

HEBREW SENIORLIFE

WEBSITE PRIVACY POLICY

This policy was last updated on October 16, 2019

Hebrew SeniorLife (“HSL”) owns and operates the web site at <https://www.hebrewseniorlife.org> (the “Website”). Hebrew Senior Life (“HSL” or “Us” or “We”) is committed to helping seniors experience and enjoy their best possible life. We understand how important the privacy of personal information is to our users.

This Privacy Policy covers how HSL collects, uses, retains, discloses and protects your Personally Identifiable Information (“PII” or “Personal Data”) through the Website. HSL believes that privacy on the Web is important, and we encourage you to read this Privacy Policy carefully, so that you will clearly understand our commitment and our method of collecting and using information. This Privacy Policy is effective immediately for users who visit the Website on or after the date set forth above. By using our Website, you consent to the collection and use of your Personal Data as described in this Privacy Policy.

Agreement

By using this Website, you are accepting the practices described in this Privacy Policy. We reserve the right, at our discretion, and within the bounds of applicable federal, state and local laws, regulations, statutes, rules and ordinances to change, modify, add, or remove portions of this Privacy Policy at any time. Please review this Privacy Policy from time to time to ensure your familiarity with its terms. Your continued use of the Website following changes to these terms means you accept those changes.

General User Information

We automatically collect Personal Data about users of the Website, including the domain name and IP address of visitors, the browser and operating system used, and the date and time of each visit. HSL and its subsidiaries, will not sell or rent Personal Data. We do not collect Personal Data about individuals, except when such individuals knowingly provide it. We do not share voluntarily provided Personal Data for any purpose other than as described in this Privacy Policy.

IP Addresses, Cookies and Other Tracking Technologies

When you visit our Website, you and your computer or mobile device may disclose certain browsing information to us in connection with your use of our Website and services. The information may include your Internet Protocol (IP) address, type of browser, Internet Service Provider, the date and time of your visit, requesting/referring/exit pages and URLs, search activity, number of clicks, type of computer or mobile device, Wi-Fi information such as SSID, mobile carrier, phone number, unique device identifier, advertising identifier, and location (including geo-location, beacon-based location, and GPS location) We do not link IP addresses to anything personally identifiable.

A “cookie” is a small text file sent from our server to the hard drive of your computer when you first use the Website. When you revisit the Website, the cookie allows us to recognize that your web browser is accessing the Site. We use information obtained from our use of cookies for marketing purposes, improving the services offered by the Website, administering our Website, and tracking and analyzing

usage of our Website for us, our partners and advertisers. We also track and log search terms entered into our Website's search feature to improve the site's search functionality and to deliver content and advertisements that we think you might be interested in. We use cookies to record information and to track and log usage of the Website.

You may also receive cookies from our partners and advertisers. Such third parties, including Google Analytics, GA Advertising Features, and Facebook Pixel, may use cookies, web beacons, and other storage technologies to collect or receive information from the Website and elsewhere on the internet and use that information to provide measurement services and target ads. HSL does not control those cookies, and they are not subject to this Website Privacy Policy. We recommend that you review the privacy policies of our partners and advertisers to learn how they use cookies. Please review the "help" information provided by your browser to learn how to monitor or disable cookies.

You can opt out of the Google Analytics Advertising Features you use, including through Ads Settings, Ad Settings for mobile apps, or any other available means by visiting Google Analytics' [currently available opt-outs](#) for the web.

Information Collection and Use

If you provide Personal Data on our Site, HSL will use that Personal Data to customize and improve your website experience. HSL also uses the Personal Data you provide to administer our business activities, improve your user experience, provide you with continued access to relevant information, products, and services, display relevant advertising, market the senior housing and care facilities listed on our Website, gather demographic information, track movement on the Website, allow for disaster recovery, enhance the security of our Website and services, and comply with legal obligations. We may use Personal Data to record visitor preferences, user-specific information, pages the user accesses or visits, and to customize content for particular users. Occasionally we may also use the Personal Data collected to notify you about changes to our Website, new services, or special offers. If you wish to disable cookies, you may do so through your individual browser options. More detailed information about cookie management with specific web browsers can be found at the website for each respective web browser. If you request information regarding a senior housing and care facility or anything related to aging, senior care and personal finance through our Website, we may send you messages or contact you about your request using the contact information you provide to us or make publicly available, or that we have on record for you, including through telephone, email, and automated SMS text messages to your phone number.

We may share aggregated results of surveys with analysts; however the aggregate data cannot be used to identify individuals, and participation in the survey is voluntary.

Methods We Use to Protect Your Information.

We use security software to protect the confidentiality of your Personal Data. In addition, our business practices are reviewed periodically for compliance with policies and procedures governing the security and confidentiality of the Personal Data we store. Our business practices limit employee access to confidential information and limit the use and disclosure of such information to authorized persons. This Website does not provide services or sell products to children under the age of 18. If you are under 18, you may use this Website only with the involvement of a parent or guardian. Unfortunately, no method of electronic transmission or storage of information over the internet or via mobile device is

completely secure. Although we cannot guarantee the security of your personal information, we make every commercially reasonable effort to protect our users' Personal Data.

Disclosure of Personal Data

To the extent required by applicable law, we will disclose your Personal Data in response to a valid legal process, for example, in response to a court order, a subpoena or other legal request for information, and/or to comply with applicable legal and regulatory reporting requirements. We also may disclose your Personal Data in response to a law enforcement agency's request or other request for information from the U.S. or other government entities, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or to verify or enforce compliance with the policies governing our services and with applicable laws, or as otherwise required or permitted by law or consistent with legal requirements.

Certain health and medical information about you is protected under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and applicable state law ("Protected Health Information" or "PHI"). Protected Health Information may be provided by you or a family member to an employee or member of the workforce at HSL. We protect covered health and medical information as required by HIPAA and applicable state law. For more details about our use and disclosure of Protected Health Information, please review our Notice of Privacy Practices found at www.hebrewseniorlife.org/organizational-policies-and-forms and notify us with any questions or concerns. We may use Protected Health Information as permitted by HIPAA and applicable state law. While HSL provides intake forms on our Website that may request Protected Health Information, we do not collect any Protected Health Information electronically. Rather, a printable version of each intake form is available for download and printing for your convenience.

All Personal Data is transmitted, stored, and processed in a secure environment in accordance with the Privacy and Security Rules under HIPAA and related guidance. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. We will retain Personal Data for as long as necessary to provide our services. We will also retain and use Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

HSL makes every reasonable effort to ensure that all of the transactions that occur on our Website are secure.

Subscription to Newsletter or Press Releases

If you subscribe to a newsletter, publication or press release published by HSL and distributed via e-mail, we will keep your e-mail address in a private distribution list. Messages sent electronically do not reveal recipients' e-mail addresses or any other personal information. HSL will only send messages to individuals who have opted to subscribe and who have provided their e-mail address to us directly. We do not use this e-mail address list for any other purpose, and we only add individuals at their request. At any time, you may opt out by using the unsubscribe link located in the publication e-mail, which will remove your e-mail address from the distribution list for that publication.

Donations and Fundraising Events

When you donate to HSL or register for a fundraising event, we ask you to voluntarily provide your name, address, telephone number, e-mail address and, if applicable, credit card number so we can process your donation or event registration, send you a receipt or confirmation and communicate with you if necessary. If you'd prefer, you can provide that information another way (by phone or regular mail).

Third-Party Service Providers

HSL may engage reputable third-party vendors to help us manage our Website and allow us to better service our patients and visitors. We may share Personal Data with these third parties to enable them to perform their services. These third parties may also share Personal Data with us that they obtain from or about you in connection with providing their services to our Website. Except as otherwise provided in this Privacy Policy or to comply with applicable law, we will not disclose any personal information to a third party without first receiving a user's consent which users give through the use of our Website.

Links to Other Sites; Transactions with Third Parties

This site may contain links to other sites that are not owned or operated by HSL that may be of interest to our site visitors. Please be aware that we are not responsible for the privacy practices of these other sites. We encourage you to review the privacy policies and statements of other sites to understand their information practices prior to sharing any Personal Data with those sites. Our Privacy Policy applies only to information collected by our Site. Our Privacy Policy does not apply to any information collected, received, used, processed, transferred or disclosed by such third parties. Additional or different terms and conditions (including without limitation, privacy and security practices) apply when you access and use third party applications, devices, platforms and websites, which are not the responsibility of HSL.

You may be able to access the Website and/or communicate with the Website from, and you may be able to link or communicate from the Website to, applications, devices, distribution platforms and websites owned and operated by third parties such as Apple, Google, Facebook or other third party distribution platform operators ("**Channel Partners**"). These other applications, devices, platforms and websites belong to third parties and are not operated or controlled by HSL. Our Privacy Policy does not apply to any information collected, received, used, processed, transferred or disclosed by such third parties. Additional or different terms and conditions (including without limitation, privacy and security practices) apply when you access and use third-party applications, devices, platforms and websites, which are not the responsibility of HSL.

HSL is NOT responsible for and will not be a party to any transactions between you and a third party provider of products, information or services. HSL does not monitor such transactions or ensure the confidentiality of your Personal Data, including, credit card information, for any third party transaction.

Any separate charges or obligations you incur in your dealings with these third parties linked to HSL's Site are solely your responsibility.

E-mail Communication

Hebrew SeniorLife does not collect your e-mail address unless you voluntarily submit it to us or choose to communicate with us via e-mail. If you sign up to receive emails from us, we will use your Personal Data only to send you messages you have opted to receive, which may include communicating with you via U.S. mail. If applicable, we share your Personal Data only with our own vendors, who use it for the same purposes. We do not sell or rent any e-mail addresses. We try to respond to e-mail messages requiring a response within five business days. If you e-mail HSL, your message and e-mail address will be forwarded to the appropriate department or program within the HSL organization. We strongly advise that you NOT communicate any patient health information through email, as no method of transmission over the Internet is 100% secure. Therefore, we cannot guarantee its absolute security.

Policy Changes

We will promptly post any changes to our Privacy Policy on all websites owned by Hebrew SeniorLife.

Analytics

When you use the Hebrew SeniorLife website, we may collect de-identified information relating to your browser or device type, the time and date you visit the site, operating system, identification of Site page views, use of particular Site features, geographic location and other statistical information relating to your use of the site but which does not identify you. This information is referred to in this Privacy Policy as "Analytics." We may use Analytics a) to develop, improve, extend and test the Service (and underlying technology platforms), b) to market and promote Hebrew SeniorLife and the Service; and c) distribute Analytics to interested third parties for their use.

Non-identifiable information in our aggregate databases will not be deleted. Hebrew SeniorLife maintains backup files as a protection against natural disasters, equipment failures, or other disruptions. Backup files protect you and us because they lower the risk of losing valuable data. Removing a record from our main files does not remove that record from any backup systems. It may take up to six months before all the information in a backup record is completely erased through the normal recycling of backup files. In the meantime, as long as backup records exist, they receive the same privacy and security protections as our other records.

Withdrawing Consent

You may withdraw your consent to further use of your Personal Data by e-mailing a request to us. We will respond to your request in accordance with the law that applies to you. Your Personal Data that we processed prior to your withdrawal of consent may not be deleted from our Site's system records but will be blocked from further processing without your permission. A request to withdraw consent may not apply to information already collected by tracking technologies or used internally to recognize you and/or facilitate your visits to the Site, or information we may keep to comply with legal requirements. Any such requests that relate to Protected Health Information will be addressed in accordance with our Notice of Privacy Practices www.hebrewseniorlife.org/organizational-policies-and-forms.

If you would like to withdraw consent, edit or delete any Personal Data you have provided to us, please email us at editor@hebrewseniorlife.org.

Questions or Comments?

Hebrew SeniorLife is committed to resolving questions or concerns about your privacy and our collection or use of your Personal Data. If you believe your privacy rights have been compromised in any way or you disagree with any action Hebrew SeniorLife or any of its subsidiaries have taken with regard to your Personal Data or this Privacy Policy, you may communicate any questions or concerns directly to:

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