

Privacy Policy

Effective date: November 11, 2025

Elder Crew LLC ("Elder Crew," "we," "us," or "our") respects your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard information when you visit our websites, portals, and online services that link to this Policy (collectively, the "Site").

Quick summary: We collect limited personal information to provide and improve our services and to respond to your inquiries. We do **not** sell personal information. You control your privacy choices and can contact us at any time to exercise your rights.

1. Who we are

Elder Crew LLC

123 Farmington Ave, #291

Bristol, CT 06010

Phone: 800-930-6716

Email: connect@eldercrew.com

Data Controller (where applicable): Elder Crew LLC.

2. Scope

This Policy applies to information we collect through the Site and through our online forms, chat, and scheduling tools. It does **not** cover information collected offline, via telephone, during home care services, or through third-party websites or services that do not link to this Policy.

3. Information we collect

3.1 Information you provide directly

- **Identifiers and contact details** (e.g., name, email, phone number, address).
- **Inquiry details** (e.g., service interests, messages you submit via forms or chat).
- **Scheduling information** (e.g., preferred dates, location, care needs).
- **Employment or contractor applications** (e.g., résumé/CV, work history, credentials, certifications, background-check authorization).
- **Payment information** where applicable (processed by our payment partners; we do not store full card numbers on our servers).

3.2 Information collected automatically

- **Device and usage data** (e.g., IP address, browser type, pages viewed, time spent, referring URLs).
- **Cookies and similar technologies** (see Section 10 for more details). You can manage your preferences via our cookie banner or your browser settings.

3.3 Information from third parties

- **Referrals and partners** who may share your contact details with your consent.
 - **Background check providers** for applicants and caregivers (as permitted by law and with required authorizations).
 - **Analytics and advertising partners** that provide aggregated insights about Site traffic and usage.
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4. How we use information

We use personal information to: - Provide, operate, and improve the Site and our services. - Respond to your questions, requests, and scheduling inquiries. - Process job applications and manage onboarding for employees and caregivers. - Communicate administrative updates, service notices, or policy changes. - Conduct analytics, debugging, and security monitoring. - Comply with legal obligations and enforce our terms.

We do **not** use sensitive personal information for inferring characteristics or for purposes that require additional notice/consent beyond what we provide here (unless required or permitted by law).

5. How we share information

We may share information with: - **Service providers and processors** (e.g., hosting, IT, analytics, communications, background checks, payroll for applicants/employees, scheduling platforms like ClearCare/WellSky) under contracts requiring them to protect your information and use it only to perform services for us. - **Business partners** with your consent (e.g., referral partners or payors). - **Government authorities** when required by law, court order, or to protect life, safety, or rights. - **Corporate transactions** in connection with mergers, acquisitions, asset sales, or financing, subject to appropriate confidentiality protections.

We do **not** sell personal information. We do not share personal information for targeted advertising where prohibited by applicable law; where permitted, we honor opt-out choices described below.

6. Your privacy rights

Depending on your location, you may have rights under laws such as the **Connecticut Data Privacy Act (CTDPA)**, **California Consumer Privacy Act (CCPA/CPRA)**, **Virginia CDPA**, **Colorado Privacy Act**, **Utah UCPA**, the **EU/UK GDPR**, and others. These may include: - **Right to know/access** the categories and specific pieces of personal information we have collected about you. - **Right to correct** inaccurate personal

information. - **Right to delete** personal information, subject to exceptions. - **Right to data portability** (receive a copy in a usable format). - **Right to opt out** of: (i) targeted advertising, (ii) sale of personal information, and (iii) certain profiling. - **Right to limit** the use and disclosure of sensitive personal information (where applicable). - **Right to appeal** if we deny your request (certain U.S. states). - **GDPR rights** (where applicable): consent withdrawal, objection, and restriction.

How to exercise your rights: - Email: connect@eldercrew.com - Phone: 800-930-6716 - Web form: [insert link]

We will verify your request as required by law (e.g., by confirming your identity). You may designate an authorized agent where permitted. We will not discriminate against you for exercising your rights.

7. Security

We employ administrative, technical, and physical safeguards designed to protect personal information, including encryption in transit, access controls, and regular monitoring. However, no method of transmission or storage is 100% secure.

8. Data retention

We retain personal information for as long as necessary to fulfill the purposes described in this Policy, comply with our legal obligations (including recordkeeping), resolve disputes, and enforce our agreements. Retention periods vary based on the type of data (e.g., job applicant records, website logs) and legal requirements.

9. Children's privacy

The Site is not directed to children under 13, and we do not knowingly collect personal information from children under 13 without appropriate parental consent. If you believe a child has provided us with personal information, please contact us so we can take appropriate action.

10. Cookies and similar technologies

We use cookies and similar technologies to operate the Site, measure performance, and understand usage. Categories may include: - **Strictly necessary** cookies for core functionality. - **Functional** cookies to remember preferences. - **Performance/analytics** cookies to improve the Site. - **Advertising** cookies (if used) to show relevant content. You can opt out where required by law.

Manage preferences: Use our cookie banner, adjust your browser settings, or use industry tools (e.g., NAI/DAA choices, platform settings). Disabling cookies may affect Site functionality.

11. International data transfers

If you access the Site from outside the United States, your information may be processed in the U.S. and other jurisdictions with different data protection laws. Where required, we use appropriate safeguards (e.g., standard contractual clauses) for cross-border transfers.

12. Do Not Track and Global Privacy Control (GPC)

Some browsers transmit "Do Not Track" or GPC signals. Where legally required and technically feasible, we treat GPC signals as opt-out requests for targeted advertising or certain data sharing.

13. Third-party services and links

The Site may link to third-party websites and services (e.g., maps, scheduling, payment, job application portals). We are not responsible for their privacy practices. Review their policies before providing information.

14. Changes to this Policy

We may update this Policy from time to time. The "Effective date" above indicates when it was last revised. Material changes will be posted on the Site and, where required, we will provide additional notice.

15. Contact us

If you have questions about this Policy or our privacy practices, or if you wish to exercise your rights, contact us at:

Elder Crew LLC

123 Farmington Ave, #291

Bristol, CT 06010

Email: connect@eldercrew.com

Phone: 800-930-6716

16. State-specific notices (California, Colorado, Connecticut, Utah, Virginia)

Categories collected (past 12 months): Identifiers (e.g., name, email, IP), internet/network activity (e.g., usage data), professional/employment information (applicants), and in some cases geolocation derived

from IP. We **do not** sell personal information. We may "share" personal information for targeted advertising **only** if we deploy such tools; if so, you may opt out via our cookie banner or by contacting us.

Sources: Directly from you, your device/browser, analytics providers, referral partners, background-check firms (applicants), and service providers.

Purposes: See Section 4 above.

Recipients: Service providers/processors, as described in Section 5. We do not use or disclose sensitive personal information for purposes other than those allowed by law.

Retention: See Section 8.

Your rights and how to exercise them: See Section 6.

Accessibility

We are committed to ensuring our privacy information is accessible to individuals with disabilities. If you need this Policy in an alternative format, contact us using the information above.

Legal disclaimer

This Policy is provided for transparency and compliance purposes but does not create contractual rights or obligations. Local laws may grant additional rights. We recommend consulting with legal counsel to tailor this Policy for your specific operations and technologies.

Version history

- v1.0 – November 11, 2025: Updated address, contact details, and format.