FRONT PORCH WEBSITE PRIVACY POLICY

This Privacy Policy was last revised on September 30, 2022.

Front Porch Communities and Services and its affiliates (collectively “Front Porch”, “we”, “our”, and “us”) are committed to protecting and maintaining your privacy. This privacy policy (“Privacy Policy”) is designed to help you understand how we collect, use, share and protect your Personal Information when you visit our websites (including www.frontporch.net), use our mobile apps, or communicate with us via phone or email. In this Privacy Policy, “Personal Information” means any information that can be used to identify you or that we can link directly to you, such as your name, email address, mailing address, and phone number.

Front Porch may have different privacy policies that apply to certain specific situations, such as when you are a volunteer or participant in the Well Connected programs. If you were given a different privacy statement or policy, those policies or statements—not this Privacy Policy—will apply to the specific situation. For example, when we act as a healthcare provider under the Health Insurance Portability and Accountability Act (“HIPAA”), our HIPAA Notice of Privacy Practices applies instead of this Privacy Policy.

If you provide us with Personal Information of anyone other than yourself, please note that you are responsible for complying with all applicable privacy and data protection laws prior to providing that information to Front Porch (including obtaining consent, if required).

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this page. We encourage you to review this Privacy Policy whenever you access our websites or otherwise interact with us to stay informed about our privacy practices.

Please take a moment to review our policies and practices described below. If you do not agree with this Privacy Policy in general or any part of it, you should not access our websites.

1. HOW WE COLLECT YOUR PERSONAL INFORMATION

The Personal Information we collect varies based on how you interact with us, which services you use, and the choices you make.

- **When you visit our websites or communicate with us via phone or email**, you may provide us your Personal Information directly, such as by emailing us or submitting the electronic form on our Contact Us page. The Personal Information we collect from you directly may include your name, email address, phone number, and any other information you choose to provide. We may also collect your Personal Information from your computer or mobile device when you visit our websites, such as your Internet Protocol address, browser software used, requests submitted to our web servers, date and time the website was accessed, and statistical information about which web pages you visited. This information may be collected using cookies and web beacons, as described below in the How We Use Cookies and Website Tracking section.
2. HOW WE USE AND SHARE YOUR PERSONAL INFORMATION

We may use your Personal Information for the following purposes:

- to provide you with the information on our websites;
- to provide you with other products or services you have requested;
- to respond to you when you communicate with us;
- to tell you about new opportunities, products, or services; and
- to create aggregate statistics relating to the use of our websites (count of visits, ranking of top pages visited, etc.).

We may share your Personal Information with third parties in limited circumstances, such as: to conduct our business; when legally required; or with your consent. The categories of recipients may include:

- cloud storage providers to store the Personal Information you provide and for disaster recovery services;
- service providers that provide us with client relationship management services;
- service providers that provide us with survey services;
- service providers that provide us with market research and digital marketing services;
- agents and suppliers that provide us with technology and other professional services;
- sales management service providers that provide us with software services;
- other service providers, including those that provide us with invoicing services;
- our professional advisors, auditors, volunteers, and business partners; and
- support providers to provide client support services.

Front Porch may also share your Personal Information: (i) if we are required to do so by law (e.g., in order to comply with a judicial proceeding, court order or other legal obligation or government inquiry); (ii) if we believe that it is necessary to enforce or apply our Terms of Use or other agreements or otherwise protect and defend the rights, property or safety of Front Porch or that of our clients; or (iii) to any entity that acquires any part of Front Porch’s current operations, including by way of affiliation, merger, de-merger, acquisition, reorganization, or sale of assets.
We do not sell your Personal Information to anyone.

3. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will keep your Personal Information for as long as is necessary for the purposes for which your Personal Information was collected. The length of time we keep your Personal Information may vary depending on our regulatory obligations (e.g., compliance with financial, tax, employment, and social security regulations), and our need to establish, exercise, or defend legal claims.

4. HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

Front Porch is committed to ensuring the security of your Personal Information. To protect your Personal Information, we have put in place appropriate physical, technical, administrative, and organizational safeguards. Unfortunately, neither the transmission of information over the internet nor the storage of information on internet-connected servers is completely secure. We cannot guarantee the security of your Personal Information.

5. HOW WE USE COOKIES AND WEBSITE TRACKING

What is a Cookie?

We use various technologies to operate our websites and collect information, including cookies and web beacons (collectively, “Cookies”). A cookie is a text file containing small amounts of information stored on your computer’s hard drive when you visit a webpage. Session cookies are erased when you close your web browser or browser tab. Persistent cookies remain on your hard drive until they expire or are deleted. Cookies will also be set by third parties operating on our behalf (e.g. to help us analyze web traffic or to improve your web navigation experience).

Types of Cookies We Use

We use the following types of cookies on our websites to help us analyze web traffic, to improve your web experience, and to better target our marketing of products and services:

- Strictly necessary cookies, which are essential in order to enable you to move around our websites and use its features;
- Performance cookies, which collect information about how you use the Website, for instance which pages you visit most often;
- Functionality cookies, which allow our websites to remember choices you make (e.g. remembering your user name, language or the region you are in) and provide enhanced, more personal features; and

To analyze traffic on the Website, an ID is assigned in these cookies to help us uniquely identify you during your session or upon repeated visits to our websites.
Third-Party Cookies

We also partner with third-party advertising networks to manage our advertising on other sites. You may receive advertisements based on information relating to your access to and use of our websites and other websites or online services on any of your devices, as well as on information received from third parties. Our advertising network partners may place or recognize a unique cookie on your browser, including through the use of pixel tags. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

How to Manage Cookies

As a user you have the ability to accept or decline the use of cookies. Cookies can be disabled and/or removed using functionality built into most web browsers and you can refuse to accept cookies by activating this setting on your browser. You can also set up your web browser to notify you of cookie placement requests, to ask for permission to accept them, or to decline cookies completely. Our websites does not respond to Do Not Track (DNT) signals from your browser. For information on how to adjust your browser regarding cookies, please visit:

- Microsoft Edge: https://docs.microsoft.com/en-us/microsoft-edge/devtools-guide-chromium/storage/cookies
- Chrome: https://support.google.com/chrome/answer/95647?hl=en
- Opera: https://www.opera.com/browser/tutorials/security/

Alternatively, you may wish to visit www.aboutcookies.org, which contains comprehensive information on how to do this on a wide variety of desktop browsers.

You may also visit the Network Advertising Initiative’s opt-out page at http://optout.networkadvertising.org/#!/ to learn how to opt-out of third-party, interest-based targeting cookies.

If you choose to decline cookies, parts of our websites may be unavailable to you.

Processing Using Website Tracking

We use Google Analytics, which is a web analytics tool, to help us understand how users engage with our websites. Google Analytics tracks your activity on our site (i.e. the pages you have seen and the links you have clicked on) and helps us measure how you interact with the content that we provide. This information is used to compile reports and to help us improve our websites. The reports disclose website trends without identifying individual visitors. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at https://tools.google.com/dlpage/gaoptout.
6. ADDITIONAL INFORMATION

Links to Third-Party Websites
Links to third-party websites are provided solely as a convenience to you. If you use these links, you will leave our websites. Front Porch has not reviewed, does not control, and is not responsible for these websites, their content or their privacy policies. Thus, we do not endorse or make any representations about them, any information, software or other products or materials found there, or any results of using them. If you decide to access any of the third-party sites linked to Front Porch’s websites, you do so entirely at your own risk and acknowledge that there might be risks that are not controlled or otherwise related to Front Porch’s activities.

Use of Our Websites by Minors
Our websites are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16. If you are the parent or guardian and believe your child has provided us with Personal Information, please contact us at the address below to request deletion.

7. CONTACT US
If you wish to contact Front Porch regarding your Personal Information or this Privacy Policy, please contact us by one of the methods listed below:

Email: privacy@frontporch.net
Phone: (818) 254-4100