

# HMP Senior Solutions Privacy Policy

Thank you for visiting [HMP Senior Solutions](#) Community ("[CLIENT]") Internet web site ("Site"). This Privacy Policy details certain policies implemented throughout [CLIENT] governing [CLIENT]'s collection and use of personally identifiable information about users of our Site and our services.

## Privacy Policy Updates

Due to the Internet's rapidly evolving nature, [CLIENT] may need to update this Privacy Policy from time to time. If so, [CLIENT] will post its updated Privacy Policy on our Site along with a change notice on the Site. [CLIENT] may also send registered users of our services a notice that this Privacy Policy has been changed. [CLIENT] encourages you to review this Privacy Policy regularly for any changes. Your continued use of this Site and/or services and/or your continued provision of personally identifiable information to us after the posting of such notice will be subject to the terms of the then-current Privacy Policy.

## Information Collection

You can generally visit our Site without revealing any personally identifiable information about yourself. However, in certain sections of this Site, we may require you to submit your personally identifiable information to us and we may invite you to submit questions, comments and request information.

Due to the nature of some of our services, you may provide us with personally identifiable information such as your name, email address, username, password, address, phone number, and other contact information that you voluntarily transmit with your communication to us.

## Information Use

We may use your personally identifiable information to deliver our services or information you have requested, verify your authority to enter certain password protected areas of the Site, verify that you are a customer or prospective customer,

send you information that you have signed up to receive, notices about our products and/or services that you have used or that may be of interest to you and notices about events, and improve the content and general administration of the Site and our services.

If you are a user of our services, we may use your personally identifiable information to provide the services to you.

## Children's Privacy

[CLIENT] recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither our Site nor our services are intended for children under the age of 13. [CLIENT] does not target its services or this Site to children under 13. [CLIENT] does not knowingly collect personally identifiable information from children under the age of 13.

## Cookies

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

On our Site, we use session cookies to make it easier for you to navigate the Site by remembering your locale preferences and to improve and track the overall Site experience. For our Site, we set a persistent cookie to authenticate your login and authorization to use the services. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on our Site. If you reject cookies, you may still use our Site, but your ability to use some areas of our Site may be limited.

## Third Party Analytics Tools

Beyond the personally identifiable information you voluntarily provide to us, [CLIENT] utilizes analytics tools including third party technologies, such as Google Analytics, to collect non-personally identifiable information utilizing cookies. Certain types of information, including geolocation, device type, onsite website usage and behavior,

demographic data, and purchase history, is collected and aggregated across [CLIENT] Site users for our analysis and advertising efforts.

[CLIENT] uses Remarketing with Google Analytics and Google Adwords to display relevant advertisements to users who have previously visited our Site. Referred to as remarketing or retargeting, [CLIENT] may utilize previous session information to serve display advertisements to you on the Site and based on such session information Google may set a cookie and serve ads to you on third party websites on the Google Display Network. Third party vendors such as Google may display [CLIENT] ads on websites across the Internet. Aggregated user data may be utilized to create remarketing/retargeting “lists,” or groups of users with similar onsite behaviors or demographics.

[CLIENT] also uses Google Display Network Impression Reporting and Google Analytics Demographics and Interest Reporting and Interest-Based Advertising to display advertisements to users based on their inferred interests and demographics. [CLIENT] does not run interest-based advertising campaigns that collect personally identifiable information.

Users may learn more about Google Analytics use of cookies by visiting the Google Privacy and Terms page at <http://www.google.com/policies/>. You may opt out of being tracked by Google Analytics by i) Turning off cookies in the preferences settings in your browser ii) Downloading the Google Analytics opt-out browser add on available at: <https://tools.google.com/dlpage/gaoptout/> iii) Opting out of user interest and demographic categories in the Settings for Google Ads feature to manage or opt out of Google interest-based ads at: or iv) Managing cookies used for online advertising across multiple companies at the US-based Network Advertising Initiative at <http://www.networkadvertising.org/choices/>.

## **Aggregate Information**

The Site may track the total number of visitors to our Site, the number of visitors to each page of our Site, browser type, IP addresses, External Web Sites (defined below) linked to and other aggregated data collected through our services and we may analyze this

data for trends and statistics in the aggregate, but such information will be maintained, used and disclosed in aggregate form only and it will not contain personally identifiable information. We may use such aggregate information to analyze trends, administer the Site, track users' movement, and gather broad demographic information for aggregate use.

## **Disclosure of Personally Identifiable Information**

We may provide your personally identifiable information and the data generated by cookies and third-party analytics tools and the aggregate information to the vendors and service agencies that we may engage to assist us in providing our services to you.

We will disclose your personally identifiable information if we reasonably believe we are required to do so by law, regulation, or other government authority or to assist in any investigation, to protect our or our users' rights or to enforce our terms of use. We will not sell your personally identifiable information to any company or organization except we may transfer your personally identifiable information to a successor entity upon a merger, consolidation or other corporate reorganization in which [CLIENT] participates or to a purchaser of all or substantially all of [CLIENT]'s assets to which this Site relates.

## **Links to Third Party Sites**

The Site may provide links to other Web sites or resources over which [CLIENT] does not have control ("External Web Sites"). Such links do not constitute an endorsement by [CLIENT] of those External Web Sites. You acknowledge that [CLIENT] is providing these links to you only as a convenience, and further agree that [CLIENT] is not responsible for the content of such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the linked to External Web Sites.

## **Security**

We may employ industry standard procedural and technological measures that are reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration, or destruction. [CLIENT] may use, without limitation, firewalls, password protection, secure socket layer, and other security

measures to help prevent unauthorized access to your personally identifiable information.

## Notice to European Users

This Site and the services on this Site are targeted for users in the United States of America. Any information you enter on this Site may be transferred outside of the European Union to the United States of America which does not offer an equivalent level of protection to that required in the European Union. You are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. Article 26 of the European Union's Data Protection Directive (Directive 95/46/EC, 1995 O.J. (L 281) 31) allows for transfer of personal data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of personal information, regardless of the third country's level of protection. By using this Site or the services, you consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in the European Union and to the processing of that information by [CLIENT] on its servers located in the United States of America as described in this Privacy Policy.

## Questions

If you have any questions regarding this Privacy Policy, please [contact us](#).

This Privacy Policy was last updated: **2020-12-17 10:36:00 -0700**

This Privacy Policy is effective as of: **2020-12-01 12:00:00 -0700**