

ENGLISH MEADOW SENIOR LIVING

Website Privacy Policy

Last modified: May 9, 2023

Introduction

English Meadows Senior Living, LLC. (“**Company**” or “**We**”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy (the “**Policy**”).

This policy describes the types of information we may collect from you or that you may provide when you visit the Website located at <https://www.englishmeadowssl.com/> (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This policy applies to the information we collect:

- On this Website.
- In an email, text, chatbots, and other electronic messages between you and this Website and/or other services provided by the Company or made available to you.
- Through mobile and desktop applications you download from this Website, which provides dedicated non-browser-based interaction between you and this Website and/or other services provided by the Company or made available to you.
- When you interact with our advertising and applications on third-party Websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other Website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

This Policy applies to:

- All visitors (“**Site Visitors**”) to the Website;
- Anyone who receives the “**Services**” from the Company (“**Clients**”).

Site Visitors and Clients are referred to collectively as “**Users**” or “**you**”, interchangeably.

In order to ensure the free, informed, and unambiguous consent of our Users to the collection and use of personal data, the Company requires all Users to read this Policy and accept the terms and conditions contained herein, together with consent to release personal data subject to such terms and conditions.

Capitalized terms used but not otherwise defined shall have the respective meanings ascribed thereto in the Company’s Terms of Use located at [URL] (the “**User Agreement**”).

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Policy. This Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or 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. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacypolicy@twenty20mgt.com

California residents under 13 years of age may have additional rights regarding the collection and sale of their Personal Information. Please see [Your California Privacy Rights](#) (below) for more information.

Topics

This Policy addresses the following topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Data retention and deletion
- Data usage and processing
- Data sharing and disclosure
- Choices About How We Use and Disclose Your Information
- Marketing
- What are your data protection rights?
- California Residents
- Virginia Privacy Rights
- Nevada Residents
- International Residents
- Cookie Policy
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

What Data We Collect

We collect some Personal Information about you from our Website to maintain the Website and to tailor the Website to your needs, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, credit, debit, or other payment cardholder information, with or without any required security or access code, personal identification number or any other identifier by which you may be contacted online or offline (“**Personal Information**”);
- That is about you but individually does not identify you;
- Information on your browser, IP address, location, and device
- Information on your behavior on our Website, including pages viewed, links clicked, and actions taken
 - Demographic information
 - Transaction information, including information related to the use of the Services, types of Services requested, dates and times of such requests, payment methods, and other similar information.
 - Location data, including User location searches
 - Communications data, including messages, comments, or file transmissions; and
 - About your internet connection, the equipment you use to access our Website, and usage details.

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

- Information that you provide by filling in forms on our Website. Records and copies of your correspondence (including email addresses), if you contact us;
- Your responses to surveys that we might ask you to complete for research purposes;
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website;
- Your search queries on the Website; and
- Metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

How Do We Collect Your Data

We collect this information:

- Directly from you when you provide it to us.

- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- Register online or place an order for any of our products or Services
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email
- Use or view the Website via your browser's cookies
- Submit content to the Website, like reviews, messages, or comments
- Enable access to their device's location-tracking functionality, whether the Website is running in the foreground (Website open and on-screen) or background (Website open but not on-screen). Certain functionality may be affected while location data is turned off.

Clients expressly and directly provide personal data, including payment information, to the Company via the Website when enrolling for the Services. Clients expressly acknowledge and agree that the data is necessary for the Company to provide the Services and that without the data the Company is unable to provide such Services.

As you navigate through and interact with our Website, 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 Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). You may opt out of behavioral tracking on this Website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking by emailing us at privacypolicy@twenty20mgt.com

The information we collect automatically may contain statistical data, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website 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 Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

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 or mobile device. You may refuse to accept browser Cookies by activating the appropriate setting on your browser. They are widely used in order to make websites and

software applications work or work in a better, more efficient way. They can do this because websites and software applications can read and write these files, enabling them to recognize you and remember important information that will make your use of a website or software application more convenient (e.g., by remembering your user preferences). However, if you select this setting, you may be unable to access certain parts of our Website. 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 Website.

- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, 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).

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 you provide to us.

How Will We Use Your Data

We use the information that we collect about you or that you provide to us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through the foregoing.
- In any other way we may describe when you provide the information.
- If you have any sanctions on your account or your account is banned due to not complying with our Terms of Services.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third parties goods and services that may be of interest to you. If you do not want us to use your information in this way, please use the unsubscribe button on your user profile page. For more information, see [Choices About How We Use and Disclose Your Information](#) (below).

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

How Do We Store Your Data

The Company securely stores your data on servers leased from a reputable third-party hosting service located in the United States. Data is retained in accordance with the Company's User Agreement.

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 Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

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 Website. 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 Website.

Data Retention and Deletion

The Company retains user profiles, transaction, and other information for as long as a user maintains their account.

Users may request the deletion of their account at any time. Following such requests, the Company deletes the data that it is not required to retain for purposes of regulatory, tax, insurance, litigation, or other legal requirements. For example, the Company retains location, device, and usage data for these purposes for a minimum of 7 years; while it retains such data, it may also use it for purposes of safety, security, fraud prevention and detection, and research and development. In certain circumstances, the Company may be unable to delete a User's account, such as if there's an outstanding credit on the account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, the Company will delete the account as described above.

The Company may also retain certain information, if necessary, for purposes of safety, security, and fraud prevention. When you use our Services, we ask that you comply with our Terms of Services associated with our Services which are intended to protect our users, employees, and more generally the Company's rights. For example, if you do not abide by our policies, you may be sanctioned and the Company may deactivate your account including in the event of unsafe behavior or security incidents. The Company will retain certain information and Data in accordance with the sanctions on the account to prevent that user from opening a new account in the future. This Data may include for example your Account identifier, your game data, your IP address, the identifier of your device, and your chat history

Data Usage and Processing

We collect and use personal data only where we have one or more lawful grounds for doing so. Such grounds may vary depending on where our Users are located, but generally include processing personal data:

1. To provide requested Services and features

In order to provide our Services, we must collect and use certain personal data. This includes:

- User profile data, which we use to establish and maintain User accounts; verify User identity; communicate with Users about their orders and accounts; and enable Users to make or receive payments (as and if applicable)
- Usage data, which is necessary to maintain, optimize, and enhance the Company's Services

- Transaction information
- Information relating to customer support

2. For purposes of the legitimate interests of the Company or other parties

This includes using personal data to maintain and enhance our Users' safety and security. For example, we use personal data to prevent use of our Services by Users who have engaged in inappropriate or dangerous behavior, such as by retaining data of banned Users to prevent their use of the Website.

This also includes purposes such as combating fraud; improving our Services, direct marketing, research, and development; and enforcing the Company's User Agreement.

In addition, it includes using personal data to the extent necessary for the interests of other people or the general public, such as in connection with legal or insurance claims, and to protect the rights and safety of others.

3. To fulfill the Company's legal obligations

We collect and use personal data to comply with applicable laws. The Company may also share data with law enforcement regarding criminal acts or threats to public safety, or requests by third parties pursuant to legal processes.

4. With consent

The Company may collect and use personal data based on the User's consent. For example, we may collect personal data through voluntary surveys. Responses to such surveys are collected on the basis of consent and will be deleted once no longer necessary for the purposes collected.

A User who has provided consent to the collection or use of their personal data can revoke it at any time. However, the User will not be able to use any Service or feature that requires the collection or use of that personal data.

Data Sharing and Disclosure

We may disclose aggregated information about our Users, and information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- 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 English Meadow

Senior Living, LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by English Meadow Senior Living, LLC's about our Users is among the assets transferred.

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

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 terms of use located at [INSERT TOS LINK] and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's Website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your Personal Information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending an email to privacypolicy@twenty20mgt.com
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, you can opt-out by sending an email to privacypolicy@twenty20mgt.com

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Marketing

The Company may send its Users information about products and services of the Company, always with the consent of the User. Clients consent to marketing and promotional communication when they enroll for the Services pursuant to the User Agreement.

If you have agreed to receive such marketing materials, you may always opt out at a later date. You have the right at any time to stop the Company from contacting you for marketing purposes.

What Are Your Data Protection Rights?

Your GDPR Privacy Rights. The Company is committed to making you fully aware of all of your data protection rights. Every User is entitled to the following:

The right to access - You have the right to request from the Company copies of your personal data. We may charge you a small fee for this service.

The right to rectification - You have the right to request that the Company correct any information you believe is inaccurate. You also have the right to request the Company to complete information you believe is incomplete.

The right to erasure - You have the right to request that the Company erase your personal data, under certain conditions.

The right to restrict processing - You have the right to request that the Company restrict the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to the Company's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that the Company transfer the data collected to another organization, or directly to you, under certain conditions.

Users who voluntarily provide their personal data in order for the Company to provide Services do so pursuant to the Company's User Agreement. The retention, return, transfer, and destruction of personal data provided for such purposes is subject to the terms of such User Agreement.

If you make a request, the Company has one month to respond to you. If you would like to exercise any of these rights, please contact us at the information provided below.

Your California Privacy Rights

Summary - [California Civil Code Section 1798.83](#) permits residents of the State of California to request from certain businesses with whom the California resident has an established business relationship a list of all third parties to which the business, during the immediately preceding calendar year, has disclosed certain personally identifiable information for direct marketing purposes. We are required to respond to a customer request only once during any calendar year. To make such a request you should contact privacy@twenty20mgt.com. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California Privacy Rights requirements and only information sharing that is covered will be included in our response.

Right to Know About Information Collected, Disclosed or Sold – You have the right to request that we disclose what personal information we collect, use, disclose, and sell. To submit a verifiable request, please visit [[Link to “Do Not Sell My Personal Information”](#)] or email privacypolicy@twenty20mgt.com. If you have an account with us, we will verify the request by confirming the email address used to make the request is the same as the email address on file for the account. If you do not have an account with us, we will verify the request by sending an email to the email address used to make the request. We may ask for additional information reasonably related to the request to verify the request.

Collection of Personal Information – The categories of California consumers’ Personal Information we may collect include the following: personal details, demographic information, contact details, consent records, location information, purchase and payment details, employer details, views and opinions. We also collect other kinds of information from you or other sources, which may include, but is not limited to, information about your use of, visits to and interaction and engagement with the Services, content and ads on the Website, all of which may be aggregated; browsing history; and searches for and interactions with e-commerce opportunities, such as merchants and offers contained in the Services.

We may collect California consumers’ Personal Information from the sources listed in the Section titled, “How Do We Collect Your Data?” As defined in that section, this may include:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- Register online or place an order for any of our products or Services
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email
- Use or view the Website via your browser’s cookies
- Submit content to the Website, like reviews, messages, or comments
- Enable access to their device’s location-tracking functionality, whether the Website is running in the foreground (Website open and on-screen) or background (Website open but not on-screen). Certain functionality may be affected while location data is turned off.

We may obtain personal information from the following sources as well: GeoIP Data; ID; IDFA; IP address; ISP; SSID; IMSI; IMEI; Log files; Web Beacons; Pixel Tags; Local Shared Objects, such as Flash cookies, and Local Storage, such as HTML5, and equivalents. We use this data for the purposes listed above in the section titled, “How Will We Use Your Data” or for direct marketing as outlined in the section titled, “Marketing.”

Disclosure or Sale of Personal Information – We may have disclosed or sold the categories of Personal Information listed within this Policy for a business or commercial purpose. We may have

disclosed such Personal Information to the following categories of third parties for a business purpose:

- other entities within the Company or its affiliate(s) for a legitimate business purpose such as operating the Services and providing the Services to you;
- third-party processors for the purpose of providing the Services to you;
- third-party providers where our Services use third-party advertising, plugins, or content;
- third-party providers to assist with the collection, storage, and segmentation of online data. These third-party providers may collect user information from our Services for their own purposes, including but not limited to, monitoring fraud around the web;
- third parties for the purpose of recognizing our users and delivering interest-based content and advertisements to them. We may share your user information with our partners such as your name, postal address, email, or other identifiers. Our partners may also: (i) collect information directly from your device, such as your IP address, device ID, advertising ID, and information about your browser or operating system; (ii) combine user information about you received from the Company with information about you from other sites or services; and (iii) place or recognize a unique cookie on your browser; and
- third party vendors involved in the administration of contests, competitions, sweepstakes, prize draws, or webcasts.

We may have disclosed or sold Personal Information to the following categories of third parties for a business purpose or a commercial purpose:

- third-party providers where our Services use third-party advertising, plugins, or content. If you choose to interact with any such advertising, plugins, or content, information about your activities on the Services and Website to provide you targeted advertising based upon your interests may be shared with the relevant third-party provider. If you click or tap on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria;
- third parties for the purpose of recognizing our users and delivering interest-based content and advertisements to them. We may share your user information with our partners such as your name, postal address, email, or other identifiers. Our partners may also: (i) collect information directly from your device, such as your IP address, device ID, advertising ID, and information about your browser or operating system; (ii) combine user information about you received from the Company with information about you from other sites or services; and (iii) place or recognize a unique cookie on your browser;
- third parties such as advertisers who will use online data to serve ads that they believe are relevant to your interests, and who agree to maintain the confidentiality of this information. Some of these third parties may combine the online data with their own data about you to form a more detailed picture;
- third-party partners such as marketing and advertising companies and agencies, content publishers, retailers, third-party providers of goods and services; or service providers whose services are embedded into and/or appear within the Services when you use a co-branded service (a service operated with a partner of the Company), or register or otherwise provide information on such co-branded site. This information is only passed on if and when you grant us permission to pass the collected information back to that third party;

- Any sponsors of contests, competitions, sweepstakes, and prize draws, or white papers, webcasts or other downloads, the registration data for such events is to be used by us as part of user information and may be shared with the sponsor and others, subject to this Policy and the sponsor's privacy policy.
- third-party providers of goods and services on a rental or other basis for some of our Services when information (such as the name of our users, their mailing address, phone number, email address – and in certain circumstances their employer's name, company size, and other industry data) is provided in connection with webcasts, white papers or other sponsored downloads.
- If you run a speed test, ISPs and mobile carriers may receive full IP addresses and/or network hardware or device identifiers for such ISP or mobile carrier's customers upon request. Equipment manufacturers and core network or wholesale providers may also receive full IP addresses and/or network, hardware, and device identifiers on a case-by-case basis for network research purposes. Third parties may receive GeoIP Data and/or precise location data.

The Services are not intended for use by minors. We do not sell personal information of minors under 16 years of age without affirmative authorization.

Right to Request Deletion of Personal Information – You have the right to request deletion of Personal Information collected or maintained by us. To do so, please submit a request via [[Link to “Do Not Sell My Personal Information”](#)] or email privacypolicy@twenty20mgt.com. If submitting a request by email, we may ask for additional information to verify your request.

Right to Opt-Out of the Sale of Personal Information – You have the right to opt-out of the sale of Personal Information by a business. To do so, please submit a request via [[Link to “Do Not Sell My Personal Information”](#)] or email privacypolicy@twenty20mgt.com. If submitting a request by email, we may ask for additional information to verify your request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights – You have the right not to receive discriminatory treatment by the business for exercising your privacy rights conferred to you by the California Consumer Privacy Act.

Authorized Agent – To make a request under the California Consumer Privacy Act on a consumer's behalf, we require a signed authorization letter from the consumer to privacypolicy@twenty20mgt.com

Contact for More Information – If you have any questions or concerns about our privacy policies and practices, you may contact us via [[Link to “Do Not Sell My Personal Information”](#)] or email privacypolicy@twenty20mgt.com

Date Privacy Policy Last Updated – Our Privacy Policy was last updated as of the date indicated at the beginning of the Policy.

Virginia Privacy Rights

This section applies only to Virginia residents. If you are a Virginia resident, the Virginia Consumer Data Protection Act – Va. Code Ann. §§ 59.1-575 to 59.1-584 (“**VCDPA**”) provides you with specific rights regarding your personal data, subject to certain exceptions. We collect the type of data described in this Privacy Policy, which includes personal data and sensitive data, as defined by the VCDPA, in the manner described herein. VCDPA defines “**Personal Data**” as any information that is linked or reasonably linkable to an identified or identifiable natural person. Personal Data does not include de-identified data or publicly available information. Personal Data that is excluded from the scope of the VCDPA includes:

1. covered entities or business associates covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and related federal laws and regulations, clinical trial data, or other qualifying research data;
2. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or the Farm Credit Act, and the Driver’s Privacy Protection Act of 1994;
3. information collected from governmental organizations, non-profit organizations and higher education institutions; and
4. data processed or maintained for employment purposes including emergency contact information or benefits administration.

If you do not provide the information that we ask for, we may not be able to provide you with the requested services. Sensitive data is a category of Personal Data that requires greater security protections and standards of care in handling. “**Sensitive Data**” is defined by the VCDPA as (1) Personal Data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status; (2) the processing of genetic or biometric data for the purpose of uniquely identifying a natural person; (3) the personal data collected from a known child; or (4) precise geolocation data. Subject to [limited exceptions](#), we will only process your Sensitive Data with your consent.

Rights Of Virginia Consumers

If you are a Virginia resident the VCDPA provides you with specific rights regarding your Personal Data, subject to certain exceptions. These rights are explained below:

- **Right against Retaliation or Discrimination.** You have the right not to be retaliated or discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your rights.
- **Right to Access.** Subject to certain exceptions, you have the right to confirm whether we are processing your data and you have the right to access such Personal Data.
- **Right to Delete.** You have the right to request that we delete any of the Personal Data we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete and will direct our service providers to delete your Personal Data from our records, unless an exception applies. Please [click here](#) to learn more about the limitations that may apply to your request.

- **Right to Correct.** In certain circumstances and upon the receipt of a verifiable consumer request, you have the right to request that English Meadow Senior Living, LLC correct any inaccurate Personal Data English Meadow Senior Living, LLC maintains about you. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable efforts to correct your Personal Data as directed, taking into account the nature of the Personal Data and the purposes of maintaining your Personal Data.
- **Right to Opt-Out of Sale or Use of Your Personal Data for Targeted Advertisement.** You have the right to opt-out of having your Personal Data, including Sensitive Data, sold and/ or used for targeted advertising. For clarity, English Meadow Senior Living, LLC does not sell Personal Data or Sensitive Data for monetary consideration. If you wish to opt-out of selling of your Personal Data, please click here to be redirected to our “Do Not Sell My Personal Data” page.
- **Right to Data Portability.** You have the right to obtain a copy of your Personal Data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance, where the processing is carried out by automated means.

Verification Of Consumer Request and Timeline

- To assert your rights, please contact us as set forth below.
- To confirm your identity, it is imperative that we verify the consumer request and so you must provide information that allows us to reasonably verify that you are the person about whom we collected the Personal Data or are an authorized representative. If you make a request on behalf of another person, we will need to verify that you have the authority to do so. You must also describe the request with sufficient detail that allows us to properly understand, evaluate and respond to such request. We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. We will not honor your request if an exception to the law applies.

We will respond to requests within forty-five (45) days after our receipt of such verifiable request (or within such other time as required by applicable law). If we need additional time, we will notify you in writing prior to the expiration of the forty-five (45) day period and inform you of the reason for an additional forty-five (45) day extension of time. For the avoidance of doubt, any such requests for Personal Data will cover the twelve (12) month period immediately preceding the date of such verifiable request and such requests can be made up to twice annually per consumer. Disclosure of Personal Data in response to such a request will be provided free of charge and in a commonly used format. If you have any questions or concerns about our privacy policies and practices, you may contact us via [[Link to “Do Not Sell My Personal Information”](#)] or email privacypolicy@twenty20mgt.com

To exercise any of your rights, please send us an email at privacypolicy@twenty20mgt.com or you can also send a request in writing to English Meadows Senior Living, LLC, at PO Box 209 Christiansburg, Virginia 24068.

If we are unable to provide you with the requested information, you can appeal our decision by contacting us at privacypolicy@twenty20mgt.com, and within sixty (60) days of receipt of your

appeal, we will inform you in writing of any action taken or not taken in response to your appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may also contact the Attorney General [here](#) to submit a complaint.

Nevada Consumer Privacy Rights

English Meadow Senior Living, LLC does not sell consumers covered personal information for monetary consideration (as defined in Chapter 603A of the Nevada Revised Statutes). However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your Personal Information. To submit such a request, please contact us using the information in the “Contact Us” section at the end of this document.

International Privacy Practices

In order to provide our products and services to you, we may send and store your personal information outside of the country where you reside or are located, including to the United States. Accordingly, if you reside or are located outside of the United States, your personal information may be transferred outside of the country where you reside or are located, including countries that may not, or do not, provide the same level of protection for your personal information. We are committed to protecting the privacy and confidentiality of personal information when it is transferred. If you reside or are located within the European Union (“EU”) or European Economic Area (“EEA”) and such transfers occur, we take appropriate steps to provide the same level of protection for the processing carried out in any such countries as you would have within the EU and EEA to the extent feasible under applicable law. By accessing and using the Click & Pledge website, App or our Services, users who reside, or are located, in countries outside of the United States, agree and consent to the transfer to, and processing of, personal information on servers located outside of the country where they reside, and assume the risk that the protection of such information may be different, and may be less protective, than those required under the laws of their residence or location.

Cookie Policy

Please click the following link to be directed to our Cookie Policy: [\[INSERT LINK \]](#)

Changes to Our Privacy Policy

It is our policy to post any changes we make to the Policy on this page. If we make material changes to how we treat our users’ Personal Information, through a notice on the Website home page. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Policy to check for any changes.

How To Contact Us

To ask questions or comment about this Policy and our privacy practices, contact us at:

English Meadow Senior Living, LLC
4289 Northfork Road,

Elliston, Virginia 24087

Email: privacypolicy@twenty20mgt.com

To register a complaint or concern, please contact: privacypolicy@twenty20mgt.com

How To Contact The Appropriate Authorities

Should you wish to report a complaint or if you feel that the Company has not addressed your concern in a satisfactory manner, you may contact your local Data Protection Authority.

[Click here for a list of jurisdictions, together with their respective Data Protection Authority and related contact information.](#)