

PACE AT HUDSON HEADWATERS PRIVACY NOTICE

This Privacy Notice is incorporated into Our Terms of Use. All terms defined in the Terms of Use shall have the same meaning when used herein unless otherwise noted.

PACE AT HUDSON HEADWATERS respects Your privacy. This Privacy Notice (“Privacy Notice”), describes what information We collect from or about You, how it is used, and what choices You may have regarding your information in connection with Our Website, located at www.pacehh.org or any other PACE AT HUDSON HEADWATERS related website, webpage, application, social media, or other Internet, mobile, or wireless offerings no matter how accessed (collectively “Website”) that provide a link to this Privacy Notice or PACE AT HUDSON HEADWATERS’ Terms of Use. This Privacy Notice applies to any individual in the United States regardless of the individual’s state of residency, who visits the PACE AT HUDSON HEADWATERS Website or related content or receives PACE AT HUDSON HEADWATERS’ products or services through the Website.

Some information that You provide to Us may be considered “individually identifiable health information” and be subject to additional terms under the Health Insurance Portability and Accountability Act of 1996 (“HIPPA”). Please read our Notice of Privacy Practices Under HIPAA by clicking here.

Please read this Privacy Notice in its entirety.

By using the Website, you are consenting to the practices described in this Privacy Policy and agree to be bound thereby. If you do not agree with the terms of the Privacy Policy, please do not use the Website.

1. PERSONAL INFORMATION THAT WE COLLECT

a. Types of Information:

PACE AT HUDSON HEADWATERS may collect Your personal information in connection with Your access to, use of, or Your submissions to the Website and Your consideration or purchase of any Products or Services offered by PACE AT HUDSON HEADWATERS in connection with the Website. For example, We may collect personal information about You, such as:

- Your name, mailing address, email address, telephone number and, under some circumstances, Your date of birth;
- information that You share as a result of Your public participation in the Website;
- Your Website, Products and Services history and preferences;
- Your IP address and information about Your browsing, search history and navigation on, to and from the Website.

We may also obtain additional information about You that may or may not be directly linkable to You. Examples include, but are not limited to, aggregate information, analytics information using cookie IDs, advertising segment information, advertising IDs/cookie or device information.

b. Sources of Information:

PACE AT HUDSON HEADWATERS collects information about You from a variety of sources, including:

- **Directly from you**, for example, purchase Products and Services from our Website; communicate with Us by email, such as in connection Your purchases, The Website, or Your Products and Services experiences; when You complete webforms; or when You participate in surveys or reviews that may be available by PACE AT HUDSON HEADWATERS or its partners or affiliates from time to time.
- **Indirectly from you**, for example, by observing your actions on our Website, or through information we collect while providing Products or Services;
- **Directly and indirectly from your activity on the Website**, for example, through Website portal or Website usage details that are collected automatically or through your inquiries or submissions on the Website;
- **From third parties**, for example, from third parties that assist PACE AT HUDSON HEADWATERS to provide customer service or maintain The Website.

2. HOW WE USE THE INFORMATION WE COLLECT

PACE AT HUDSON HEADWATERS may use personal information for a variety of PACE AT HUDSON HEADWATERS' business purposes and to the extent and manner permitted by law:

- **To fulfill or meet the reason for which the information is provided.** For example, to respond to Your questions or communications regarding PACE AT HUDSON HEADWATERS, Our Products and Services, to communicate with You regarding any changes to your account; and to otherwise process customer service functions;
- **To provide You with communications** regarding any changes to PACE AT HUDSON HEADWATERS' policies or account management procedures, notices, or terms of use; information on new products or services or updates; promotions and special offers regarding PACE AT HUDSON HEADWATERS, Our Products and Services, The Website or programs, or Our partners' or affiliates' products, services or programs that may interest you;
- **To carry out Our obligations** and enforce Our rights arising from any contracts entered into between You and Us, including for billing and collections;
- **To publish content on the Website**, under some circumstances, such as when PACE AT HUDSON HEADWATERS publishes testimonial comments or enables public participation forum by Users on the Website;

- **To personalize Your Website experience** and to deliver content and service offerings relevant to Your interests including via email or text message (with your consent, where required by law);
- **To help maintain the safety, security, and integrity of our Website**, services, databases and other technology assets, and business on behalf of PACE AT HUDSON HEADWATERS and its Users;
- **To investigate or prevent a violation** of any individual's contractual or other relationship with PACE AT HUDSON HEADWATERS or where PACE AT HUDSON HEADWATERS has a good faith belief that access, preservation or disclosure of such information is reasonably necessary to protect the rights, property or safety of PACE AT HUDSON HEADWATERS, its Users or the public, or to prevent or respond to any illegal, fraudulent or harmful activity;
- **For testing, research, analysis, and product development**, including to develop and improve our Website, Products and Services, and Your experience with the Website, Products and Services;
- **For marketing PACE at HUDSON HEADWATERS' Products and Services or Programs**, including providing You, (via alerts, banner ads, postal mail, event registration, email and other notices) with information about offers, programs, products and services that PACE AT HUDSON HEADWATERS believes may be of interest to You;
- **At the request of law enforcement or governmental agencies** or in response to subpoenas, court orders or other legal process, or to establish, protect or exercise PACE AT HUDSON HEADWATERS' legal or other rights, to defend against a legal claim or as otherwise allowed by law or regulation;
- **To evaluate or conduct a merger**, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Users is among the assets transferred.

3. HOW WE SHARE INFORMATION

PACE AT HUDSON HEADWATERS does not sell Your personal information, personal health information or sensitive information to nonaffiliated third parties for their business purposes, nor do we share information, except as permitted by law, as described in this Privacy Policy or otherwise with Your consent.

PACE AT HUDSON HEADWATERS may share information about You to third parties for PACE AT HUDSON HEADWATERS' business purpose, such as with agents, contractors, service providers or affiliates who help Us operate the Website, assist with PACE AT HUDSON HEADWATERS' marketing, conduct business on Our behalf, or help Us complete a service You requested. When We share information for a business purpose, We do so only to the extent required for Our business purpose and only as permitted by relevant law. We may also share personal information with third parties if you have directed and authorized Us to do so in connection with the Products and Services that PACE AT HUDSON HEADWATERS provides to You.

PACE AT HUDSON HEADWATERS may share personal information when required to do so by Federal or State enforcement officials, when state or federal law requires Us to do so (such as to comply with an inquiry from law enforcement officials), when ordered by a court or by other compulsory legal process or when We believe, in good faith, it is necessary for us to comply with its legal obligations or to investigate or prevent suspected illegal activities or fraud.

4. COOKIES, IP ADDRESSES and OTHER TECHNOLOGY

a. Browser Cookies

“Cookies” are small pieces of information that are stored by Your browser on Your computer’s hard drive. By placing a “cookie”, the web servers operated by PACE AT HUDSON HEADWATERS and Our third-party service providers can remember and distinguish Your web browser over time. We use “cookies” for a variety of functions, such as authentication, other types of security, User logins, to enable collection of analytics information, to market Our Products to You, to optimize Our Website, and to personalize and customize Your experience with the Website. As one example, cookies enable Us to remember information You gave to Us so that you don’t have to reenter it each time You visit. If You do not wish to permit “cookies” to be placed by Us, You should turn off or disable cookies on your browser or device. However, disabling cookies will also prevent the Website from being fully functional.

b. IP Addresses

PACE AT HUDSON HEADWATERS maintains internal logs for Internal Protocol (IP) addresses. An IP address is a number that is automatically assigned to Your computer each time You access the Internet. Your IP address does not contain personally identifiable information. PACE AT HUDSON HEADWATERS or its third-party service providers may collect IP addresses in order to conduct system administration, report aggregate information, conduct site analysis, and to detect improper use of the site. We sometimes use IP addresses to identify the general location of Your computer based on publicly available and third-party information. We may use IP addresses to market to You through internet marketing, mail or call campaigns, or online targeted, interest-based advertising.

c. Other Technical Information We Collect

In addition to using browser cookies to remember Your browser, PACE AT HUDSON HEADWATERS also may use other technologies such as pixels, local shared objects (such as “Flash cookies”), and HTML5 local storage to collect information and remember your device. Some of the technical information We collect is the type of browser You use (such as Google Chrome, Internet Edge, Safari or Firefox), Your Internet protocol (“IP”) address, the name of Your Internet Service Provider (“ISP”), the version of Your operating system, the dimensions and resolution of your display, Your referrer URL (which is the URL for the website that you were viewing prior to visiting the Website), how You were directed to the Website, which specific pages You access on the Website, how long You view each page, the time and date You access our Website, and any other interaction You have with the Website or PACE AT HUDSON HEADWATERS. Most, if not all this information is collected by third party service providers who assist PACE AT HUDSON HEADWATERS in the operation and maintenance of its Website and to server its Users.

d. Your Options

Most popular Internet browser applications will allow You to configure the browser so as not to accept cookies. However, setting Your browser to reject cookies may, in certain instances, prevent You from taking full advantage of the Website and its capabilities, or cause some features of the Website to function improperly, slowly or not at all.

As noted, the Website also uses various third-party services, such as and including Google Analytics and WIX. You can consult the Google Analytics Terms of Use and the Google Privacy Policy for more information on how Google Analytics uses the data it collects. Google utilizes the data collected to track and examine the use of the Website, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Website to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects on the Website, please review "How Google Uses Information From Sites or Apps That Use Our Services." If You would like additional information regarding the security and privacy practices of Google Analytics, and how You may manage privacy settings, please review the materials provided by Google here. You can also consult the WIX Terms of Use and the WIX Privacy Policy for more information as to how WIX uses the data it collects.

5. E-MAILS

PACE AT HUDSON HEADWATERS uses e-mail forms to allow Users to ask questions about PACE AT HUDSON HEADWATERS, and Our Products and Services. You may opt-out of receiving future emails by clicking on the link provided in each email for that purpose.

While We make reasonable efforts to protect the personal information that You share with us, it is important to note that such e-mail messages are unsecured. Please consider the information You chose to include in any email You send. Should you choose to send your information via e-mail, You do so at your own risk. We recommend that if your communication is sensitive or contains personal information, You may want to send it another way.

If You choose to correspond with Us via e-mail, We reserve the right (but not the obligation) to retain the content of Your email messages as well as Your e-mail address or other personal information, and Our responses.

6. PERSONAL INFORMATION PROVIDED AS PART OF USER CONTENT

On occasion and under certain circumstances, PACE AT HUDSON HEADWATERS may, in its sole discretion, offer Users the opportunity to submit content to the Website, such as questions and endorsements regarding PACE AT HUDSON HEADWATERS or Products and Service, general discussions of care, and other communications with the PACE AT HUDSON HEADWATERS Website community. You should consider what information You chose to share in the content that You submit. If You include personal, health or sensitive information in the content that You provide to PACE AT HUDSON HEADWATERS for public postings to the Website, including any bulletin boards, forum posts, etc., such information may be made available to anyone using the Website. Your contact information (which may include, without limitation, Your Account Information such as Your email address) may be included with any content that You post via the Website. PACE AT HUDSON HEADWATERS does not edit or otherwise remove such information from User content before it is posted on the Website. If You do not wish to have Your information made available in this manner, You must remove any such information from the

content before posting. PACE AT HUDSON HEADWATERS is not liable for any damages caused or incurred due to information that You have made available in the foregoing manner.

7. LINKS TO OTHER WEBSITES

The Website may contain links to non-PACE AT HUDSON HEADWATERS websites. Links to other websites are provided to You for information and convenience only and do not constitute an endorsement or recommendation by PACE AT HUDSON HEADWATERS. We are not responsible for, and this Privacy Notice does not apply to, the privacy practices of those websites or of any companies that We do not own or control. We make no representations or warranties regarding the correctness, accuracy, performance, security, privacy or quality of any content, software, service, or application found at any Linked Site. We encourage You to seek out and read the privacy policy and terms of use of each website that you visit.

8. SECURITY

PACE AT HUDSON HEADWATERS takes commercially reasonable precautions to protect the security of your personal information. We store personal information, personal financial information and other sensitive information in a secure manner and transmit it via a secure internet channel. However, no security measures are perfect or impenetrable, and PACE AT HUDSON HEADWATERS cannot guarantee that the information submitted to, maintained on or transmitted from its systems will always be secure. PACE AT HUDSON HEADWATERS is not responsible for the circumvention of any privacy settings or security measures contained on the Website by any Users or third parties.

Remember that You are the first and best defense against unauthorized access to Your information. Please take the necessary steps to assess whether Your personal information is being transmitted to its intended **recipient** in a reasonably secure manner.

9. YOUR CHOICES ABOUT YOUR PERSONAL INFORMATION

a. *Inquiries concerning the collection and deletion of Your personal information.*

We understand that You may have certain questions about PACE AT HUDSON HEADWATERS' access and use of information that We have collected. Under some circumstances, You may be able to opt-out of Our continued collection or use of Your personal information, and/or seek access to or deletion of personal information that We have collected about You in the past.

There are circumstances when PACE AT HUDSON HEADWATERS will not be able to comply with such requests. For example, We may deny a request if We determine, in good faith, that We should not comply because: to do so would violate or conflict with PACE AT HUDSON HEADWATERS' legal obligations, including, but not limited to, legal obligations as to the preservation and non-disclosure of financial, medical or personal health information; the information is the privileged, proprietary or confidential information of PACE AT HUDSON HEADWATERS or someone other than the person making the request; the identity or authority of the person making the request cannot be confirmed; compliance with the request would compromise the privacy or legal rights of others; the burden or expense of responding would be disproportionate to the requesting individual's privacy risk; the information is commercially necessary for Us to complete transactions or provide products or services that the User requested; or to do so would impede PACE AT HUDSON HEADWATERS' detection,

correction or prevention of any security incident, intentional or non-intentional interference with the Website, products or services.

Additionally, under some circumstances, even if You opt-out, non-personal information regarding your activities on the Website, and/or information from third-party websites for non-interest-based advertising purposes may be collected and used to determine the effectiveness of the advertisements.

If You have any questions or concerns about PACE AT HUDSON HEADWATERS' collection or use of Your personal information, wish to opt-out of further collection of Your personal information or request deletion of personal information presently in Our possession, please contact Us using one of the methods set forth below. Upon receiving Your request, We will endeavor to respond to request in a commercially reasonable time.

Please contact us:

EMAIL

info@pacehh.org

US Mail

38 Larose Street
Glens Falls, NY 12801

Phone Number

(518) 886-7223

b. Opt-out of specific phone, email, text, or marketing offers.

In accordance with Your prior experience with PACE AT HUDSON HEADWATERS, including in some cases, the permission You have given Us, PACE AT HUDSON HEADWATERS may use a variety of means, such as phone, email, or text, to communicate with You regarding PACE AT HUDSON HEADWATERS' marketing offers and/or the marketing offers of Our partners or others that may be of interest to You.

If You do not wish to receive phone, mail, or email marketing offers, You may request that we remove your name from our internal email, direct mail, or internal telemarketing lists.

EMAIL

info@pacehh.org

US Mail

38 Larose Street
Glens Falls, NY 12801
Attention: Customer Support

Phone Number

(518) 886-7223

If You no longer would like to receive special offer information from Us, via email, You may click the link at the bottom of any email You receive from Us and follow the instructions. Your email address will be removed from Our marketing list. However, PACE AT HUDSON HEADWATERS may continue to communicate with you concerning Your PACE AT HUDSON HEADWATERS' User Account, Products and Services, and other matters. Please allow us a commercially reasonable period of time in order to satisfy your request, as some promotions may already be in process.

10. CHILDREN

The Website is intended for a general audience. We do not knowingly collect information about children or sell products or services to children. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 16. If you are under the age of 16, please do not use the Website.

11. GOVERNING LAW

Unless otherwise noted, this Privacy Notice and use of PACE AT HUDSON HEADWATERS' Website, or Products or Service shall be governed by and construed in accordance with the laws of the State of New York, United States of America. If any provision of this agreement shall be unlawful, void, or for any reason unenforceable, then that provision shall be deemed severable from the other provisions and shall not affect the validity of the other provisions.

12. NOTICE TO CALIFORNIA RESIDENTS

If You are a California resident that is visiting the Website, You may be aware that, under certain circumstances, not presently applicable to PACE AT HUDSON HEADWATERS, You may be entitled to additional disclosures or to exercise different privacy rights under applicable California law. As a condition of Your access or use any portion of the Website, You understand and agree that the Website, Products and Services are **NOT** governed by California law and agree to the terms set forth in this Privacy Notice.

13. VISITING THE WEBSITE FROM OUTSIDE THE UNITED STATES

If You are visiting the Website from outside of the United States of America, please be aware that your information may be transferred to, stored or processed in the United States. The data protection, privacy and other laws of the United States and other countries might not be as comprehensive as those in your country. By using any portion of the Website, You understand and consent to the transfer of your information to our facilities in the United States and to those third parties with whom We share it as described in this Privacy Notice.

14. CHANGES TO OUR PRIVACY POLICY

We update or change this Privacy Notice at any time and from time to time.

We reserve the right to update, change, modify, add, delete, revise or replace any part of this Privacy Notice at any time. The most recent version of the Privacy Notice and its effective date is reflected by the version and date located at the top of this Privacy Notice. Any update or change will automatically govern

Your use of the Website 30 days after it is posted on the Website, unless otherwise noted. We recommend that You regularly check the Terms of Use when visiting the Website, or ordering any Products or Services, as these Terms of Use may have changed since you last did so. Your continued use of The Website after the Privacy Notice is updated will constitute Your consent and agreement to be bound by the updated terms.

15. QUESTIONS OR COMMENTS

If You have any questions or concerns about this Privacy Notice, the practices of this Website, or your interaction with this Website, please contact us:

EMAIL info@pacehh.org

US Mail

38 Larose Street
Glens Falls, NY 12801
Attention: Customer Support

Phone Number

(518) 886-7223

Version: 001

Effective Date: 09/19/2023