



Homewood Retirement Centers, Inc. Privacy Policy

Thank you for visiting a Homewood Retirement Centers, Inc. (“Homewood”) website. This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit any Homewood websites, including www.homewood.com and any websites of our affiliates or subsidiaries which are governed by this Privacy Policy (collectively, the “Sites” and each individually, the “Site”), and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Privacy Policy Updates

Homewood may need to update this Privacy Policy from time to time, as Homewood updates or expands its Sites, or as may be needed to comply with applicable laws. If so, Homewood will post its updated Privacy Policy on our Sites along with a change notice on the Site for any material changes. Homewood may also send registered users of our services a notice that this Privacy Policy has been changed. You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the bottom of this Privacy Policy. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable privacy or data protection laws. Homewood encourages you to review this Privacy Policy regularly for any changes. Your continued use of the Sites or services or your continued provision of personal information to us after the posting of such notice is deemed to be an acceptance of those changes and will be subject to the terms of the then-current Privacy Policy.

Additionally, when you use any of our Sites, you agree to comply with our Website Terms of Use.

Information Collection

We collect several types of information from and about users of our Sites, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number;
- About your internet connection, the equipment you use to access our Sites, and usage details.
- About your device, including data about the type of device or browser you use.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Sites. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies, as described below.

Information You Provide to Us

The information we collect on or through our Sites may include:

- Information that you provide by filling out forms on our Sites. This includes information provided at the time of requesting services or subscribing to receive communications, marketing materials, or updates from us. We may also ask you for information when you report a problem with our Sites.
- Records and copies of your correspondence (including email addresses), if you contact us.

As you navigate through and interact with our Sites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Site, including pages you visit, portions of the Site that you view and interact with, the time of day you visit or browse, and your referring and exiting pages.
- Information about your computer and internet connection, including your device's operating system, your internet service provider, your device's regional and language settings, and device identifiers such as IP address.

The information we collect automatically helps us to improve our Sites and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Site according to your individual interests.
- Recognize you when you return to our Sites.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, your ability to use some areas of our Site may be limited. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Sites.
- Flash Cookies. Certain features of our Sites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of our Sites may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Homewood, for example, to count users who have visited those pages or and for other related website statistics (for example, recording the popularity of certain content and verifying system and server integrity).

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

On our Site, we use session cookies to make it easier for you to navigate the Site by remembering your locale preferences and to improve and track the overall Site experience. For our Site, we set a persistent cookie to authenticate your login and authorization to use the services. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on our Site.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or which you provide to us.

Third-Party Cookies. Cookies that are placed on your browsing device by a third party can be managed through your browser (as described above) or by checking the third party's website for more information about cookie management and how to "opt-out" of receiving cookies from them. We use Google Analytics, a web analytics service. Through this third party technology, certain types of information, including geolocation, device type, onsite website usage and behavior, demographic data, and purchase history, is collected and aggregated across Homewood Site users for our analysis and advertising efforts. You can prevent the storage of data relating to your use of the Sites and created via the cookie (including your IP address) by Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout> (requires you to install a browser add-on).

Information Use

We may use information that we collect about you or that you provide to us, including any personal information:

- to deliver our services or information you have requested;
- to verify your authority to enter certain password protected areas of the Site;
- to verify that you are a customer or prospective customer;
- to send you information that you have signed up to receive, notices about our products and/or services that you have used, or that may be of interest to you and notices about events;
- to notify you about material changes to our Privacy Policy;
- to improve the content and general administration of the Site and our services; or
- in any other way we may describe when you provide the information

If you are a user of our services, we may use your personal information to provide the services to you.

In addition, Homewood uses Remarketing with Google Analytics and Google Adwords to display relevant advertisements to users who have previously visited our Site. Referred to as remarketing or retargeting, Homewood may

utilize previous session information to serve display advertisements to you on the Site and based on such session information, Google may set a cookie and serve ads to you on third party websites on the Google Display Network. Third party vendors such as Google may display Homewood ads on websites across the Internet. Aggregated user data may be utilized to create remarketing/retargeting “lists,” or groups of users with similar onsite behaviors or demographics.

Homewood also uses Google Display Network Impression Reporting and Google Analytics Demographics and Interest Reporting and Interest-Based Advertising to display advertisements to users based on their inferred interests and demographics. Homewood does not run interest-based advertising campaigns that collect personally identifiable information.

Users may learn more about Google Analytics use of cookies by visiting the Google Privacy and Terms page at <http://www.google.com/policies/>. You may opt out of being tracked by Google Analytics by i) turning off cookies in the preferences settings in your browser ii) downloading the Google Analytics opt-out browser add on available at: <https://tools.google.com/dlpage/gaoptout/> iii) opting out of user interest and demographic categories in the Settings for Google Ads feature to manage or opt out of Google interest based ads, or iv) managing cookies used for online advertising across multiple companies at the US-based Network Advertising Initiative at <http://www.networkadvertising.org/choices/>.

Children's Privacy

Homewood recognizes the privacy interests of children, and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither our Site nor our services are intended for children under the age of 13. Homewood does not target its services or this Site to children under 13. Homewood does not knowingly collect personally identifiable information from children under the age of 13.

If you believe we might have any information from or about a child age 13 and under, please contact us.

Aggregate Information

The Site may track the total number of visitors to our Site, the number of visitors to each page of our Site, browser type, IP addresses, External Web Sites (defined below) linked to and other aggregated data collected through our services and we may analyze this data for trends and statistics in the aggregate but such information will be maintained, used and disclosed in aggregate form only and it will not contain personally identifiable information. We may use such aggregate information to analyze trends, administer the Site, track users' movement, and gather broad demographic information for aggregate use.

Disclosure of Personal Information

We may provide your personal information and the data generated by cookies and third-party analytics tools and the aggregate information to the vendors and service agencies that we may engage to assist us in providing our services to you. We may disclose information that we collect or you provide as described in this Privacy Policy:

- To our agents and representatives assisting Ascend with our marketing efforts, to fulfill the purpose for which you provided the information.
- To our vendors and service providers so they can provide us with support services such as data analytics, website hosting, maintenance, technical support, and information security and technology services. For example, we engage with G5 Search Marketing, Inc. to assist us in creating and hosting this Site.
- To our subsidiaries and affiliates.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Homewood's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Homewood about our Site users is among the assets transferred.
- To generally fulfill the purpose for which you provide it.

- For any other purpose disclosed by us when you provide the information.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Website Terms of Use.

Links to Third Party Sites

The Sites may provide links to other websites or resources over which Homewood does not have control ("External Web Sites"). Such links do not constitute an endorsement by Homewood of those External Web Sites. You acknowledge that Homewood is providing these links to you only as a convenience, and further agree that Homewood is not responsible for the content of such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the External Web Sites.

Security

We employ commercially reasonable procedural and technological measures that are reasonably designed to help protect your personal information from loss, unauthorized access, disclosure, alteration, or destruction. Homewood may use, without limitation, firewalls, password protection, secure socket layer, and other security measures to help prevent unauthorized access to your personal information.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, including any accounts that you may establish on our Sites, you are responsible for keeping this password and other login credentials confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Sites, like message boards or comment areas. The information you share in public areas may be viewed by any user of the Sites. Also, if you share a computer, you should sign out of your Homewood account and close the browser window before someone else logs on. This may help protect your information entered on public terminals from disclosure to third parties.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Sites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

Notice to European Users

This Site and the services on this Site are targeted for users in the United States of America. Any information you enter on this Site may be transferred outside of the European Union to the United States of America which does not offer an equivalent level of protection to that required in the European Union. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. Article 26 of the European Union's Data Protection Directive (Directive 95/46/EC, 1995 O.J. (L 281) 31) allows for transfer of personal data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of personal information, regardless of the third country's level of protection. By using this Site or the services, you consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in the European Union and to the processing of that information by Homewood or its servers located in the United States of America, as described in this Privacy Policy.

Questions

If you have any questions regarding this Privacy Policy, please contact us.

This Privacy Policy was last updated: **2022-07-19 09:20:43 -0700**

This Privacy Policy is effective as of: **2022-07-19 19:13:55 -0700**