

## **PRIVACY POLICY**

PRIVACY POLICY This privacy policy (the "Privacy Policy") of Phoenix Rising Wellness Center ("Company," "we," "us," or "our,") privacy practices regarding information we collect from persons or entities ("you" or "your") who access our property's website (the "Site"). To access the Privacy

**PURPOSE.** The purpose of this Privacy Policy is to inform you about the types of information we gather about you, including information gathered when you visit the Site, and information we may receive from third parties or affiliates in addition to that online information, how we may use that information, whether we disclose that information to anyone, and the choices you have regarding our use of, and your ability to correct, the information. Company strives to help visitors of the Site protect their privacy while using our Site.

THE SITE IS NOT INTENDED FOR CHILDREN AND COMPANY DOES NOT KNOWINGLY SOLICIT OR COLLECT PERSONAL INFORMATION ON THE SITE FROM CHILDREN UNDER THE AGE OF 13. IF COMPANY LEARNS THAT A CHILD UNDER THE AGE OF 13 HAS SUBMITTED PERSONALLY IDENTIFIABLE INFORMATION TO COMPANY THROUGH THE SITE, IT WILL TAKE REASONABLE MEASURES TO DELETE SUCH INFORMATION FROM ITS RECORDS AND TO NOT USE SUCH INFORMATION FOR ANY PURPOSE (EXCEPT WHERE NECESSARY TO PROTECT THE SAFETY OF THE CHILD OR OTHERS, AS REQUIRED BY LAW, OR AS MAY OTHERWISE BE REQUIRED BY LAW).

**YOUR CONSENT AND POLICY CHANGES.** PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY. BY USING THE SITE, YOU EXPRESSLY CONSENT, WITHOUT QUALIFICATION, TO THE COLLECTION, USE AND DISCLOSURE OF INFORMATION, INCLUDING PERSONAL INFORMATION, AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO USE THE SITE Company may amend this Privacy Policy from time to time. Should the Privacy Policy be modified in any way, the new Privacy Policy will be posted to this webpage. As we may make changes from time to time without notifying you, we suggest that you periodically review the Privacy Policy. By using the Site after the effective date of any modification to the Privacy Policy, you expressly consent, without qualification, to the collection, use and disclosure of information, including Personally Identifiable Information (that you previously provided or later provide), as described in the new Privacy Policy.

**TYPES OF INFORMATION COLLECTED.** We collect two types of information: personally, identifiable information and non-personally identifiable information. Personally, identifiable information is information that identifies you or can be used to identify or contact you (“Personally Identifiable Information”). We also may collect information that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, internet service providers, referring/exit pages, date/time stamp, operating system, clickstream data, information about you such as how you use the Site and your communication preferences, and other anonymous statistical data involving the use of our Site (“Non-Personally Identifiable Information”).

Personally Identifiable Information we collect may include, but is not limited to: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver’s license number, prior addresses, monthly rent paid at prior residences, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, information about your pets, information about your vehicles including license plate numbers, and other information either desirable or necessary to provide quality services to our customers and visitors. We may also collect information about you such as your use of the Site and communication preferences. You may choose not to provide your Personally Identifiable Information by not entering it on the Site; however, you will not be able to use certain services and features if those services and features require Personally Identifiable Information in order to function.

**USE OF COOKIES AND OTHER TECHNOLOGIES.** Like many other website operators, Company may use cookies to customize content specific to your interests and track your use of the Site. “Cookies” are text files that are placed on your computer and may be used to store your personal information. In addition to cookies, Company may use other now known or later developed technologies, to assist Company in observing the behavior of users visiting the Site. These technologies access individual user information but the information is used only to compile aggregated statistics about the Site’s usage. This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist Company in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your

computer's IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for Company's use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. The use of cookies by Google Analytics is covered by Google's privacy policy: <https://www.google.com/policies/privacy/> (<https://www.google.com/policies/privacy/>). You can choose to delete existing cookies, allow or block all cookies, and set preferences for certain websites in your browser's settings. Please note you may not be able to use the full functionality of the Site if you choose to block all cookies.

**HOW WE COLLECT AND USE INFORMATION.** We may collect information in several ways by your use of this Site, as well as from forms you submit to us, personal correspondence, such as emails or letters that you send to us, information you include in an application you complete on the Site, information you provide when scheduling a property visit through the Site, or any other activity through which you identify yourself to us. When you visit the Site, our servers may log your IP address, the URL of your request and other information that is provided in the HTTP header. We may also ask you to voluntarily provide us with personal information on this Site. Further, in some instances, we may ask you to provide personal information to perform screening services. Although you may decline to voluntarily provide Personally Identifiable Information when asked, some features, products and services will be unavailable to you as a result. We may also use your personal information to send you targeted messages, publications, news, and information about events, special offers, promotions, and benefits.

**EMAIL MANAGEMENT.** You may receive emails from Company for a variety of reasons. We respect your desire to manage email correspondence. If you have an account with Company on the Site, you can select your preferences through your account settings. You can also manage your receipt of certain types of communication by following the instructions included in the email we send you. Please note that, even if you unsubscribe from certain email correspondences, we may still need to email you with important transactional or administrative information.

**SHARING OF INFORMATION COLLECTED.** Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Site. We may share with third parties,

including, without limitation, our corporate partners, aggregated demographic, and statistical information that is not personally identifiable. Company may also disclose an individual's personal information: to a person who in the reasonable judgment of Company is seeking the information as an agent of the individual; in situations where sharing or disclosing your information is required in order to offer you products or services you desire; to a third party or parties, where disclosure is required or permitted by law, a judicial proceeding, a criminal investigation, a court order, or legal process; if, in the reasonable judgment of Company, it is necessary to enforce compliance with our internal policies or the Terms of Use, to prevent illegal activity or suspected fraud, or to protect our Site, customers, or others; and to any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of Company's assets. Company may be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order or a subpoena/summons. We also may disclose such information in response to a law enforcement agency's request.

**HOW WE STORE YOUR INFORMATION.** Company is committed to protecting the security of any personal information you provide to us. We maintain commercially reasonable safeguards to maintain the security and privacy of personal information that you provide to us. In spite of these protections, Company cannot guarantee the security of any data submitted over the Internet. After your information reaches Company, however, it is protected by procedures and technology designed to block reasonably foreseeable intrusions by unauthorized third parties. We may store and process your personal information in the United States or Canada or any other country in which we or our agents maintain facilities. By using the Site, you consent to the transfer of your information among these facilities, including those located outside your home country.

**THIRD-PARTY WEBSITES.** This Privacy Policy applies solely to information collected by Company. This Privacy Policy does not apply to other websites that are accessible through this Site, including but not limited to any third-party websites.

**DATA RETENTION.** To provide you with the products and services you request, answer questions you may have about the products and services provided, and for our own accountability to external regulatory bodies, we retain your information for a period deemed reasonable under the circumstances. Information stored is removed, destroyed, or deleted from time

to time when it appears we will no longer have a need to contact you. Retention periods may be extended if we are required to preserve your personal data in connection with litigation, investigations, and proceedings, or if a longer retention period is required or permitted by applicable law.

**RIGHTS OF INDIVIDUALS.** Site users who wish to correct, update, change, or erase the information they submit on the Site should be able to go back to the applicable web form or their account to edit their user or organization record. For additional information or problems accessing your information from such page, please contact Company using one of the methods listed below. If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country. HIPAA stands for the Health Insurance Portability and Accountability Act of 1996.

**HIPAA** HIPAA is Federal legislation that was made law by Congress in 1996. With all the advancements in electronic technology, Congress recognized the need for Federal privacy protections of individually identifiable health information and therefore has mandated privacy protections.

The HIPAA Privacy Rule, effective April 14, 2003, is aimed at safeguarding the privacy of our residents through increased accountability in the areas of privacy and security. The Privacy Rule establishes for the first time, a foundation for Federal protections for the privacy of Protected Health Information (PHI). The HIPAA Security Rule, effective April 20, 2005, becomes more specific and calls for protection of PHI in electronic formats. Compliance with the HIPAA Privacy Rule is required for certain Beachside Rehab and offices because they transmit resident health information electronically related to health care claims, payment, or coordination of benefits. They are called Covered Entities. If you have any questions regarding a community and its applicability under the HIPAA Privacy Rule, please contact us at 772-584-3692

Below are the Notice of Privacy Practices:

Beachside Rehab already practices confidentiality and respect for resident privacy. The Privacy and Security Rule will provide an even greater opportunity for Beachside Rehab to monitor the safe keeping of our client's Protected Health Information (PHI). If you have any questions or comments regarding the Notice of Privacy Practices, please feel free to contact us at 772-584-3692