# **Transformations Privacy Notice**

Last Updated: 4/2/2025

Northeast Health Services, LLC d/b/a Transformations Care Network and its affiliates and subsidiaries ("Transformations," "we," "us," or "our") respect your privacy. This Privacy Notice ("Notice") describes the processing of Personal Information (defined below) on the websites, applications, and online platforms that link to this Notice (collectively, "Site"), including when you apply for a job with us. It also describes rights you may have under applicable laws. Please read this Notice carefully to understand our policies and practices regarding your Personal Information and how we will treat it. To access this Notice in an alternative downloadable format, please click here.

In some instances, your Personal Information may constitute Protected Health Information under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). In those instances, please review our HIPAA Notice of Privacy Practices, which is supplemented by this Notice.

#### **Personal Information We Collect**

We collect several categories of Personal Information from and about users of our Site. "Personal Information" means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. The categories of Personal Information we collect may include:

- Contact Information If you submit an inquiry or provide information on or through our Site, we may collect your contact information including your name, mailing address, email address, and phone number.
- *Usage Information* When you use our Site, we may automatically record information, including your Internet Protocol address (IP Address), geolocation of your device, browser type, referring URLs (e.g., the website you visited before coming to our Site), domain names associated with your internet service provider, and any other information regarding your interaction with our Site.
- Employment Information If you apply for employment with us, we will collect Personal Information related to your potential employment, including your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
- Communication Information We may collect Personal Information contained within your communications with us via email, chat functionality, social media, telephone, or otherwise, and in certain cases we may use third-party service providers to do so. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, post, or similar functionality.

### **How We Collect Personal Information**

• *Directly From You* – We collect Personal Information that you provide to us directly, for example, if you choose to contact us, request information from us, sign up to receive updates, or otherwise utilize our Site.

- From Third Parties We may collect Personal Information from third parties, including but not limited to business partners, advertising networks, social networks, data analytics providers, mobile device providers, Internet or mobile service providers, recruiters and job application portals, and background check providers.
- Through Online Tracking Technologies We use cookies and similar technologies to collect Personal Information automatically as you navigate our Site. For additional information regarding our use of these technologies, see the Cookies and Tracking Technologies section below.

#### **How We Use Personal Information**

To the extent permitted by applicable law, we use Personal Information:

- To provide and personalize our Site and related services, such as providing and personalizing our Site, providing customer service, verifying prospective patient information, creating and maintaining business records, and undertaking or providing similar services.
- *To optimize, improve, and maintain our Site*, including understanding how users interact with our Site, gauging user interest in certain Site functionality, and troubleshooting problems.
- For internal research and development, such as testing, verifying, and improving the quality of our Site or developing new ones.
- For marketing and advertising, including using your information to send you messages, notices, newsletters, surveys, promotions, or event invitations.
- For communicating with you, such as responding to your questions and comments or notifying you of changes to our Site.
- For legal, security, or safety reasons, such as protecting our and our users' safety, property, or rights; complying with legal requirements; enforcing our terms, conditions, and policies; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity.
- As part of a corporate transaction, such as in connection with the sale of part or all of our assets or business, the acquisition of part or all of another business or another business' assets, or another corporate transaction, including bankruptcy.
- To fulfill any other purpose for which you provide it, including purposes described when you provide the information or give your consent.

If you are applying for employment with us, we also use Personal Information to process your job application, to verify the information you have provided in your application, conduct interviews, perform background and reference checks, to communicate with you and answer your questions, to confirm your eligibility for employment, and improve our recruiting processes. We may also save your Personal Information for future employment opportunities with us.

### **How We Disclose Personal Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose your Personal Information with your consent or in the following circumstances:

- Affiliates and Subsidiaries We may share Personal Information within our family of companies for their and our business and marketing purposes, including providing you with information about the services we think may be of interest to you.
- Service Providers We disclose your Personal Information with the service providers that we use to support our business, including but not limited to, data analytics providers, website hosting providers, and other technology providers. If you are applying for a job with us, this may include service providers such as background check providers and human resource providers.
- Legal Obligation or Safety Reasons We may disclose Personal Information to a third party when we have a good faith belief that such disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Transformations, its employees and clients, or the public against harm.
- Merger or Change of Control We may disclose Personal Information to third parties as necessary if we are involved in a merger, acquisition, or any other transaction involving a change of control in our business, including but not limited to, a bankruptcy or similar proceeding. Where legally required, we will give you notice prior to such disclosure.
- Other We may disclose Personal Information to third parties when explicitly requested by or
  consented to by you, or for the purposes for which you disclosed the Personal Information to us as
  indicated at the time and point of the disclosure (or as was obvious at the time and point of
  disclosure).

## **Cookies and Other Tracking Technologies**

We and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our Site. The technologies we use for this automatic data collection may include cookies and web beacons that permit us to verify system and server integrity and generate statistics around the popularity of certain content. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our Site, to enhance your experience through personalization, and to help us better understand the features of our Site that you and other users are most interested in.

Website Delivery and Appearance – We may use third party providers to enable certain customer interaction opportunities, content delivery, or other service capabilities. Examples include, but are not limited to, the following functionality:

Customer Interaction: We enhance our customer interactions by offering features like Google
Maps to locate our various locations and clinics. Each of these offerings are governed by the terms,
conditions, and policies of the underlying service provider. For example, please see Google
Maps/Google Earth Terms of Service and Google's Privacy Policy for more information on how
that feature operates.

• Chat-based Customer Support: We use a chat feature powered by a third-party to enable live customer service and technical support via our Site. When you engage in the live chat enabled by this service provider, we will automatically collect and share certain information (such as personal identifiers, usage information, and message content) with the vendor to provide the customer service and technical support enabled by the live chat tool.

Website Analytics and Heatmapping – We use analytics and heatmapping services, that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Site traffic and site usage to optimize, maintain, and secure our Site and inform subsequent business decisions (including, e.g., advertising). These include, but are not limited to, the following third-party services:

- **Heatmapping:** We partner with third parties, including VWO, to capture how you use and interact with our Site through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Site usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising.
- Google Analytics: To learn more about how Google uses data, visit Google's Privacy Policy and Google's page on "How Google uses data from sites or apps that use our services." You may download the Google Analytics Opt-out Browser Add-on for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit Google Analytics Cookie Usage on Websites.

Interest-Based Advertising — We may also allow or enable third parties to collect limited Personal Information and anonymized data to provide their interest-based advertising on behalf of our products and services, or their own. Interest-based advertising occurs when advertisements are shown to you based on information collected from your online interactions over time and across multiple websites, devices, or online services that you visit or use. Some companies may engage in cross-context behavioral advertising to predict your preferences and show you advertisements that are most likely to be of interest or relevant to you. We do not control these third parties' collection or use of your information for these purposes, or the opt-out options they may individually offer you via their terms, conditions, and privacy policies. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. Examples of the third-party service providers we engage to serve interest-based advertisements include Google Ads, Meta Ads, Bing Ads, and LinkedIn marketing solutions (including LinkedIn Ads and Analytics) for employee recruiting.

Cookie Choices – To manage your preferences with respect to these technologies, you can:

- Visit our preferences page or customize your browser settings to refuse all or some browser cookies,
  or to alert you when websites set or access cookies. If you disable certain cookies, please note that
  some parts of our Site may not function properly. These settings may be lost and require
  reconfiguration if you delete your cookies.
- Block the collection and use of your information by online platforms and ad tech companies for the purpose of serving interest-based advertising by visiting the opt out pages of the self-regulatory programs of which those companies are members: <a href="National Advertising Initiative">National Advertising Initiative</a> and <a href="Digital Advertising Alliance">Digital Advertising Alliance</a>, if you are located in the European Economic Area). Please note that even if you opt out of interest-based advertising, you may still see "contextual" ads which are based on the context of what you are looking at on the websites and pages you visit.

Review and execute any provider-specific instructions to customize your preferences or opt-out of
certain processing, including interest-based advertising, by third party service providers. For
example, to opt-out of this type of advertising by Google, customize your ad preferences, or limit
Google's collection or use of your data, visit Google's Safety Center and Google's Ad Settings and
follow Google's personalized ad opt-out instructions.

## **How Long We Keep Your Personal Information**

We retain your information for as long as needed: (i) to conduct business with you; (ii) fulfill the purposes outlined in this policy; and (iii) to comply with our legal obligations, resolve disputes, and enforce any agreements.

Criteria we will use to determine how long to retain your Personal Information include the nature and length of our business relationship with you; our legal rights, obligations, and retention requirements; and if we have an ongoing business purpose for retaining your Personal Information.

### **Links to Third-Party Websites**

We are not responsible for the practices employed by any websites or services linked to or from our Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third party's privacy policy.

In some cases, we offer links to social media platforms (like Facebook, Instagram, and YouTube) that enable you to easily connect with us or share information on social media. Any content you post via these social media pages is subject to the terms and privacy notices for those platforms. For more information about how YouTube collects and processes Personal Information, for example, please see <u>Google's Privacy Policy</u>.

#### **International Use**

If you are visiting our Site from outside of the United States, please note that our Site is hosted in the United States. Where permitted by applicable law, we may transfer the personal data we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Policy.

#### **How We Protect Personal Information**

We have implemented commercially reasonable measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. despite these efforts to store Personal Information in a secure environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

## **Exercising Your Privacy Rights**

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- Access The right to request access to and obtain a copy of any Personal Information we may have about you.
- *Deletion* The right to delete your Personal Information that we have collected or obtained, subject to certain exceptions.
- Correction The right to request that we correct any inaccuracies in your Personal Information, subject to certain exceptions.
- Opt Out of Certain Processing The right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale or sharing of your Personal Information; (c) limit the use of your sensitive Personal Information (if applicable), and (c) opt out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of the privacy rights afforded to you under applicable data protection laws, e-mail us at <a href="mailto:tencorporatecompliance@TransformationsNetwork.com">tencorporatecompliance@TransformationsNetwork.com</a>. You may also exercise your opt out rights by broadcasting an Opt-Out Preference Signal. We honor Opt-Out Preference Signals. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.

To opt out of marketing emails, please email us at <a href="Unsubscribe@TransformationsNetwork.com">Unsubscribe@TransformationsNetwork.com</a> or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law.

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Notice. However, should you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some, or all, of our services to you.

Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

#### **SMS Terms and Conditions**

By opting in to receive SMS messages, you agree to receive SMS messages from Transformations Care Network to provide updates and important information. Message frequency may vary, and message and data rates may apply. You can opt out anytime by replying STOP. For help or more information, reply HELP.

- Opt-In Consent is obtained before sending messages. Subscribers will receive a confirmation
  message upon opting in: "You have successfully been subscribed to messages from
  Transformations Care Network from this number. Message frequency may vary. Message and data
  rates may apply. Reply HELP for help. Reply STOP to unsubscribe."
- Opt-Out Reply STOP at any time to unsubscribe. You will receive a confirmation message: "You have now been opted out and will receive no further messages from Transformations Care Network from this number. Reply START to resubscribe."
- Help Reply HELP for assistance. You will receive: "For additional information, please call Transformations Care Network at (508) 880-6666. To opt out, reply STOP."

<u>Please note</u>: Phone numbers obtained as part of a SMS consent process will not be shared with third parties for marketing or promotional purposes.

## Children's Privacy

We do not knowingly collect or solicit any Personal Information from children, as defined under applicable law, without verified written parental consent, and we have no actual knowledge of selling such Personal Information of minors under 16 years of age. If we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you believe we might have any information from or about a child, please contact us at <a href="mailto:tencorporatecompliance@TransformationsNetwork.com">tencorporatecompliance@TransformationsNetwork.com</a>.

# **Changes to this Notice**

Please note that we may modify or update this Notice from time to time, so please review it periodically. If we make material changes to how we treat Personal Information, we will notify you according to applicable law. Unless otherwise indicated, any changes to this Notice will apply immediately upon posting to our Site. You are responsible for periodically visiting our Site and this Notice to check for any changes.

## **Contact Us**

If you have any questions about our practices or this Notice, please contact us at <a href="mailto:tcncorporatecompliance@TransformationsNetwork.com">tcncorporatecompliance@TransformationsNetwork.com</a>.