

## Multi-State Privacy Addendum

This Multi-State Privacy Addendum applies solely to residents of California and certain other U.S. states with applicable consumer privacy laws, to the extent those laws apply to The Elms of Cranbury Rehabilitation & Healthcare Center (“The Elms,” “we,” “our,” or “us”). This Addendum supplements the Privacy Policy and is intended to provide additional disclosures regarding personal information collected through the website and other covered interactions.

This Addendum is intended to address consumer privacy laws such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and similar laws in states such as Colorado, Connecticut, Virginia, Utah, and other states that may provide residents with privacy rights, in each case only to the extent applicable and effective.

### a. Your Rights

Depending on your state of residence and subject to applicable exceptions, you may have the right to request that The Elms:

- Confirm whether personal information about you is being processed.
- Provide access to certain categories of personal information or specific pieces of personal information collected about you.
- Correct inaccurate personal information maintained about you.
- Delete certain personal information, subject to legal and operational exceptions.
- Provide information about the categories of personal information collected, the categories of sources of that information, the purposes for which it is used, and the categories of third parties to whom it is disclosed.
- Permit you to opt out of the sale of personal information, the sharing of personal information for cross-context behavioral advertising, or the use of personal information for targeted advertising, to the extent those activities occur and the law grants such rights.
- Permit you to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects, if applicable.
- Limit the use or disclosure of sensitive personal information, or require opt-in consent for certain sensitive data processing, where required by applicable law.
- Not discriminate or retaliate against you for exercising applicable privacy rights.

These rights may vary by state, and some rights may not apply in all jurisdictions or in all circumstances.

## Exercising Your Rights

Requests to access, confirm, correct, delete, or opt out may be submitted using the contact methods identified in the Privacy Policy. The Elms may need to verify your identity before responding to your request and may request additional information as necessary to authenticate the request and protect personal information from unauthorized disclosure.

Where permitted by law, you may designate an authorized agent to submit a request on your behalf. The Elms may require proof of the agent's authority and may also verify your identity directly before honoring the request.

## Appeals

Residents of certain states may have the right to appeal a denial of a privacy-rights request. Appeal instructions, if applicable, may be provided at the time a request is denied or may be obtained by contacting The Elms through the contact methods listed in the Privacy Policy.

## b. Personal Information We Collect, Use, Disclose, and May Sell or Share

The table below summarizes categories of personal information that may be collected through the website or related interactions, along with categories of sources, purposes of use, and categories of third parties to whom information may be disclosed, and, where applicable, categories of third parties to whom information may be sold or shared for advertising or related purposes. Actual practices may vary depending on how the website, forms, analytics tools, admissions processes, and vendor relationships operate.

| Category of<br>Personal<br>Information | Categories of<br>Sources | Purposes of Use | Categories of<br>Parties to<br>Whom<br>Disclosed | Categories of<br>Parties to<br>Whom Sold<br>or Shared, if<br>applicable |
|----------------------------------------|--------------------------|-----------------|--------------------------------------------------|-------------------------------------------------------------------------|
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|                                                                                                                                                        |                                                                                                |                                                                                                                                                      |                                                                                                                                                |                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers, such as name, email address, telephone number, postal address, IP address, or online identifiers                                          | You; website forms; cookies and similar tools; referral sources; service providers; affiliates | Respond to inquiries; admissions or tour requests; provide services; communicate; maintain operations; analytics; security; legal compliance         | Service providers; affiliates; professional advisors; government authorities where required; healthcare or referral partners where appropriate | Advertising, analytics, or similar vendors, only to the extent such activity constitutes a sale or sharing under applicable law              |
| Internet or other electronic network activity, such as browsing activity, device information, pages viewed, referral URLs, or cookie data              | You; cookies, analytics tools, and similar technologies                                        | Website functionality; analytics; performance measurement; fraud prevention; security; service improvement; marketing communications where permitted | Service providers; analytics providers; security vendors                                                                                       | Advertising or analytics vendors, only to the extent such activity constitutes a sale, sharing, or targeted advertising under applicable law |
| Commercial or transactional information, such as inquiry history, admission-related communications, service interests, or billing-related interactions | You; representatives; service providers; referral sources                                      | Respond to requests; evaluate admissions; coordinate services; billing; recordkeeping; compliance                                                    | Service providers; affiliates; healthcare or referral partners; professional advisors; government authorities where required                   | Generally not sold or shared, except as may result from online advertising technologies if used in a manner covered by law                   |

|                                                                                                                                                                                  |                                                                          |                                                                                                |                                                                                                              |                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Audio, visual, or similar information, such as call recordings, voicemail, submitted media, or surveillance-related information where applicable                                 | You; representatives; service providers; on-site systems                 | Quality assurance; training; safety; security; communication management; legal compliance      | Service providers; affiliates; legal advisors; government authorities where required                         | Generally not sold or shared                                                                                                                 |
| Sensitive personal information, such as health-related information, insurance information, government identifiers, precise geolocation, or account credentials, where applicable | You; representatives; healthcare or referral partners; service providers | Provide or coordinate services; admissions; billing; security; legal compliance; recordkeeping | Service providers; healthcare partners; insurers; affiliates; legal or regulatory authorities where required | Not sold or shared except as permitted by law; some categories may be exempt from state consumer privacy laws                                |
| Inferences drawn from personal information, such as preferences, service interests, or website interaction patterns                                                              | You; cookies and analytics tools; service providers                      | Personalization; website improvement; communications; analytics; service development           | Service providers; affiliates; analytics vendors                                                             | Advertising or analytics vendors, only to the extent such activity constitutes a sale, sharing, or targeted advertising under applicable law |

The Elms may also aggregate or de-identify information and use or disclose that information for any lawful purpose. De-identified or aggregated information is not treated as personal information where permitted by law.

### **c. Additional California Information**

California residents may have the right to opt out of the sale or sharing of personal information, including certain disclosures involving cookies, device identifiers, browsing information, hashed identifiers, or similar data used for cross-context behavioral advertising. If The Elms engages in practices that constitute a sale or sharing under California law, California residents may exercise those rights through the contact methods or opt-out tools identified in the Privacy Policy.

California residents may also have the right to limit the use or disclosure of sensitive personal information if that information is used for purposes beyond those permitted by the CCPA. However, certain sensitive information, including health-related information, may be exempt from the CCPA or governed by other laws such as HIPAA or state medical privacy laws.

Where required, The Elms may honor browser-based opt-out preference signals, such as Global Privacy Control, for the specific browser or device from which the signal is sent.

#### **d. Additional Information for Colorado, Connecticut, Virginia, Utah, and Other States**

Residents of certain states may have rights relating to targeted advertising, sale of personal data, profiling, and sensitive-data processing that differ from California law. In states that require opt-in consent for the processing of sensitive personal data, The Elms will obtain consent where required and where the law applies.

Residents of certain states may also have the right to appeal a denial of a rights request. Any such appeal may be submitted using the contact methods identified in the Privacy Policy, together with sufficient information to identify the original request and the basis for the appeal.

#### **e. Healthcare Information and Exempt Data**

This Addendum does not apply to information that is exempt from applicable state consumer privacy laws. Depending on the circumstances, exempt information may include protected health information governed by HIPAA, medical information governed by state healthcare privacy laws, employment-related information, and other information excluded from the scope of applicable privacy statutes.

Because The Elms is a healthcare and rehabilitation facility, some personal information collected in connection with patient or resident care, treatment, billing, or operations may be regulated under HIPAA or other healthcare privacy laws rather than this Addendum. This Addendum should therefore be read together with any separate Notice of Privacy Practices or other healthcare privacy notices provided by The Elms.

## **f. Contacting Us**

Residents with questions about this Addendum or about privacy rights requests may contact The Elms using the contact information listed in the main Privacy Policy. The Elms may update this Addendum from time to time, and any changes will be posted with a revised effective date.