

# Privacy Policy

This Privacy Policy was last updated: March 2020

Thank you for visiting Claiborne Senior Living's ("CSL" or "we") Internet web site ("Site") located at the URL [www.theclaiborne.com](http://www.theclaiborne.com). This Privacy Policy details certain policies implemented throughout CSL governing CSL's collection and use of personally identifiable information about users of the Site and our services.

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### 1. **Privacy Policy Updates**

**CSL** may need to update this Privacy Policy from time to time. If so, **CSL** will post its updated Privacy Policy on the Site along with a change notice on the Site. **CSL** may also send registered users of our services a notice that this Privacy Policy has been changed. **CSL** encourages you to

review this Privacy Policy regularly for any changes. Your continued use of this Site and/or services and/or your continued provision of personally identifiable information to us after the posting of such notice will be subject to the terms of the then-current Privacy Policy.

## **2. Information Collection**

In certain sections of this Site, we may require you to submit your personally identifiable information to us, and we may invite you to submit questions, comments and request information. In addition to any personal information that you may voluntarily provide, the Site collects information using cookies and other third-party tools. Please refer to the sections below on “Cookies” and “Third Party Analytics Tools” and “Third Party Advertising Tools” for more information about the information these tools collect and use.

Due to the nature of some of our services, you may provide us with personally identifiable information such as your name, email address, age (our services are designed for senior care and our facilities may have certain minimum age restrictions (i.e. 55+)), username, password, address, phone number, and other contact information that you voluntarily transmit with your communication to us.

## **3. Information Use**

We may use your personally identifiable information to deliver our services or information you have requested, verify your authority to enter certain password protected areas of the Site, verify that you are a customer or prospective customer, 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, and improve the content and general administration of the Site and our services.

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

## **4. Children's Privacy**

**CSL** 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 the Site nor our services are intended for children under the age of 16. **CSL** does not target its services or this Site to children under 16. **CSL** does not knowingly collect personally identifiable information from children under the age of 16.

## **5. Cookies**

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 the 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 the 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 the Site. If you reject cookies, you may still use the Site, but your ability to use some areas of the Site may be limited.

## **6. Third Party Analytics Tools**

Beyond the personally identifiable information you voluntarily provide to us directly, **CSL** may utilize analytics tools including third party technologies, such as Google Analytics, to collect information utilizing cookies. Certain types of information, including geolocation, device type, onsite website usage and behavior, demographic data, and purchase history, may be collected and aggregated across **CSL** Site users for our analysis and advertising efforts.

## **7. Third Party Advertising Tools**

**CSL** may use Google Analytics and Google Ads and similar types of technologies to display relevant advertisements to users who have previously visited the Site. Referred to as remarketing or retargeting, **CSL** 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 **CSL** 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. **CSL** also uses Google tools to display advertisements to users based on their inferred interests and demographics.

Users may learn more about Google’s 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 at: or iv) Managing cookies used for online advertising across multiple companies at the US-based Network Advertising Initiative at <http://www.networkadvertising.org/choices/>.

## **8. Usage Information**

We automatically collect information about your interactions with the Site, including information about the device you use to interact with and/or access the Site, such as: IP address, access dates and times, information about your approximate location (as determined through your IP address), hardware and software information, mobile, computer or hardware device information (e.g., operating system version, Hardware model, IMEI number and other unique device identifiers, MAC address, and device settings), device event information, and crash data. This information

allows CSL to understand how you've used the Site (which may include administrative and support communications with us or whether you have clicked on links to External Web Sites), and other actions you have taken in connection with your use of the Site. We automatically collect log data when you access and use the Site, even if you have not created an account or logged in.

#### **9. Aggregate Information**

We may collect and track the total number of visitors to the Site, the number of visitors to each page of the Site, 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 information for purposes such as analyzing trends, administering the Site, and to understand how users interact with the Site.

#### **10. Disclosure of Personally Identifiable Information**

We may provide your personally identifiable 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. For example, we engage with G5 Search Marketing, Inc. to assist us in creating and hosting this Site.

We will disclose your personally identifiable information if we reasonably believe we are required to do so by law, regulation or other government authority or to assist in any investigation, to protect our or our users' rights or to enforce our terms of use. We will not sell your personally identifiable information to any company or organization except we may transfer your personally identifiable information to a successor entity upon a merger, consolidation or other corporate reorganization in which CSL participates or to a purchaser of all or substantially all of CSL's assets to which this Site relates.

#### **11. Links to Third Party Sites**

The Site may provide links to other Web sites or resources over which CSL does not have control ("External Web Sites"). Such links do not constitute an endorsement by CSL of those External Web Sites. You acknowledge that CSL is providing these links to you only as a convenience, and further agree that CSL 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 linked to External Web Sites.

#### **12. Security**

We may employ industry standard procedural and technological measures that are reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration or destruction. CSL may use, without limitation, firewalls, password

protection, secure socket layer, and other security measures to help prevent unauthorized access to your personally identifiable information.

### 13. Privacy Notice for California Residents

This section supplements the information provided in the Privacy Policy above and applies only to visitors and users who are residents of the state of California.

If you have questions or concerns about any of the information provided in this Privacy Notice for California Residents, please contact us using the information provided in the “Contact Us” section of this Privacy Policy below.

#### Personal Information We Collect

For purposes of this section “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include:

- information that is lawfully made available from federal, state, or local government records;
- de-identified or aggregated information; and
- information excluded from the scope of the California Consumer Privacy Act of 2018 (“CCPA”) such as health or medical information covered under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and financial information covered under the Fair Credit Reporting Act (“FCRA”) or Gramm-Leach Bliley Act (“GLBA”).

In the last twelve (12) months, we have collected the categories of personal information identified in the third column entitled “Collected” in the table below:

Category	Examples	Collected
1. Identifiers	Real name (such as first name and last name); alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	Yes
2. Customer Records Information	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education,	Yes

	employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
3. Characteristics of protected classifications under California or federal law	Age (other than age of 55+ commiserate with the company's business), race, color, ancestry, national origin, citizenship, religion or creed, marital or familial status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), medical conditions, political affiliations or activities, status as a victim of domestic violence, assault, or stalking.	No
4. Commercial information.	Records of products or services purchased, personal property, or other purchasing or consuming histories or tendencies.	No
5. Biometric information.	Fingerprints, facial or hand imagery, voice recordings from which an identifier template can be extracted, keystroke patterns, gait patterns, sleep, health, or exercise data.	Yes
6. Internet or other similar network activity information	Browsing history, search history, information regarding consumer's interaction with a	Yes

	website, application, or advertisement.	
7. Geolocation data	GPS coordinates or other location tracking information.	Yes
8. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
9. Professional or employment-related information	Employer, employment history, resumes and CVs, background checks, and other employment-related information.	No
10. Education information	Records maintained by an educational agency or institution that pertain to a student, such as grades and transcripts.	No
11. Inferences	Inferences drawn from any of the categories described above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

The table below describes the sources for each category of personal information we collect, the business and/or commercial purposes for which we use each category of personal information, and the third parties with whom we share each category of personal information we collect.

Category	Sources	Business or Commercial Purposes	Third Parties Shared With
1. Identifiers	<ul style="list-style-type: none"> <li>● Directly from consumers</li> <li>● Website cookies</li> <li>● Website analytics providers</li> </ul>	<ul style="list-style-type: none"> <li>● To fulfill specific consumer requests</li> <li>● To enhance the website experience</li> <li>● For marketing purposes</li> </ul>	<ul style="list-style-type: none"> <li>● Website providers</li> <li>● Analytics providers</li> <li>● Advertising providers</li> <li>● Telephone service providers</li> </ul>

2. Customer Records Information	<ul style="list-style-type: none"> <li>• Directly from consumers</li> <li>• Website cookies</li> <li>• Website analytics providers</li> </ul>	<ul style="list-style-type: none"> <li>• To analyze website traffic</li> <li>• For marketing purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Website providers</li> <li>• Analytics Providers</li> <li>• Advertising providers</li> </ul>
3. Biometric Information	<ul style="list-style-type: none"> <li>• Website cookies</li> <li>• Website analytics providers</li> </ul>	<ul style="list-style-type: none"> <li>• To enhance the website experience</li> <li>• For marketing purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Website providers</li> <li>• Advertising providers</li> </ul>
4. Internet or other similar network activity information	<ul style="list-style-type: none"> <li>• Website cookies</li> <li>• Website analytics providers</li> </ul>	<ul style="list-style-type: none"> <li>• To enhance the website experience</li> <li>• For marketing purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Website providers</li> <li>• Advertising providers</li> </ul>
5. Geolocation data	<ul style="list-style-type: none"> <li>• Directly from consumers</li> <li>• Website Cookies</li> <li>• Website analytics providers</li> <li>• Advertising providers</li> </ul>	<ul style="list-style-type: none"> <li>• To analyze website traffic</li> <li>• For marketing purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Website providers</li> <li>• Analytics Providers</li> <li>• Advertising providers</li> </ul>
6. Sensory Data and Inferences	<ul style="list-style-type: none"> <li>• Website analytics providers</li> <li>• Advertising providers</li> </ul>	<ul style="list-style-type: none"> <li>• For marketing purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Analytics Providers</li> <li>• Advertising providers</li> </ul>

### Personal Information We Disclose

#### a. *Sale of Personal Information*

We do not sell personal information.

#### b. *Disclosure of Personal Information for Business Purposes*

We disclose the following categories of personal information for business purposes: identifiers, biometric information, internet or other similar network activity information, geolocation data, and inferences.

We do not sell personal information of minors under the age of sixteen (16) years of age without affirmative authorization.

### Your Rights

If you are a resident of the state(s) identified above, you have specific rights regarding your personal information. This section describes your rights and how to exercise them.

#### a. *Right to Know About Personal Information Collected and Disclosed*



You have the right to request that **CSL** disclose to you what personal information we collect, use and disclose. You may exercise this right following the methods described under the subsection titled “Exercising Your Rights” below.

*b. Right to Delete Personal Information*

You have the right to request that **CSL** delete personal information we may hold about you. You may exercise this right following the methods described under the subsection titled “Exercising Your Rights” below.

Please be aware that we may not always be able to delete your personal information. For example, there may be business or operational reasons why we need to retain personal information. If we deny your request to delete personal information, we will inform you of the basis for our denial in our response to you.

*c. Right to Opt-Out of Sale of Personal Information*

You have the right to opt out of the sale of your personal information.

Because we do not sell personal information, this right does not apply to **CSL**.

*d. Right to Non-Discrimination*

You have the right to not receive discriminatory treatment from **CSL** for exercising any of your rights described under this “Your Rights” section. This means we will not treat you differently for exercising any of the rights described above.

Exercising Your Rights

You may exercise each right once every twelve (12) months. To exercise your rights, you must submit a verifiable request to us. To submit a verifiable request, please follow the methods described below: Send an email request indicating which right you have chosen to exercise to [QualityConnection@TheClaiborne.com](mailto:QualityConnection@TheClaiborne.com).

To verify your request we may send an email response back to you to confirm your request or ask for clarification if necessary.

You may designate an authorized agent to submit a request on your behalf. To designate an authorized agent you must email a signed authorization letter to [QualityConnection@TheClaiborne.com](mailto:QualityConnection@TheClaiborne.com).

We will respond to your rights request within forty-five (45) days from the date we receive it. In some cases, we may require additional time to complete your request and will inform you if additional time is needed. Where additional time is needed, we may take up to a maximum of ninety (90) additional days to complete your request.

Financial Incentives

**CSL** does not offer financial incentives or price or service differences in exchange for the retention or sale of personal information.

#### **14. Notice to Users Located Outside of the United States**

This Site and the services on this Site are targeted for users in the United States of America only. Any information you enter on this Site may be transferred outside of your home country to the United States of America, which may not offer an equivalent level of protection to that required of your home country's data protection laws.

#### **Contact Us**

If you have any questions regarding this Privacy Policy please contact us via email at [QualityConnection@theclaiborne.com](mailto:QualityConnection@theclaiborne.com) or by phone at 601-913-5009.