

# myFamilyChannel Privacy Policy

Last modified: November 12, 2018

## **Introduction**

We (Senior Group LLC) respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you register with us and/or use [www.myfamilychannel.com](http://www.myfamilychannel.com) or the My Family Channel services (collectively, the “Services”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect through the Services and through emails, texts, and other electronic communications sent through or in connection with the Services.

This policy DOES NOT apply to information that:

- We collect offline or through any other apps or websites.
- Is “protected health information” (PHI) subject to the Health Insurance Portability and Accountability Act of 1996 and its accompanying regulations, as amended from time to time (“HIPAA”). The Services are not designed for the delivery or communication of PHI, and you agree to refrain from transmitting any PHI through the Services. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not register with us or use these Services. By registering with us or using these Services, you agree to this privacy policy. This policy may change from time to time (see "Changes to Our Privacy Policy"). Your continued use of these Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 13**

The Services are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please notify us at [support@seniorgroup.us](mailto:support@seniorgroup.us).

## **Information We Collect and How We Collect It**

We collect information from and about users of our Services:

- Directly from you when you provide it to us.
- Automatically when you use the Services.

### **Information You Provide to Us**

When you register with us, or use the Services, we may ask you to provide certain information:

- By which you may be personally identified, such as your name, postal address, email address, cell phone number, or any other identifier by which you may be contacted online or offline ("**personal information**").

Also, we may collect information:

- That is about you but individually does not identify you, such as details of your use of our Services, including traffic data, logs and other communication data and the resources that you access and use when using the Services, your computer and internet connection, including your IP address, operating system, browser type, usage details, IP addresses, phone numbers and information collected through cookies, web beacons and other tracking technologies.

This information includes:

- Information that you provided when you registered to use the Services. This also includes information you have provided by filling in forms included as part of the Services, posting content and materials to the Services, and requesting further services. We may also ask you for information when you report a problem with the Services.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

You may provide information to be published or displayed ("**Posted**"), such as photos or messages, in certain sections of the Services, which have restricted access, or in a public area, such as the Directory (collectively, "**User Content**"). Your User Content is Posted and transmitted to others at your own risk. Although the restricted access areas of the Services are not publicly accessible, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other parties with whom you may choose to share your User Content. Therefore, we cannot and do not guarantee that your User Content will not be viewed by unauthorized persons.

### **Automatic Information Collection and Tracking**

When you access and use the Services, we may use technology to automatically collect:

- **Usage Details.** When you access and use the Services, we may automatically collect certain details of your access to and use of the Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the Services.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Stored Information and Files.** The Services also may access metadata and other information associated with other files stored on your computer or device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- **Location Information.** The Services may, from time-to-time, collect real-time information about the location of your device.

If you do not want us to collect this information, you should not use the Services.

### **Information Collection and Tracking Technologies**

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your computer or smartphone. It may be possible to refuse to accept computer or mobile cookies by activating the appropriate setting on your computer or smartphone. However, if you select this setting you may be unable to access certain parts of our Services.
- **Web Beacons.** The Services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited certain parts of the Services and to obtain other related statistics (for example, recording the popularity of certain services and verifying system and server integrity).
- **Google Analytics.** We use analytics services, such as Google Analytics, to help analyze how users make use of our Services. Google Analytics collects information such as how often users make use of our Services and what parts of the Services users visit. We use the information we get from Google Analytics solely to improve the Services. Google Analytics collects only the IP address assigned to you on the date you use the Services, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent

cookie on your web browser or smartphone to identify you as a unique user the next time you use the Services, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your use of the Services is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. See <https://www.google.com/analytics/terms/us.html> and [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the Services and any other information, products or services that you request from us.
- Fulfill any other purpose for which you provide the information.
- Give you notices about your user account (“User Account”), including expiration and renewal notices.
- Notify you when Services updates are available, and of changes to any products or services we offer or provide.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To improve our Services.

The usage information we collect helps us to improve our Services and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Recognize you when you use the Services.

We use location information we collect to analyze local and regional differences in user preferences and for network analysis and system optimization, all for the purposes of improving the Services.

### **Disclosure of Your Information**

We may use and disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

In addition, we may disclose personal information that we collect, or you provide:

- To contractors, service providers, and other third parties 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.
- To a successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Senior Group’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Senior Group about our users is among the assets transferred; provided,

however, that such successor will be subject to the terms and conditions of this Privacy Policy.

- To fulfill the purpose for which a resident or family member has provided the information. For example, if a resident gives us contact information for those family members to whom the resident wants to communicate through the Services, we will engage with those family members as a part of the process of giving them access to the resident's My Family Channel account.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the Terms of Use and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Senior Group, our customers or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Your Choices About Our Collection, Use and Disclosure of Your Information**

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Services may then be inaccessible or not function properly.
- **Promotion by the Company.** If you do not want us to use your email address or other contact information to promote our own products or services, you can opt-out by stating your request to [support@seniorgroup.us](mailto:support@seniorgroup.us)

In the future, we may choose to allow third parties to sell products or services through the Services. We will update our Privacy Policy at that time to reflect this change in our Services should it occur.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

### **Accessing and Correcting Your Personal Information**

You can review and change your personal information by logging into your User Account and changing your preferences in your account profile.

You may also send us an email at support@seniorgroup.us to request access to, correct, or delete any personal information that you have provided to us. We cannot delete certain items of your personal information except by also deleting your User Account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your user provided content (“User Content”) from the Services, copies of your User Content may remain viewable in cached and archived pages or might have been copied or stored by other users of the Services. Proper access and use of information provided through the Services, including User Content, is governed by our terms of use [\[LINK TO TERMS OF USE\]](#).

### **Your California Privacy Rights**

California Civil Code Section 1798.83 permits users of our Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. At this time, we do not provide personal information to third parties for their direct marketing purposes. To make such a request, please send an email to support@seniorgroup.us or write us at: Senior Group LLC, 1300 West Main St., Louisville, KY 40203.

### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Services. The information you share in public areas may be viewed by any user of the Services.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we take all reasonable steps to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

### **Changes to Our Privacy Policy**

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy with a notice that the privacy policy has been updated and notify you by email and/or text message to the primary email address and/or phone number specified in your User Account.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address and/or phone number for you and for periodically visiting this privacy policy to check for any changes.

#### Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Senior Group LLC, 1300 W. Main St., Louisville, KY 40203 or via our toll -free number at (855) 993-2323.

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