

PRIVACY POLICY

Aging Well Advocates, LLC is a private, comprehensive Aging Life Care Management practice, serving older adults and their families in the Metro West area of Massachusetts, located in Franklin. We empower you to manage your privacy preferences and exercise your privacy rights when visiting our website, using our services, and communicating with us.

Data Covered by this Privacy Notice

This global privacy notice covers personal data when we act as the data controller.

- Personal data includes data that identifies or could be used to identify a specific person, and any data about that person. For example, your name, address, and payment details are personal data.
- We act as a controller when we process personal data for our own use. For example, we act as a controller when you provide your personal data to open an account.

This notice does not apply when our customers or another person processes personal data for their own benefit. For example, when a customer sends email for their own business purposes that includes personal data, the customer is acting as the “controller”. When our customer acts as the controller, we act as the “processor” and process personal data only in accordance with our customer's instructions or as required by law.

You can update your privacy preferences via the Contact Us page of our website and exercise your privacy rights.

This notice does not apply to third-party applications offered through our services or linked through our website, such as Microsoft 365 and similar offerings. For information about the privacy practices of any third-party offerings, please review the privacy notice applicable to that offering before using it.

Core Privacy Rights

We recognize several core privacy rights for all individuals:

- the right to know what personal data we hold about you
- the right to access, correct, or delete your personal data
- the right to transfer your personal data (data portability)
- the right to set your individual marketing and advertising preferences

Where technically feasible and appropriate, we provide self-service and automated mechanisms to allow individuals to exercise their privacy rights.

We also manually review requests to exercise privacy rights where self-service is not possible or appropriate. We promptly review such requests to exercise privacy rights. If we need more information to process a request, we will contact the requestor by email or, if we do not have an email address on file for the requestor, by the same method the request was made.

If we do not honor a request for legal or other reasons, we will explain why we did not honor the request, the right to appeal, and any right to file a complaint (if available where the requestor lives).

PII We Collect

1. Personal Data Individuals Provide

We collect personal data when a customer or another person sets up an account, uses our services, or contacts us. Examples of personal data we may collect include a person's name, email address, phone number, physical address, and payment method.

2. Personal Data from Other Sources

We may collect personal data about you from other sources. Examples of personal data obtained from other sources include publicly available data, social media information, and information lawfully gathered by third party data providers.

3. Personal Data We Generate

We process data in connection with our business and services to generate inferences and insights that may be linked to a specific person, including through the use of data analytics and artificial intelligence.

Use of Personal Data

We use personal data to operate and improve our business and services. Examples of how we use personal data include:

- Managing client accounts
- Provisioning services
- Providing client support
- Securing, updating, and improving our services
- Marketing and advertising of our services
- Contacting clients, prospective clients, and others by telephone, text or messaging applications to offer you our services
- Website traffic measurement
- Other uses consistent with the purposes for which the personal data was collected or provided to us

No Sale of Personal Data

We do not sell, lease, rent, or transfer personal data to third parties for monetary or other considerations.

Disclosures to Others

We disclose personal data:

- to processors to operate our business and provide services, including but not limited to providing security services, customer support; conducting contests and surveys; generating data insights; and performing other activities related to our business and services.
- to business partners to offer some services, such as email and payment processing.
- to comply with law enforcement and other legal requests, protect our legal rights, prevent harm to us or others, and enforce our policies and contracts.
- in addition, if we sell some or all our assets or merge with a third-party, we may transfer relevant personal data to the buyer or new company.

Cookies, Web Beacons, and Other Online Identifiers

We use three main types of online identifiers on our website and in our services: cookies, web beacons, and scripts.

- **Cookies** are text files placed on a device when a person visits our webpages or view messages from us. Some cookies are “session cookies” that expire at the end of a browser session, while others are “persistent cookies” that allow us to remember user preferences and settings over multiple visits and across other websites.
- **Web Beacons** are image files placed in our web pages and emails that we use for such purposes as determining if an email has been opened or an advertisement has been viewed.
- **Scripts** are small pieces of computer code that power customer service tools, deliver video, provide interactive experiences, and help us measure service use.

We manage some identifiers directly. Other identifiers are managed by third parties. For example, we use Google Analytics to monitor website performance and visitor engagement.

We use identifiers to provide customized services, measure website performance, provide customer support, deliver personalized advertising, and generate data insights, including through the use of artificial intelligence. Specific examples of how we use identifiers include, but are not limited to:

- Setting your service preferences
- Guarding against fraud
- Measuring website use
- Conducting research on use of product features to improve our services

"Do Not Track" and other Preference Signals

Some web browsers provide a “Do Not Track” feature. There are no generally accepted standards for this feature, and we do not respond to “Do Not Track” signals.

We recognize universal opt-out mechanisms, such as the Global Privacy Control, where required by applicable law.

Marketing and Advertising Preferences

You can manage your marketing and advertising preferences, including whether you wish to receive customized marketing and advertising by email to agingwelladvocates.com/contactus

Storage

We store personal data on our own systems.

Length of Retention

We retain personal data for our business needs and to comply with law. If we no longer need personal data, we may delete it or de-identify it so that it no longer identifies a specific person. Factors we consider when deciding when to delete or de-identify your personal data include: (1) if you still have an account, (2) if we are required to retain personal data to comply with law, or (3) if the personal data is needed for tax other business purposes.

Security

We use risk-based measures to protect personal data, including appropriate security controls and employee training. We also require that our service providers, business partners, and advertisers use appropriate risk-based controls to protect personal data.

No Collection of Personal Data about Children

We do not knowingly collect personal data about anyone under 18 without permission from their legal guardian. Please contact us at agingwelladvocates.com/contact us if you believe we have collected information from a child without permission from their legal guardian.

Legal Basis for Processing

We process personal data upon a person's request, with a person's consent, to fulfill our contracts, based on our legitimate interest, or other lawful bases. The specific basis of processing depends on the services you are using, the data being processed, the place where the processing occurs, and the place where you live. If you have questions about our basis for processing your personal data, please contact us at agingwelladvocates.com/contact us.

Non-Discrimination

We will not discriminate against you for exercising your privacy rights.

No Financial Incentives

We do not provide any financial incentives for providing personal data to us.

Policy Changes

We may revise this global privacy notice by posting a revised statement at the same location as this Notice, on another location on our website, or by contacting customers directly. If we change this global privacy notice, it will apply to personal data collected prior to adoption of the new statement only to the extent as the new statement does not reduce the rights of affected data subjects.

Contact Us

If you have any questions, you can contact us at agingwelladvocates.com/contact us or by mail at: Aging Well Advocates, LLC., 6 Corey Way, Franklin, MA 02038

SMS opt-in or phone numbers for the purpose of SMS are not being shared. SMS and phone numbers will not be shared to third parties.

We respond to all questions or concerns within 30 days.