

Privacy Policy

Last Revised: 8/7/2024

We know that your privacy is important to you, and we work hard to earn and keep your trust. Suffield Rehabilitation and Healthcare Center, (“we,” “us,” and “our”), respects your privacy and is committed to protecting your privacy through our compliance with this Privacy Policy (the “Policy”). The words “you” and “your” refer to you as a visitor of the Site (defined below).

This Policy describes:

- The types of information we collect from you or that you may provide when you visit our website available at: <https://theatlashcg.com> as well as any websites directly owned by us where this Policy is linked (collectively, our “Site”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the Site or in emails and other electronic messages between you and the Site, and information gathered when you interact with our advertising on third-party websites if such advertisements include links to this Policy.

This Policy does not apply to information collected by us offline or through any other means, including on any other website operated by us or any third party, or information collected by any third party through any application or content (including advertising) that may link to or be accessible from the Site (for further information, see below, “Third-party Websites”).

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Site. By using our Site, you agree to the terms of this Policy. This Policy may change from time to time. Your continued use of our Site after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Contact

After reviewing this Policy, if you have additional questions or want more information about our privacy practices, please contact us by e-mail at info@suffieldrhc.com.

Collecting Personal Information

When you visit the Site, we collect certain information about your device, your interaction with the Site, and information necessary to process your purchases. We may also collect additional information if you contact us for customer support. In this Policy, we refer to any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user, household or device as “Personal Information”. See the list below for more information about what Personal Information we collect and why. The Personal Information that we may receive and collect depends on what you do when you visit our Site.

Category	Examples	Collected	Disclosed
Identifiers.	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name.	YES	YES-Affiliates and/or Service Providers
Protected classification characteristics.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO	NO

Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	NO
Sensitive Personal Information	Precise geolocation, Social Security number, driver's license, state identification card, passport number, account log-in, financial account, debit card, credit card number with security, or access code or password, racial or ethnic origin, religious/philosophical beliefs, or union membership, genetic data and processing of biometric information, health and sexual orientation.	Yes	Service Providers
Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	NO
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	YES – Affiliates and/or Service Providers.
Geolocation data.	Physical location or movements.	NO	NO

Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	NO
Professional or employment-related information.	Current or past job history or performance evaluations.	NO	NO
Non-public education information.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	NO.
Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	NO

We may obtain the Personal Information listed above from the following categories of sources:

- **Directly from you.** For example, when you:
 - Provide Personal Information through the Site.
 - Subscribe to one of our e-newsletters.
 - Otherwise communicate with us, such as contacting us for more information.
- **Indirectly from you.** For example, through information we collect from you in the course of providing our services to you.
- **Directly and indirectly from activity on our Site.** For example, from Site usage details that are collected automatically. For more information on automatic information collection, please review the “Automated Information Collection” section below.

Minors

The Site is not intended for individuals under the age of 18. We do not intentionally collect Personal Information from children. If you are the parent or guardian and believe your child has provided us with Personal Information, please contact us at the address above to request deletion.

Sharing Personal Information

We do not sell or lease your Personal Information to any third party. We may disclose your Personal Information to a third party for a business purpose, including the following categories of third parties:

- Our Affiliates. We may disclose the information collected through the Site with our Affiliates in order to provide our products, services and effective customer support.
- Third-party Service Providers. We disclose Personal Information collected through the Site with third-party Service Providers who act for or on behalf of us. These third parties may need information about you to perform their functions. "Service Providers" may include suppliers, dealers, distributors, companies and consultants that provide Site hosting, software development, payment processing, Site and data analytics, order fulfillment, information technology and related infrastructure support, customer service, email delivery, and auditing.
- In Aggregate or De-Identified Form. We may aggregate or otherwise anonymize the data we collect for purposes of analytics, research, marketing and other business interests of us. Such use shall not include Personal Information or information that can identify you as an individual or reasonably be used to identify you.

Except as described in this Policy, we will not disclose your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Legal Reasons.
 - We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, subpoena, or court order.
 - To respond to duly authorized information requests from law enforcement or other governmental authorities.
 - To enforce our agreements or policies.

- To investigate and prevent security threats, fraud, or other malicious activity.
- To respond to an emergency that we believe in good faith requires us to disclose such information to assist in preventing the death or serious bodily injury of any person or employee.
- Sale of Business or Merger. There are circumstances where we may decide to buy, sell, or reorganize its business. Under these circumstances, it may be necessary to disclose or receive Personal Information with prospective or actual purchasers, acquisition targets, partners or affiliates. In such circumstances, we will ensure your information is used in accordance with this Policy.

Behavioral Advertising

As described herein, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For example:

- We use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
- We share information about your use of the Site, your purchases, and your interaction with our ads on other websites with our advertising partners. We collect and share some of this information directly with our advertising partners, and in some cases through the use of cookies or other similar technologies (which you may consent to, depending on your location).

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <https://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt-out of targeted advertising by:

- FACEBOOK - <https://www.facebook.com/settings/?tab=ads>
- GOOGLE - <https://www.google.com/settings/ads/anonymous>
- BING - <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <https://optout.aboutads.info/>.

Using Personal Information

We use your Personal Information to provide our services to you at your request, in addition to various other purposes, including but limited to:

- Keeping you up to date on new products, services, and offers.
- Security, credit or fraud prevention purposes.
- Providing you with effective customer services,
- Providing you with a personalized experience when you use the Site.
- Contacting you with information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us).
- Contacting you with information and notices related to your use of the Site.
- Improving the content, functionality and usability of the Site.
- Improving our services.
- Improving our marketing and promotional efforts.
- Any other purpose identified at the point of data collection, in an applicable privacy notice, in a click-through agreement or in any other agreement between you and us.

Retention

When you place an order through the Site, we may retain your Personal Information for our records unless and until you ask us to erase this information. For more information on your right of erasure, please see the 'Your Choices and Selecting Your Privacy Preferences' section below.

Automatic decision-making

We *DO NOT* engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Your Rights Under State Law

California

- **Shine the Light law.** Pursuant to California Civil Code Section 1798.83, we will not disclose or share your Personal Information with third parties for the purposes of third-party marketing to you without your prior consent.
- **WE DO NOT SELL OR SHARE YOUR PERSONAL INFORMATION.** If we ever decide to “sell” or “share” Personal Information, as those terms are defined under the CCPA, we will update you via this Policy and include a link entitled “Do Not Sell or Share My Personal Information,” to provide you with an opportunity to opt out of the selling or sharing of your Personal Information.

Your Consumer Rights

Some state laws in the United States provide consumers with additional rights with respect to their Personal Information (also known as “personal data”), as those terms are defined under those applicable state laws. Such state laws may include, but are not limited to, the California Consumer Privacy Act of 2018 (the “CCPA”) as amended by the California Privacy Rights Act, the Colorado Privacy Act (“CPA”), the Utah Consumer Privacy Act (“UCPA”), and the Virginia Consumer Data Protection Act (“VCDPA”). We seek to provide these rights regarding Personal Information to all visitors to its Site, regardless of the state in which the visitor resides. Subject to our verification of your identity, the following rights are available to you as a visitor to our Site.

1. **Access.** You have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past twelve (12) months. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
2. **Correction.** You can correct what personal data our Site database currently contains by accessing your account directly, or by contacting us to request that we correct or rectify any personal data that you have provided to us.
3. **Limit Use and Disclosure of Sensitive Personal Information.** If we collect any sensitive personal information, you have the right to request that we limit the use of the sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
4. **Portability.** Upon request and when possible, we can provide you with copies of your Personal Information. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy

5. **Deletion.** You have the right to request that we delete any of your Personal Information, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies. Where applicable, we will ensure such changes are shared with trusted third parties.
6. **Opt-out of Processing.** You have the right to request that we do not sell your Personal Information, use your Personal Information for Targeted Advertising, or use your Personal Information for profiling. Where applicable, we will ensure such changes are shared with trusted third parties.
7. **Non-Discrimination.** If a consumer exercises his or her rights under applicable state law, including but not limited to the CCPA, CPA, UCPA, and VCDPA, we shall not discriminate against that data subject by denying our goods or services, charging different prices or rates to similarly situated consumers, providing a different level or quality of our goods or services, or taking any other adverse action.
8. **Exercising your rights.** If you are a consumer that has rights under applicable state law, including but not limited to the CCPA, CPA, UCPA, and VCDPA, who chooses to exercise the rights listed above, you can submit a request via email at the address listed above.

Only you, or someone legally authorized to act on your behalf, may make a request related to your Personal Information. If an authorized agent makes a request on your behalf, we may require proof that you gave the agent permission to submit the request.

Responding to Your Request. Upon receiving your request, we will confirm receipt of your request by sending you an email confirming receipt. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the Personal Information. In some instances, such as a request to delete personal information, we may first separately confirm that you would like for us to in fact delete your personal information before acting on your request.

We will respond to your request within forty-five (45) days. If we require more time, we will inform you of the reason and extension period in writing.

In some cases our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

Location of Our Website and Services

We do not warrant or represent that this Policy or the Site's use of your Personal Information complies with the laws of every jurisdiction. Furthermore, to provide you with our services, we may store, process, and transmit information in the United States and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

For Website Users Outside the United States

Under the (i) General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or "GDPR"), (ii) Data Protection Act 2018, (iii) the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland (i.e., "UK GDPR") as provided in the Data Protection Act 2018, and (iv) any other applicable data protection legislation of any country or other jurisdiction (collectively "International Data Protection Laws") individuals have specific rights with respect to their Personal Information, or "personal data" as defined under the International Data Protection Laws. For the purposes of this Policy, we operate as a data controller. Any personal data we collect from you is processed in the United States and under the terms of this Policy.

Any personal data we collect from you is processed in the legitimate interest of our business and providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law and in accordance with your rights below.

The Data Controller is:

Name: Suffield House Rehabilitation and Healthcare Center

Email Address: info@suffieldrhc.com

You can exercise any of the following rights, subject to verification of your identity, by notifying us as described below:

- **Access.** You may request a copy of the personal data our Site databases currently contain.

- **Automated Processing and Decision-Making.** You may request that we stop using your personal data for automated processing, such as profiling. When contacting us, please explain how you wish us to restrict automated processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- **Correction or Rectification.** You can correct what personal data our Site database currently contains by accessing your account directly, or by emailing us (as provided below) to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause information to be incorrect. Where applicable, we will ensure such changes are shared with trusted third parties.
- **Restrict Processing.** When applicable, you may restrict the processing of your personal data by submitting a request via email (to the email provided below). In your email, please explain how you wish us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- **Object to Processing.** When applicable, you have the right to object to the processing of your personal data by submitting a request via email to (to the email provided below). When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- **Portability.** Upon request and when possible, we can provide you with copies of your personal data. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent. Where applicable, we will ensure such changes are shared with any trusted third parties.
- **Withdraw Consent.** At any time, you may withdraw your consent to our processing of your personal data through this Site by notifying us via email (to the email provided below). Using the same email address associated with your Site account, simply type the words "WITHDRAW CONSENT" in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal

data. Where applicable, we will ensure such changes are shared with trusted third parties.

- **Erasure.** If you should wish to cease use of our Site and have your personal data deleted from our Site, then you may submit a request by emailing us at the email provided below. Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your personal data has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.

Exercising your rights. If you are a data subject that has rights under the International Data Protection Laws, who chooses to exercise the rights listed above, you can submit a request via email as listed above.

Submit Complaints or Questions. If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state or the United Kingdom, you may also lodge a complaint with the supervisory authority in your country.

Your Choices and Selecting Your Privacy Preferences

We want to provide you with relevant information that you have requested. When possible, we will always provide options as to what information we collect and how you can manage any preferences that pertains to such information.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages, such as delivery confirmation messages, are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

From time to time, we may send you email newsletters and marketing emails. You may opt out of them at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

Accuracy and Access to Your Personal Information

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing. Should you ever have questions about the accuracy or your Personal Information, please contact us at the email listed above.

Third-Party Websites

This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Our Site may link to third-party websites and services. Because this Policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or website and providing any information. These links are not endorsements of these websites, and this Policy does not extend to them.

Automated Information Collection

In addition to the information that you provide to us, we may also collect information about you during your visit to our Site. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Site. Some of the tools we use to automatically collect information about you may include:

- Cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use either (or both) of them:
 - Session cookies, which do not stay on your device after you close your browser.
 - Persistent cookies, which remain on your device until you delete them or they expire.

We may use the following categories of cookies on our Site.

- **Strictly Necessary Cookies.** These cookies are essential in order to enable you to move around the Site and use its features. Without these cookies, services you have requested cannot be provided.
- **Performance Cookies.** These cookies collect anonymous information on how you use our Site to help us understand how you arrive at our Site, browse or use our Site and highlight areas where we can improve, such as navigation. The data stored by these cookies never shows personal details from which your individual identity can be established.
- **Functionality Cookies.** These cookies remember choices you make such as the country from which you visit our Site, your preferred language, and your search parameters. This information can then be used to provide you with an experience more appropriate to your selections and to make your visits to our Site more tailored to your preferences. The information in these cookies may be anonymized. These cookies cannot track your browsing activity on other websites.
- **Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third-party advertising networks. These cookies remember the websites you visit and that information is shared with other parties, such as advertisers.

If you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser's settings. However, by disabling cookies on your device, you may be prohibited from full use of the Site's features or lose access to some functionality.

- **Google Analytics.** The Site sends aggregated non-Personal Information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the Site's performance. For more information on how Google Analytics supports the Site and uses information sent from the Site, please review Google's privacy policy available at <https://policies.google.com/technologies/partner-sites>.
- **Web Beacons.** A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. This information is only collected in aggregate form and will not be linked to your Personal

Information. Please note that any image file on a webpage can act as a Web Beacon.

- **Embedded Web Links.** Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- **Third-party Websites and Services.** We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our Site and also on the websites where our marketing communications are appearing. For example, we may sometimes collect data where our banner advertisements are displayed on third-party websites.

The length of time that a cookie remains on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser’s “Tools” or “Preferences” menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser’s help file or through such sites as: www.allaboutcookies.org.

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners.

Do Not Track

Please note that because there is no consistent industry understanding of how to respond to “Do Not Track” signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

Safeguarding the Information We Collect

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us immediately of any actual or suspected unauthorized use of the Site or your information.

Changes

We may update this Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons. If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the “Last Revised” block above. You can get to this page from any of our webpages by clicking on the “Privacy Policy” link (usually at the bottom of the screen).