



NOTICE OF PRIVACY PRACTICES FOR PROTECTED HEALTH INFORMATION

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

A. INTRODUCTION

During the course of providing 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 characterized as your “protected health information.” Protected health information consists of any information relating to your physical or mental health, to any health care provided to you, or to payment for such care and that either identifies you or provides information that can be used to identify you. This Notice of Privacy Practices for Protected Health Information (“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.

B. FRONT PORCH’S RESPONSIBILITIES

Front Porch is required by federal and state law to maintain the privacy of your protected health information. Front Porch is also required by law to provide you with this Notice of Privacy Practices that describes Front Porch’s legal duties and privacy practices with respect to your protected health information. Front Porch will abide by the terms of this Notice of Privacy Practices. Front Porch reserves the right to change this or any future Notice of Privacy Practices and to make the new notice provisions

effective for all protected health information that it maintains, including protected health information already in its possession. The notice will be made available to you upon request. In addition, the notice will be posted in a clear and prominent place in the facility and on the Front Porch website.

C. USE AND DISCLOSURE WITH YOUR AUTHORIZATION

Front Porch will require a written authorization from you before it uses or discloses your protected health information, unless a particular use or disclosure is expressly permitted or required by law without your authorization. An authorization is generally required for the following uses or disclosures, except in very limited circumstances: (1) uses or disclosures of psychotherapy notes; (2) uses or disclosures of protected health information for marketing purposes; and (3) disclosures of protected health information that constitute its sale.

Front Porch has prepared an authorization form for you to use that authorizes Front Porch to use or disclose your protected health information for the purposes set forth in the form. You are not required to sign the form as a condition to obtaining treatment or having your care paid for. If you sign an authorization, you may revoke it at any time by written notice. Front Porch then will not use or disclose your protected health information, except where it has already relied on your authorization.

D. HOW FRONT PORCH MAY USE AND DISCLOSE YOUR PROTECTED HEALTH INFORMATION WITHOUT YOUR AUTHORIZATION

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

1. Your Care and Treatment

Front Porch may use or disclose your protected health information to provide you with or assist in your treatment, care and services. For example, Front Porch may disclose your health information to health care providers who are involved in your care to assist them in your diagnosis and treatment, as necessary.

2. Billing and Payment

a. Medicare, Medi-Cal and Other Public or Private Health Insurers –Front Porch may use or disclose your protected health information to public or private health insurers (including medical insurance carriers, HMOs, Medicare, and Medi-Cal) in order to bill and receive payment for your treatment and services that you receive. The information on or accompanying a bill may include information that identifies you, as well as your diagnosis, procedures, and supplies used.

b. Health Care Providers –Front Porch may also disclose your protected health information to health care providers in order to allow them to determine if they are owed any reimbursement for care that they have

furnished to you and, if so, how much is owed.

3. Provision of Basic Information about Residents

Front Porch allows staff to provide certain basic information about a resident to persons who ask for the resident by name and to members of the clergy. Unless you notify Front Porch that you object, it will disclose your name, your location in the community and your general condition to anyone who asks for you by name. It will disclose your name, your location in the community, your general condition, and your religious affiliation to members of the clergy.

4. Individuals Involved in Your Care or Payment for Your Care

Unless you specifically object, Front Porch may disclose to a family member, other relative, a close personal friend, or to any other person identified by you, all protected health information directly relevant to such person's involvement with your care or directly relevant to payment related to your care. Front Porch may also disclose your protected health information to a family member, personal representative, or other person responsible for your care to assist in notifying them of your location, general condition, or death.

5. Disclosures within Provider Community

Unless you specifically object, Front Porch may disclose certain general information about you (e.g., past activities, present interests, birthday, and location if hospitalized) to members of its community, including other residents and staff, by means such as newsletter or bulletin board.

6. Health Care and Community Operations

Front Porch may use your protected health information for its health care and community operations. These uses and disclosures are necessary to manage Front Porch and to monitor our quality of services and care. For example, we may use your protected health information to review our services and to evaluate the performance of our staff in caring for you.

7. Reporting

Front Porch will disclose protected health information about a resident who is suspected to be the victim of child, dependent adult, or elder abuse to the extent necessary to complete any oral or written report mandated by law. Under certain circumstances, Front Porch may disclose further protected health information about the resident to aid the investigating agency in performing its duties. Front Porch will promptly inform the resident about any disclosure unless Front Porch believes that informing the resident would place the resident in danger of serious harm, or would be informing the resident's personal representative, whom the Provider believes to be responsible for the abuse, and believes that informing such person would not be in the resident's best interest.

8. Legal Process

Front Porch will disclose protected health information in accordance with an order of a court or of an administrative tribunal of a government agency. In addition, Front Porch will disclose protected health information in accordance with a valid subpoena issued by a party to adjudication before a court, an administrative tribunal, or a private arbitrator. Reasonable efforts will be made to notify you of the subpoena, or attempts will be made to obtain an order or agreement protecting your protected health information.

9. Law Enforcement Agencies and Officials

Front Porch will disclose protected health information to law enforcement agencies in accordance with a search warrant, a court order or court-ordered subpoena, or an investigative subpoena or summons. In addition, it may disclose such information as necessary to assist law enforcement officials investigating crimes involving residents.

10. National Security and Intelligence Activities

Front Porch will disclose protected health information about a resident to authorized federal officials conducting national security and intelligence activities or as needed to protect federal and foreign officials.

11. Licensing, Certification, and Accreditation

Front Porch may disclose your protected health information to any government or private agency, such as to the Medical Board of California, responsible for licensure or accreditation, so that the agency can carry out its oversight activities. These oversight activities include audits; civil, administrative, or criminal investigations; inspections; licensure or disciplinary actions; civil, administrative, or criminal proceedings or actions; or other activities necessary for appropriate oversight.

12. Public Health Activities

Front Porch may disclose your protected health information to any public health authority that is authorized by law to collect it for purposes of preventing or controlling disease, injury, or disability.

13. Business Associates

Front Porch may contract with certain individuals or entities, called "business associates," to provide services on its behalf. Examples include data processing, quality assurance, legal, or accounting services. Front Porch may disclose your protected health information to a business associate, as necessary, to allow the business associate to perform its functions. Front Porch will have a contract with each business associate that obligate the business associate to maintain the confidentiality of your protected health information.

14. Marketing

Front Porch may use protected health information or disclose it to business associates in certain limited circumstances in order to encourage you to use a service or product. This includes, for example, making face-to-face communications with you about the service or product, providing you with a promotional gift of nominal value, or communicating about drug refills. Otherwise, it will obtain a specific written authorization from you before using or disclosing protected health information for marketing purposes.

15. Fundraising

Front Porch or its business associates may use certain protected health information to contact you in an effort to raise money for Front Porch and its operations. Front Porch may disclose the protected health information to related foundations that it uses to raise funds for its own benefit. The information to be used or disclosed for these purposes will be limited to certain demographic information. Each fundraising communication will provide a means by which you can opt out of receiving further such communications.

16. Sale of Protected Health Information

Front Porch may disclose your protected health information for remuneration in certain very narrow circumstances such as where a governmental agency reimburses it for its expenses in providing information (such as data relating to outbreak of a disease) for public health purposes. Otherwise, it will obtain a specific written authorization from you or your personal representative before receiving reimbursement for using or disclosing your protected health information.

17. Coroner

Front Porch will disclose protected health information to a coroner where the coroner requests the information to identify a decedent; to notify next of kin; or to investigate deaths that may involve public health concerns, suspicious circumstances, elder abuse, or organ or tissue donation. In other cases, Front Porch may disclose protected health information to the coroner to allow the coroner to perform its duties.

18. Organ Procurement

If you are an organ donor, Front Porch may disclose your protected health information following your death to an organ procurement agency or tissue bank in order to aid in using your organs or tissues in transplant.

19. Workers' Compensation

Front Porch may disclose your protected health information in order to comply with California workers' compensation laws.

20. Preventing Danger to Identified Persons

Front Porch may disclose your protected health information to prevent an immediate, serious threat to the safety of an identified person.

21. Disaster Relief

Front Porch may disclose your protected health information to a public or private entity authorized to assist in disaster relief efforts.

22. Research

Front Porch may disclose your protected health information for research purposes, provided that an outside Institutional Review Board overseeing the research approves the disclosure of the information without a written authorization.

23. Hospital Peer Review

Front Porch may disclose your protected health information to hospital medical staffs to aid in the credentialing of applicants and in the peer review of members.

24. Disclosures Otherwise Required by Law

Front Porch will disclose protected health information about a resident when otherwise required by law.

E. YOUR RIGHTS REGARDING PROTECTED HEALTH INFORMATION

You have the following rights with respect to your protected health information. To exercise these rights, contact Front Porch at the following address: Front Porch 800 N. Brand Blvd., 19th Floor, Glendale, CA 91203, Attention: Privacy Officer.

1. Right to Receive a Copy of the Notice of Privacy Practices

You have the right to request and receive a copy of Front Porch's Notice of Privacy Practices for Protected Health Information in written or electronic form.

2. Right to Request Special Privacy Protections

You have the right to request restrictions on the use and disclosure of your protected health information 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. Front Porch is not required to grant your request except where you ask it not disclose information to your health plan regarding care paid for by you or someone else out of pocket. Whenever the Provider agrees to comply with your request, it will do so, unless there is an emergency or until the Provider or you terminate the restriction. You also have the right to request that Front Porch communicate protected health information to you or another recipient by alternative means or at alternative locations.

3. Right to Request Access

You have the right to inspect and copy your health records maintained by Front Porch. This includes the right to have electronic records made available in electronic format to you or to someone whom you designate. In certain limited circumstances, Front Porch may deny your request as permitted by law. However, you may be given an opportunity to have such denial reviewed by an independent licensed health care professional.

4. Right to Request Amendment

You have the right to request an amendment to your health records maintained by Front Porch. If your request for an amendment is denied, you will receive a written denial, including the reasons for such denial, and an opportunity to submit a written statement disagreeing with the denial.

5. Right to an Accounting

You have the right to receive an accounting of disclosures of your protected health information created and maintained by Front Porch over the six years prior to the date of your request or for a lesser period of time. Front Porch is not required to provide an accounting of certain routine disclosures or of disclosures of which you already are aware.

F. NOTICE OF SECURITY BREACHES

Front Porch will provide you with written notification in the event of a security breach involving your protected health information. The notification will describe what happened, the types of information involved, the steps that Front Porch is taking to deal with the situation, what you should do to protect yourself against any harmful consequences, and contacts for obtaining further information.

G. COMPLAINTS

If you believe that your privacy rights have been violated, you may file a complaint with Front Porch at the following address: Privacy Officer, Front Porch, 800 N. Brand Blvd., 19th Floor, Glendale, CA 91203 or by email at privacy@frontporch.net or by phone at (818) 254-4100. You also have the right to submit a complaint to the Secretary of the U.S. Department of Health and Human Services, Office for Civil rights, 200 Independence Avenue, S.W. Washington, D.C. 20201, Telephone (877) 696-6775. **Front Porch will not retaliate against you if you file a complaint.**

H. FURTHER INFORMATION

If you have questions about this Notice of Privacy Practices or would like further information about your privacy rights, contact Front Porch at the following address: Privacy Officer, Front Porch, 800 N. Brand Blvd., 19th Floor, Glendale, CA 91203 or by email at privacy@frontporch.net or by telephone at (818) 254-4100.

NOTICE OF PRIVACY PRACTICES
ACKNOWLEDGEMENT OF RECEIPT

The effective date of this Notice of Privacy Practices is February 10, 2023.

I hereby acknowledge receipt from Front Porch of a copy of its Notice of Privacy Practices for Protected Health Information effective on the date set forth above.

**RESIDENT:
REPRESENTATIVE:**

PERSONAL

(if signed on resident's behalf)

OR

Signature of Resident

Signature of Personal Representative

Print Name of Resident

Print Name and Relationship to Resident

Address

Address

City State ZIP

City State ZIP

Telephone

Telephone

Date

Date

**CONFIRMATION OF RECEIPT
OF NOTICE OF PRIVACY PRACTICES
FOR PROTECTED HEALTH
INFORMATION**

Name of Resident: _____

Front Porch hereby certifies that it provided:

- the above-named resident; or
- _____ [*Name of Personal Representative*],
the personal representative of the above-named resident with a copy of its Notice of Privacy Practices for Protected Health Information on _____ [*Insert Date*], and at the same time made a good faith effort to obtain a written acknowledgment of his/her receipt of such Notice of Privacy Practices.

Front Porch did not receive a written acknowledgment of receipt because:

FRONT PORCH:

Signature: _____

Printed Name: _____

Title: _____

Date: _____



FRONT PORCH WEBSITE PRIVACY POLICY

This Privacy Policy was last revised on September 30, 2022.

Front Porch Communities and Services and its affiliates (collectively “**Front Porch**”, “**we**”, “**our**”, and “**us**”) are committed to protecting and maintaining your privacy. This privacy policy (“**Privacy Policy**”) is designed to help you understand how we collect, use, share and protect your Personal Information when you visit our websites (including www.frontporch.net), use our mobile apps, or communicate with us via phone or email. In this Privacy Policy, “**Personal Information**” means any information that can be used to identify you or that we can link directly to you, such as your name, email address, mailing address, and phone number.

Front Porch may have different privacy policies that apply to certain specific situations, such as when you are a volunteer or participant in the Well Connected programs. If you were given a different privacy statement or policy, those policies or statements—not this Privacy Policy—will apply to the specific situation. For example, when we act as a healthcare provider under the Health Insurance Portability and Accountability Act (“**HIPAA**”), our HIPAA Notice of Privacy Practices applies instead of this Privacy Policy.

If you provide us with Personal Information of anyone other than yourself, please note that you are responsible for complying with all applicable privacy and data protection laws prior to providing that information to Front Porch (including obtaining consent, if required).

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this page. We encourage you to review this Privacy Policy whenever you access our websites or otherwise interact with us to stay informed about our privacy practices.

Please take a moment to review our policies and practices described below. If you do not agree with this Privacy Policy in general or any part of it, you should not access our websites.

1. HOW WE COLLECT YOUR PERSONAL INFORMATION

The Personal Information we collect varies based on how you interact with us, which services you use, and the choices you make.

- **When you visit our websites or communicate with us via phone or email**, you may provide us your Personal Information directly, such as by emailing us or submitting the electronic form on our Contact Us page. The Personal Information we collect from you directly may include your name, email address, phone number, and any other information you choose to provide. We may also collect your Personal Information from your computer or mobile device when you visit our websites, 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. This information may be collected using cookies and web beacons, as described below in the How We Use Cookies and Website Tracking section.

2. HOW WE USE AND SHARE YOUR PERSONAL INFORMATION

We may use your Personal Information for the following purposes:

- to provide you with the information on our websites;
- to provide you with other products or services you have requested;
- to respond to you when you communicate with us;
- to tell you about new opportunities, products, or services; and
- to create aggregate statistics relating to the use of our websites (count of visits, ranking of top pages visited, etc.).

We may share your Personal Information with third parties in limited circumstances, such as: to conduct our business; when legally required; or with your consent. The categories of recipients may include:

- cloud storage providers to store the Personal Information you provide and for disaster recovery services;
- service providers that provide us with client relationship management services;
- service providers that provide us with survey services;
- service providers that provide us with market research and digital marketing services;

- agents and suppliers that provide us with technology and other professional services;
- sales management service providers that provide us with software services;
- other service providers, including those that provide us with invoicing services;
- our professional advisors, auditors, volunteers, and business partners; and
- support providers to provide client support services.

Front Porch may also share your Personal Information: (i) if we are required to do so by law (e.g., in order to comply with a judicial proceeding, court order or other legal obligation or government inquiry); (ii) if we believe that it is necessary to enforce or apply our Terms of Use or other agreements or otherwise protect and defend the rights, property or safety of Front Porch or that of our clients; or (iii) to any entity that acquires any part of Front Porch's current operations, including by way of affiliation, merger, de-merger, acquisition, reorganization, or sale of assets.

We do not sell your Personal Information to anyone.

3. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will keep your Personal Information for as long as is necessary for the purposes for which your Personal Information was collected. The length of time we keep your Personal Information may vary depending on our regulatory obligations (e.g., compliance with financial, tax, employment, and social security regulations), and our need to establish, exercise, or defend legal claims.

4. HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

Front Porch is committed to ensuring the security of your Personal Information. To protect your Personal Information, we have put in place appropriate physical, technical, administrative, and organizational safeguards. Unfortunately, neither the transmission of information over the internet nor the storage of information on internet-connected servers is completely secure. We cannot guarantee the security of your Personal Information.

5. HOW WE USE COOKIES AND WEBSITE TRACKING

What is a Cookie?

We use various technologies to operate our websites and collect information, including cookies and web beacons (collectively, "Cookies"). A cookie is a text file containing small amounts of information stored on your computer's hard drive when you visit a webpage. Session

cookies are erased when you close your web browser or browser tab. Persistent cookies remain on your hard drive until they expire or are deleted. Cookies will also be set by third parties operating on our behalf (e.g. to help us analyze web traffic or to improve your web navigation experience).

Types of Cookies We Use

We use the following types of cookies on our websites to help us analyze web traffic, to improve your web experience, and to better target our marketing of products and services:

- Strictly necessary cookies, which are essential in order to enable you to move around our websites. and use its features;
- Performance cookies, which collect information about how you use the Website, for instance which pages you visit most often;
- Functionality cookies, which allow our websites. to remember choices you make (e.g. remembering your user name, language or the region you are in) and provide enhanced, more personal features; and

To analyze traffic on the Website, an ID is assigned in these cookies to help us uniquely identify you during your session or upon repeated visits to our websites.

Third-Party Cookies

We also partner with third-party advertising networks to manage our advertising on other sites. You may receive advertisements based on information relating to your access to and use of our websites and other websites or online services on any of your devices, as well as on information received from third parties. Our advertising network partners may place or recognize a unique cookie on your browser, including through the use of pixel tags. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

How to Manage Cookies

As a user you have the ability to accept or decline the use of cookies. Cookies can be disabled and/or removed using functionality built into most web browsers and you can refuse to accept cookies by activating this setting on your browser. You can also set up your web browser to notify you of cookie placement requests, to ask for permission to accept them, or to decline cookies completely. Our websites does not respond to Do Not Track (DNT) signals from your browser. For information on how to adjust your browser regarding cookies, please visit:

Microsoft Edge: <https://docs.microsoft.com/en-us/microsoft-edge/devtools-guide-chromium/storage/cookies>

Firefox: <https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>

Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Opera: <https://www.opera.com/browser/tutorials/security/>

Alternatively, you may wish to visit www.aboutcookies.org, which contains comprehensive information on how to do this on a wide variety of desktop browsers.

You may also visit the Network Advertising Initiative's opt-out page at <http://optout.networkadvertising.org/#/> to learn how to opt-out of third-party, interest-based targeting cookies.

If you choose to decline cookies, parts of our websites. may be unavailable to you.

Processing Using Website Tracking

We use Google Analytics, which is a web analytics tool, to help us understand how users engage with our websites. Google Analytics tracks your activity on our site (i.e. the pages you have seen and the links you have clicked on) and helps us measure how you interact with the content that we provide. This information is used to compile reports and to help us improve our websites. The reports disclose website trends without identifying individual visitors. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

6. ADDITIONAL INFORMATION

Links to Third-Party Websites

Links to third-party websites are provided solely as a convenience to you. If you use these links, you will leave our websites. Front Porch has not reviewed, does not control, and is not responsible for these websites, their content or their privacy policies. Thus, we do not endorse or make any representations about them, any information, software or other products or materials found there, or any results of using them. If you decide to access any of the third-party sites linked to Front Porch's websites, you do so entirely at your own risk and acknowledge that there might be risks that are not controlled or otherwise related to Front Porch's activities.

Use of Our Websites by Minors

Our websites are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16. If you are the parent or guardian and believe your child has provided us with Personal Information, please contact us at the address below to request deletion.

7. CONTACT US

If you wish to contact Front Porch regarding your Personal Information or this Privacy Policy, please contact us by one of the methods listed below:

Email: privacy@frontporch.net

Phone: (818) 254-4100