



Website Privacy Notice

Website Privacy Notice

This Front Porch Communities and Services ("Front Porch") Privacy Notice applies solely to information collected by this web site. It describes:

1. What Personal Information is collected from you through the web site, how it is used, and with whom it may be shared.
2. What choices are available to you regarding the use of your data
3. The security procedures in place to protect the misuse of your information.
4. How you can correct any inaccuracies in the information.

This Privacy Notice focuses on Personal Information – information about you that is personally identifiable, such as contact information (*e.g.*, name, telephone number, address, email address) and any other non-public information that is associated with such information (collectively, "Personal Information"). Please read this policy carefully to understand what we do. If you do not understand any aspects of our Privacy Notice, please feel free to contact us as described at the end of this Notice.

What Information Do We Collect?

We are the sole owners of the information collected on this site. We collect two types of information: (1) information that you voluntarily give us via email, and (2) information that we collect through your use of this website

Information You Provide Us

You may provide us with your email address, name, telephone number, or other contact information when you contact us to ask questions or request information. You may also donate to one of our affiliated Foundations by clicking on a link that directs you to PayPal, a third party site. Front Porch does not collect or maintain any payment related information through our website.

Information We Collect Through Your Use of the Website

You also provide us information in other ways, such as via your browser's cookies or through similar technologies when you use or view our website. Cookies are text files placed on your computer to allow us to facilitate an ongoing internet interaction. We collect information such as your Internet Protocol address, browser software used, requests submitted to our web-servers, date and time the website was accessed, and statistical information about which web pages you visited to improve the quality of our website including for storing user preferences and tracking user trends.

We use Google Analytics to collect and process website data for our corporate site, and we use Google Analytics advertising services on our individual community websites to personalize content related to your interests. We do not share Personal Information with Google Analytics. You may access "How Google uses data when you use our partners' sites or apps", (located at www.google.com/policies/privacy/partners/, or any other URL Google may provide from time to time) to find out about how Google Analytics uses your data. This document also provides information about how to opt out of Google Analytics. In addition, you can use web browser settings to refuse cookies or delete cookie files from your computer. Information on how to delete cookies from your computer can be found at the following website: <http://www.aboutcookies.org>.

Front Porch does not track its visitors over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, most web browsers will allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked.

How Do We Use And Share Your Personal Information?

We will use your Personal Information for the following purposes, subject to applicable legal restrictions):

- to provide you with the information on the website,

- to respond to you regarding the reason you contacted us.
- To tell you about new opportunities, products, or services.
- to create aggregate statistics relating to the use of the website (count of visits, ranking of top pages visited, etc.).

We will not sell or rent this information to anyone. We may share your Personal Information in limited circumstances, such as to conduct our business, when legally required, or with your consent.

We may also disclose Personal Information that we collect or you provide (subject to applicable legal restrictions) as follows:

- to contractors, service providers and other third parties that 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.
- as required by law.
- for any other purpose disclosed by us when you provide the information.

What Are Your Rights?

You may opt out of any future contacts from us at any time. You can also do the following at any time by contacting us via the email address or phone number given at the end of this Privacy Notice.:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

How Is Your Information Protected?

We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of Personal Information. Our website is operated and managed on servers located and operated within the United States. By using and viewing the website, you agree and consent to the transfer to and processing of Personal Information on servers located in the United States, even if you travel or are located outside the United States.

What If You Visit Other Websites?

This Privacy Notice applies only to information we collect through the Front Porch website. This website contains links to third party sites that are not owned or controlled by us. . Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects Personal Information.

How Will You Know if This Policy Changes?

We will post any revised version of the Privacy Policy on this webpage.

Who Should You Contact With a Request or Question?

If you have a request for access, correction, or deletion of Personal Information, or have any questions, concerns, or complaints, you should contact Sally Plank, Sr. Vice President, Organizational Accountability Group, at (818) 254-4146 or at splank@frontporch.net.



Notice of Privacy Practices for Health Information

NOTICE OF PRIVACY PRACTICES FOR HEALTH INFORMATION HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)

“THIS NOTICE DESCRIBES HOW PROTECTED HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

GENERAL INFORMATION: When we provide services and care to you, Front Porch Communities and Services (“Front Porch”) gathers, creates, and retains certain personal information about you that identifies who you are and relates to your past, present, or future physical or mental condition, the provision of health care to you, and payment for your health care services. This personal information is called “*protected health information*.”

This Notice of Privacy Practices describes how Front Porch maintains the confidentiality of your protected health information, and informs you about the possible uses and disclosures of such information. It also informs you about your rights with respect to your protected health information. This Notice is intended to help you understand how your health information is used and to make informed decisions when authorizing disclosure to others.

Front Porch is required by law to:

- Make sure that your protected health information is kept private in compliance with the Health Insurance Portability and Accountability Act (HIPAA) and California law;
 - Give you this notice of our legal duties and privacy practices with respect to protected health information; and
- Follow the terms of the notice that is currently in effect.

This Notice describes Front Porch’s practices and that of:

- Any health care professional authorized to enter information into your health or medical record.
- Any member of a volunteer group we allow to help you while you are at Front Porch.
- All employees, staff and other personnel.

This Notice applies to Front Porch and its senior living facilities, including Carlsbad By The Sea, Carlsbad By The Sea Care Center, Casa De Manana, Cecil Pines, Claremont Manor, Claremont Care Center, England Oaks, Fredericka Manor, Fredericka Manor Care Center, Kingsley Manor, Kingsley Manor Care Center, Sunny View Retirement Community, Sunny View Care Center, Villa Gardens, Villa Gardens Health Center, Vista Del Monte, Walnut Village, Walnut Village Rehabilitation and Care Center, and Wesley Palms. All these entities, sites and locations follow the terms of this notice. In addition, these facilities may share protected health information with each other for treatment, payment or health care operations purposes described in this Notice.

HOW WE MAY USE AND DISCLOSE YOUR PROTECTED HEALTH INFORMATION

Front Porch may, in its discretion, use or disclose your protected health information without your written authorization in the following circumstances:

We will use your information for treatment. Information obtained by physicians, nurses, social workers, administrative staff or other health care providers will be recorded in your paper and/or computerized medical record. This information is used to plan your treatment and services as well as to document progress, events, plans of care, observations and evaluation of care and treatment, information for consultants, diagnostic services, or for other providers or transfer to another Health Facility.

We will use your health information for payment. A bill may be sent to a third party such as Medicare, Medi-Cal (Medicaid), your health plan, your insurance companies and/or **to you**. We may provide your

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demographic information, your diagnosis, information about the services provided, and additional health information to support the billing.

We will use your health information for health care operations. Front Porch and staff may use your protected health information to carry out its regular operations and to make sure that all of our residents receive quality services and care.

Business Associates: Front Porch may contract with certain individuals or organizations to provide services on its behalf, such as data processing, legal, or quality assurance services. These entities are called business associates. We may disclose your protected health information to business associates as necessary. These business associates are required by HIPAA to protect your information.

Individuals Involved in Your Care or Payment for Your Care: We may disclose protected health information about you to a friend or family member who is involved in your care, or to someone who helps pay for your care. Unless you ask us not to in writing, we may tell your family or friends your condition and your location. Front Porch may notify individuals that you identify as a responsible party or your personal representative of appointments, special meetings to discuss care and treatment, and other information related to your health condition or status.

Community Special Directory: Front Porch maintains a Special Directory of residents to allow staff to provide certain basic information to members of the clergy or to other persons who ask for you by name. Unless you notify us that you object, the directory will include certain limited information about you such as your name and location in the facility.

Disaster Relief: Front Porch may disclose your protected health information to a public or private entity authorized to assist in disaster relief efforts so that your family can be notified about your condition, status and location.

Research: Under certain circumstances, we may use and disclose protected health information for the purposes of research. Such disclosures shall only be made after documentation of approval for the research study or in limited circumstances, for preparing to conduct a research study.

Fundraising: Front Porch may use certain protected health information to contact you in an effort to raise money for our operations. We may disclose protected health information to foundations that are related to Front Porch that and raise funds for us. Front Porch will disclose only your name, address and phone number.

As Required by Law: We will disclose protected health information about you when required to do so by federal, state or local law.

To Avert a Serious Threat to Health or Safety: We may use and disclose medical information about you when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

SPECIAL SITUATIONS

Funeral Directors and Coroner's Office: If necessary, we may disclose the health information to funeral directors and coroner's office consistent with applicable laws as required for them to carry out their duties.

Organ and Tissue Donation: We may release medical information to organizations that handle organ procurement or organ, eye or tissue transplantation, or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.

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Military and Veterans: If you are a member of the armed forces, we may release protected health information about you as required by military command authorities. We may also release health information about foreign military personnel to the appropriate foreign military authority.

Workers Compensation and Employee Actions: We may release medical information about you for workers' compensation or similar programs that provide benefits for work-related injuries or illness.

Public Health Activities: We may disclose medical information about you for public health activities, such as:

- To prevent or control disease, injury or disability;
- To report deaths;
- To report regarding the abuse or neglect of elders and dependent adults;
- To report reactions to medications or problems with products, or to notify people of recalls of products they may be using;
- To notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition.

Law Enforcement: We may release medical information if asked to do so by a law enforcement official:

- In response to a court order, subpoena, warrant, summons or similar process;
- To identify or locate a suspect, fugitive, material witness, or missing person;
- About the victim of a crime if, under certain limited circumstances, we are unable to obtain the person's agreement;
- About a death we believe may be the result of criminal conduct;
- About criminal conduct at the facility; and
- In emergency circumstances to report a crime; the location of the crime or victims; or the identity, description or location of the person who committed the crime.

Health Oversight Activities: Front Porch may disclose protected health information to any government or private agency, such as the California Department of Health Services and the California Department of Social Services, so that the agency may carry out its oversight responsibilities. These oversight activities include, for example, audits, investigations, inspections, and licensure activities, which are necessary for the government to monitor the health care system, government programs, and compliance with civil rights laws.

Lawsuits and Disputes: If you are involved in a lawsuit or a dispute, we may disclose protected health information about you in response to a court or administrative order. We may also disclose health information about you in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request (which may include written notice to you) or to obtain an order protecting the information requested.

Other Special Circumstances: We may also use and disclose your protected health information in a limited number of circumstances that are specifically permitted or required by law.

Special Categories of Information: In some circumstances, your health information may be subject to restrictions that may limit or preclude some uses or disclosures described in this Notice. For example, there are special restrictions on the use or disclosure of certain categories of information — e.g., tests for HIV, certain mental health services, or certain treatment for alcohol and drug abuse. Government health benefit programs, such as Medi-Cal, may also limit the disclosure of beneficiary information for purposes unrelated to the program.

YOUR RIGHTS REGARDING PROTECTED HEALTH INFORMATION ABOUT YOU

Right to Request or Authorize the Use and Disclosure of Your Information: We may disclose protected health information when requested by you. Front Porch will require a written authorization from

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you before it discloses your information. You may request an authorization form from Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net.

Right to Inspect and Copy: You have the right to inspect and obtain a copy of protected health information that may be used to make decisions about your care. Usually, this includes medical and billing records, but may not include some mental health information. To inspect and obtain a copy of protected health information that may be used to make decisions about you, you must submit your request in writing to Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net. We may charge a reasonable fee for the costs of copying, mailing or other supplies associated with your request. We will usually provide a copy or summary of your health information within 30 days. We may deny your request to inspect and obtain a copy in certain very limited circumstances.

Right to Amend: If you believe that protected health information we have about you is incorrect or incomplete, you may ask us to amend the information. To request an amendment, your request must be made in writing and submitted to Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net. In addition, you must provide a reason that supports your request. We may deny your request but will inform you of the reason in writing, generally within 60 days.

Right to an Accounting of Disclosures: You have the right to request an accounting of disclosures of your protected health information. This is a list of the disclosures that we made other than for treatment, payment and health care operations (as described above), and certain other exceptions (such as any you asked us to make). To request this list or accounting of disclosures, you must submit your request in writing to Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net. Your request must state a time period of six years or less, for any time period on or after April 14, 2003. Your request should indicate whether you want the list on paper or electronically. The first list you request within a 12-month period will be free. For additional lists, we may charge you for the costs of providing the list.

Right to Request Restrictions: You have the right to request a restriction or limitation on the protected health information we use or disclose about you for treatment, payment or health care operations. You also have the right to request a limit on the protected health information we disclose about you to someone who is involved in your care or the payment for your care. We are not required to agree to your request, except if you ask us to restrict disclosure to a health plan or insurer for payment or health care operations purposes and if you, or someone else on your behalf (other than the health plan or insurer), has paid for the item or service out of pocket in full. If we agree to a different restriction, we will comply with your request unless the information is needed to provide you emergency treatment.

To request restrictions, you must make your request in writing to Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net. In your request, you must tell us 1) what information you want to limit; 2) whether you want to limit our use, disclosure or both; and 3) to whom you want the limits to apply, for example, disclosures to your spouse.

Right to Request Confidential Communications: You have the right to request that we communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing to Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

Right to a Copy of this Notice: You have the right to a paper copy of this notice. You may obtain a paper copy of this notice by contacting Nancee Lee-Allen, Privacy Officer, at nlallen@frontporch.net.

Right to Notification of Breach: We will notify you as required by law, if any breach of your unsecured protected health information that compromises the privacy or security of your information occurs.

Right to Have Someone Act for You: If you have given someone healthcare power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health

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information. We will make sure the person has this authority and can act for you before we take any action.

Questions and Complaints: If you have a question, desire additional information, or wish to report a problem you may call the facility contact person at the facility phone number. **If** you think your privacy rights have been violated. If you are not satisfied with the response to your concern, file a written or oral complaint with the Administrator. If your response is still a concern you may file a complaint with the privacy officer, Nancee Lee-Allen, at 818-254-4284, or nlallen@frontporch.net.

You are also notified that you may file a complaint with the Secretary of Health and Human Services, Office for Civil Rights:

U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201
(202) 619-0257
1-877-696-6775 (toll free)
<http://www.hhs.gov/ocr>

CHANGES TO THIS NOTICE

Front Porch reserves the right to change our privacy practices and to make new practices known to you through our routine methods of communications to the latest address/contact provided.

OTHER USES OF YOUR PROTECTED HEALTH INFORMATION

Other uses and disclosures of protected health information not covered by this Notice or the laws that apply to us will be made only with your written permission. If you provide us permission to use or disclose medical information about you, you may revoke that permission, in writing, at any time. If you revoke your permission, this will stop any further use or disclosure of your protected health information for the purposes covered by your written authorization, except if we have already acted in reliance on your permission. You understand that we are unable to take back any disclosures we have already made with your permission, and that we are required to retain our records of the care that we provided to you.

Effective date: 4.13.03
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