

SDECS Privacy Policy

This privacy policy (the “**Privacy Policy**”) explains the collection, use, and disclosure practices of websites owned and operated by SOUTHERN CALIFORNIA HEALTH ALLIANCE LLC DBA SAN DIEGO ELDER CARE SOLUTIONS (“**SDECS**,” “**we**,” “**us**,” or “**our**”). This Privacy Policy constitutes an agreement between you and SDECS while accessing and using our websites. Please be advised that the practices described in this Privacy Policy apply to information gathered online at our Sites, information that you submit to us offline, and to Personal Information (as described below) that we may collect from third parties.

CONSENT

Privacy Policy. By using our Sites, registering with SDECS, or submitting information to us, you consent to the terms of our Privacy Policy and to our collection, use, and disclosure of Personal Information.

COLLECTION & USE OF YOUR PERSONAL INFORMATION

Information Collected Directly from You. In general, you can visit our Sites without disclosing any personal information. Any information you provide to us is voluntary, but please note that some information may be necessary for us to provide you with certain services, offers and content on our Sites. We may ask you to provide personal information such as your name, email address, phone number and zip code, and other personally identifiable information (“**Personal Information**”) in order to provide you with services in connection with our Sites. We may also ask you to provide Personal Information about another person for whom you may be seeking senior housing and/or care services, and to affirm that you have permission to provide Personal Information for that person. SDECS does not collect biometrics or sensitive information relating to health, race, gender, or other special category data unless that information is necessary to provide the service requested by the individual providing the information. We may periodically supplement the Personal Information we collect from you by obtaining personal or nonpersonal information about you or another person from other businesses, business partners, contractors and other third parties.

We use this Personal Information to provide you with the services you have requested from us and to provide services to Participating Communities. In addition, we use Personal Information to send you periodic email and newsletter communications about products and services offered by us or third parties, to operate and improve our Sites and services, to respond to customer inquiries, and to send you surveys and other communications.

Information Collected from Your Use of this Site. We may collect information about you from your use of our Sites using website analytics tools or other technologies, like cookies and web beacons. These tools collect information like the pages you view, the links you click and other actions you take in connection with the Sites and our services. We also may collect certain standard information that your browser sends to every

website you visit, such as your IP address, browser type and language, access times, and referring website addresses. We may supplement aggregate information collected from the Sites with similar information obtained from companies with whom we have marketing or other business relationships and other third party sources. Any aggregate information that is linked with your Personal Information will be treated as Personal Information under this Privacy Policy.

We use information collected from your use of our Sites for our own internal business purposes including improving the performance, functionality, and content of the Sites and performing statistical, design, or operational tasks, such as estimating our audience size, measuring aggregate traffic patterns, and understanding demographic trends among our users.

Cookies. Cookies are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences. We use cookies to track use of our Sites and online services. We may also use cookies to monitor traffic, improve the Sites, make the Sites easier and/or relevant for your use, and improve the performance of our advertising on other websites. You can opt out of accepting cookies by adjusting your browser settings to not accept cookies or to notify you when you are sent a cookie. However, certain features of our Sites or other services may not work if you delete or disable cookies.

Web Beacons. Some pages of our Sites and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email, and for other related website statistics (for example, recording the popularity of certain website content, and verifying system and server integrity).

DISCLOSURE OF PERSONAL INFORMATION

We will only disclose, sell, or share your name, email address or other information:

- **To Participating Communities.** We may disclose, sell or share Personal Information to one or more Participating Communities in order to provide you with the services you've requested. The Participating Communities may contact you directly by email, telephone, regular mail, in-person visits, or other means. We do not control how these Participating Communities use or disclose your Personal Information.
- **To Other Third Party Providers.** We may disclose, sell or share Personal Information to one or more third parties with which we have contracted to provide services to us or to offer the services you have requested from us. We may also disclose Personal Information to one or more third parties who are interested in providing services or products to you. We do not control how these third parties use or disclose your Personal Information.
- **To Affiliates.** We may disclose some or all of your Personal Information with our

parent company, subsidiaries, joint ventures, or other companies under common control with us, in which case we will require them to honor this Privacy Policy.

- **For Our Internal Analysis and Operations.** We may disclose Personal Information to third party vendors for our own internal statistical, design or operational purposes, such as estimating our audience size, measuring aggregate traffic patterns, and understanding demographic trends among our users. The use and disclosure of your Personal Information by these third parties is restricted to performance of such tasks and subject to confidentiality.
- **For Legal and Other Compliance.** We may disclose Personal Information when we believe it is appropriate to: (a) comply with the law; (b) enforce or apply this Privacy Policy or our other policies or agreements; (c) protect our or our users' rights, property or safety; (d) protect our users from fraudulent, abusive or unlawful use of our Site; or (e) if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.
- **As Part of Business Transfers.** We may disclose Personal Information as part of any merger, acquisition, debt financing, sale of company assets, or other business transaction.
- **As Aggregated Information.** We may share or sell aggregated, anonymous information to our advertisers, business partners, and other third parties that includes or is based on information about you. We take technical and organizational measures to anonymize your information and combine it with other users' information, so that it does not directly identify you. This information may be used by those third parties for marketing, promotional, or statistical purposes. We do not limit the third parties' use of the aggregated information.

LINKS TO THIRD PARTIES

This privacy statement applies only to information collected by this Site. We may provide links to third party websites from our Sites as a service to our users, but we have no ability to control, and we are not responsible for, the privacy and data collection, use, and disclosure practices of third party websites. When you click on links that take you to external websites, you will be subject to their privacy policies and practices, and not ours. We encourage you to review and understand the privacy policies of such websites before providing them with any information.

SECURITY

SDECS takes precautions to protect your information. We use reasonable security measures, including encryption and scrambling, to store and maintain Personal Information to protect it from loss, misuse, alteration or destruction by any unauthorized party while it is under our control. Access to the Personal Information we collect is

restricted to employees who are trained in the proper handling of Personal Information. Please note, however, that no transmission of data over the Internet is 100% secure. All Internet users should take care with how they handle and disclose their personal information. Please refer to the Federal Trade Commission's website at <http://www.ftc.gov/bcp/menus/consumer/data.shtm> for information about how to help protect yourself against identity theft.

THIRD PARTY ADVERTISING

Third party advertisers or ad networks may use cookies or other technologies on our Sites for various purposes, including measuring the effectiveness of their ads, and analyzing and personalizing ads or other content delivered to you. We have no ability to control the privacy, data collection, use, and disclosure practices of such websites, and the privacy policies of such websites may differ from the Sites. Therefore, we encourage you to review and understand the privacy policies of such websites before providing them with any information.

CHILDREN

SDECS services and Sites are designed for adults, not children. As such, we do not intend, and these Sites are not designed, to collect Personal Information from children under the age of 16. If you are under 16 years old, do not register for our services, provide any information about yourself to us (including your name, address, telephone number, email address, or any screen name or user name you may use), or otherwise provide information on our Sites. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at 858-774-4604 or info@sdeldercaresolutions.com

YOUR CALIFORNIA PRIVACY RIGHTS

Companies that collect personally identifiable information from California residents and disclose such information to third parties for marketing purposes must, in response to a request by a consumer, either (1) provide a list detailing the categories of information shared and the entities to which such information was provided, or (2) provide a mechanism by which a consumer may opt out of having their information shared with third parties. We have elected the second option, and you may request that your personally identifiable information not be shared with third parties by sending your request, including your full name, email address, and postal address to: San Diego Elder Care Solutions, 8400 Miramar Road Suite 200-228 San Diego, CA 92126. In accordance with California Civil Code Sec. 1789.3, California resident users are entitled to know that they may file grievances and complaints with California Department of Consumer Affairs, 400 R Street, Suite 1080, Sacramento, CA 95814, by phone at 916-445-1254 or 800-952-5210, or by email to dca@dca.ca.gov

DO NOT TRACK DISCLOSURES

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, our Sites take no action in response to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third party websites or online services. Although we use Google Analytics and other third party tracking tools for our Sites, we are not aware if third parties collect personally identifiable information about an individual consumer's online activities when a consumer uses our Sites. For information about Do Not Track, visit <https://allaboutdnt.com>.

OPT-OUT OF SDECS COMMUNICATIONS

We may periodically send you newsletters and other communications that promote the use of our services. When you receive a newsletter from us, you may indicate a preference to stop receiving further newsletters by following the opt-out instructions included in the newsletter. Additionally, you can opt-out of data collection for targeted advertising for sandiegoeldercareolutions.com during your visits to other websites by emailing info@sdeldercareolutions.com

If you wish to opt-out of communications with Participating Communities, you must contact them directly as we do not control communications from Participating Communities.

CONTROLLING YOUR PERSONAL INFORMATION

You have the right to submit a complaint or object to the collection and use of your information by SDECS at any time, or to require SDECS to review, transmit, change, or delete your information that we have collected and retained. SDECS will fulfill your request to exercise any of these rights within 30 days of receiving a complete request. You can exercise these rights by contacting SDECS at:

Email: info@sdeldercareolutions.com
(858)774-4604

Mailing Address:
San Diego Elder Care Solutions
8400 Miramar Road Suite 200-228

San Diego, CA 92126

QUESTIONS AND CONCERNS

If you have any questions about this Privacy Policy or the privacy practices of our Sites, please contact us at info@sdeldercareolutions.com

GOVERNING LAW

SDECS owns and maintains the Sites in the United States. We attempt to comply with local data protection and consumer rights laws to the extent they may apply to our services. If you are uncertain whether this Privacy Policy conflicts with the applicable local privacy laws where you are located, you should not submit your Personal Information to the Sites.

CHANGES IN THIS PRIVACY POLICY

As our Sites continue to develop, we may add new services and features to our Sites. In the event that these additions affect our Privacy Policy, this Privacy Policy will be updated appropriately. If we make any substantial changes, we will prominently post a notice on the main page and other pages to alert you of the change. This policy was last updated on January 02, 2021.