

Website Privacy Policy

Welcome to the Foundations Group website, mobile app, and related digital and online services ("Foundations Group Site" the "Site," or "Sites"), provided by Foundations Group and its affiliates ("Foundations Medical Adult Day Care" or "Foundations Psychiatric Rehabilitation Program" or "We" or "Us").

We are committed to protecting the privacy of all visitors to our website, and we want you to know how we collect, use, share, and protect your information.

This Website Privacy Policy ("Privacy Policy") applies to individually identifiable information that you provide to us for purposes of obtaining medical care through the Admissions (such information is also referred to as "Protected Health Information" or "PHI"), which is subject to our Health Insurance Portability and Accountability Act"), and information that is not PHI. The HIPAA Notice describes how we can use and share your PHI and also describes your rights with respect to your PHI. This Privacy Policy supplements the HIPAA Notice for PHI. If there is ever any conflict between this Privacy Policy and the HIPAA Notice, the HIPAA Notice will apply. The HIPAA Notice does not apply to information that is not PHI.

The Foundations Group **Notice of Privacy Practices** (the "HIPAA Notice") is a separate document that governs how medical information about you may be used and disclosed by Foundations Group.

Revised August 2023

What information we collect

Information you give us

We collect and store information you provide directly to us, such as when you create or modify your account or user preferences, sign up for a newsletter, contact us, respond to a survey, or otherwise communicate with us. This includes information you submit on forms, such as appointment request forms, necessary for us to provide services to you. We may collect some or all of the following types of information:

- Contact information, such as your full name, email address, phone number(s), and postal address;
- Username and password;
- Insurance information;
- Payment information, such as your credit card number, expiration date, and credit card security code;
- Personal health information (which, to the extent it is considered Protected Health Information under HIPAA, shall be subject to the <u>Foundations Group HIPAA</u> <u>Notice</u>)
- Survey responses;

- Doctor reviews;
- User content stored or entered into the forms found in our online platforms; and
- Any other information you choose to provide to us, including information you search for or ask us about.

Information we collect automatically

When you interact with our Site, certain information about your use of our Site is automatically collected. This information includes computer and connection information, such as statistics on your page views, traffic to and from our Site, referral Universal Resource Locators (URL), ad data, your Internet Protocol (IP) address, and device identifiers. This information also may include your transaction history, and your web log information, how you search our Site, the websites you click on from our Site or emails, whether and when you open our emails, and your browsing activities across other websites.

Much of this information may be collected through cookies, pixel tags, web beacons and other tracking technologies, as well as through your web browser or device. Cookies are small bits of information that are stored by your computer's web browser. Pixel tags are very small images or small pieces of data embedded in images, also known as "web beacons" or "clear GIFs," that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device. Local Shared Objects (sometimes referred to as "Flash Cookies") are similar to standard cookies except that they can be larger and are downloaded to a computer or mobile device by the Adobe Flash media player. By using the Sites, you consent to our use of cookies and similar technologies.

You can usually change your browser setting to prevent acceptance of cookies or make changes to your cookie settings.

We may also receive information about you from other sources, including through third-party services and organizations. We may combine our first-party data, such as your email address or name, with third-party data from other sources and use this to contact you (e.g. through direct mail). For example, if you access third-party services, such as Facebook, Google, or Twitter, through the Services to login to the Services or to share information about your experience on the Services with others, we may collect information from these third-party services.

How we use the information we collect

The information you provide to us will be used to:

- Set up your account (if applicable)
- Fulfil your requests for products, services, and information
- Send you information about additional clinical services or general wellness from us or on behalf of our affiliates, unless you tell us not to

- Analyze the use of the Services and user data to understand and improve the Services;
- Improve the Site and online platforms
- Respond to your inquiries
- Facilitate your job application
- Fulfill any other purpose for which you provided it

We will not use your information for any purposes other than as described in this Privacy Policy or explained to you at the point at which the information was collected.

Email communications, newsletters and related services

Foundations Group communicates with you through newsletters, mailings, email, or other means about treatment options, health-related information, disease management programs, wellness programs or other community-based activities in which Foundations Group participates.

Electronic communications that you send to us electronically through our Site may be shared with a customer service representative, employee, medical expert or agent that is most able to address your inquiry. We make every effort to respond in a timely fashion once communications are received.

Surveys

We occasionally may survey visitors to our Site. The information from these surveys is used in aggregated, de-identified form to help us understand the needs of our visitors so that we can improve our Site. The information may be shared with third parties with whom we have a business relationship. We generally do not ask for information in surveys that would personally identify you; if we do request contact information for follow-up, you may decline to provide it. If survey respondents provide personal information (such as an email address) in a survey, it is shared only with those people who need to see it to respond to the question or request, or with third parties who perform data management services for our Site. Those third parties have agreed to keep all data from surveys confidential.

Sharing of Information

We may share information as described in this Notice or as otherwise described at the time such information is collected from you. Foundations Group does not sell, trade or rent personal information about its Site visitors. Information shared by us includes:

Affiliates. We may share information with a parent, subsidiary or other entity affiliated
with Foundations Group. Any organization to which we provide such information is
required to keep it confidential and to only use such information in accordance with
this Privacy Policy.

- Authorized Third Party Vendors and Service Providers. In the course of doing business, we employ other companies and individuals to perform a variety of functions on our behalf. For example, we may provide information as necessary to companies that host our online platforms or send communications on our behalf.
 These service providers may have access to information about you if it is needed to perform their functions for us, but they are not authorized by us to use or disclose such information except as necessary to perform services on our behalf or to comply with legal requirements, and they are required to maintain the information in confidence.
- Internal Marketing. We may use cookies and other similar technologies for our internal
 marketing purposes. Cookies are used in some areas of our Site to enable functionality
 and ease of use for those people visiting, to improve the content on the Site, or track
 activity on the Site. Some of our affiliate / advertising partners may also use cookies for
 similar purposes.
- **Legally Required.** We reserve the right to disclose information if required to do so by law or by a regulatory authority. We may also disclose information as part of an investigation or enforcement action relating to improper or illegal conduct in connection with our online platforms or other products, such as a situation that could potentially involve threats to the safety or privacy of any person or misuse of our online platforms.

Aggregated and Non-Identified Data. We may maintain and use aggregate data or other non-identified information (i.e., data that does not identify a specific individual), such as usage statistics, device data, online traffic patterns and user feedback. In addition to using this information for the purposes discussed in this Privacy Policy, we may disclose such aggregated or non-identified data to third parties.

How we protect the information we collect

Security

We use reasonable security measures to protect the confidentiality of personal information under our control and appropriately limit access to it. We use a variety of information security measures to protect your online transactions with us. Our Site uses encryption technology, such as Secure Sockets Layer (SSL), to protect your personal information during data transport. SSL protects information you submit via our Site, such as information including your name address and credit card number to pay medical bills.

Foundations Group cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. We take reasonable steps to ensure the integrity and confidentiality of personally identifiable information that you may provide. However, electronic transmissions via the Internet are not necessarily secure from interception, and so we cannot absolutely guarantee the security or confidentiality of such transmissions.

Protecting children's privacy

We are committed to protecting the privacy of children. Foundations Group's online services are not intended or designed to attract children under the age of 13. We do not knowingly collect, maintain, or use personal information from children under 13 years of age. If you learn that your child has provided us with personal information without your consent, you may alert us at info@foundationsgroup.net. If we learn that we have collected any personal information from children under 13 years old, we will promptly take steps to delete such information.

Your choices

By contacting us using the information below, you may:

- Update and correct your personal information
- Cancel your account or request that we no longer use your information to provide you services
- Stop receiving communications from our Site. To stop receiving communications, send an email message to or send regular mail to the following postal address:

Foundations Group Website 1025 W Nursery Road, Suite 112 Linthicum, MD 21090

Email: info@foundationsgroup.net

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies. If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

Data retention

We will retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

Links to other websites

Our Site links to other websites, many of which have their own privacy policies. Be sure to review the privacy policy on the site you're visiting.

Privacy policy updates

We may need to update our Privacy Notice as technology changes and Foundations Group evolves. When we update the Privacy Notice, we will update the "Revised" date above and post the new Privacy Notice.

Contact information

If you have questions about this Website Privacy Policy or our practices, please email us at: info@foundationsgroup.net.