# **Privacy Policy**

This Privacy Policy ("Policy") applies to all websites operated by Sonrisas Assisted Living, LLC ("Sonrisas"), including without limitation www.sonrisasfamily.com (the "Site"). Any reference to "we", "us", or "our" in this Policy shall refer to Sonrisas. This Policy has been created in order to demonstrate and inform you of our firm commitment to privacy. The following Policy describes how we collect, protect and use information we receive from visitors to the Site or prospective consumers.

These Terms and Conditions apply to all site visitors, customers, and all other users of the Site.

# **Privacy Policy Updates**

Sonrisas reserves the right to amend/change the terms and conditions and privacy policy without prior notice. Please check back regularly to view any updates. If you have any further questions, please visit our contact page. 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.

# **Intellectual Property Rights**

Other than the content you own, under these Terms, Sonrisas and/or its licensors own all the intellectual property rights and materials contained in this Website.

You are granted limited license only for purposes of viewing the material contained on this Website.

### No warranties

This Website is provided "as is," with all faults, and Sonrisas express no representations or warranties, of any kind related to this Website or the materials contained on this Website. Also, nothing contained on this Website shall be interpreted as advising you.

## **Limitation of liability**

In no event shall Sonrisas, nor any of its officers, directors and employees, shall be held liable for anything arising out of or in any way connected with your use of this Website whether such liability is under contract. Sonrisas, including its officers, directors and employees shall not be held liable for any indirect, consequential or special liability arising out of or in any way related to your use of this Website.

## Indemnification

You hereby indemnify to the fullest extent Sonrisas from and against any and/or all liabilities, costs, demands, causes of action, damages and expenses arising in any way related to your breach of any of the provisions of these Terms.

## The Information We Collect

There are two kinds of information web sites can obtain about you:

- Anonymous Information: Anonymous Information is aggregate data that
  web sites use to administer their Site. It may include such information as
  your browser type or your Internet Protocol (IP) address. We may from
  time to time retain third parties to help us collect and aggregate Site
  visitor information.
- IP Addresses: An IP address is unique string of numbers that is assigned to your computer by your Internet Service Provider. Web servers automatically identify your computer by its IP address. We use your IP address to help diagnose problems with our server, to administer the Site, avoid hacking attacks on the Site' servers, and may use it to gather broad demographic information.
- Cookie Information: As is the case with many web sites, the Sites use a
  technology called "cookies", which are small data files that are
  downloaded onto your computer. The use of cookies is standard on the
  Internet, and allows us to tailor your visits to the Site to your individual
  preferences. We may also contract with third party service providers
  who assign cookies to conduct site tracking for us. These companies
  use cookies solely to provide us with data about site traffic. Although
  most web browsers automatically accept cookies, you can change your
  browser to prevent cookies or notify you whenever you are sent a

cookie. Even without accepting a cookie, you can still access most of the features on the Site.

## **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, address, phone number, and other contact information that you voluntarily transmit with your communication to us.

## **How We Use Gathered Information**

The information you share with us may be used in a few ways:

- Anonymous Information: "Anonymous Information" is used internally for Site administration, troubleshooting and to help improve the quality of the web pages. We may share such aggregated, non-personally identifiable information, such as demographics, with existing and prospective business partners and advertisers.
- Personally Identifiable Information: "Personally Identifiable Information" collected by us may be used for purposes including administration of the Site and communications with you. We may use your personally identifiable information to deliver our services or information you have requested and send you information that you have signed up to receive. If you are a user of our services, we may use your personally identifiable information to provide the services to you. We also may disclose Personally Identifiable Information if we are required to do so by law or we in good faith believe that such action is necessary to (a) comply with the law or with legal process; (b) protect and defend our rights and property; (c) protect against misuse or unauthorized use of the Site; or (d) protect the personal safety or property of our users or the public. We will not sell, distribute or lease your personal information to third parties.

# **Security**

The Site incorporates appropriate safeguards to protect the security, integrity, completeness, accuracy and privacy of the personal information we have collected. We have put in place reasonable precautions to protect information from loss, misuse and alteration. While on a secure page, the lock icon on the bottom of Web browsers such as Google Chrome, Mozilla Firefox and Microsoft Internet Explorer becomes locked, as opposed to unlocked, or open, when you are just "surfing". Security of information communicated by or to us over the Internet is of utmost concern to us; unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Please note that your email or other electronic correspondence with us through the Site, like most, if not all, non-encrypted Internet communications, may be accessed and viewed by other Internet users, without your knowledge and permission, while in transit to us. For that reason, to protect your privacy, please do not use email or the contact forms provided through the Site to communicate information to us that you consider confidential. While we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or through the Site, and you do so at your own risk. Once we receive your transmission, we will use reasonable efforts to ensure its security on our internal systems. Depending on the nature of the inquiry, your communication may be discarded or archived. If you wish, you may contact us instead via telephone at the numbers provided throughout the Site.

# **Links to Third Party Sites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our Site, we are not responsible for the nature, quality or accuracy of the content or opinions expressed in such web sites, and such web sites are not investigated, monitored or checked for quality, accuracy or completeness by us. Each of these linked web sites maintains its own independent privacy and data collection policies and procedures. If you visit a web site that is linked to the Site, we encourage you to consult that web site's privacy policy before providing any personal information and whenever interacting with any web site.

# Third Party Analytics Tools

Beyond the personally identifiable information you voluntarily provide to us, Sonrisas 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 Sonrisas Site users for our analysis and advertising efforts.

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/.

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. Sonrisas 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. In particular, 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 Sonrisas 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: 2018-03-13

This Privacy Policy is effective as of: 2018-03-13