GLENNIS FAMILY MOBILE PRIVACY NOTICE

Effective Date: March 15, 2023

Your privacy and the privacy of the respective resident(s) is important to us. We developed this Privacy Notice to explain how Glennis Solutions, Inc ("Glennis", "we", "our", or "us") may collect, use, and share information about you and the respective resident(s) that we obtain through the use the Family Mobile application (the "App").

Changes to this Privacy Notice

We may revise this Privacy Notice from time to time. If we make changes, we will update the Effective Date at the top of this page. Your continued use of the App after we update the Notice indicates that you accept the revised terms. We encourage you to check this page whenever you use the App, to stay informed about our data practices.

Information We Collect

Information You Submit. We may obtain information about you and/or the respective resident(s) through the App. This may include personally identifiable information such as name, email, photos, as well as any information disclosed in the respective resident(s)'s App profile. We may also obtain information about the daily activities and certain health conditions of the respective resident(s). If you provide to us personally identifiable information about others, you represent that you have the authorization to do so. Please be mindful that any sensitive information uploaded or shared on the App profile for the respective resident(s) will be obtained by Glennis and may be shared to others by individuals accessing the subject App profile.

Protected Health Information. We also collect information associated with the care plan of the respective resident(s), which will be visible to the individuals who have permission to view that specific individual's profile in the App. This care information may include protected health information ("PHI") as defined by the federal HIPAA law, such as medical treatment plans and diagnoses. Notwithstanding anything in this Privacy Notice to the contrary, when we receive PHI in the course of performing services under the federal HIPAA law, we treat and protect the PHI consistent with our obligations under HIPAA and similar state laws, the HIPAA Notice of Privacy Practices, and our contractual obligations.

Social Media Information. We may require users to use social networking sign-on services to register and access the App using the user's respective social networking credentials. We do not access, collect or sell information in connection with social networking services through these sign-on features. This includes public profiles, friend list, people followed or followers, email addresses, birthdays, work history, education history, interests, current city, website, personal description and likes, and friends' birthdays, education histories, personal descriptions and likes.

Automatically Collected Data. We also may automatically collect certain information when the App is being utilized. For example, we may use certain automated tracking tools to collect, user type (responsible party, guest, etc.), device model and details about the use of the App. We may associate the unique identifier assigned to a mobile device with other information we obtain.

Information about the use of this App and/or other websites or mobile applications may be collected across time, devices, and online locations for various purposes, including to associate

different devices used and to deliver relevant and/or retargeted content online. We do not access or collect Internet protocol (IP) addresses.

To find out more about how these third-party tracking technologies manage the privacy of information in conjunction with delivering ads online, and how to opt-out of information collection by these networks, please visit: <u>http://www.youradchoices.com</u>, <u>http://www.aboutads.info/appchoices</u>, or <u>https://www.networkadvertising.org/mobile-choice</u>.

App Permissions. Depending on your device's or App permission settings, we may collect automatically from your device the following information:

- 1) **Stored information and files.** This allows the App to read, modify, or delete the contents of your shared storage.
- 2) **Camera.** This allows the App to take pictures.
- 3) **Calendar.** This allows the App to access and modify the contents of your device's calendar.
- 4) **Other.** This allows the App to receive data from Internet, view network connections, have full network access, and prevent device from sleeping.

Information Use

We may use information that we obtain, including personally identifiable information, for various purposes, including to:

- Process your account registration and provide access to your registered account;
- Authenticate your identity for account registration purposes;
- Respond to your comments, questions, and other inquiries, or to contact you for other purposes;
- Facilitate and personalize your user experience and improve the App;
- Conduct statistical analysis of App content, layout, and features for our marketing purposes;
- Improve the App, our marketing, or services we may offer;
- Deliver promotional content to you;
- Comply with applicable laws, regulations, or legal process, as well as industry standards and our company policies;
- Prevent, investigate, identify, stop, or take any other action with regard to suspected or actual fraudulent or illegal activity, or any activity that violates our policies; or
- For any other purpose, with your consent.

We may use information we obtain about you in other ways, in which case we will notify you at the time of collection.

We will store your personal information for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the information was collected, or as may be permitted under applicable law. Unless otherwise required by applicable law, at the end of the retention period we will remove personal information from our systems and records or take appropriate steps to properly anonymize it.

Information Sharing

We may permit our agents, vendors, consultants, and other service providers to access information obtained through the App to carry out work on our behalf. Our service providers use

personally identifiable information we disclose to them only for the purpose(s) for which it was disclosed.

We may share your information (1) if we are required or requested to do so by law or legal process (such as in response to a subpoena or court order or similar government or law enforcement request); (2) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, to protect property or safety, or in connection with the investigation of possible fraud or other illegal activity; or (3) as needed to enforce our policies.

We reserve the right to transfer any information we obtain through the App in the event of a joint venture, partnership, merger, or other collaboration with another organization, or in the event we sell or transfer all or a portion of our business or assets (e.g., further to a reorganization, liquidation, or any other business transaction, including negotiations of such transactions).

Social Features

The App may include features that are designed to permit interactions that you initiate between the App and third-party websites or services, including third-party social networks like Facebook (collectively, "Social Features"). For example, you may use your Facebook, Google, or other third-party account to log in to the App.

If you use Social Features on the App, both Glennis and the third-party services that operate those Social Features may have access to certain information about you and your use of both the App and their service. The information we collect in connection with your use of Social Features is subject to this Privacy Notice. If we discontinue use of any third-party service (for example, if we stop allowing users to access the App using their Facebook accounts), we may nevertheless retain the personally identifiable information and other data we already received. The information collected and stored by the third parties remains subject to those third parties' privacy policies, including how they share information with us, the types of information shared, and your choices with regard to what is visible to others on their websites or services.

Analytics

Glennis may use service providers for analytics services. These analytics services may use cookies and other tracking technologies to help Glennis analyze how users use the App. Service providers may be store and use information (e.g., your IP address and other usage information) for purposes such as evaluating your use of the App and compiling statistic reports on the App's activity.

Links to Other Services

The App may contain content and that is supplied by a third party, and those third parties may collect usage data and your device identifier when such content is served to you. Associated third-party services may also be available via the App. We are not responsible for the data collection and privacy practices employed by such third parties or their services and they may themselves be collecting data from you and may be sharing it with us and/or others. These third parties and their services may also associate their tracking technologies with you, track you across sites, apps, devices and time, serve you their own ads, and may or may not have their own published privacy policies.

The App may include links to Glennis and non-Glennis websites or online services for your convenience and information. These websites or services may have their own privacy policies or notices, which we encourage our users to review. This Privacy Notice applies solely to

information collected through the App. Glennis is not responsible for the privacy practices or content of any linked websites that we do not control.

Your Choices

Marketing Communications. If you no longer wish to receive marketing emails, newsletters, or other promotional communications from Glennis, follow the unsubscribe instructions included in the marketing emails or send an email to Glennis <u>privacyrequest@glennissolutions.com</u>. Please note that even if you opt out of receiving promotional communications from us, we may continue to send you transactional emails that concern our ongoing relationship with you.

App Controls. You can prevent further collection of information via the App by uninstalling the App. Also, you may be able to exercise specific privacy choices, such as enabling or disabling certain features (e.g., camera access, push notifications, or access to your photos), by adjusting the permissions on your mobile device or through the App's settings.

Accessing and Controlling Your Information. If you wish to update, correct, or delete information you have provided through the App, you may edit certain information by signing into your App account. Alternatively, you may make a request by contacting privacyrequest@glennissolutions.com.

Children's Privacy

The App is not intended for, nor targeted to, children under 13, and we do not knowingly or intentionally collect information from children under 13. If we learn that we have received information directly from a child who is under the age of 13, we will delete the information in accordance with applicable law.

Information Security

Glennis implements reasonable physical, administrative, and technical safeguards to help us protect your personally identifiable information collected through the App. Even with our safeguards in place, however, no data transmission over the Internet or any wireless network can be guaranteed secure. Accordingly, we cannot ensure or guarantee the security of information you transmit to us.

Your use of the App is password-protected. We recommend that you do not divulge your password to anyone who you do not want to have access to your account. It is not our policy or practice to request password information through unsolicited phone calls or emails; if you receive such a request, do not provide the information and notify privacyrequest@glennissolutions.com.

California Privacy Rights

California law permits customers in California to request certain details about how their "personal information" (as defined by California Civil Code Section 1798.83) is shared with third parties for direct marketing purposes. We do not share personal information with third parties or affiliates for those third parties' or affiliates' own direct marketing purposes. California customers may request information about our compliance with this law by contacting us at privacyrequest@glennissolutions.com or 866-291-3877

Your inquiry must specify "California Privacy Rights Request" in the subject line of the email. Please note that we are only required to respond to one request per consumer each year.

Information for Users Outside the United States

The App is intended for use in the United States. If you happen to be using the App from outside the United States, please be aware that information we collect will be transferred to and stored on our servers in the United States. By using the App, you acknowledge and consent to the transfer and processing of your personal data in the United States as described in this Privacy Notice. Please be aware that the data protection laws and regulations applicable to your personal data transferred to the United States may be different from the laws in your country of residence.

Contact Us

If you have a question about this Privacy Notice or about Glennis's information practices, you may email us at privacyrequest@glennissolutions.com or 866-291-3877.

Depending on the nature of your inquiry, we may ask you for certain information to verify your identity or for other details to help us to respond to your request.