beacon and often the image is designed to blend into the background of a Web page or email. Web beacons can be used for many purposes - including site traffic reporting, unique visitor counts, advertising auditing and reporting, personalization and determining the rate at which recipients open email communications.

Looking for ElderCare™ may display retargeted ads to our site prospects across the Internet. We may collect non-personally identifiable information about your visits to our website, and your interaction with our products and services. The anonymous information is collected through the use of a pixel tag, which is industry standard technology used by most major web sites. No personally identifiable information is collected during in this process. If you do not want Looking for ElderCare™ to collect this information, you may opt out of our service. Opting out will not affect your use of our site. To Opt-out of retargeting, please click [here](#).

## **Information Disclosure to Third Parties**

We know how important it is to keep the information you've entrusted to us confidential. We will not rent, sell or share personal information about you with third parties except to provide you with a product or service you request or under certain circumstances as described below. In all other cases, we will ask for your permission before we disclose your personal information.

### **Disclosure for legal reasons:**

We may release personal information to third parties:

- (1) To comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order
- (2) In special cases, such as a physical threat to you or others, a threat to homeland security, a threat to our system or network, or cases in which we believe it is reasonably necessary to investigate or prevent harm, fraud, abuse, or illegal conduct. In the event that we are legally compelled to disclose your personal information to a third party, we will make reasonable efforts to notify you unless doing so would violate the law or court order.

### **Agents and contractors:**

Contractors sometimes have access to your personal information in the course of assisting in operating our business and providing products or services to you. These contractors include vendors and suppliers that provide us with technology, services, and/or content for the operation and maintenance of our site. Access to your personal information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function. Contractors have an obligation under their contracts with us to keep your information confidential and to comply with our privacy and security policies.

## **Aggregated, non-personal information:**

We may share aggregated information about you with third parties. This is information that is combined with the non-personal information of other users and does not allow you to be identified or contacted. Depending on the circumstances, we may or may not charge third parties for this aggregated information. We also may not limit the third parties' use of the aggregated information.

## **Changes in our corporate structure:**

If all or part of our company is sold, merged or otherwise transferred to another entity, the personal information you have provided at this site may be transferred as part of that transaction. We will take steps to ensure that, without your consent, any personal information that is transferred will not be used or shared in a manner inconsistent with the Privacy Policy under which it was collected.

## **Our Commitment To Data Security**

To prevent unauthorized access, maintain data accuracy, and to ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect.

## **Our Position Regarding HIPAA**

The Health Insurance Portability and Accountability Act (commonly known as "HIPAA") was signed into law on August 21, 1996. HIPAA affects virtually all areas of the healthcare industry and is designed to provide insurance portability, to improve the efficiency of healthcare by standardizing the exchange of administrative and financial data, and to protect the privacy, confidentiality and security of healthcare data. The various provisions of HIPAA are enforced via regulations promulgated by the U.S. Department of Health and Human Services ("HHS"). HHS has issued final regulations with respect to transaction and code standards and healthcare data privacy and security.

In general, the HIPAA regulations apply to "covered entities" including healthcare providers, health insurance companies, and healthcare data clearinghouses, as well as to certain "Business Associates" of such covered entities. Looking for ElderCare™ is compliant with the requirements of a Business Associate under HIPAA Regulations and engages in relationships with covered entities that require such compliance.