# Cookie Policy of gracious retirement living.com

This document informs Users about the technologies that help this Website to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Website.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Website uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# Activities strictly necessary for the operation of this Website and delivery of the Service

This Website uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

# **Third-party Trackers**

# Traffic optimization and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

# Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

# Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

# Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

# Collection of privacy-related preferences

This type of service allows this Website to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

#### iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on this Website.

Personal Data processed: Trackers.

Place of processing: Italy – Privacy Policy.

Storage duration:

• \_iub\_cs-\*: 1 year

• \_iub\_cs-\*-granular: 1 year

• euconsent-v2: 2 years

# Other activities involving the use of Trackers

# **Functionality**

This Website uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

#### Contacting the User

#### Contact form (this Website)

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address, first name, last name, phone number, Trackers, Usage Data and various types of Data.

#### Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data processed: city, email address, first name, last name, phone number, physical address, state, Trackers, Usage Data and ZIP/Postal code.

# User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

#### HubSpot CRM (HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: email address, first name, last name, phone number, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Storage duration:

• \_\_hs\_gpc\_banner\_dismiss: 6 months

hssc: 30 minutes

hssrc: duration of the session

\_hstc: 2 monthshubspotutk: 2 monthsmessagesUtk: 2 months

# **Experience**

This Website uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

#### Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### YouTube video widget (Google LLC)

YouTube is a video content visualization service provided by Google LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• PREF: 8 months

VISITOR\_INFO1\_LIVE: 8 monthsYSC: duration of the session

#### Measurement

This Website uses Trackers to measure traffic and analyze User behavior to improve the Service.

#### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Storage duration:

• AMP TOKEN: 1 hour

• \_ga: 2 years

gac\*: 3 months gat: 1 minute

• gid: 1 day

# Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

Personal Data processed: browser information, city, device information, latitude (of city), longitude (of city), number of Users, session statistics, Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

\_ga: 2 years\_ga\_\*: 2 years

#### Meta Events Manager (Meta Platforms, Inc.)

Meta Events Manager is an analytics service provided by Meta Platforms, Inc. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Storage duration:

• fbp: 3 months

# Marketing

This Website uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

Some of the advertising services used by the Owner adhere to the <u>IAB Transparency and Consent Framework</u>, an initiative that facilitates responsible privacy practices across the digital advertising industry - providing Users with enhanced transparency and control over how their data are used for advertising tracking purposes. Users can customize their advertising preferences at any time by accessing the advertising preferences panel from within the cookie notice or via the relevant link on this Website.

This Website participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. This Website uses iubenda (identification number 123) as a Consent Management Platform.

# Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User's interests and behavior, or to measure ads performance. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

# Google Ads conversion tracking (Google LLC)

Google Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Storage duration:

• IDE: 2 years

• test\_cookie: 15 minutes

#### Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on this Website. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Storage duration:

• \_fbp: 3 months

• fr: 3 months

# How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

# **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

# How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

#### **Consequences of denying the use of Trackers**

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

# **Owner and Data Controller**

Hawthorn Senior Living - 9310 NE Vancouver Mall Drive, Suite 200 Vancouver, WA 98662

#### Owner contact email: Privacy@hawthornret.com

Since the use of third-party Trackers through this Website cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Website.

# **Definitions and legal references**

# Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

# **Data Subject**

The natural person to whom the Personal Data refers.

#### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

# **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

#### This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

#### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

#### Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

#### Legal information

This privacy policy relates solely to this Website, if not stated otherwise within this document.

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