

# CARDINAL SENIOR LIVING ADVISORS, LLC PRIVACY POLICY

EFFECTIVE JANUARY 1, 2020

PLEASE READ PRIVACY POLICY CAREFULLY. THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU OR A LOVED ONE MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. CARDINAL SENIOR LIVING ADVISORS, LLC "CARDINAL SENIOR LIVING ADVISORS" IS PROVIDING THIS NOTICE OF PRIVACY PRACTICES BECAUSE THE PRIVACY OF YOUR HEALTH INFORMATION IS VERY IMPORTANT TO YOU AND TO US, AND IN COMPLIANCE WITH FEDERAL REGULATIONS. BY "YOUR HEALTH INFORMATION" WE MEAN THE INFORMATION THAT WE MAINTAIN THAT SPECIFICALLY IDENTIFIES YOU OR A LOVED ONE AND/OR RESPECTIVE HEALTH STATUS.

## CONSENT

Privacy Policy. By using the Cardinal Senior Living Advisor site or by providing information, you acknowledge and understand the terms of our Privacy Policy. By providing us with your telephone number or e-mail, including on our site or over the telephone, you agree to be contacted by Cardinal Senior Living Advisors and senior housing and care providers that have contracted with us to be part of our referral information service program in relation to the Services that we provide you to explore options relating to our Services. You agree to be contacted by telephone call or text message at the telephone number you provided.

## COLLECTION & USE OF YOUR PERSONAL INFORMATION

As used in this Privacy Policy, "Personal Information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, reasonably can be linked, directly or indirectly, with an individual or household, or as otherwise defined under applicable law.

We collect Personal Information from four primary sources: directly from our users or customers, automatically from the use of our Services, from affiliated and unaffiliated third parties, and by using information we collect to derive new Personal Information. The types of Personal Information we collect about you depend on your interactions with us and are described in more detail below.

**Information We Collect Directly from You.** We collect information directly from you in a variety of ways. Any information you provide to us is voluntary, but please note that some information may be necessary for us to provide you with our Services. You may also provide Personal Information about another person for whom you may be seeking senior housing and/or care Services ("Resident").

The categories of Personal Information we collect directly from you include:

- Identifiers, such as your first name, last name, phone number, email address, and mailing address;
- Financial information, including a Resident's budget for senior housing options and whether the Resident receives Medicare or Medicaid;
- Commercial information, including records of your move-in status with referred Participating Communities;
- Feedback you provide to us about our Services, including in response to surveys or through our customer service centers; and
- For Residents, his or her gender; household income; budget; senior care needs, including health information and medical conditions; and veteran status, as well as other information you may choose to voluntarily provide, such as marital status, religion, or ethnicity.

## INFORMATION WE COLLECT FROM OTHER SOURCES

We may collect information about you from other sources. For example, we may collect information about you from:

- Residents (if you are not the Resident) or a person who contacts us seeking Services for a Resident;
- From Participating Communities;

## **DISCLOSURE OF PERSONAL INFORMATION**

We will share your Personal Information as follows:

- To Participating Communities. We may share Personal Information with Participating Communities to provide you with the Services you've requested. The Participating Communities may contact you directly, including by email, telephone, regular mail, or in-person visits.
- To People Acting On Your Behalf. We may share Personal Information with the person who referred you as a Resident or to another person acting on your behalf.
- To Our Service Providers. We may share Personal Information with one or more service providers with which we have contracted to provide services to us or to offer the Services you have requested from us.
- For Legal and Other Compliance. We may share Personal Information when we believe it is appropriate for legal purposes, including to: (a) comply with the law; (b) enforce or apply this Privacy Policy or our other policies or agreements; (c) protect our or our users' rights, property, or safety; (d) protect our users from fraudulent, abusive, or unlawful use of our Site; or (e) if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.
- At your request. We may otherwise share Personal Information with your consent or at your direction.

## **USE OF YOUR INFORMATION**

For each category of Personal Information we collect about you (whether directly or automatically), we use such category of Personal Information for the business and commercial purposes set forth below:

- To provide you the Services and otherwise complete the transactions and/or referrals you request, perform our contractual obligations, and as otherwise anticipated within the context of our ongoing business relationship;
- Communicate with you, including by telephone, text, email, and chat, regarding your use of the Services;
- Respond to your requests and any other communications from you, including to provide customer service;
- Send advertising or marketing communications about products, services, offers, promotions, rewards, and events offered by us and provide news and information that we believe may be of interest to you;
- Offer and administer surveys, contests, prize draws, sweepstakes, and other promotions;

## **SECURITY**

We use reasonable security measures to store and protect your Personal Information while it is under our control, that being stated, no transmission of data over the Internet is 100% secure.

## **RECORDED TELEPHONE COMMUNICATIONS**

Telephone communications between You and Cardinal Senior Living Advisors may be recorded or monitored for quality control purposes. By providing information to us, you expressly consent to the recording of these telephone communications.

## COMPLAINTS, CONTACT PERSON AND ACKNOWLEDGEMENT

You may complain to us and to the Secretary of Health and Human Services if you believe your privacy rights have been violated.

- You will not be retaliated against for filing a complaint.
- You may file your complaint with our agency by writing to the Privacy Officer.
- You may file a complaint with the Secretary of Health and Human Services by writing to:

*Secretary of Health and Human Services*

*U.S. Department of Health and Human Services*

*200 Independence Avenue, S.W.*

*Washington, DC 20201*

*source: [www.hhs.gov](http://www.hhs.gov)*

For further information, you may write or call:

*Cardinal Senior Living Advisors Privacy Officer*

*PO Box 1338*

*Allen, Texas 75002*

*Telephone: 214-533-8212*

*Email: [kkunkle@cardinalseniorlivingadvisors.com](mailto:kkunkle@cardinalseniorlivingadvisors.com)*